



SOUTH
KESTEVEN
DISTRICT
COUNCIL

LOCAL PLAN REVIEW - ISSUES AND OPTIONS CONSULTATION

Appendix 2 - Summary of Representations and Officer Response



SOUTH
KESTEVEN
DISTRICT
COUNCIL

Appendix 2: Consultation Responses & Officer Comment

Proposal 1 – 2036 Vision for South Kesteven

NB. Blank boxes indicate question was responded to, but no comment provided.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
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?					
SK.IAO.0003		X		Lack of infrastructure with the Grantham area will cause problems. The lack of hospital facilities within the Grantham area should be a concern to developments. Lack of school places, doctors availability. Inability of electrical, gas and water infrastructure to large scale development.	Noted. The infrastructure delivery plan will assess all infrastructure requirements for all levels of growth as part of the local plan review.
SK.IAO.0004		X		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?	Bourne is one the four market towns in the settlement hierarchy and growth will be proportionate to the given the level of services.
SK.IAO.0005		X		The vision should remain the same. Bourne is already above the required quota for housing and the increase is not necessary or required, extra housing should be in Elsea Park area not quiet and calm less likely to be built up areas such as North of Bourne. Outlined growth does not reflect the growing population in Bourne. Difficult and tiresome to keep track of continual changes to the Local Plan. 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? Please ensure the democratic of local residents are at the front of all decision making.	Bourne is one the four market towns in the settlement hierarchy and growth will be proportionate to the given the level of services.
SK.IAO.0007			X	Any extra housing must be planned in conjunction with job availability and adequate infrastructure.	Noted. The infrastructure delivery plan will assess all infrastructure requirements for all levels of growth as part of the local plan review.
SK.IAO.0012	X				
SK.IAO.0014	X				
SK.IAO.0015		X		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.	The Issues and options is a broad statement of the intentions of the Local Plan reviews. The infrastructure delivery plan will assess all infrastructure requirements for all levels of growth as part of the local plan review.
Sk.IAO.0016		X		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.	The Issues and options is a broad statement of the intentions of the Local Plan reviews. The infrastructure delivery plan will assess all infrastructure requirements for all levels of growth as part of the local plan review.
SK.IAO.0017	X			Generally. Housing growth levels needs to be considered along with employment and amenities.	Noted. Sustainable development is about housing and employment and balance of all social economic environmental needs, and housing and jobs will be assessed to ensure that growth is sustainable.
SK.IAO.0018	X				
SK.IAO.0019	X				
SK.IAO.0020		X		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	Noted. General comment. Sustainable development is about housing and employment and balance of all social economic environmental needs, and housing and jobs will be assessed to ensure that growth is sustainable. In terms of the proposed growth

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				planning, unless they take on the economic and development role for their authorities. 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.	for Bourne, the site selection process will ensure that the most robust sites are selected.
SK.IAO.0022	X				
SK.IAO.0023			X	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: http://www.sportengland.org/activedesign	Noted. The Active design (October 2015) document will be considered as part of the evidence of the Local Plan review.
SK.IAO.0024	X			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	Support welcomed.
SK.IAO.0028	X				
SK.IAO.0030	X			The vision for growth is broadly supported and is considered to represent a sustainable approach to the distribution of development across the District.	Support welcomed.
SK.IAO.0031	X				
SK.IAO.0032	X				
SK.IAO.0034	X				
SK.IAO.0035	X				
SK.IAO.0037			X	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.	The Vision refers to future development which includes existing housing commitments. All site allocations and directions of growth will be subject to a robust site appraisal process and Sustainability Appraisal. Any historic assets will be taken into consideration.
SK.IAO.0038			X	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. 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. 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.	Support welcomed and comments noted.

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SK.IAO.0039		X		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	Support welcomed.
SK.IAO.0040	X			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.	Support welcomed.
SK.IAO.0042			X	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.	Noted.
SK.IAO.0043	X				
SK.IAO.0044	X				
SK.IAO.0045	X				
SK.IAO.0047		X		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 & 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). 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	Comments noted, the impacts of Covid-19 are still to be fully understood. The planning system and the local plan review will respond accordingly.
SK.IAO.0049	X				
SK.IAO.0054	X				
SK.IAO.0055	X			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.	Comments noted, the growth levels will be assessed by relative sustainability criteria. Following responses to Q5 we will considered if changes to the current spatial strategy for growth is required.
SK.IAO.0010	X				

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SK.IAO.0025				The broad aims are supported, in particular the references to heritage throughout 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.	Support noted, paragraph will be strengthened in line with comments made. Historic England is a statutory consultee so will therefore be consulted on all potential site allocations.
SK.IAO.0013	X			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.	Support welcomed.
SK.IAO.0029				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.	Support welcomed. However, the impacts of Covid-19 are still to be fully understood. The planning system and the local plan review will respond accordingly.
SK.IAO.0036				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.	Support welcomed.
SK.IAO.0046		X		"sustainable" needs to be defined. What does "high quality growth" actually mean?	National Planning Guidance sets out the definition of sustainable development and creating well designed places. This includes an assessment of the growth needs for areas.
SK.IAO.0056	X				
SK.IAO.0057	X			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.	Comments noted, the Vision for the Local Plan will be reviewed in line with the adopted Deepings Neighbourhood Plan.
SK.IAO.0065		X		Should include more emphasis and detail with regards redevelopment of living in the existing town boundaries.	The current Local and National Policy Guidance is driven by the emphasis on effective use of land in a way that makes use as much as possible of previously developed land.
SK.IAO.0066				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.	Noted. General comment. Sustainable development is about housing and employment and balance of all social economic environmental needs, and housing and jobs will be assessed to ensure that growth is sustainable. In terms of the proposed growth for Stamford, the site selection process will ensure that the most robust sites are selected.
SK.IAO.0067				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.	The current Local development scheme for the Local Plan review is expected to submit in 2024 enactment of future legislation is still yet to be determined should this come into force prior to 2024 the Local Plan will take this into account.
SK.IAO.0068				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	Support welcomed.

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				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.	
SK.IAO.0069	X				
SK.IAO.0071				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.	Support welcomed.
SK.IAO.0076		X		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.	Comment noted. In line with the NPPF sustainable development can only be proportionate to development size. We are considering allocations within the non-market towns around the district.
SK.IAO.0079		X		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.	Comment noted. In line with the NPPF sustainable development can only be proportionate to development size. We are considering allocations within the non-market towns around the district.
SK.IAO.0080	X			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.	Comment noted. In line with the NPPF sustainable development can only be proportionate to development size. We are considering allocations within the non-market towns around the district.
SK.IAO.0081		X		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.	Comments noted. We will be considering the appropriate open space provision as part of the Local Plan review and incorporating green infrastructure as part of the design of new developments. Sustainable development is about housing and employment and balance of all social economic environmental needs, and housing and jobs will be assessed to ensure that growth is sustainable.

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SK.IAO.0083	X				
SK.IAO.0084	X				
SK.IAO.0087		X		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.	Support welcomed. The vision will be updated to reflect the settlement hierarchy.
SK.IAO.0089		X		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.	Whilst an exhaustive list cannot be provided, a definition will be provided, either in the text or in the glossary.
SK.IAO.0090	X			Yes, the Vision for the Local Plan reflects the spatial strategy and existing allocations across the District. This could be updated if required, in respect of relevant allocations in the emerging Local Plan.	Support welcomed.
SK.IAO.0091				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.	Noted. General comment. Sustainable development is about housing and employment and balance of all social economic environmental needs, and housing and jobs will be assessed to ensure that growth is sustainable. In terms of the proposed growth for Stamford, the site selection process will ensure that the most robust sites are selected.
SK.IAO.0092	X				
SK.IAO.0094		X		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. 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 vision for South Kesteven is to support the network of towns and villages to grow and develop and provide a range of	Policy BRN1 of the adopted Local Plan requires a minimum of 100 new additional homes to be identified through the Bourne Neighbourhood Plan which is currently in preparation. The table on page 16 of the emerging Local Plan Issues & Options details that "364-746 new homes will be identified through the new Local Plan." This does not include the homes to be identified through the Bourne Neighbourhood Plan or the allocated sites without planning permission. These sites are included in the 'Commitments as at 1 st April 2020' column.

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				<p>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 "all sections of the community to enjoy a sustainable way of life" – 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>	
SK.IAO.0096		X			
SK.IAO.0097		X			
SK.IAO.0103	X			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.	Comment noted.
SK.IAO.0105	X			<p>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.</p> <p>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.</p>	We are currently reviewing our employment land evidence as part of the Local Plan review, this will include an evaluation of employment demand by use type and suitability of current and proposed employment sites within the district. This will inform the approach to allocations within the local plan review.
SK.IAO.0106	X			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.	Comments noted.
SK.IAO.0108			X	<p>The vision fails to take account of linked/complementary events, strategies and structures – e.g. the downgrading of A&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. For whom, and why, are the Council doing this? Please ask yourselves this fundamental question.</p>	Noted. The infrastructure delivery plan will assess all infrastructure requirements for all levels of growth as part of the local plan review.
SK.IAO.0110	X			Yes broadly the same.	Comments noted.
SK.IAO.0111	X				
SK.IAO.0112	X				
SK.IAO.0113	X				
SK.IAO.0114	X				
SK.IAO.0115	X				
SK.IAO.0116	X				

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SK.IAO.0117	X				
SK.IAO.0118	X				
SK.IAO.0119	X				
SK.IAO.0120	X				
SK.IAO.0051				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 plan a key role in the vision of the Local Plan.	Comments noted.
SK.IAO.0072	X			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.	Comments noted, housing delivery is assessed as part of the housing trajectory and monitoring of the current sites of the Local Plan as they come forward should this need to be reviewed, we will take into account in the local plan review.
SK.IAO.0073	X			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. 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.	We are currently reviewing our employment land evidence as part of the Local Plan review, this will include an evaluation of employment demand by use type and suitability of current and proposed employment sites within the district. This will inform the approach to allocations within the local plan review. The impacts of Covid-19 are still to be fully understood the planning systems and the local plan review will respond accordingly.
SK.IAO.0074	X			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	Comments noted.
SK.IAO.0075			X	Please see attached – it may be too early to confirm that all elements of the vision remain valid and unchanged. 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. 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.	Comments noted. Vision will be amended to reflect the emerging objectives.
SK.IAO.0085	X			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”. 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.	Support welcomed.
SK.IAO.0098		X		The vision needs to be for the more radical in challenging climate change and meeting housing needs for the young and the old.	Comments noted.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0100				<p>The Vision for The Deepings states: “The Deepings 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 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’.</p>	<p>Noted. General comment. Sustainable development is about housing and employment and balance of all social economic environmental needs, and housing and jobs will be assessed to ensure that growth is sustainable. In terms of the proposed growth for The Deepings, the site selection process will ensure that the most robust sites are selected.</p>
SK.IAO.0101				<p>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</p>	<p>Comments noted. Future development of any settlement should come forward in line with sustainable development principles within the current local plan and the national planning policy framework. The responsibility of the Bourne NP is within the current plan period and further options may need to be explored through the review of the Local Plan through to 2041.</p>
SK.IAO.0093	X			<p>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. 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</p>	<p>Comment noted. In line with the NPPF sustainable development can only be proportionate to development size. We are considering allocations within the non-market towns around the district.</p>

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				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.	
SK.IAO.0104	X			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.	Comments noted.
SK.IAO.0121	X			<p>Specific comments are:</p> <ul style="list-style-type: none"> • 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 overruled. 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. 	Comments noted. The Council is preparing a Stamford North Supplementary Planning Document which will detail infrastructure required, as well as services and facilities. The SPD is delayed due to the implications of the withdrawal of the Rutland Local Plan

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SK.IAO.0078		X		<p>his 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.</p> <p>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?</p> <p>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?</p> <p>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?</p> <p>Villages and Countryside Please add 'identity'. All villages will retain their identity, diversity and vitality.</p>	
SK.IAO.0124	X				

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0003		X		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.	Comments noted. Sustainable development is about housing and employment and balance of all social economic environmental needs, and housing and jobs will be assessed to ensure that growth is sustainable.
SK.IAO.0004	X				
SK.IAO.0005	X				
SK.IAO.0007			X	Bourne is in need of urgent action to revitalise the town centre with an ever increasing number of shop closures.	Comment noted. There has been a number of planning reforms in respect of town centre use class the aim of these is to address the decline of town centres nationally by Central Government and the local plan will be reviewed accordingly.
SK.IAO.0012			X	Not provided.	
SK.IAO.0014		X		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.	Comments noted.
SK.IAO.0015		X		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.	Comments noted. The Council declared Climate Change emergency in 2019 the key objective of the Local Plan Review is to reduce the carbon reduction and develop planning policies which will support and mitigate the impacts of climate change.
Sk.IAO.0016		X		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.	Comments noted.
SK.IAO.0017		X		More needs to be followed to avert the climate change which we are all currently experiencing er flooding in Bardney and other areas of Lincolnshire.	Comments noted.
SK.IAO.0018	X				
SK.IAO.0019	X				
SK.IAO.0020		X		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.	Comments noted, the impacts of Covid-19 are still to be fully understood. The planning system and the local plan review will respond accordingly.
SK.IAO.0022	X				

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0024			X	There is an opportunity to recognise that the pandemic has changed the way we work and the economy of the district.	Comments noted, the impacts of Covid-19 are still to be fully understood. The planning system and the local plan review will respond accordingly.
SK.IAO.0028			X	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.	Comments noted, the impacts of Covid-19 are still to be fully understood. The planning system and the local plan review will respond accordingly.
SK.IAO.0030	X				
SK.IAO.0031			X	The general approach of supporting growth and focussing that growth in the larger settlements, such as Bourne, is supported. 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. 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 clients 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. 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 Issues and Options consultation, however, promotes a higher growth target for Bourne, which will require new sites to be allocated. The emphasis on promoting allocations on land to the east of Bourne is based on 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 constrained 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.	Noted. General comment. Sustainable development is about housing and employment and balance of all social economic environmental needs, and housing and jobs will be assessed to ensure that growth is sustainable. In terms of the proposed growth for Bourne, the site selection process will ensure that the most robust sites are selected.
SK.IAO.0032	X				
SK.IAO.0034	X				
SK.IAO.0035	X				
SK.IAO.0037		X		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.	Comments noted. The Council declared Climate Change emergency in 2019 the key objective of the Local Plan Review is to reduce the carbon reduction and develop planning policies which will support and mitigate the impacts of climate change.
SK.IAO.0038	X				

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0039		X		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).	Comments noted. The Council declared Climate Change emergency in 2019 the key objective of the Local Plan Review is to reduce the carbon reduction and develop planning policies which will support and mitigate the impacts of climate change. The impacts of Covid-19 are still to be fully understood. The planning system and the local plan review will respond accordingly.
SK.IAO.0040	X			No specific comment to make.	
SK.IAO.0042			X	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.	Comments noted. The Council declared Climate Change emergency in 2019 the key objective of the Local Plan Review is to reduce the carbon reduction and develop planning policies which will support and mitigate the impacts of climate change. The impacts of Covid-19 are still to be fully understood. The planning system and the local plan review will respond accordingly.
SK.IAO.0043		X			
SK.IAO.0044		X		Vision seems to rely heavily on roads (eg A1) not improving public transport/cycleways – apart from in Grantham.	Comments noted. The Local Plan Review is to reduce the carbon reduction and develop planning policies which will support and mitigate the impacts of climate change. Sustainable modes of transport will be considered in the review of the Local Plan.
SK.IAO.0047		X		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. 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.	Sustainable development is about housing and employment and balance of all social economic environmental needs, and housing and jobs will be assessed to ensure that growth is sustainable. The SA and the impending Environment Bill (2020), aims to ensure that the 10% biodiversity net gain on all developments. The Local Plan Review is to reduce the carbon reduction and develop planning policies which will support and mitigate the impacts of climate change. This will include specific requirements of new developments which is support national planning guidance.
SK.IAO.0049		X		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	Specific requirements for renewable and thermal energy are set by Building control regulations Part F and Part L and Building Control will consider the standards for New buildings. These are currently being reviewed nationally and once this becomes national policy this will be considered as part of the Local Plan Review.
SK.IAO.0054	X				
SK.IAO.0055			X	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.	Comments noted, the spatial strategy for growth is currently being reviewed as part of the Local Plan.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0010				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.	Comments welcomed. The Council declared Climate Change emergency in 2019 the key objective of the Local Plan Review is to reduce the carbon reduction and develop planning policies which will support and mitigate the impacts of climate change.
SK.IAO.0036				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.	Comment noted.
SK.IAO.0046		X		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.	Comments noted, the vision aims to protect and enhance of natural and built environment. Green Infrastructure will be a key policy area for the Local Plan Review to mitigate against Climate change
SK.IAO.0050	X			<p>As far as it goes, but not ambitious enough</p> <p>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</p> <p>To “new normal” needs to be a long way from the “old normal”</p> <ul style="list-style-type: none"> • 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 	Comments noted. The Council declared Climate Change emergency in 2019 the key objective of the Local Plan Review is to reduce the carbon reduction and develop planning policies which will support and mitigate the impacts of climate change. The impacts of Covid-19 are still to be fully understood. The planning system and the local plan review will respond accordingly. Building control regulations Part F and Part L will consider the standards for New buildings. These are currently being reviewed nationally and once this becomes national policy this will be considered as part of the Local Plan Review. There has been a number of planning reforms in respect of town centre use class the aim of these is to address the decline of town centres nationally by Central Government and the local plan will be reviewed accordingly.
SK.IAO.0056		X		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.	Comments noted.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0057	X			<p>No. It does not present a sufficient vision, as it is not reflecting new dynamics bearing down on the Deepings. By way of example, on economic matters, the 2020 change in the national Use Classes Order (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 Northfields Industrial Estate, 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). 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>	The changes of the use class system and the creation of the new E class has been established as a result of national government planning policy. There will be current implication for current town centres policies which are subsequently defunct. Unless the Council or Neighbourhood plan introduced an Article 4 direction with town centres. As a result of the planning reforms and the use class system current local plan policies will be reviewed.
SK.IAO.0065		X		Safe guarding agricultural land and food production with world population's and demand growing. The UK can not afford increasing expenditure on more expensive food. This alongwith environmental safeguards taking into account climate change.	Comments noted. The Council declared Climate Change emergency in 2019 the key objective of the Local Plan Review is to reduce the carbon reduction and develop planning policies which will support and mitigate the impacts of climate change.
SK.IAO.0067		X		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.	Comments noted the vision will be amended in line with planning reforms.
SK.IAO.0069	X			n/a	
SK.IAO.0070		X		<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 NPPF requires Local Plans to “take a proactive approach to mitigating and adapting to climate change,” (paragraph 149). 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.”</p>	Comments noted.
SK.IAO.0076			X	<p>Reflection needs to be taken of the matters mentioned in Q1a above.(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.</p> <p>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.)</p>	Comment noted. In line with the NPPF sustainable development can only be proportionate to development size. We are considering allocations within the non market towns around the district.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0079			X	<p>Reflection needs to be taken of the matters mentioned in Q1a above (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.</p> <p>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.)</p>	Comment noted. In line with the NPPF sustainable development can only be proportionate to development size. We are considering allocations within the non market towns around the district.
SK.IAO.0080		X		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.	Comments noted.
SK.IAO.0081		X		<p>We would like to see a more specific reference to the need to tackle climate change, through both mitigation and adaptation.</p> <p>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."</p>	comments noted
SK.IAO.0083	X				
SK.IAO.0084		X		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.	Comments noted. The Council declared Climate Change emergency in 2019 the key objective of the Local Plan Review is to reduce the carbon reduction and develop planning policies which will support and mitigate the impacts of climate change. The impacts of Covid-19 are still to be fully understood. The Vision will be amended to reflect recent changes with climate change and Covid-19.
SK.IAO.0089			X	The vision should clearly define precisely what is meant by "sustainable".	The NPPF provides the definition of sustainable development
SK.IAO.0090	X			<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>	Comments noted. The Council declared Climate Change emergency in 2019 the key objective of the Local Plan Review is to reduce the carbon reduction and develop planning policies which will support and mitigate the impacts of climate change. The impacts of Covid-19 are still to be fully understood. The Vision will be amended to reflect recent changes with climate change and Covid-19.
SK.IAO.0091				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	Comments noted. The Council declared Climate Change emergency in 2019 the key objective of the Local Plan Review is to reduce the carbon reduction and develop planning policies which will support and mitigate the impacts of climate change. The impacts of Covid-19 are still to be fully understood. The Vision will be amended to reflect recent changes with climate change and Covid-19.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				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.	The Local Plan review will include a review of the Employment Land study which will assess the current employment land supply is fit for purpose.
SK.IAO.0092	X				
SK.IAO.0096	X				
SK.IAO.0097	X				
SK.IAO.0103		X		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.	Comments noted.
SK.IAO.0105			X	The Vision should be in line with Government objectives to deliver a Carbon neutral economy and developments in line with International Agreements. 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.	The Vision will be amended to reflect recent changes with climate change and Covid-19. The Local Plan review will include a review of the Employment Land study which will assess the current employment land supply is fit for purpose and evaluate future demand for provision.
SK.IAO.0106			X	The Vision should be in line with Government objectives to deliver a Carbon neutral economy and developments in line with International Agreements.	Comments noted the vision will be amended to reflect recent changes with climate change and covid-19.
SK.IAO.0108		X		There are many worthy statements with lots of motherhood & apple pie – but also increased traffic and pollution and, sadly, very little in the way of proposals that will make a positive difference.	Comments noted.
SK.IAO.0110		X		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.	Comments noted.
SK.IAO.0111	X				
SK.IAO.0112			X		
SK.IAO.0113			X		
SK.IAO.0114			X		
SK.IAO.0115			X		
SK.IAO.0116			X		
SK.IAO.0117			X		
SK.IAO.0118			X		
SK.IAO.0119			X		
SK.IAO.0120			X		
SK.IAO.0073	X			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. 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.	Comments noted, support welcomed.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0074	X			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. 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.	Comments noted, support welcomed.
SK.IAO.0075			X	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. 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. 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.	Comments noted, the vision will be amended to take in account Issues and Options consultation and any policy changes as a result of the Local Plan review.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0085		X		<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	Comments noted, the impacts of Covid-19 are still to be fully understood. The planning system and the local plan review will respond accordingly.
SK.IAO.0098		X		The vision needs to be for the more radical in challenging climate change and meeting housing needs for the young and the old.	Comment noted. Both the housing needs and climate will be taken into consideration in the Local Plan review.,
SK.IAO.0101				<p>Whilst the Town Council is supportive of the vision it is the detail behind that vision that is important.</p> <p>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.</p>	The Local Plan and the housing needs of the District determine the level of growth which is required which is supported by the infrastructure delivery plan to ensure that growth is supported by infrastructure. Should there be impact on infrastructure these will be addressed by the Local Plan.
SK.IAO.0104	X			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. 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.	Comments noted, the impacts of Covid-19 are still to be fully understood. The planning system and the local plan review will respond accordingly.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0121		X		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.	Comments noted. The vision will be amended to take in account climate change and there will be further planning policy development as part of the local plan review to address climate change.
SK.IAO.0078		X		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 on the survival of the businesses in the Town Centres. Covid-19 has forced businesses, to reassess the most appropriate workplace for their officebased employees. What modelling is available, and what consultation is taking place with businesses to evaluate the possible effect of Covid-19 on the workplace?	The planning system and the local plan review will respond accordingly. The Vision will be amended to reflect recent changes with climate change and Covid-19. The Local Plan review will include a review of the Employment Land study which will assess the current employment land supply is fit for purpose and evaluate future demand for provision.
SK.IAO.0124			X		

Proposal 2 – Objectives

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
Do you agree that the Objectives should remain the same for the new plan?					
SK.IAO.0003		X		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.	Noted. Sustainable development is about housing and employment and balance of all social economic environmental needs, and all sites in Grantham will be assessed to ensure that growth is sustainable.
SK.IAO.0004			X	It should broadly remain the same, however any developments should work hand in hand with neighbourhood plans at all times.	Comments noted.
SK.IAO.0005			X	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.	Comments noted. NP once adopted make up part of the statutory development plan as part of the district.
SK.IAO.0007	X			If concerns in Q1a/Q1b are addressed.	comments noted.
SK.IAO.0012	X				
SK.IAO.0014		X		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	comments noted.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				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.	
SK.IAO.0015				Yes as far as they go, but Grantham centric as always. Let's see all 4 major tons 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.	Grantham is the largest town and its role in the settlement hierarchy is based on its size and services within the town and its function and relationship with wider area. Local character and requirements for each market town is key to the local plan policy which is underpinned by evidence.
Sk.IAO.0016			X	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.	Local character and requirements for each market town is key to the local plan policy which is underpinned by evidence.
SK.IAO.0017		X		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.	Comments noted.
SK.IAO.0018	X				
SK.IAO.0019	X				
SK.IAO.0020	X			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.	Comments noted, the impacts of Covid-19 are still to be fully understood. The planning system and the local plan review will respond accordingly.
SK.IAO.0022	X				
SK.IAO.0023		X		Objective 10 and 11 should be strengthened to deliver health outcomes in the vision	Comments noted. Objective 11 already included reference to improving health and well-being of residents.
SK.IAO.0024	X			The focus on health and wellbeing as one of the key objectives is welcomed	Support welcomed.
SK.IAO.0026	X			<p>Agreed, but Objective 10 cannot be met by the Local Plan. Question 3</p> <p>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</p>	Comments noted the level of housing provision for elderly care is evidenced by the SHMA.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				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.	
SK.IAO.0027		X		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. 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.	Comments noted objectives will be amended to include suggested wording.
SK.IAO.0028	X				
SK.IAO.0030	X				
SK.IAO.0031	X				
SK.IAO.0032	X				
SK.IAO.0034	X				
SK.IAO.0035	X				
SK.IAO.0037			X	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.	Comment noted, support welcomed.
SK.IAO.0038	X				
SK.IAO.0039	X			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.	Comments noted.
SK.IAO.0040	X			No specific comment to make.	
SK.IAO.0042	X				
SK.IAO.0044	X			Objective 9 should include reference to the Town's Neighbourhood Plans being core in any decisions made.	Comments noted - Neighbourhood plans form part of the statutory development plan and will have their own section signposted within the Local Plan review.
SK.IAO.0045	X				
SK.IAO.0047		X		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	Comments noted.
SK.IAO.0049		X		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,	Energy efficiency standards are sent by building control requirements new standards are to be implemented in 2021 these are aligned to the Governments climate change emergency.
SK.IAO.0054	X				
SK.IAO.0055	X				
SK.IAO.0010				Objective 13 relating to Climate Change should be strengthened. It should commit to achieving any current target set by government for carbon reduction.	Comments noted.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0025				Objective 12 should be updated to reference the 'setting' of heritage assets and 'nondesignated heritage assets'. Historic England would be very happy to assist with wording.	Comments noted.
SK.IAO.0013	X			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.	Comments noted.
SK.IAO.0029				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.	Support welcomed.
SK.IAO.0036	x			We agree.	Support welcomed.
SK.IAO.0050		X		the environmental objectives should be first - integral of the economic objectives. Without the environment, you have no economy <ul style="list-style-type: none"> • 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 	Support welcomed, planning is a balance of social, environmental and economic objectives.
SK.IAO.0056		X		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. 2.No. You should aim to build a green economy based on local support jobs. 3. Define sustainable. 4. Yes 5. Yes. 6. OK 7. OK 8. Superfast broadband accessibility 9 OK 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.	Comments noted. The objectives will be amended to take in account national and local targets in terms of climate change and the definition for sustainable development for planning is set out in the national planning policy framework.
SK.IAO.0057			X	SKDC is asked to check consistency with Submission Draft DNP objectives.	Comments noted.
SK.IAO.0061				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.	Support welcomed.
SK.IAO.0067		X		No. The proposed development of further sites mainly to the East of the Deepings means that greater investment in local infrastructure is vital.	Any future development proposed will be supported by the infrastructure delivery plan in the next Local Plan.
SK.IAO.0069	X				
SK.IAO.0070		X		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	Comments noted the Local Plan will be in accordance with the national policy at the time.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				contribute to requirements of the NPPF for Local Plans to “take a proactive approach to mitigating and adapting to climate change,” (paragraph 149)	
SK.IAO.0071				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.	Support welcomed.
SK.IAO.0076		X		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.	Comments noted. The current Local Plan and future Local Plan will set a broadly similar settlement hierarchy for development to come forward this supports development in larger and smaller villages. No further action required.
SK.IAO.0079		X		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.	Comments noted. The current Local Plan and future Local Plan will set a broadly similar settlement hierarchy for development to come forward this supports development in larger and smaller villages. No further action required.
SK.IAO.0080		X		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.	Comments noted deliverability of all sites in terms of size and mix are considered within the Local Plan housing trajectory to ensure the necessary housing requirements can be delivery across the plan period and will form part of the evidence base of the Local Plan.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0081		X		<p>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.</p> <p>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. "</p> <p>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."</p>	Comments noted the objectives will be strengthened to consider the impacts of climate change.
SK.IAO.0083	X				
SK.IAO.0084	X				
SK.IAO.0087	X			We support the objectives listed, particularly in regards to Objectives 10 and 11.	Support welcomed.
SK.IAO.0089		X		<p>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.</p> <p>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.</p> <p>The objectives should mention reviewing the borders of the Stamford conservation area with a view to extending them.</p>	<p>Comments noted - Neighbourhood plans form part of the statutory development plan and will have their own section signposted within the Local Plan review.</p> <p>The aim of the objectives is to set out how the vision will be achieved. The objectives 4 and 7 do not conflict with each other. The objectives overall are set to ensure the Local Plan creates sustainable development for the district each objective is not mutually exclusive.</p> <p>Stamford conservation area and its borders will only be reviewed in line with conservation area appraisals.</p>
SK.IAO.0090	X			<p>There are 15 detailed objectives in the adopted Local Plan.</p> <ul style="list-style-type: none"> - 9 relate to economic objectives - 2 relate to social objectives - 4 relate to environmental objectives <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>	Support welcomed.
SK.IAO.0091				<p>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</p>	The employment land study will appraise all employment land to be assessed if it fit for purpose and will determine the employment needs for the next Local Plan this will include an assessment of Exeter Fields.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				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.	
SK.IAO.0092	X				
SK.IAO.0094	X				
SK.IAO.0096	X			Yes as far as they go.	Support welcomed.
SK.IAO.0097	X			Yes as far as they go.	Support welcomed.
SK.IAO.0103		X		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.	Comments noted.
SK.IAO.0105	X			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	Support noted.
SK.IAO.0106	X			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	support noted.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	
SK.IAO.0108			X	<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> <p>How are you going to save, let alone 'strengthen' the viability of town centres? By promoting out of town retail centres?</p> <p>Good words – but what are you actually going to do?</p>	The I&O is a scoping exercise to identify key issues and review the current Local Plan. What we are actually proposing to do will be at the Draft Consultation on Local Plan Review (Regulation 18) stage of the Local Plan review.
SK.IAO.0110	X			Yes	
SK.IAO.0111	X				
SK.IAO.0112	X				
SK.IAO.0113	X				
SK.IAO.0114	X				
SK.IAO.0115	X				
SK.IAO.0116	X				
SK.IAO.0117	X				
SK.IAO.0118	X				
SK.IAO.0119	X				
SK.IAO.0120	X				
SK.IAO.0051				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.	Comments noted.
SK.IAO.0072		X		<p>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:</p> <p>"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.</p>	Comments noted
SK.IAO.0073	X			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.	Support welcomed.
SK.IAO.0074	X			It is agreed that the objectives can remain the same for the new Local Plan.	support welcomed.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0075			X	<p>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.</p> <p>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. 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. 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. This is also relevant to Questions under Proposal 9 re: Employment Policy.</p>	Comments noted. Vision will be amended to reflect the emerging objectives. The employment land study will appraise all employment land to be assessed if it fit for purpose and will determine the employment needs for the next Local Plan.
SK.IAO.0085	X			We support the current Objectives to assist in meeting the Vision, with a strong emphasis on the economy and enhancing prosperity.	Support welcomed.
SK.IAO.0098		X		The vision needs to be for the more radical in challenging climate change and meeting housing needs for the young and the old.	Comments noted. The vision will be amended to take into account climate change. Meeting the housing needs for the young and old are included within objective 10.
SK.IAO.0104	X			It is agreed that the objectives should remain the same for the new Local Plan.	Support welcomed.
SK.IAO.0121			X	<p>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.</p>	Comments noted. Officers are of the view that objective 3 and 8 was inconformity with NPPF (2012) however these objectives will be updated as part of the local plan review to ensured that the objectives are in conformity with legislation. Suggested wording will be updated to reference to Larger villages. Once further evidence base has been completed as part of the Local Plan review we will ensure that the objectives reflect any changes. Furthermore, the objectives will be strengthened to consider the impacts of climate change.
SK.IAO.0078			X	<p>Objective 8 To retain and improve accessibility for all to employment, services, community, leisure and cultural activities through:</p> <ul style="list-style-type: none"> • 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 <p>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.</p>	These objectives will be supported by policies that will implement them which will reduce the need to travel by car.
SK.IAO.0088				<p>We support the objectives of the adopted Local Plan and suggest these remain for the Local Plan Review.</p> <p>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.</p>	Support welcomed.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				Recommendation One: Retain the Objectives outlined within the adopted Local Plan through the Local Plan Review to 2041.	
SK.IAO.0107				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.	Support welcomed.
SK.IAO.0124	X				

Proposal 3 – Policies not proposed to be changed significantly

Representation Reference Number	Yes	No	Unsure	Comment	Officer Response
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
SK.IAO.0003		X		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 concerns & issues raised.	OS1 already has a policy in respect to protect of open space this in line with national guidance. The Local community are able to comment on all planning applications that are submitted.
SK.IAO.0004			X	This 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.	"Not proposed to be changed significantly" means that these policies will not be reviewed and examined in detail as part of the Local Plan review. The Issues and Options stage is a discussion paper that sets out in response to the inspector's report on the current local plan which identifies employment housing growth and gypsy and traveller and showpeople needs as key policy areas to reviewed. The Council is of the view that the list specified could be reviewed as part of the process and welcome input from local residents at each consultation stage.
SK.IAO.0005			X	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.	"Not proposed to be changed significantly" means that these policies will not be reviewed and examined in detail as part of the Local Plan review. The Issues and Options stage is a discussion paper that sets out in response to the inspector's report on the current local plan which identifies employment housing growth and gypsy and traveller and showpeople needs as key policy areas to reviewed. The Council is of the view that the list specified could be reviewed as part of the process and welcome input from local residents at each consultation stage.
SK.IAO.0007	X				
SK.IAO.0011		X		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	Comment not relevant to the question.

Representation Reference Number	Yes	No	Unsure	Comment	Officer Response
				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 regards as "compromising the nature and character"?	
SK.IAO.0012			X	Not provided.	
SK.IAO.0014		X		<p>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:</p> <ul style="list-style-type: none"> • 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. <p>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.</p>	Comments noted, Policy H2 will be changed in line with the NPPF and the Rectory Homes Judgement
SK.IAO.0015				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	Comment not relevant to the question.
Sk.IAO.0016				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.	Comment not relevant to the question.
SK.IAO.0017	X				
SK.IAO.0018	X				
SK.IAO.0019			X	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.	Comments noted, SP6 will not be changed significantly unless there are changes to national guidance.
SK.IAO.0020		X		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.	Comments noted. The Council is of the view that the list specified could be reviewed as part of the process and welcome input from local residents at each consultation stage.
SK.IAO.0021		X		<p>There are a number of district wide policies which are of relevance to Anglian Water as follows:</p> <ul style="list-style-type: none"> • Policy EN4: Pollution Control • Policy EN5: Water Environment and Flood Risk Management • Policy ID1: Infrastructure for growth <p>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</p>	Comments noted.

Representation Reference Number	Yes	No	Unsure	Comment	Officer Response
				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	
SK.IAO.0022	X				
SK.IAO.0023		X		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?	Comments noted. The Council is of the view that the list specified could be reviewed as part of the process and welcome input from local residents at each consultation stage.
SK.IAO.0024	X				
SK.IAO.0026		X		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.	The SHMA will be updated in line with the latest ONS population projections and new evidence could require a review of policy H4 in terms of elderly care provision. This will form part of the Local Plan review.
SK.IAO.0027	X			We support Objective 13 and the decision to not significantly change policy EN5 'Water Environment and Flood Risk Management'	Comments noted.
SK.IAO.0028	X				
SK.IAO.0030	X			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.	Comments noted.
SK.IAO.0031		X		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	Comments noted. The Council is of the view that the list specified could be reviewed as part of the process and welcome input from local residents at each consultation stage.

Representation Reference Number	Yes	No	Unsure	Comment	Officer Response
				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 revisiting to reflect the changing growth target for the settlement and to identify any strategic directions for growth.	
SK.IAO.0032		X		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.	Comments noted. The Council is of the view that the list specified could be reviewed as part of the process and welcome input from local residents at each consultation stage.
SK.IAO.0034		X		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. 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. 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.	The Local Plan allows for windfall development to come forward and approach to development aligns to housing strategy in the current local plan and going forward could be reviewed if it could be evidenced that we could increase the windfall allowance. However, there would have to be evidence to justify this. Furthermore, SP4 allows for edge of settlement development which is in addition to allocated sites.
SK.IAO.0035	X				
SK.IAO.0037	X			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).	Support welcomed.
SK.IAO.0038	X				
SK.IAO.0039			X	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).	Comments noted, the impacts of Covid-19 are still to be fully understood. The planning system and the local plan review will respond accordingly.

Representation Reference Number	Yes	No	Unsure	Comment	Officer Response
SK.IAO.0040		X		<p>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:</p> <p>- H4 (Meeting All Housing Need).</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>The SHMA will be updated in line with the latest ONS population projections and new evidence could require a review of policy H4 in terms of elderly care provision. This will form part of the Local Plan review. The Local Plan allows for windfall development to come forward and approach to development aligns to housing strategy in the current local plan and going forward could be reviewed if it could be evidenced that we could increase the windfall allowance. However, there would have to be evidence to justify this. Furthermore, SP4 allows for edge of settlement development which is in addition to allocated sites.</p>
SK.IAO.0042	X				
SK.IAO.0044	X				
SK.IAO.0045	X				
SK.IAO.0047				Broadly the objectives remain relevant, but the means by which they will be achieved will need a fresh assessment and dynamic.	Comments noted.
SK.IAO.0049		X		<p>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.</p> <p>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,</p>	<p>Specific requirements for renewable and thermal energy are set by Building control regulations Part F and Part L and Building Control will consider the standards for New buildings. These are currently being reviewed nationally and once this becomes national policy this will be considered as part of the Local Plan Review.</p>
SK.IAO.0054		X		<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>	<p>Comments noted. The Council is of the view that the list specified could be reviewed as part of the process and welcome input from local residents at each consultation stage.</p>

Representation Reference Number	Yes	No	Unsure	Comment	Officer Response
SK.IAO.0055	X			<p>Comments on SP3 Infill and SP4 Edge of Settlements:</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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).</p> <p>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</p>	<p>SP3 and SP4 will be assessed in the LP review. Comments about planning application not relevant.</p>

Representation Reference Number	Yes	No	Unsure	Comment	Officer Response
				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.	
SK.IAO.0010				<p>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.</p> <p>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.</p> <p>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.</p> <p>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</p> <p>Page 3 of 5 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.</p>	Comments noted biodiversity and net gain is included within the SA scoping report and further updated evidence will be reviewed as part of the local plan review.
SK.IAO.0025				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.	Comments noted.
SK.IAO.0013				<p>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.</p>	Comments noted. All current allocations are to be reassessed in terms of deliverability throughout the Local Plan review.

Representation Reference Number	Yes	No	Unsure	Comment	Officer Response
SK.IAO.0029				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 Barberrry 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, Barberrry 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.	The issues and options consultation recognises the additional housing as a result of the standard methodology. Further housing allocations may be required as part of the local plan review and existing allocations and their ability to deliver will also be reassessed as part of the updated housing trajectory.
SK.IAO.0036				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.	Comments noted the Stamford North allocation has a link road to improve sustainable transport in Stamford.
SK.IAO.0050		X		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.	Comments welcomed. The Council declared Climate Change emergency in 2019 the key objective of the Local Plan Review is to reduce the carbon reduction and develop planning policies which will support and mitigate the impacts of climate change.
SK.IAO.0056	X				

Representation Reference Number	Yes	No	Unsure	Comment	Officer Response
SK.IAO.0057		X		<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>SKLP Policy SP4 – development on the edge of settlements. 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>SKLP Policy E4- Protection of existing employment. This does not recognise the existence of a significant employment area at Hards Lane . See DNP 4.4 .</p> <p>SKLP Policy OS1 - open space.</p> <p>a. The policy is based on an inadequate and dated assessment of open space need across the district. The is a deficiency of open space in the Deepings as measured by the Council’s own standards. This is referenced in the DNP, Appendix B. Page 31 Local Green Spaces Justification and Maps (Sub-Appendix 1 : Assessment of Local Green spaces)</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 useable (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>SKLP Policy DEP2 – Market Deeping Town Centre . Comments above in question 1b apply here.</p> <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>Policy SP4 - Inspectors final report has removed to 0.5 hectare requirement on developments within the Deepings Neighbourhood plan.</p> <p>Policy E4 Hards lanes will form part of the Local Plan review when reviewing Policy E4.</p> <p>Open space is also to be reviewed as part of the Local Plan review.</p> <p>The changes of the use class system and the creation of the new E class has been established as a result of national government planning policy. There will be current implication for current town centres policies which are subsequently defunct. Unless the Council or Neighbourhood plan introduced an Article 4 direction with town centres. As a result of the planning reforms and the use class system current local plan policies will be reviewed.</p> <p>Currently the Local Plan review is not going to consider Town centres. However, this may be required and comments will be considered in identifying further work.</p>

Representation Reference Number	Yes	No	Unsure	Comment	Officer Response
SK.IAO.0058				<p>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:</p> <p>'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.</p>	<p>The current policy is NPPF compliant and supports sustainable growth in line with the settlement hierarchy. Policies prior to the current development plan document were restrictive and the intention of SP4 is to support growth and keep policy SP4 under review,</p>

Representation Reference Number	Yes	No	Unsure	Comment	Officer Response
SK.IAO.0060				<p>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:</p> <p>'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.</p>	The current policy is NPPF compliant and supports sustainable growth in line with the settlement hierarchy. Policies prior to the current development plan document were restrictive and the intention of SP4 is to support growth and keep policy SP4 under review,
SK.IAO.0065		X		Be a lot more flexible.	Comment noted.
SK.IAO.0066				<p>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 open 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.</p>	Comments noted. The Council is of the view that the list specified could be reviewed as part of the process and reassessed considering new evidence. The issues and options consultation recognises the additional housing as a result of the standard methodology. Further housing allocations may be required as part of the local plan review and existing allocations and their ability to deliver will also be reassessed as part of the updated housing trajectory.

Representation Reference Number	Yes	No	Unsure	Comment	Officer Response
SK.IAO.0067		X		<p>No. The Parish Council would ask that the following policies are given further consideration</p> <p>SKLP Policy SP4 – Development on the edge of settlements – 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.</p> <p>SKDC Policy E4 – Protection of Employment.</p> <p>Hard’s Lane is a small industrial Site in Deeping St James, but it is not included.</p> <p>SKLP Policy OS1 - 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 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>Comments noted in relation to SP4 the policy reviewed as part of the process.</p> <p>Policy E4 Hards lanes will form part of the Local Plan review when reviewing Policy E4.</p> <p>Open space is also to be reviewed as part of the Local Plan review.</p>
SK.IAO.0068				<p>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:</p> <p>'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.</p>	<p>Comments noted. The windfall allowance within the current local plan based on 30 dwellings per annum this was found sound by the inspector and also confirmed recently through the annual position statement (2020).</p> <p>SP4 and sites that do come forward under this policy are developments that are in addition to sites allocated to meet housing needs in SK. This policy enables flexibility with the Local Plan. Policy SP4 the policy reviewed as part of the process.</p>
SK.IAO.0069	X				
SK.IAO.0070		X		<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 feel that the following require revision in light of both the current NPPF (2018) and the Councils declaration of a climate emergency.</p> <p>EN2: Protecting Biodiversity and Geodiversity</p> <p>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.</p> <p>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.</p> <p>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...”</p> <p>EN3 Green Infrastructure</p>	<p>Comments noted.</p>

Representation Reference Number	Yes	No	Unsure	Comment	Officer Response
				<p>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.</p> <p>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.</p>	
SK.IAO.0071				<p>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.</p>	BRN1 will be reviewed in light reviewed housing requirement and spatial strategy for the District.
SK.IAO.0076		X		<p>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.</p>	Comments noted.
SK.IAO.0079		X		<p>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.</p>	Comments noted.
SK.IAO.0080	X				
SK.IAO.0081		X		<p>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).</p> <p>“.....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.”</p> <p>The protection of ancient woodland and veteran trees was significantly strengthened by para 175c of the new NPPF which was passed two years ago:</p> <p>“(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.”</p> <p>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.</p>	Comments noted.
SK.IAO.0083	X				
SK.IAO.0084	X				

Representation Reference Number	Yes	No	Unsure	Comment	Officer Response
SK.IAO.0087		X		<p>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.</p> <p>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.</p> <p>In light of the above, we have reviewed the list of policies in 'Proposal 3' and have comments on the following:</p> <ul style="list-style-type: none"> - 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. 	<p>Comments noted. Schedule of supporting evidence will be consulted upon at the next stage of consultation. The Council will continue to monitor the position of national planning guidance and should any changes come into legislation this will be reflected as part of the Local Plan review.</p> <p>Policy H1 will be reviewed as part of the Local Plan review this will involve evaluation of the settlement hierarchy.</p>
SK.IAO.0089		X		<p>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).</p> <p>Policy H1 should not be modified to increase housing allocations for Stamford.</p>	<p>Comments noted. Policy H1 will be reviewed as part of the Local Plan review. Allotments are currently protected land. Any review of allotment space and provision will form part of a review of the open space.</p>
SK.IAO.0090			X	<p>Policy STM1-H1</p> <p>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.</p> <p>Possible Changes</p> <p>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.</p> <p>It is noted, via its absence from the list, that the Council does intend to amend:</p> <ul style="list-style-type: none"> - Policy SP1 – Spatial Strategy - Policy SP2 – Settlement hierarchy 	<p>SP1 and SP2 will be revised as part of the local plan review and the Council will have to demonstrate that existing allocations are deliverable and can be included within the housing trajectory.</p>
SK.IAO.0091				<p>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.</p>	<p>The employment land study will appraise all employment land to be assessed if it fit for purpose and will determine the employment needs for the next Local Plan this will include an assessment of Exeter Fields.</p>

Representation Reference Number	Yes	No	Unsure	Comment	Officer Response
SK.IAO.0092	X				
SK.IAO.0094		X		<p><u>Adopted Local Plan Policy SP4</u> 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.</p> <p><u>Adopted Local Plan Policy H4</u> 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.</p>	<p>Policy SP4 will be reviewed as part of the Local Plan review.</p> <p>Elderly provision is defined with the NPPF and the currently Local Plan is in accordance with this. However, since the current Local Plan has been updated there is a need to consider the updated PPG and NPPF in terms of elderly care provision. Policy H4 as part of the Local Plan review there will be and updated SHMA which will considered elderly care and needs.</p>
SK.IAO.0096	X			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.	Bourne Town Council and all local residents on the Local Plan consultation database will be consulted upon and Bourne neighbourhood plan will be supported by SKDC in its duty as the Local Planning Authority.
SK.IAO.0097	X			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.	Bourne Town Council and all local residents on the Local Plan consultation database will be consulted upon and Bourne neighbourhood plan will be supported by SKDC in its duty as the Local Planning Authority.
SK.IAO.0103	X				
SK.IAO.0105	X			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.	Comments noted.
SK.IAO.0106	X			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.	Comments noted.
SK.IAO.0108			X	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.	The Council has a duty to monitor the implementation of policies the current local plan and appendix 5 of the current Local Plan considers the impact of planning policies. The development plan as set out by the town and country planning act is the starting point of decision making and unless material considerations indicate otherwise.
SK.IAO.0110				No comment due to the number of policies we have been unable to compare insignificant changes	
SK.IAO.0111	X				

Representation Reference Number	Yes	No	Unsure	Comment	Officer Response
SK.IAO.0112		X		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.	Policy H1 will be reviewed as part of the Local Plan review this will involve evaluation of the settlement hierarchy.
SK.IAO.0113		X		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.	Policy H1 will be reviewed as part of the Local Plan review this will involve evaluation of the settlement hierarchy.
SK.IAO.0114		X		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.	Policy H1 will be reviewed as part of the Local Plan review this will involve evaluation of the settlement hierarchy.
SK.IAO.0115		X		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.	Policy H1 will be reviewed as part of the Local Plan review this will involve evaluation of the settlement hierarchy.
SK.IAO.0116		X		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.	Policy H1 will be reviewed as part of the Local Plan review this will involve evaluation of the settlement hierarchy.
SK.IAO.0117		X		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.	Policy H1 will be reviewed as part of the Local Plan review this will involve evaluation of the settlement hierarchy.
SK.IAO.0118		X		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.	Policy H1 will be reviewed as part of the Local Plan review this will involve evaluation of the settlement hierarchy.
SK.IAO.0119		X		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.	Policy H1 will be reviewed as part of the Local Plan review this will involve evaluation of the settlement hierarchy.
SK.IAO.0120		X		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.	Policy H1 will be reviewed as part of the Local Plan review this will involve evaluation of the settlement hierarchy.
SK.IAO.0051				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. 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.	The Council has responsibility to meet housing need. If the identified need is not met through the Bourne Neighbourhood Plan as detailed within Policy BRN1 of the adopted Local Plan, the Council will be required to find land to meet the need through the emerging Local Plan. The associated text of Policy BRN1 states that "Should the Neighbourhood Plan not do this within the first five years of the Local Plan being adopted, the Local Plan will make the required allocations through its first review.
SK.IAO.0073	X			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.	Comments noted. However, other policies may be reviewed as part of the process.

Representation Reference Number	Yes	No	Unsure	Comment	Officer Response
SK.IAO.0074		X		<p>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.</p> <p>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. 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. 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. 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.</p>	Comments noted. The self build register will be reviewed separately. However, there may be a need to review this policy.
SK.IAO.0075		X		<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	Policy H1 will be reviewed as part of the Local Plan review this will involve evaluation of the settlement hierarchy.
SK.IAO.0085	X			<p>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.</p>	Comments noted.
SK.IAO.0098		X		<p>The vision needs to be for the more radical in challenging climate change and meeting housing needs for the young and the old.</p>	Comments noted.

Representation Reference Number	Yes	No	Unsure	Comment	Officer Response
SK.IAO.0100				<p>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.</p>	<p>SP4 and sites that do come forward under this policy are developments that are in addition to sites allocated to meet housing needs in SK. This policy enables flexibility with the Local Plan. Policy SP4 the policy reviewed as part of the process.</p>

Representation Reference Number	Yes	No	Unsure	Comment	Officer Response
SK.IAO.0093		X		<p>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.</p> <p>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.</p> <p>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”</p> <p>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:</p> <ul style="list-style-type: none"> 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. <p>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. 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. 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 (see map in rep)</p>	<p>The housing trajectory will enable delivery of all type of sites to be delivered and maintain housing requirement across the plan period in accordance with the NPPF.</p> <p>The Local plan review will consider the spatial distribution and have an updated housing trajectory.</p> <p>Comments on SP3 are noted. The relationship between policy SP2 and SP3 will be reviewed as part of the Local Plan review.</p>

Representation Reference Number	Yes	No	Unsure	Comment	Officer Response
SK.IAO.0121		X		<p>Not completely:</p> <ul style="list-style-type: none"> • E1 - as we represented 2019 (see attached with supplementary comments of 4th 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' CO2 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. 	<p>Existing Allocations will be reassessed as part of the Local Plan review.</p> <p>Policy SD1 will be reviewed to refer to the Environmental Bill and reference Biodiversity net gain this is already considered as part of the Issues and Options SA scoping report</p> <p>Policy SP1 will be approach to agricultural land, site assessment and the policy will be reviewed and the latter part of SP1.</p> <p>Agree policy SP2 will be reviewed. Parish service survey will be reviewed and the site selection methodology will look at relative sustainability criteria.</p> <p>Comments noted on the potential garden village and comment on Policy SP4 noted.</p> <p>H1 – the current housing requirement is 650 and this currently could be increase circa 750 per annum. This is approximately additional 2,300 over the plan period and 16% increase from the period Local Plan. This level of growth is significant for the District.</p> <p>The employment spatial strategy is to be reviewed as part of the Local Plan.</p> <p>Comments on Policy E5 noted.</p> <p>E6 – the employment land review will evaluate current employment sites and their future allocation in the Local plan review.</p> <p>Comments noted on DE1 and SB1 and future climate change impacts will be considered as part of the local plan review.</p>
SK.IAO.0078			X	See later responses to questions.	

Representation Reference Number	Yes	No	Unsure	Comment	Officer Response
SK.IAO.0088				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	SP4 and sites that do come forward under this policy are developments that are in addition to sites allocated to meet housing needs in SK. This policy enables flexibility with the Local Plan. Policy SP4 the policy reviewed as part of the process.
SK.IAO.0107				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.	SP4 and sites that do come forward under this policy are developments that are in addition to sites allocated to meet housing needs in SK. This policy enables flexibility with the Local Plan. Policy SP4 the policy reviewed as part of the process.
SK.IAO.0124		X		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.	Comments noted, H1 will be reviewed as part of the Local plan review.

Proposal 4 – Plan Period

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
Do you agree with the proposed plan period up to 2041?					
SK.IAO.0003		X		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.	Comments noted.
SK.IAO.0004		X		Does 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.	Comments noted, Central Government is responsible for national planning policy framework.
SK.IAO.0005		X		Does 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.	Comments noted, Central Government is responsible for national planning policy framework.
SK.IAO.0007	X				

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0012	X				
SK.IAO.0014		X		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 review!!!	Policy M1 requires that the next full review of the Local Plan should start in 2020 with South Kesteven Local Plan submission for examination anticipated by the end of 2023.
SK.IAO.0015	X				
SK.IAO.0016	X				
SK.IAO.0017	X				
SK.IAO.0018	X				
SK.IAO.0019	X				
SK.IAO.0020	X				
SK.IAO.0022	X				
SK.IAO.0024	X				
SK.IAO.0028	X			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.	Comments welcomed.
SK.IAO.0030	X			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.	Comments welcomed.
SK.IAO.0031	X				
SK.IAO.0032	X				
SK.IAO.0034	X				
SK.IAO.0035	X				
SK.IAO.0037	X			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.	Comments welcomed.
SK.IAO.0038			X	Paragraph 22 of the NPPF outlines that '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'. 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. 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.	Comments noted , the current local plan accounts for 1,775 units up to 2036 the remainder of the site until completed in total to 4,000 will potentially be beyond 2041 and the housing trajectory and housing site specific policies will be reviewed as part of the Local Plan review.
SK.IAO.0039			X	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.	Comments noted.
SK.IAO.0040	X			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.	Comments welcomed.
SK.IAO.0042	X				
SK.IAO.0044	X				
SK.IAO.0045	X				

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0047	X				
SK.IAO.0049		X		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.	Comments the evidence base should be updated every five years as per national policy but there is no requirement to review a Local Plan every five. Implementation is monitoring annually as part of the authorities monitoring report.
SK.IAO.0054	X				
SK.IAO.0055	X				
SK.IAO.0013	X			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.	Comments noted.
SK.IAO.0029				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.	Comments noted.
SK.IAO.0036				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.	Spatial strategy of growth is yet to be determined and any future development for Stamford will be a sustainable level of growth for the town.
SK.IAO.0056	X				
SK.IAO.0065		X		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.	Comments noted.
SK.IAO.0067				It is difficult to respond to this when the next development sites have not actually been identified at this stage.	
SK.IAO.0069	X				
SK.IAO.0071				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.	Support welcomed.
SK.IAO.0076	X				
SK.IAO.0079	X				
SK.IAO.0080	X				
SK.IAO.0081	X				
SK.IAO.0083	X				
SK.IAO.0084	X				
SK.IAO.0087	X			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.	Support welcomed.
SK.IAO.0089	X				
SK.IAO.0090	X			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	Comments noted.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				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.	
SK.IAO.0092	X				
SK.IAO.0094	X				
SK.IAO.0096		X			
SK.IAO.0097		X			
SK.IAO.0103	X				
SK.IAO.0105	X			Subject to the finding of the New Employment Land Study, that will inform the emerging Local Plan of future employment needs of the district.	Comments noted.
SK.IAO.0106	X			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.	Comments noted.
SK.IAO.0108			X	There is no point in having any long term plan if you review it within 1 year of establishing its predecessor. No stability.	Policy M1 requires that the next full review of the Local Plan should start in 2020 with South Kesteven Local Plan submission for examination anticipated by the end of 2023.
SK.IAO.0111	X				
SK.IAO.0112	X				
SK.IAO.0113	X				
SK.IAO.0114	X				
SK.IAO.0115	X				
SK.IAO.0116	X				
SK.IAO.0117	X				
SK.IAO.0118	X				
SK.IAO.0119	X				
SK.IAO.0120	X				
SK.IAO.0051				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.	The Local Plan was found sound in 2020 and Policy M1 requires that the next full review of the Local Plan should start in 2020 with South Kesteven Local Plan submission for examination anticipated by the end of 2023. This Policy and recommendation of the Inspector takes account of the standard methodology.
SK.IAO.0073		X		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. 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.	Comments noted.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0074		X		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. 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. Thus, the Council should extend the plan period beyond 2041.	Comments noted.
SK.IAO.0075	X			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.	Comments noted.
SK.IAO.0085	X			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.	Comments noted.
SK.IAO.0098	X				
SK.IAO.0101				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.	Comments noted.
SK.IAO.0104		X		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. 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. Thus, the Council should extend the plan period beyond 2041.	Comments noted.
SK.IAO.0121	X				
SK.IAO.0078	X				
SK.IAO.0124	X				

Proposal 5 – Settlement Hierarchy

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
Do you think the Settlement Hierarchy should be retained in the new Local Plan?					
SK.IAO.0003			X		
SK.IAO.0005			X	Sorry not sure I understand what this term really means. No Comment.	
SK.IAO.0007	X				
SK.IAO.0011		X		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"	A further audit will be undertaken of the current services. The SHLAA process, site selection methodology and the infrastructure delivery plan will consider the potential constraints should future sites be taken forward through the Local Plan.
SK.IAO.0012	X				
SK.IAO.0014		X		Further consideration to be given to villages that have been excluded from the 'sustainable village' definition -Castle Bytham being a case in point	It is proposed to utilise the existing settlement hierarchy as the basis for determining the spatial distribution of growth through the Local Plan review. The Council will undertake a survey of services and facilities to review and determine those settlements forming the Larger Villages set out in Policy SP2. We will not be revisiting the settlement hierarchy in terms of the smaller villages as part of the Local Plan review.
SK.IAO.0015		X		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	Comments noted.
SK.IAO.0017			X		
SK.IAO.0018	X				
SK.IAO.0019	X				
SK.IAO.0020	X				
SK.IAO.0022	X				
SK.IAO.0024	X			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.	Support welcomed.
SK.IAO.0028	X				
SK.IAO.0030	X			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.	The apportionment of growth throughout the settlement hierarchy will be re-evaluated following the review of the potential sites coming forward. This will be considered alongside the outcomes of the issues and options which discusses the potential of an additional settlement.
SK.IAO.0031	X				
SK.IAO.0032	X				
SK.IAO.0034		X		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.	It is proposed to utilise the existing settlement hierarchy as the basis for determining the spatial distribution of growth through the Local Plan review. The Council will undertake a survey of services and facilities to review and determine those settlements forming the Larger Villages set

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
					out in Policy SP2. We will not be revisiting the settlement hierarchy in terms of the smaller villages as part of the Local Plan review.
SK.IAO.0035	X				
SK.IAO.0037	X				
SK.IAO.0038	X				
SK.IAO.0039			X	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.	Comments noted. The assessment of the settlement hierarchy has been accepted by the Inspector and the audit of services and methodology is a robust assessment of what is classed as settlement and what is considered to be countryside. Neighbourhood plans and the Localism act enables plans to come forward within these settlements.
SK.IAO.0040			X	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.	Comments noted.
SK.IAO.0042	X			No reason to think that this Settlement Hierarchy is outdated.	Comments noted.
SK.IAO.0043			X	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.	It is proposed to utilise the existing settlement hierarchy as the basis for determining the spatial distribution of growth through the Local Plan review. The Council will undertake a survey of services and facilities to review and determine those settlements forming the Larger Villages set out in Policy SP2. We will not be revisiting the settlement hierarchy in terms of the smaller villages as part of the Local Plan review.
SK.IAO.0044	X				
SK.IAO.0045	X				
SK.IAO.0047	X			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 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.	It is proposed to utilise the existing settlement hierarchy as the basis for determining the spatial distribution of growth through the Local Plan review. The Council will undertake a survey of services and facilities to review and determine those settlements forming the Larger Villages set out in Policy SP2. We will not be revisiting the settlement hierarchy in terms of the smaller villages as part of the Local Plan review. As part of demonstrating the that duty to cooperate has been met further engagement will be undertaken with Newark and Sherwood District Council to understand the impacts of cross boundary issues.
SK.IAO.0049	X				
SK.IAO.0054			X	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.	Comments noted.
SK.IAO.0055	X			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.	Support welcomed.
SK.IAO.0013	X			We are in broad agreement that the settlement hierarchy should be retained in the new Local Plan.	Support welcomed.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0029				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 as 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.	Support welcomed.
SK.IAO.0036				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.	Any future growth will be assessed in terms of infrastructure requirements and supported by the Infrastructure Delivery Plan.
SK.IAO.0046		X		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.	Comments noted. The Government has set out an aspiration to deliver 300,000 new homes per annum. The housing growth for SK takes account of this aspiration and housing is determined by a national standard calculation.
SK.IAO.0056	X			Retain the existing Settlement Hierarchy	Support welcomed.
SK.IAO.0058				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.	Support welcomed.
SK.IAO.0059				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.	Support welcomed.
SK.IAO.0061				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.	Support welcomed.
SK.IAO.0065	X				

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0067		X		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.	Comments noted we acknowledge your objection to further development within the Deepings.
SK.IAO.0068				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.	Support welcomed.
SK.IAO.0069	X				
SK.IAO.0071				We are in broad agreement that the settlement hierarchy should be retained in the new Local Plan.	Support welcomed.
SK.IAO.0076		X		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.	It is proposed to utilise the existing settlement hierarchy as the basis for determining the spatial distribution of growth through the Local Plan review. The Council will undertake a survey of services and facilities to review and determine those settlements forming the Larger Villages set out in Policy SP2. We will not be revisiting the settlement hierarchy in terms of the smaller villages as part of the Local Plan review.
SK.IAO.0079		X		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.	It is proposed to utilise the existing settlement hierarchy as the basis for determining the spatial distribution of growth through the Local Plan review. The Council will undertake a survey of services and facilities to review and determine those settlements forming the Larger Villages set out in Policy SP2. We will not be revisiting the settlement hierarchy in terms of the smaller villages as part of the Local Plan review.
SK.IAO.0080	X			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. 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	Support welcomed. Objection to new settlement noted.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				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.	
SK.IAO.0081			X	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	
SK.IAO.0083	X			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.	It is proposed to utilise the existing settlement hierarchy as the basis for determining the spatial distribution of growth through the Local Plan review. The Council will undertake a survey of services and facilities to review and determine those settlements forming the Larger Villages set out in Policy SP2. We will not be revisiting the settlement hierarchy in terms of the smaller villages as part of the Local Plan review.
SK.IAO.0084	X				
SK.IAO.0087	X			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.	It is proposed to utilise the existing settlement hierarchy as the basis for determining the spatial distribution of growth through the Local Plan review. The Council will undertake a survey of services and facilities to review and determine those settlements forming the Larger Villages set out in Policy SP2. We will not be revisiting the settlement hierarchy in terms of the smaller villages as part of the Local Plan review.
SK.IAO.0089			X	n/a	
SK.IAO.0090	X			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.	Support welcomed.
SK.IAO.0096		X		It should be retained exactly and not altered in any way.	Support welcomed.
SK.IAO.0097		X		It should be retained exactly and not altered in any way.	Support welcomed.
SK.IAO.0103	X				
SK.IAO.0106	X			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. 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	Support welcomed.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				reference to the important role larger villages can play as sustainable locations to delivering housing, both open market value and importantly affordable homes. 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 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.	
SK.IAO.0108		X		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.	It is proposed to utilise the existing settlement hierarchy as the basis for determining the spatial distribution of growth through the Local Plan review. The Council will undertake a survey of services and facilities to review and determine those settlements forming the Larger Villages set out in Policy SP2. We will not be revisiting the settlement hierarchy in terms of the smaller villages as part of the Local Plan review. The site selection process to determine the sustainable level of growth across the district considers land availability and constraints. All allocations proposed are also subject to Sustainability Appraisals and that all reasonable alternatives and locations are considered to ensure that the Local Plan delivers sustainable development.
SK.IAO.0110	X			Yes	Support welcomed.
SK.IAO.0111	X				
SK.IAO.0112	X			We do, though, believe that an increase in allocation of the housing in smaller and larger villages would help fulfil the housing target.	Comments noted.
SK.IAO.0113	X			We do, though, believe that an increase in allocation of the housing in smaller and larger villages would help fulfil the housing target.	Comments noted.
SK.IAO.0114	X			We do, though, believe that an increase in allocation of the housing in smaller and larger villages would help fulfil the housing target.	Comments noted.
SK.IAO.0115	X			We do, though, believe that an increase in allocation of the housing in smaller and larger villages would help fulfil the housing target.	Comments noted.
SK.IAO.0116	X			We do, though, believe that an increase in allocation of the housing in smaller and larger villages would help fulfil the housing target.	Comments noted.
SK.IAO.0117	X			We do, though, believe that an increase in allocation of the housing in smaller and larger villages would help fulfil the housing target.	Comments noted.
SK.IAO.0118	X			We do, though, believe that an increase in allocation of the housing in smaller and larger villages would help fulfil the housing target.	Comments noted.
SK.IAO.0119	X			We do, though, believe that an increase in allocation of the housing in smaller and larger villages would help fulfil the housing target.	Comments noted.
SK.IAO.0120	X			We do, though, believe that an increase in allocation of the housing in smaller and larger villages would help fulfil the housing target.	Comments noted.
SK.IAO.0051				We are broadly supportive of the retention of the settlement hierarchy and the position of Bourne as a market town.	Comments noted.
SK.IAO.0072	X			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. 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.	It is proposed to utilise the existing settlement hierarchy as the basis for determining the spatial distribution of growth through the Local Plan review. The Council will undertake a survey of services and facilities to review and determine those settlements forming the Larger Villages set out in Policy SP2. We will not be revisiting the settlement hierarchy in terms of the smaller villages as part of the Local Plan review.

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SK.IAO.0073	X			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.	Support welcomed.
SK.IAO.0074	X			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.	Support welcomed.
SK.IAO.0075			X	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. 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. 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. 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.	Comments noted.
SK.IAO.0085	X			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.	Support welcomed.
SK.IAO.0104	X			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).	Support welcomed.
SK.IAO.0121	X				
SK.IAO.0078	X				

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0088				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.	Comments noted.
SK.IAO.0107				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.	Comments noted.
SK.IAO.0124	X			We do, though, believe that an increase in allocation of the housing in smaller and larger villages would help fulfil the housing target.	Comments noted.
SK.IAO.0003			X		
SK.IAO.0007	X				
SK.IAO.0005			X	Not comment.	
SK.IAO.0012	X				
SK.IAO.0014				Further consideration to be given to villages that have been excluded from the 'sustainable village' definition - Castle Bytham being a case in point	Castle Bytham is a smaller village within the current settlement hierarchy.
SK.IAO.0015				Have you commissioned work to find out if some smaller as well as larger villages would find it helps viability to expand?	It is proposed to utilise the existing settlement hierarchy as the basis for determining the spatial distribution of growth through the Local Plan review. The Council will undertake a survey of services and facilities to review and determine those settlements forming the Larger Villages set out in Policy SP2. We will not be revisiting the settlement hierarchy in terms of the smaller villages as part of the Local Plan review.
Sk.IAO.0016	X				

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0017			X		
SK.IAO.0018	X				
SK.IAO.0022	X				
SK.IAO.0024	X				
SK.IAO.0028	X				
SK.IAO.0030	X			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. Then 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.	It is proposed to utilise the existing settlement hierarchy as the basis for determining the spatial distribution of growth through the Local Plan review. The Council will undertake a survey of services and facilities to review and determine those settlements forming the Larger Villages set out in Policy SP2. We will not be revisiting the settlement hierarchy in terms of the smaller villages as part of the Local Plan review.
SK.IAO.0031	X				
SK.IAO.0032	X				
SK.IAO.0034	X				
SK.IAO.0035	X				
SK.IAO.0037			X		
SK.IAO.0039	X			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.	Support welcomed.
SK.IAO.0040			X	no specific comments to make.	
SK.IAO.0042	X			The current methodology seems appropriate.	Support welcomed.
SK.IAO.0043		X		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.	It is proposed to utilise the existing settlement hierarchy as the basis for determining the spatial distribution of growth through the Local Plan review. The Council will undertake a survey of services and facilities to review and determine those settlements forming the Larger Villages set out in Policy SP2. We will not be revisiting the settlement hierarchy in terms of the smaller villages as part of the Local Plan review.
SK.IAO.0044	X				
SK.IAO.0047		X		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.	Comments noted, the brownfield land assessment will also inform land availability of sites considered within the Local Plan review.
SK.IAO.0049	X				

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0055			X	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.	It is proposed to utilise the existing settlement hierarchy as the basis for determining the spatial distribution of growth through the Local Plan review. The Council will undertake a survey of services and facilities to review and determine those settlements forming the Larger Villages set out in Policy SP2. We will not be revisiting the settlement hierarchy in terms of the smaller villages as part of the Local Plan review.
SK.IAO.0046		X		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.	Comments noted. The Government has set out an aspiration to deliver 300,000 new homes per annum. The housing growth for SK takes account of this aspiration and housing is determined by a national standard calculation.
SK.IAO.0056	X			Yes, the methodology is appropriate for this review.	Support welcomed.
SK.IAO.0059				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.	It is proposed to utilise the existing settlement hierarchy as the basis for determining the spatial distribution of growth through the Local Plan review. The Council will undertake a survey of services and facilities to review and determine those settlements forming the Larger Villages set out in Policy SP2. We will not be revisiting the settlement hierarchy in terms of the smaller villages as part of the Local Plan review. However, in light of the neighbourhood plan and the sentiment of co-location of settlements will this be considered.
SK.IAO.0065	X				
SK.IAO.0067		X		No – see above response. (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.) 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.	Comments noted we acknowledge your objection to further development within the Deepings.
SK.IAO.0069	X				
SK.IAO.0076		X		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.	It is proposed to utilise the existing settlement hierarchy as the basis for determining the spatial distribution of growth through the Local Plan review. The Council will undertake a survey of services and facilities to review and determine those settlements forming the Larger Villages set

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
					out in Policy SP2. We will not be revisiting the settlement hierarchy in terms of the smaller villages as part of the Local Plan review.
SK.IAO.0079		X		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.	It is proposed to utilise the existing settlement hierarchy as the basis for determining the spatial distribution of growth through the Local Plan review. The Council will undertake a survey of services and facilities to review and determine those settlements forming the Larger Villages set out in Policy SP2. We will not be revisiting the settlement hierarchy in terms of the smaller villages as part of the Local Plan review.
SK.IAO.0080	X			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.	Comments noted.
SK.IAO.0081		X		We have included this in our answer to the previous question.	
SK.IAO.0083	X				
SK.IAO.0084	X				
SK.IAO.0087	X			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. We support the proposed retention of the existing settlement hierarchy in the Local Plan Review document. Response to Question 5a - 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.	It is proposed to utilise the existing settlement hierarchy as the basis for determining the spatial distribution of growth through the Local Plan review. The Council will undertake a survey of services and facilities to review and determine those settlements forming the Larger Villages set out in Policy SP2. We will not be revisiting the settlement hierarchy in terms of the smaller villages as part of the Local Plan review.
SK.IAO.0089			X		
SK.IAO.0092			X		
SK.IAO.0096	X				
SK.IAO.0097	X				
SK.IAO.0103		X		A shop that sells bread and milk is not a realistic village facility. Weightings of key factors need to be adjusted to be fairer.	Comments noted. The definition a settlement and settlement hierarchy review takes a weighted assessment of local services.
SK.IAO.0106	X				
SK.IAO.0108		X		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	It is proposed to utilise the existing settlement hierarchy as the basis for determining the spatial distribution of growth through the Local Plan review. The Council will undertake a survey of services and facilities to review and determine those settlements forming the Larger Villages set

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				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.	out in Policy SP2. We will not be revisiting the settlement hierarchy in terms of the smaller villages as part of the Local Plan review.
SK.IAO.0110	X			Yes	
SK.IAO.0111	X				
SK.IAO.0112	X				
SK.IAO.0113	X				
SK.IAO.0114	X				
SK.IAO.0115	X				
SK.IAO.0116	X				
SK.IAO.0117	X				
SK.IAO.0118	X				
SK.IAO.0119	X				
SK.IAO.0120	X				
SK.IAO.0075			X	The link provided in the I&O document does not relate to Larger Villages? 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. 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. 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. 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.	Comments noted.
SK.IAO.0121	X				
SK.IAO.0078		X		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	Comments noted. Comments on the NPPF noted. The November 2016 survey will be updated, and the site assessment methodology will be evaluated as part of the Local Plan review.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				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. Submission from Thurlby Parish Council to the SKDC Local Plan Review (2041) Issues and Options Document. There has been little change in the hierarchy assessments which placed the LSC'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) 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?	
SK.IAO.0124	X				
SK.IAO.0003			X		
SK.IAO.0007			X		
SK.IAO.0012			X		
SK.IAO.0014	X			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	Comments noted. Housing needs are based on the standard methodology and there are three main towns which need to be supported by further growth.
SK.IAO.0015				Where?	
SK.IAO.0016	X				
SK.IAO.0017			X		
SK.IAO.0018			X		
SK.IAO.0022			X		
SK.IAO.0024			X	I would like to understand this option further before I was able to make a considered judgement	comment noted.
SK.IAO.0028		X			
SK.IAO.0030		X		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.	Comments noted, support welcomed for proportionate growth with existing settlements.
SK.IAO.0031		X			
SK.IAO.0032		X			
SK.IAO.0034			X		

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SK.IAO.0035		X			
SK.IAO.0037			X		
SK.IAO.0038		X			
SK.IAO.0039		X		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.	Further growth is required as a result of using the standard methodology for housing.
SK.IAO.0040			X	no specific comments to make.	
SK.IAO.0042		X		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.	Comments noted.
SK.IAO.0043			X		
SK.IAO.0044		X			
SK.IAO.0047		X		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.	The site assessment methodology will be evaluated as part of the Local Plan review. This will consider the SA. Comments noted on the interim SA however the report also notes that Larger Villages could potentially accommodate increased levels of growth without necessarily leading to adverse impacts.
SK.IAO.0049		X			
SK.IAO.0054		X		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.	The site assessment methodology will be evaluated as part of the Local Plan review.
SK.IAO.0055			X	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.	Comments noted. The Government has set out an aspiration to deliver 300,000 new homes per annum. The housing growth for SK takes account of this aspiration and housing is determined by a national standard calculation.
SK.IAO.0029				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. Barberray 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.	Comments noted. Allocations in Grantham were found sound by the Local Plan Inspector and updated review of housing delivery and sites will be part of the Local Plan review.
SK.IAO.0056		X		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	Comments noted.
SK.IAO.0065		X		Retaining agricultural land a muste more use of existing brownfield sites and re development of shops and apartments for housing and more emphasis of environment in the towns less concreting over of graden spaces more trees and educations to create better environmental living in towns.	Comments noted, the value of agricultural land is considered as part of the site selection methodology as well as brownfield sites.
SK.IAO.0069		X			
SK.IAO.0076		X		There is plenty of opportunities within the towns and villages to avoid the need for a new Greenfield settlement site.	As part of the site selection methodology the consideration of sites with urban locations will be considered.
SK.IAO.0079		X		There is plenty of opportunities within the towns and villages to avoid the need for a new Greenfield settlement site.	As part of the site selection methodology the consideration of sites with urban locations will be considered.
SK.IAO.0080		X		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	The delivery of housing will be reviewed as part of the housing trajectory.

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				<p>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.</p> <p>Q5a - 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>	
SK.IAO.0083	X				
SK.IAO.0084		X			
SK.IAO.0087		X		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.	Comments noted.
SK.IAO.0089	X				
SK.IAO.0092			X		
SK.IAO.0096	X			Where would these be placed.	The issues and options is considering a new settlement as an option for the increased need in housing. Should this be taken forward, a location will be decided as part of the local plan review.
SK.IAO.0097	X			Where would these be placed.	The issues and options is considering a new settlement as an option for the increased need in housing. Should this be taken forward, a location will be decided as part of the local plan review.
SK.IAO.0103	X			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.	Support for garden village noted.
SK.IAO.0108	X			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.	SKDC housing needs are for the district based on the standard methodology and there are no cross-boundary issues in terms of housing needs. The standard methodology is standard for assessing housing needs by the Government.
SK.IAO.0112		X			
SK.IAO.0113		X			
SK.IAO.0114		X			
SK.IAO.0115		X			
SK.IAO.0116		X			
SK.IAO.0117		X			
SK.IAO.0118		X			
SK.IAO.0119		X			
SK.IAO.0120		X			
SK.IAO.0074	X			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. 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	All proposed new settlements will be assessed as part of the strategic housing land availability assessment study. The assessment of housing

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				<p>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. 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:</p> <ul style="list-style-type: none"> 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)³⁵; and e) consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size.' <p>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). 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.</p> <p>The preceding 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). 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</p>	<p>needs is set out by the standard methodology and the type of sites and delivery will be assessed as part of an updated housing trajectory.</p>

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				<p>supported by the necessary infrastructure and facilities.</p> <p>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. 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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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).</p> <p>The Sustainability Appraisal (SA) for the South Kesteven Local Plan Review (October 2020) prepared by AECOM clearly</p>	

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				<p>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;</p> <ul style="list-style-type: none"> · 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. <p>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.</p> <p>SA Theme Boyer’s Commentary</p> <p>Biodiversity and geodiversity <i>It is agreed that the impact on this theme is dependent upon the location of the development. 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.</i></p> <p>Landscape <i>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. 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.</i></p> <p>Historic Environment <i>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.</i></p> <p>Air, land, water and soil resource <i>We concur with AECOMs conclusion that ‘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> <i>It is also important to note that the Land north of A52 falls entirely within Grade 3 agricultural land (see paragraph 2.31 below).</i></p> <p>Climate change <i>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.</i></p> <p>Population and community <i>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</i></p>	

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				<p><i>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.</i></p> <p>Health and wellbeing <i>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.</i></p> <p>Transport <i>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. 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.</i></p> <p>Economic Viability <i>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.</i></p> <p>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. 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. 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. 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. 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. 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’.</p>	

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				For the reasons outlined above, South Kesteven District Council should amend the settlement hierarchy to include a new settlement and Land North of A52.	
SK.IAO.0075	X			<p>Please see attached. This should be considered in the wider sub-regional housing market area context, not in isolation.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	Comments noted SKDC under the duty to cooperate is required to assess our own housing requirement as set out by the standard methodology as well as any arising cross boundary housing needs throughout the Local Plan review. Ongoing engagement will be undertaken with all neighbouring local authorities to ensure that the duty to cooperate is met. Should housing needs increase more than the 745 this will be considered as part of the Local Plan review however currently there are no arising needs of neighbouring authorities.
SK.IAO.0121		X		No (and see answer to Q3)	please see answer to Q3.
SK.IAO.0078	X			<p>Corby Glen, Long Bennington and Colsterworth</p> <p>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.</p> <p>Each of these settlements has the following:</p> <ul style="list-style-type: none"> • 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. <p>This exceptional range of services sets these three settlements apart from the other larger villages in the Settlement hierarchy Table 1.</p> <p>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</p>	Comments noted however these are not in relation to a new standalone garden village. The consideration of relative sustainability of larger villages will be updated and the site assessment methodology will be evaluated as part of the Local Plan review.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				<p>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</p> <p>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.</p> <p>Table 2. Settlement Hierarchy by Population compared to Services Ranking.</p> <p>Table 3. Distance travelled to work ONS Crown Copyright Reserved [Nomis on 18 November 2020]</p> <p>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.</p> <p>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.</p> <p>Table 4. Method of travel to work ONS Crown Copyright Reserved [Nomis on 17 November 2020]</p> <p>Table 4 illustrates the dependency on driving or being a passenger in a car or van to travel to work.</p> <p>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.</p>	
SK.IAO.0124		X			

Proposal 6 – Housing Need and Requirement

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?					
SK.IAO.0003		X		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.	Comments noted. The infrastructure delivery plan will be updated to support further housing growth.
SK.IAO.0004		X		This is not justified. 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.	SKDC housing needs are for the district based on the standard methodology and is standard set by the Government for assessing housing needs.
SK.IAO.0005		X		This is not justified. 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.	SKDC housing needs are for the district based on the standard methodology and is standard set by the Government for assessing housing needs.
SK.IAO.0007			X	Any housing must be accompanied by work opportunities and infrastructure/service improvements.	Comments noted. The infrastructure delivery plan will be updated to support further housing growth.
SK.IAO.0012		X		Only if it covers all of South Kesteven.	Noted.
SK.IAO.0014		X		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. 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	SKDC published an Annual Position Statement which makes an assessment of the delivery of sites this has been agreed by the Planning Inspectorate as sites are considered deliverable.
SK.IAO.0015				You seem to overlook specific types of accommodation in your allocations, the dwellings should meet the needs of people.	Policy H4 Meeting all housing needs requires all planning applications to meet local housings needs.
Sk.IAO.0016				the dwellings should meet the needs of people.	Policy H4 Meeting all housing needs requires all planning applications to meet local housings needs.
SK.IAO.0017		X		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.	Comments noted, the value of agricultural land is considered as part of the site selection methodology. The distribution of growth is based on relative sustainability.
SK.IAO.0018	X				
SK.IAO.0020	X				
SK.IAO.0022	X				
SK.IAO.0024			X		
SK.IAO.0028	X			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.	The proposals as set out in the White Paper have not been taken forward by the government.
SK.IAO.0030	X				
SK.IAO.0031	X				
SK.IAO.0032	X				

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0034		X		<p>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.</p> <p>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.</p>	Comments noted. The proposals as set out in the White Paper have not been taken forward by the government.
SK.IAO.0035	X				
SK.IAO.0037	X			The Council will need to keep its housing need figure under review as the Government revises its standard calculation method.	Comments noted.
SK.IAO.0038			X	<p>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.</p> <p>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.</p> <p>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."</p>	Comments noted. The standard methodology is the starting point for housing numbers we will also be updating the SHMA.
SK.IAO.0039	X			Provided the figure is based upon a robust and defensible evidence base for housing need.	Comments noted the standard methodology is the starting point for housing numbers we will also be updating the SHMA.
SK.IAO.0040		X		<p>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.</p> <p>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.</p>	Comments noted. The proposals as set out in the White Paper have not been taken forward by the government.
SK.IAO.0042	X			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.	Comments noted the standard methodology is the starting point for housing numbers we will also be updating the SHMA.
SK.IAO.0044			X		
SK.IAO.0047	X				

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0049			X	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.	The SHMA will be provide an updated housing needs assessment which will consider all aspects of the housing market.
SK.IAO.0054		X		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.	Comments noted. The standard methodology is the starting point for housing numbers we will also be updating the SHMA.
SK.IAO.0055	X			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).	Support welcomed.
SK.IAO.0025				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."	Comments noted. Site specific comments on the current local plan but are noted within the Local Plan review.
SK.IAO.0013				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.	Comments noted.
SK.IAO.0029				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.	Comments noted. The standard methodology is the starting point for housing numbers we will also be updating the SHMA. The proposals as set out in the White Paper have not been taken forward by the government.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0036				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?’	The proposed east to west distributor road as part of Stamford North will alleviate traffic problems in an around Stamford. Comments on the Tallington bypass are noted.
SK.IAO.0046		X		The huge impact of present developments is reducing the quality of life for residents and taking large chunks of agricultural land out of production.	Comments noted.
SK.IAO.0050		X		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	As part of the Local Plan review we will be looking at existing available stock and previously developed land as part of the growth strategy to enable the required homes to be delivered.
SK.IAO.0056	X				
SK.IAO.0058				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.	Comments noted. The standard methodology is the starting point for housing numbers we will also be updating the SHMA. The proposals as set out in the White Paper have not been taken forward by the government.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0059				<p>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.</p>	<p>Comments noted. The standard methodology is the starting point for housing numbers we will also be updating the SHMA. The proposals as set out in the White Paper have not been taken forward by the government.</p>
SK.IAO.0060				<p>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.</p>	<p>Comments noted. The standard methodology is the starting point for housing numbers we will also be updating the SHMA. The proposals as set out in the White Paper have not been taken forward by the government.</p>

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0061				<p>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.</p> <p>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.</p>	<p>Comments noted. The standard methodology is the starting point for housing numbers we will also be updating the SHMA. The proposals as set out in the White Paper have not been taken forward by the government.</p>
SK.IAO.0065		X		<p>Example many empty houses and apartments in Grantham - should be a priority to identify and modernise there for families all existing service are at hand.</p>	<p>As part of the Local Plan review we will be looking at existing available stock and previously developed land as part of the growth strategy to enable the required homes to be delivered.</p>
SK.IAO.0066				<p>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.</p> <p>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.</p> <p>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.</p>	<p>Comments noted. The standard methodology is the starting point for housing numbers we will also be updating the SHMA. The assessment of housing needs is set out by the standard methodology and the type of sites and delivery will be assessed as part of an updated housing trajectory.</p>
SK.IAO.0067				<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>The assessment of housing needs is set out by the standard methodology and the type of sites and delivery will be assessed as part of an updated housing trajectory to enable the proposed increase of 16% across the district.</p>

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0068				<p>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.</p> <p>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.</p>	Comments noted. The standard methodology is the starting point for housing numbers we will also be updating the SHMA. The proposals as set out in the White Paper have not been taken forward by the government.
SK.IAO.0069	X				
SK.IAO.0071				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.	Comments noted the most up to date information will be used at submission draft stage.
SK.IAO.0076			X	The answer to this is probably yes, but this needs to be regularly reviewed with emerging data as the Plan review progresses.	Comments noted the most up to date information will be used at submission draft stage.
SK.IAO.0079			X	The answer to this is probably yes, but this needs to be regularly reviewed with emerging data as the Plan review progresses.	Comments noted the most up to date information will be used at submission draft stage.
SK.IAO.0080			X	<p>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.</p> <p>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.</p>	Comments noted. The standard methodology is the starting point for housing numbers we will also be updating the SHMA.
SK.IAO.0083	X			Please see comments at Q.9.	
SK.IAO.0084	X				

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0087		X		<p>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.</p> <p>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.</p> <p>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.</p>	<p>Comments noted. The standard methodology is the starting point for housing numbers we will also be updating the SHMA. The proposals as set out in the White Paper have not been taken forward by the government.</p>
SK.IAO.0089			X		
SK.IAO.0090	X			<p>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.</p> <p>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.</p>	<p>Support welcomed. The standard methodology is the starting point for housing numbers we will also be updating the SHMA. The proposals as set out in the White Paper have not been taken forward by the government.</p>
SK.IAO.0091				<p>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 and 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.</p>	<p>Comments noted. The assessment of housing needs is set out by the standard methodology and the type of sites and delivery will be assessed as part of an updated housing trajectory. To ensure that our housing needs are met across the plan period.</p>

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				<p>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.</p> <p>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: <i>“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”.</i></p> <p>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: <i>“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”.</i></p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	
SK.IAO.0092	X				
SK.IAO.0094	X			<p>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.</p> <p>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.</p> <p>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</p>	Support welcomed. The standard methodology is the starting point for housing numbers we will also be updating the SHMA. The most up to date information will be used at submission draft stage.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				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.	
SK.IAO.0096	X			Dwellings should meet the needs of people e.g. older people and first time buyers	The SHMA will be provide an updated housing needs assessment which will consider all aspects of the housing market.
SK.IAO.0097	X			Dwellings should meet the needs of people e.g. older people and first time buyers	The SHMA will be provide an updated housing needs assessment which will consider all aspects of the housing market.
SK.IAO.0103	X			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.	Comments noted. The distribution of growth within the district and suitability of sites will inform the potential options for the local plan review, larger villages will be considered as part of this process to accommodate this growth.
SK.IAO.0106	X			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).	Comments noted. The standard methodology is the starting point for housing numbers we will also be updating the SHMA. The proposals as set out in the White Paper have not been taken forward by the government. The most up to date information will be used at submission draft stage.
SK.IAO.0108			X	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.	SKDC housing needs are for the district based on the standard methodology and there are no cross-boundary issues in terms of housing needs. The standard methodology is standard for assessing housing needs by the Government.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				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.	
SK.IAO.0110				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.	Comments on support for a plan led system are welcomed. The standard methodology is the starting point for housing numbers we will also be updating the SHMA. The proposals as set out in the White Paper have not been taken forward by the government.
SK.IAO.0111	X				
SK.IAO.0112	X				
SK.IAO.0113	X				
SK.IAO.0114	X				
SK.IAO.0115	X				
SK.IAO.0116	X				
SK.IAO.0117	X				
SK.IAO.0118	X				
SK.IAO.0119	X				
SK.IAO.0120	X				
SK.IAO.0051				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.	Comments noted.
SK.IAO.0072		X		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. 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. 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. 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. If this trend were to continue, then further increases would need to be planned for to make sure that the figure finally adopted	The Government confirmed its position on the Standard Methodology in January 2021. Comments noted. the figures will be updated in line with the most up to date evidence at submission stage. The 238dpa is correct this is an error within the Local Plan. The Annual Position Statement sets out delivery annually, to date there has been no shortfall in delivery against the 650 dpa. Furthermore, SKDC have a Housing Delivery Test result of 99%. As part of the Local Plan Review delivery, the housing trajectory and Strategic Housing Market Assessment will be updated.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				<p>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. 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.</p> <p>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.</p> <p>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 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.</p> <p>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).</p> <p>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. 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.</p>	
SK.IAO.0074		X		<p>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. 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. 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. 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. If this trend were to</p>	<p>The Government confirmed its position on the Standard Methodology in January 2021. Comments noted. the figures will be updated in line with the most up to date evidence at submission stage. The 238dpa is correct this is an error within the Local Plan. The Annual Position Statement sets out delivery annually, to date there has been no shortfall in delivery against the 650 dpa. Furthermore, SKDC have a Housing Delivery Test result of 99%. As part of the Local Plan Review delivery, the housing trajectory and Strategic Housing Market Assessment will be updated.</p>

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				<p>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.</p> <p>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. 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. 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. 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). 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. 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.</p>	
SK.IAO.0075			X	<p>Please see attached. It is too early to confirm the OAN figure.</p> <p>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. 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 example, national work undertaken and published by Nathaniel Lichfield & Partners¹ 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. 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</p>	<p>The Government confirmed its position on the Standard Methodology in January 2021. Comments noted. The figures will be updated in line with the most up to date evidence at submission stage. The 238 dpa is correct this is an error within the Local Plan. The Annual Position Statement sets out delivery annually, to date there has been no shortfall in delivery against the 650 dpa. Furthermore, SKDC have a Housing Delivery Test result of 99%. As part of the Local Plan Review delivery, the housing trajectory and Strategic Housing Market Assessment will be updated.</p>

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				<p>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.</p> <p>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.</p> <p>1 https://lichfields.uk/grow-renew-protect-planning-for-the-future/how-many-homes-the-new-standard-method/</p>	
SK.IAO.0098		X		<p>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.</p>	<p>Comments noted. Existing capacity within the brownfield land register and urban areas will be considered within the Local Plan Review and as site options for delivery of housing need. The types and mix of housing will be informed by an updated Strategic Housing Market Assessment.</p>
SK.IAO.0101				<p>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.</p> <p><u>Location</u> Net Completions April 2011- March 2020 <i>Percentage of District Completions</i></p> <p><u>Grantham</u> 1551 31%</p> <p><u>Stamford</u> 831 17%</p> <p><u>Bourne</u> 1494 30%</p> <p><u>The Deepings</u> 489 9.85%</p> <p>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.</p>	<p>The housing need identified in the adopted Plan is for the plan period 2011-2036. The emerging Local Plan extends the plan period up until 2041, and the housing need is increased from 650 dwellings per year to 754 dwellings per year. As such, further allocations are required across the district, in line with the spatial policy to meet the need identified for the plan period.</p>

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0104		X		<p>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. 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.</p> <p>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. 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. 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. 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. 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. 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. 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 that their latest data). 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. 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</p>	<p>The Government confirmed its position on the Standard Methodology in January 2021. Comments noted. the figures will be updated in line with the most up to date evidence at submission stage. The 238dpa is correct this is an error within the Local Plan. The Annual Position Statement sets out delivery annually, to date there has been no shortfall in delivery against the 650 dpa. Furthermore, SKDC have a Housing Delivery Test result of 99%. As part of the Local Plan Review delivery, the housing trajectory and Strategic Housing Market Assessment will be updated.</p>

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				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. 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.	
SK.IAO.0121	X				
SK.IAO.0078			X	There is no evidence that this increase will have environmental benefits.	Comments noted.
SK.IAO.0088				<p>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.</p>	<p>The Government confirmed its position on the Standard Methodology in January 2021. Comments noted. the figures will be updated in line with the most up to date evidence at submission stage. The 238dpa is correct this is an error within the Local Plan. The Annual Position Statement sets out delivery annually, to date there has been no shortfall in delivery against the 650 dpa. Furthermore, SKDC have a Housing Delivery Test result of 99%. As part of the Local Plan Review delivery, the housing trajectory and Strategic Housing Market Assessment will be updated.</p>

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0107				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 Four: Plan for the increased housing need outlined within Standard Method 2 (839 dwellings per annum) as a minimum.	The Government confirmed its position on the Standard Methodology in January 2021. Comments noted. The figures will be updated in line with the most up to date evidence at submission stage. The 238dpa is correct this is an error within the Local Plan. The Annual Position Statement sets out delivery annually, to date there has been no shortfall in delivery against the 650 dpa. Furthermore, SKDC have a Housing Delivery Test result of 99%. As part of the Local Plan Review delivery, the housing trajectory and Strategic Housing Market Assessment will be updated.
SK.IAO.0124	X				

Proposal 7 – Distribution of Growth

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
Do you agree that Grantham should remain as the focus for growth in South Kesteven?					
SK.IAO.0003		X		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.	Comments noted. It is proposed to utilise the existing settlement hierarchy as the basis for determining the spatial distribution of growth through the Local Plan review.
SK.IAO.0007	X				
SK.IAO.0012	X				
SK.IAO.0014		X		Re-focus on Stamford. 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. 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	Comments noted. The Annual Position Statements (2020) sets out the most up to date deliverability of large sites and allocations. The delivery of housing will be reviewed as part of the housing trajectory. The distribution of growth within the district and suitability of sites will inform the potential options for the local plan review, development in the market towns including Stamford will be considered as part of this process to accommodate this growth.
SK.IAO.0015	X			Yes Grantham should have its 53%	Support welcomed.
SK.IAO.0016	X				
SK.IAO.0017	X			Provided this does not become the only growth area and it is proportioned.	Comments noted.
SK.IAO.0018	X				

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0020		X		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.	Comments noted. The distribution of growth within the district and suitability of sites will inform the potential options for the local plan review, development in the market towns will be considered as part of this process to accommodate this growth.
SK.IAO.0021			X	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.	Comments noted.
SK.IAO.0022	X				
SK.IAO.0024	X			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.	Comments noted.
SK.IAO.0028	X			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	Comments noted.
SK.IAO.0030	X			Whilst this is supported, opportunities within larger villages should be fully explored.	Comments noted.
SK.IAO.0031	X				
SK.IAO.0032	X				
SK.IAO.0034	X				
SK.IAO.0035	X				
SK.IAO.0037			X	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.	It is proposed to utilise the existing settlement hierarchy as the basis for determining the spatial distribution of growth through the Local Plan review. The Council will undertake a survey of services and facilities to review the spatial distribution patterns across all settlements which will be backed up by a robust Sustainability Appraisal.
SK.IAO.0038	X			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: <ul style="list-style-type: none"> • 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. 	Comments noted.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0039	X			Delivery of Spitalgate Garden Village and associated infrastructure to the south east of Grantham, should be regarded as the priority for South Kesteven.	The delivery of housing will be reviewed as part of the housing trajectory.
SK.IAO.0040	X			No specific comments to make.	
SK.IAO.0042	X			It seems to be a reasonable sustainable approach.	Support welcomed.
SK.IAO.0044	X				
SK.IAO.0045	X				
SK.IAO.0047	X				
SK.IAO.0049	X				
SK.IAO.0054		X		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.	It is proposed to utilise the existing settlement hierarchy as the basis for determining the spatial distribution of growth through the Local Plan review. The Council will undertake a survey of services and facilities to review and determine those settlements forming the Larger Villages set out in Policy SP2. We will not be revisiting the settlement hierarchy in terms of the smaller villages as part of the Local Plan review.
SK.IAO.0055	X			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.	Comments noted.
SK.IAO.0029				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.	Support welcomed.
SK.IAO.0036				We agree.	Support welcomed.
SK.IAO.0050		X		The answer to Q6 means we do not agree with the proposals in Q7 about foci for growth. 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	Comment noted. As part of the Local Plan review, we will be looking at existing available stock and previously developed land as part of the growth strategy to enable the required homes to be delivered.
SK.IAO.0056	X				

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0061				<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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).</p> <p>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.</p> <p>Recommendation Four: Continue to direct much of the Districts required growth to Grantham.</p> <p>Recommendation Five: Allocate the Land at Heath Farm (South of Harrowby Lane) to accommodate up to 1900 dwellings.</p>	Support welcomed. All sites will be assessed as part of the Local Plan Review.
SK.IAO.0065	X				
SK.IAO.0066				<p>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.</p> <p>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.</p>	Support welcomed. All sites will be assessed as part of the Local Plan Review.
SK.IAO.0068				<p>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. 4 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</p>	Support welcomed. All sites will be assessed as part of the Local Plan Review.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				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	
SK.IAO.0069	X				
SK.IAO.0076	X			Subject to there being flexibility in other locations as referred to previously.	
SK.IAO.0079	X			Subject to there being flexibility in other locations as referred to previously.	
SK.IAO.0080	X			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.	Whilst a percentage for growth is attributed to each category of settlement, additional growth is permitted in accordance with policies SP2-SP5.
SK.IAO.0083	X				
SK.IAO.0084	X			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.	Comments noted.
SK.IAO.0089	X			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.	Comments noted.
SK.IAO.0091				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 the 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.	Support welcomed. Stamford North is an allocated site which is considered deliverable. A review of all allocations will be undertaken as part of the updated trajectory and all sites considered as part of the Local Plan review. An Employment Land Review is to be prepared to inform the Local Plan Review.
SK.IAO.0092	X				
SK.IAO.0094	X				
SK.IAO.0096	X				
SK.IAO.0097	X				

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0103	X			Provided more is done to promote leisure and entertainment facilities and supporting infrastructure is improved.	Comments noted.
SK.IAO.0106	X			<p>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.</p> <p>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.</p> <p>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.</p>	Comments noted. All sites will be assessed as part of the Local Plan Review. The consideration of relative sustainability of larger villages will be updated and the site assessment methodology will be evaluated as part of the Local Plan review.
SK.IAO.0108		X		<p>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.</p> <p>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.</p>	The Settlement Hierarchy is proposed to be retained through the Local Plan Review to ensure that development is directed to the most sustainable locations.
SK.IAO.0110	X			Yes	
SK.IAO.0111	X				
SK.IAO.0112		X		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.	Comments noted.
SK.IAO.0113		X		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.	Comments noted.
SK.IAO.0114		X		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.	Comments noted.
SK.IAO.0115		X		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.	Comments noted.
SK.IAO.0116		X		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.	Comments noted.
SK.IAO.0117		X		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.	Comments noted.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0118		X		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.	Comments noted.
SK.IAO.0119		X		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.	Comments noted.
SK.IAO.0120		X		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.	Comments noted.
SK.IAO.0072	X			<p>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. 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.</p> <p>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. 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.</p>	Comments noted. Paragraph 68 of the NPPF refers to small and medium sized sites whereby 10% of the housing requirement on sites no larger than 1 ha the Local Plan Review will be in conformity with national policy.
SK.IAO.0074	X			<p>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. 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. 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. 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.</p>	Support welcomed.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0075			X	<p>In the context of increased housing need, 'more of the same' may not be the most appropriate strategy. Please see attached. South Kesteven's adopted Local Plan sets out the following targets</p> <ul style="list-style-type: none"> • 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. <p>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.</p> <p>Based on previous Local Plan reviews, the planning strategy options are likely to include some or all of the following:</p> <ul style="list-style-type: none"> • 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. <p>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 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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	Comments noted. Any future allocations will consider the relative sustainability of the settlement as well as identify constraints. All future options for future development will be available to comment at the draft plan stage. SKDC under the duty to cooperate is required to assess our own housing requirement as set out by the standard methodology as well as any arising cross boundary housing needs throughout the Local Plan review. Ongoing engagement will be undertaken with all neighbouring local authorities to ensure that the duty to cooperate is met. Should housing needs increase more than the 745 this will be considered as part of the Local Plan review however currently there are no arising needs of neighbouring authorities.
SK.IAO.0098	X				
SK.IAO.0121	X				
SK.IAO.0078			X	<p>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</p>	Not relevant to question.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0088				<p>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.</p> <p>4</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Recommendation Five: Continue to direct much of the Districts required growth to Grantham.</p> <p>Recommendation Six: Allocate the Land to the North of Harrowby Lane.</p>	Support welcomed. All sites will be assessed as part of the Local Plan Review.
SK.IAO.0107				<p>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.</p>	Support welcomed. All identified development sites will be assessed as part of the Local Plan Review.
SK.IAO.0124		X		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.	Comments noted.
SK.IAO.0003		X			
SK.IAO.0004		X		From a Bourne perspective we are already above the housing quota so this is not justified.	Comments noted. SKDC housing needs are for the district based on the standard methodology and is standard set by the Government for assessing housing needs.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0005		X		From a Bourne perspective we are already above the housing quota so this is definitely not justified. Any growth should be limited to Elsea Park area where residents are exposed and more expecting to further building and not in areas where residents invested and chose properties in an area more quiet and calm (such as North of Bourne) is unfair and make investing to live in Bourne less attractive. Questions why you would chose to buy and live in Bourne if planning allowed unwanted growth everywhere.	Comments noted. SKDC housing needs are for the district based on the standard methodology and is standard set by the Government for assessing housing needs.
SK.IAO.0007			X	Agree if there is the combined jobs, sevicees and infrastructure.	Comments noted. The infrastructure delivery plan will be updated to support further housing growth.
SK.IAO.0012	X				
SK.IAO.0014	X			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. 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. Given the reduction in SKDC's housing land supply, Bourne allocations must be revisited and the aforementioned site allocated for development. 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.	Neighbourhood Plans are permitted to make land allocations, and once 'Made' will form part of the development plan. The Bourne Neighbourhood Plan is to make sufficient, suitable and sustainable allocations to meet Bourne's housing requirement as set out in the adopted Local Plan. Should the Neighbourhood Plan not do this within the first five years of the Local Plan being adopted, the Local Plan will make the required allocations through its first review.
SK.IAO.0015		X		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.	SKDC housing needs are for the district based on the standard methodology and is standard set by the Government for assessing housing needs. The infrastructure delivery plan will be updated to support further housing growth.
SK.IAO.0016				Bourne has delivered 30% of your housing since 2011, its has not received compatible infrastructure growth. Services are burdened and broken.	SKDC housing needs are for the district based on the standard methodology and is standard set by the Government for assessing housing needs. The infrastructure delivery plan will be updated to support further housing growth.
SK.IAO.0017			X		
SK.IAO.0018			x		
SK.IAO.0020		X		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. 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.	Comments noted. The distribution of growth within the district and suitability of sites will inform the potential options for the local plan review, development in the market towns will be considered as part of this process to accommodate this growth.
SK.IAO.0021			X	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.	Comments noted.
SK.IAO.0022	X				
SK.IAO.0024	X				
SK.IAO.0028	X				
SK.IAO.0030	X			Whilst this is supported, opportunities within larger villages should be fully explored (see response to Q7c below).	Comments noted.
SK.IAO.0031	X				
SK.IAO.0032	X				
SK.IAO.0034	X				
SK.IAO.0035	X				

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0037			X	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.	It is proposed to utilise the existing settlement hierarchy as the basis for determining the spatial distribution of growth through the Local Plan review. The Council will undertake a survey of services and facilities to review the spatial distribution patterns across all settlements which will be backed up by a robust Sustainability Appraisal.
SK.IAO.0039	X			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.	Comments noted. The distribution of growth within the district and suitability of sites will inform the potential options for the local plan review, development in the market towns will be considered as part of this process to accommodate this growth. As part of meeting the Duty to Cooperate East Northamptonshire will be engaged to consider any cross boundary or strategic policy issues.
SK.IAO.0040	X			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	The Council notes the respondent's comments on the site at Newstead Farm. All sites officially submitted through the Local Plan Review and the Call for Sites process will be assessed through the review of the Local Plan.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				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.	
SK.IAO.0042	X			It seems to be a reasonable sustainable approach.	Support welcomed.
SK.IAO.0044	X			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.	Comments noted. The infrastructure delivery plan will be updated to support further housing growth.
SK.IAO.0045		X		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.	Comments noted. The distribution of growth within the district and suitability of sites will inform the potential options for the local plan review, development in the market towns will be considered as part of this process to accommodate this growth. The infrastructure delivery plan will be updated to support further housing growth.
SK.IAO.0047	X			n/a	
SK.IAO.0049	X			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.	Comments noted. Sustainable development is about housing and employment and balance of all social economic environmental needs, and housing and jobs will be assessed to ensure that growth is sustainable.
SK.IAO.0054		X		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.	It is proposed to utilise the existing settlement hierarchy as the basis for determining the spatial distribution of growth through the Local Plan review. The Council will undertake a survey of services and facilities to review and determine those settlements forming the Larger Villages set out in Policy SP2. We will not be revisiting the settlement hierarchy in terms of the smaller villages as part of the Local Plan review. Paragraph 68 of the NPPF refers to small and medium sized sites whereby 10% of the housing requirement on sites no larger than 1 ha the Local Plan Review will be in conformity with national policy.
SK.IAO.0055	X			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.	Comments noted. The distribution of growth within the district and suitability of sites will inform the potential options for the local plan review, development in the market towns will be considered as part of this process to accommodate this growth.
SK.IAO.0013				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.	Support welcomed.
SK.IAO.0036				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.	SKDC housing needs are for the district based on the standard methodology and is standard set by the Government for assessing housing needs. The infrastructure delivery plan will be updated to support further housing growth.
SK.IAO.0046		X		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.	Comments noted. The infrastructure delivery plan will be updated to support further housing growth.
SK.IAO.0056	X				
SK.IAO.0057	X			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.	Support noted. The infrastructure delivery plan will be updated to support further housing growth.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				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.	
SK.IAO.0065	X				
SK.IAO.0066				Yes, we agree Stamford should remain as a focus for growth.	Support welcomed.
SK.IAO.0067				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.	Comments noted. The infrastructure delivery plan will be updated to support further housing growth.
SK.IAO.0069	X				
SK.IAO.0071				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).	Comments noted. All proposed new sites will be assessed as part of the strategic housing land availability assessment study. The assessment of housing needs is set out by the standard methodology and the type of sites and delivery will be assessed as part of an updated housing trajectory.
SK.IAO.0076	X			Subject to there being flexibility in other locations as referred to previously.	Comments noted.
SK.IAO.0079	X			Subject to there being flexibility in other locations as referred to previously.	Comments noted.
SK.IAO.0080	X			Please see response to Q7a	
SK.IAO.0081			X		
SK.IAO.0083	X				
SK.IAO.0084		X		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.	Comments noted. The proposed east to west distributor road as part of Stamford North will alleviate traffic problems in an around Stamford. The infrastructure delivery plan will be updated to support further housing growth.
SK.IAO.0089		X		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.	Comments noted. Any future allocations will consider the relative sustainability of the settlement as well as identify constraints. All future options for future development will be available to comment at the draft plan stage.
SK.IAO.0090	X			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.	Comments noted.
SK.IAO.0091				Stamford should indeed be a focus for growth as set out in more detail above.	Comments noted.
SK.IAO.0092	X				

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0094	X			<p>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.</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 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.</p>	Neighbourhood Plans are permitted to make land allocations, and once 'Made' will form part of the development plan. The Bourne Neighbourhood Plan is to make sufficient, suitable and sustainable allocations to meet Bourne's housing requirement as set out in the adopted Local Plan. Should the Neighbourhood Plan not do this within the first five years of the Local Plan being adopted, the Local Plan will make the required allocations through its first review.
SK.IAO.0096		X		Because of the lack of infrastructure and facilities growth. To many empty business premises	Comments noted. It is proposed to utilise the existing settlement hierarchy as the basis for determining the spatial distribution of growth through the Local Plan review. The Council will undertake a survey of services and facilities to review the spatial distribution patterns across all settlements which will be backed up by a robust Sustainability Appraisal. The infrastructure delivery plan will be updated to support further housing growth.
SK.IAO.0097		X		Because of the lack of infrastructure and facilities growth. To many empty business premises	Comments noted. It is proposed to utilise the existing settlement hierarchy as the basis for determining the spatial distribution of growth through the Local Plan review. The Council will undertake a survey of services and facilities to review the spatial distribution patterns across all settlements which will be backed up by a robust Sustainability Appraisal. The infrastructure delivery plan will be updated to support further housing growth.
SK.IAO.0103	X				
SK.IAO.0105			X		
SK.IAO.0106		X		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.	Comments noted.
SK.IAO.0108	X			See above Grantham should not take on disproportionate allocations – 53% (or even 50%) is disproportionate, especially given the	Comments noted. The distribution of growth within the district and suitability of sites will inform the potential options for the local plan review, development in the market towns will be considered as part

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				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.	of this process to accommodate this growth. The infrastructure delivery plan will be updated to support further housing growth.
SK.IAO.0110	X			Yes	
SK.IAO.0111	X				
SK.IAO.0112	X				
SK.IAO.0113	X				
SK.IAO.0114	X				
SK.IAO.0115	X				
SK.IAO.0116	X				
SK.IAO.0117	X				
SK.IAO.0118	X				
SK.IAO.0119	X				
SK.IAO.0120	X				
SK.IAO.0051				<p>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.</p> <p>Table 1: 1 April 2011-31 March 2018 Completions by year and settlement</p> <p>Table 2: Local Plan: Housing Need, Intial Spatial Distribution across the District and Proposed Housing Supply, 2018-41.</p> <p>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.</p>	Comments noted. The distribution of growth within the district and suitability of sites will inform the potential options for the local plan review, development in the market towns will be considered as part of this process to accommodate this growth.
SK.IAO.0072	X			<p>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. 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. 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.</p>	Comments noted. The Annual Position Statements (2020) sets out the most up to date deliverability of large sites and allocations. The delivery of housing will be reviewed as part of the housing trajectory. The distribution of growth within the district and suitability of sites will inform the potential options for the local plan review, development in the market towns including Stamford will be considered as part of this process to accommodate this growth.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0075			X	<p>In the context of increased housing need, 'more of the same' may not be the most appropriate strategy. Please see attached. South Kesteven's adopted Local Plan sets out the following targets</p> <ul style="list-style-type: none"> • 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. <p>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. Based on previous Local Plan reviews, the planning strategy options are likely to include some or all of the following:</p> <ul style="list-style-type: none"> • 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. 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 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. 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. 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. 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. 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. 	<p>Comments noted. Any future allocations will consider the relative sustainability of the settlement as well as identify constraints. All future options for future development will be available to comment at the draft plan stage. SKDC under the duty to cooperate is required to assess our own housing requirement as set out by the standard methodology as well as any arising cross boundary housing needs throughout the Local Plan review. Ongoing engagement will be undertaken with all neighbouring local authorities to ensure that the duty to cooperate is met. Should housing needs increase more than the 745 this will be considered as part of the Local Plan review however currently there are no arising needs of neighbouring authorities.</p>

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0101				<p>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.</p> <p>Location Net Completions April 2011- March 2020</p> <p>Percentage of District Completions</p> <p>Grantham 1551 31%</p> <p>Stamford 831 17%</p> <p>Bourne 1494 30%</p> <p>The Deepings 489 9.85%</p> <p>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.</p> <p>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.</p>	<p>The Bourne Neighbourhood Plan is to make sufficient, suitable and sustainable allocations to meet Bourne's housing requirement as set out in the adopted Local Plan. Should the Neighbourhood Plan not do this within the first five years of the Local Plan being adopted, the Local Plan will make the required allocations through its first review. The Settlement Hierarchy is intended to be retained through the Local Plan Review which identifies Bourne as a sustainable location for growth.</p>

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0104	X			<p>As outlined above, it is agreed that the existing settlement hierarchy is an appropriate mechanism for directing development to the most sustainable locations.</p> <p>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.</p> <p>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</p> <p>Biodiversity and geodiversity</p> <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. 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> <p>Landscape</p> <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 'opportunities could exist in certain locations around the edge of existing settlements for some areas of new development', including our clients site at Land off Lincoln Road, Market Deeping.</p> <p>Historic environment</p> <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> <p>Air, land, water and soil resources</p> <p>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.</p> <p>Climate Change</p> <p>Whilst the assessment is inconclusive it does state that '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'. With regards to flooding, whilst there are areas in the market towns and more specifically The Deepings</p>	Comments noted.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				<p>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.</p> <p>Population and community We concur with the assessment which reads as follows; ‘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.’</p> <p>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.</p> <p>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.</p> <p>Economic vitality We agree with the assessment on economic viability which concludes that ‘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.’</p> <p>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).</p> <p>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.</p> <p>The assessment outlined that the site has the potential to deliver;</p> <ul style="list-style-type: none"> · 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); <p>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;</p> <ul style="list-style-type: none"> · 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. 	

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				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.'	
SK.IAO.0121	X			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.	Comments noted. Any future allocations will consider the relative sustainability of the settlement as well as identify constraints. All future options for future development will be available to comment at the draft plan stage.
SK.IAO.0078			X	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.	Comments noted. The infrastructure delivery plan will be updated to support further housing growth.
SK.IAO.0124	X				
SK.IAO.0003			X		
SK.IAO.0006	X				
SK.IAO.0007	X				
SK.IAO.0011		X		If LSCs have 10% of the overall new housing there should be a fair and reasonable spread across the 15 LSCs.	Comment Noted
SK.IAO.0012			X		
SK.IAO.0014	X			See above comments on the settlement Hierarchy - the selection/qualifying process is to constraining	

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0015				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?	It is proposed to utilise the existing settlement hierarchy as the basis for determining the spatial distribution of growth through the Local Plan review. The Council will undertake a survey of services and facilities to review and determine those settlements forming the Larger Villages set out in Policy SP2. It is proposed that these villages will have the level of services and facilities to support growth and they will be consulted on accordingly.
SK.IAO.0016	X				
SK.IAO.0017			X		
SK.IAO.0018	X				
SK.IAO.0021			X	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	Comments noted.
SK.IAO.0022	X				
SK.IAO.0024			X	As long as quality impact assessments are undertaken and there is the infrastructure to support these proposals	Comments noted. An SA is being produced as part of the Local Plan review along with and update to the infrastructure delivery plan.
SK.IAO.0028	X				
SK.IAO.0030	X			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.	Comments noted. The consideration of relative sustainability of larger villages will be updated and the site assessment methodology will be evaluated as part of the Local Plan review. Furthermore, all sites will be assessed on their own merits as part of the Local Plan Review.
SK.IAO.0031	X				
SK.IAO.0032	X				
SK.IAO.0034	X				
SK.IAO.0035	X				
SK.IAO.0037			X	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.	It is proposed to utilise the existing settlement hierarchy as the basis for determining the spatial distribution of growth through the Local Plan review. The Council will undertake a survey of services and facilities to review the spatial distribution patterns across all settlements which will be backed up by a robust Sustainability Appraisal.
SK.IAO.0039	X			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.	Comments noted.
SK.IAO.0040	X			No specific comments to make.	
SK.IAO.0042	X			It seems to be a reasonable sustainable approach.	Support noted

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0043		X		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.	The Council will undertake a survey of services and facilities to review and determine those settlements forming the Larger Villages set out in Policy SP2. Plans for the Retail outlet village are situated off the A1 and traffic mitigation measures for the scheme have been reviewed within the specific planning application. Proposed allocations are not based on any specific housing type and all proposed future allocations will be expected to provide a variety of housing types to suit each settlements needs.
SK.IAO.0044	X				
SK.IAO.0045		X		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.	Comments noted
SK.IAO.0047		X		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	The site assessment methodology will be evaluated as part of the Local Plan review. This will consider the SA. Comments noted on the interim SA however the report also notes that Larger Villages could potentially accommodate increased levels of growth without necessarily leading to adverse impacts.
SK.IAO.0049			X	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!	Comments noted. The Council must continue to allocate sites to meet housing targets set by National Government.
SK.IAO.0054		X		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.	It is proposed to utilise the existing settlement hierarchy as the basis for determining the spatial distribution of growth through the Local Plan review. The Council will undertake a survey of services and facilities to review and determine those settlements forming the Larger Villages set out in Policy SP2. We will not be revisiting the settlement hierarchy in terms of the smaller villages as part of the Local Plan review.
SK.IAO.0055	X			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.	Comments noted
SK.IAO.0056	X				
SK.IAO.0059				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	Comments noted. The consideration of relative sustainability of larger villages will be updated and the site assessment methodology will be evaluated as part of the Local Plan review. Furthermore, all sites will be assessed on their own merits as part of the Local Plan Review.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				<p>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</p> <p>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 4 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</p> <p>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 5 In summary, the Land at Old Post Lane presents and 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.</p>	
SK.IAO.0065	X				
SK.IAO.0069	X				
SK.IAO.0076	X			Subject to there being greater opportunity in other villages as indicated below.	Comments noted
SK.IAO.0079	X			Subject to there being greater opportunity in other villages as indicated below.	Comments noted
SK.IAO.0080	X			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. - Whilst development should be directed to the most sustainable	Whilst a percentage for growth is attributed to each category of settlement, additional growth is permitted in accordance with policies SP2-SP5.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				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.	
SK.IAO.0081			X		
SK.IAO.0083	X				
SK.IAO.0084	X				
SK.IAO.0087	X			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.	Comments noted. The consideration of relative sustainability of larger villages will be updated and the site assessment methodology will be evaluated as part of the Local Plan review. Furthermore, all sites will be assessed on their own merits as part of the Local Plan Review.
SK.IAO.0089	X				
SK.IAO.0090				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.	Comments noted. Allocations through the neighbourhood plans process is supported should sites come forward through NP's this will be considered as part of the Local Plan Review.
SK.IAO.0092	X				
SK.IAO.0094	X				
SK.IAO.0096	X				
SK.IAO.0097	X				
SK.IAO.0103		X		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.	
SK.IAO.0106	X			Please see response above to Question 7a 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.	Comments noted. All sites will be assessed as part of the Local Plan Review. The consideration of relative sustainability of larger villages will be updated and the site assessment methodology will be evaluated as part of the Local Plan review.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				<p>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.</p> <p>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.</p>	
SK.IAO.0108			X	<p>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.</p> <p>Please see above for comments about the Larger Village definition methodology.</p> <p>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?</p>	SKDC housing needs are for the district based on the standard methodology and there are no cross-boundary issues in terms of housing needs. The standard methodology is standard for assessing housing needs by the Government.
SK.IAO.0110	X			Yes	Comment Noted
SK.IAO.0111	X			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.	Comment noted
SK.IAO.0112	X				
SK.IAO.0113	X				
SK.IAO.0114	X				
SK.IAO.0115	X				
SK.IAO.0116	X				
SK.IAO.0117	X				
SK.IAO.0118	X				
SK.IAO.0119	X				
SK.IAO.0120	X				
SK.IAO.0072	X			<p>Considering the apparent constraint to Stamford and the number of Large Villages 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.</p> <p>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.</p>	Comments noted. The Annual Position Statements (2020) sets out the most up to date deliverability of large sites and allocations. The delivery of housing will be reviewed as part of the housing trajectory. The distribution of growth within the district and suitability of sites will inform the potential options for the local plan review, development in the market towns including Stamford will be considered as part of this process to accommodate this growth.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0075			X	<p>In the context of increased housing need, 'more of the same' may not be the most appropriate strategy. Please see attached. South Kesteven's adopted Local Plan sets out the following targets</p> <ul style="list-style-type: none"> • 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. <p>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.</p> <p>Based on previous Local Plan reviews, the planning strategy options are likely to include some or all of the following:</p> <ul style="list-style-type: none"> • 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. <p>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 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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	The Government confirmed its position on the Standard Methodology in January 2021. Comments noted. the figures will be updated in line with the most up to date evidence at submission stage. The 238dpa is correct this is an error within the Local Plan. The Annual Position Statement sets out delivery annually, to date there has been no shortfall in delivery against the 650 dpa. Furthermore, SKDC have a Housing Delivery Test result of 99%. As part of the Local Plan Review delivery, the housing trajectory and Strategic Housing Market Assessment will be updated.
SK.IAO.0121	X				
SK.IAO.0078		X		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.	Comments noted. The infrastructure delivery plan will be updated to support further housing growth.
SK.IAO.0124	X				
SK.IAO.0003	X				
SK.IAO.0006		X		Most small villages need more development to support existing services. Covid-19 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	Comments noted. The NPPF, site selection methodology and SA regulations define what is considered sustainable development.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				developments 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.	
SK.IAO.0007	X				
SK.IAO.0012	X				
SK.IAO.0014		X		Both routes through to the delivery of housing should be properly explored at the Plan Making stage - allocation AND windfall sites.	Comments noted.
SK.IAO.0015		X		Windfalls are always selective and do not reflect a range of housing types and demographics. Elitist living.	Comments noted. Current and future applications will have to demonstrate how the mix and tenure aligns with meeting all housing needs as evidenced by the Strategic Housing Market Assessment.
SK.IAO.0017	X				
SK.IAO.0018	X				
SK.IAO.0022	X				
SK.IAO.0024	X			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.	Comments noted. Windfall sites are assessed against all policies within the Local Plan. The NPPF, site selection methodology and SA regulations define what is considered sustainable development.
SK.IAO.0028	X				
SK.IAO.0030	X			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.	Support welcomed. The NPPF, site selection methodology and SA regulations define what is considered sustainable development.
SK.IAO.0031		X		A blanket ban on the use of allocations in smaller settlement 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.	Windfall development will enable some development to come forward in the smaller villages, however comments on allocations in the smaller villages are noted.
SK.IAO.0032		X		A blanket ban on the use of allocations in smaller settlement 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.	Windfall development will enable some development to come forward in smaller villages, however comments on allocations in the smaller villages are noted.
SK.IAO.0034		X		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.	Windfall development will enable some development to come forward in smaller villages, however comments on allocations in the smaller villages are noted.
SK.IAO.0035	X				
SK.IAO.0037	X				
SK.IAO.0039			X	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	Comments noted.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				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.	
SK.IAO.0040			X	No specific comments to make.	
SK.IAO.0042	X			Windfall sites will proportionate an adequate level of growth in these smaller settlements.	Support welcomed.
SK.IAO.0044	X				
SK.IAO.0047		X		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.	Support welcomed. Comments noted, a windfall allowance of 10% is nationally accepted within Local Plans to enable small scale development to come forward. SKDC has an allowance for 30 dwellings per annum.
SK.IAO.0049	X				
SK.IAO.0052		X		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.	Comments noted. The NPPF, site selection methodology and SA regulations define what is considered sustainable development. Support welcomed for the continuation of current Local Plan policy. Comments noted, a windfall allowance of 10% is nationally accepted within Local Plans to enable small scale development to come forward.
SK.IAO.0054		X		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.	Comments noted. The Housing trajectory, the mix of allocations in terms of size and distribution will be reassessed as part of the Local Plan Review. the deliverability of sites and the delivery of the overall housing requirement will also be assessed to ensure the Local Plan Review is sound and in conformity with national planning guidance.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0055		X		<p>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.</p> <p>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.</p> <p>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.</p>	Comments noted. Paragraph 68 of the NPPF refers to small and medium sized sites whereby 10% of the housing requirement on sites no larger than 1 ha this is in reference to the potential for allocations within the local plan rather than windfall. Comments on 'local people' and SP4 noted.
SK.IAO.0036				We agree.	Comment noted.
SK.IAO.0056			X	It may be acceptable to allocate housing development in smaller settlements that fulfil Zero Carbon criteria, with the agreement of the Parish Council.	Comments noted.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0058				<p>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.</p> <p>Land at Grange Farm, Carlby</p> <p>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. 5 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</p>	<p>The current Settlement Hierarchy supports the spatial strategy by focusing development at locations with good levels of services and facilities and to provide clarity for investment throughout South Kesteven. It is recognised however, that smaller communities should positively respond to local housing need. As such, the policy in the adopted plan is suitably more permissive than in previous iterations of the Local Plan – allowing small, sensitive infill.</p> <p>Through an audit of village services and facilities, the villages within the Settlement Hierarchy will be reviewed to ensure the villages are still within the most suitable categories.</p> <p>Sites are invited to be submitted to the Council through our Call for Sites. More information can be found here.</p>

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				<p>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.</p> <p>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 6 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.</p>	
SK.IAO.0060				<p>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. 4 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</p>	<p>The current Settlement Hierarchy supports the spatial strategy by focusing development at locations with good levels of services and facilities and to provide clarity for investment throughout South Kesteven. It is recognised however, that smaller communities should positively respond to local housing need. As such, the policy in the adopted plan is suitably more permissive than in previous iterations of the Local Plan – allowing small, sensitive infill.</p> <p>Through an audit of village services and facilities, the villages within the Settlement Hierarchy will be reviewed to ensure the villages are still within the most suitable categories.</p> <p>Sites are invited to be submitted to the Council through our Call for Sites. More information can be found here.</p>

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				<p>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 5 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 and 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.</p>	
SK.IAO.0065		X		These become exclusive and very expensive places to live. Local People who would work in those areas not able to afford to compete.	Comments noted.
SK.IAO.0069	X				

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0076		X		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.	The current Settlement Hierarchy supports the spatial strategy by focusing development at locations with good levels of services and facilities and to provide clarity for investment throughout South Kesteven. It is recognised however, that smaller communities should positively respond to local housing need. As such, the policy in the adopted plan is suitably more permissive than in previous iterations of the Local Plan – allowing small, sensitive infill. Through an audit of village services and facilities, the villages within the Settlement Hierarchy will be reviewed to ensure the villages are still within the most suitable categories.
SK.IAO.0079		X		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.	The current Settlement Hierarchy supports the spatial strategy by focusing development at locations with good levels of services and facilities and to provide clarity for investment throughout South Kesteven. It is recognised however, that smaller communities should positively respond to local housing need. As such, the policy in the adopted plan is suitably more permissive than in previous iterations of the Local Plan – allowing small, sensitive infill. Through an audit of village services and facilities, the villages within the Settlement Hierarchy will be reviewed to ensure the villages are still within the most suitable categories.
SK.IAO.0080		X		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.	Comments noted. Paragraph 68 of the NPPF refers to small and medium sized sites whereby 10% of the housing requirement on sites no larger than 1 ha the Local Plan Review will be in conformity with national policy.
SK.IAO.0081			X		
SK.IAO.0083	X			Please see comments at Q.9	
SK.IAO.0084	X				
SK.IAO.0087		X		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.	Comments noted. Paragraph 68 of the NPPF refers to small and medium sized sites whereby 10% of the housing requirement on sites no larger than 1 ha the Local Plan Review will be in conformity with national policy.
SK.IAO.0089			X		

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SK.IAO.0090				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.	Comments noted.
SK.IAO.0092	X				
SK.IAO.0096		X			
SK.IAO.0097		X			
SK.IAO.0103		X		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.	Comments noted. The NPPF, site selection methodology and SA regulations define what is considered sustainable development.
SK.IAO.0106	X				
SK.IAO.0108		X		All settlements should contribute to some degree on a planned basis – not just as 'windfall'.	Comments noted.
SK.IAO.0110	X			Agree not appropriate to make allocations, however should use Neighbourhood plan to support development areas.	Comments noted.
SK.IAO.0111	X				
SK.IAO.0112		X		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.	Windfall, brownfield and infill development is currently supported by the Local Plan. Comments noted, SP3 will be considered to be included within the Local Plan Review.
SK.IAO.0113		X		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.	Windfall, brownfield and infill development is currently supported by the Local Plan. Comments noted, SP3 will be considered to be included within the Local Plan Review.
SK.IAO.0114		X		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.	Windfall, brownfield and infill development is currently supported by the Local Plan. Comments noted, SP3 will be considered to be included within the Local Plan Review.
SK.IAO.0115		X		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.	Windfall, brownfield and infill development is currently supported by the Local Plan. Comments noted, SP3 will be considered to be included within the Local Plan Review.
SK.IAO.0116		X		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.	Windfall, brownfield and infill development is currently supported by the Local Plan. Comments noted, SP3 will be considered to be included within the Local Plan Review.
SK.IAO.0117		X		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.	Windfall, brownfield and infill development is currently supported by the Local Plan. Comments noted, SP3 will be considered to be included within the Local Plan Review.
SK.IAO.0118		X		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.	Windfall, brownfield and infill development is currently supported by the Local Plan. Comments noted, SP3 will be considered to be included within the Local Plan Review.
SK.IAO.0119		X		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.	Windfall, brownfield and infill development is currently supported by the Local Plan. Comments noted, SP3 will be considered to be included within the Local Plan Review.

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SK.IAO.0120		X		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.	Windfall, brownfield and infill development is currently supported by the Local Plan. Comments noted, SP3 will be considered to be included within the Local Plan Review.
SK.IAO.0075			X	<p>In the context of increased housing need, 'more of the same' may not be the most appropriate strategy. Please see attached. South Kesteven's adopted Local Plan sets out the following targets</p> <ul style="list-style-type: none"> • 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. <p>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.</p> <p>Based on previous Local Plan reviews, the planning strategy options are likely to include some or all of the following:</p> <ul style="list-style-type: none"> • 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. <p>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 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. 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.</p> <p>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. 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.</p> <p>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.</p>	Comments noted. It is proposed to utilise the existing settlement hierarchy as the basis for determining the spatial distribution of growth through the Local Plan review. The Council will undertake a survey of services and facilities to review and determine those settlements forming the Larger Villages set out in Policy SP2. SKDC under the duty to cooperate is required to assess our own housing requirement as set out by the standard methodology as well as any arising cross boundary housing needs throughout the Local Plan review. Ongoing engagement will be undertaken with all neighbouring local authorities to ensure that the duty to cooperate is met. Should housing needs increase more than the 745 this will be considered as part of the Local Plan review however currently there are no arising needs of neighbouring authorities.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0093		X		<p>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.</p> <p>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.</p> <p>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. 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. 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. 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. 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.</p> <p>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. 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.</p>	<p>Support for the SA and Settlement Hierarchy welcomed. Windfall, brownfield and infill development is currently supported by the Local Plan. Comments noted, SP3 will be considered to be included within the Local Plan Review. However, in addition to windfall, SP4 allows, subject to the policy, sites to come forward on the edge of settlements. Growth which is acceptable under SP4 is in addition to the 4% within the smaller villages and allows for flexibility of development within the smaller villages.</p>
SK.IAO.0121	X				
SK.IAO.0078		X		<p>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.</p> <p>The sustainability of these villages would benefit from further development as their locations are sufficiently distant from Sleaford and Grantham.</p> <p>Growth in these villages would also be supported by NPPF (2019) para. 78.</p>	<p>It is proposed to utilise the existing settlement hierarchy as the basis for determining the spatial distribution of growth through the Local Plan review. The Council will undertake a survey of services and facilities to review and determine those settlements forming the Larger Villages set out in Policy SP2.</p>

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0124		X		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.	Windfall, brownfield and infill development is currently supported by the Local Plan. Comments noted, SP3 will be considered to be included within the Local Plan Review.
SK.IAO.0003	X				
SK.IAO.0006	X			<p>planning is almost totally reliant on private developers to meet existing needs.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	General comments noted.
SK.IAO.0007	X			Planning for any medium/large developments should only be approved when shown to be XXX. No development on productive agricultural land.	Comments noted.
SK.IAO.0012	X				
SK.IAO.0014	X				
SK.IAO.0015		X		People before developers.	Comments noted.
SK.IAO.0016				people before developers.	Comments noted.
SK.IAO.0017	X			Housing growth levels needs to be considered along with employment and amenities.	Comments noted. Sustainable development is about housing and employment and balance of all social economic environmental needs, and housing and jobs will be assessed to ensure that growth is sustainable.
SK.IAO.0018	X				
SK.IAO.0022	X				
SK.IAO.0024			X		
SK.IAO.0028	X				
SK.IAO.0030	X				
SK.IAO.0031		X		The ability of developers to successfully develop new homes in an area is 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.	Comments noted.
SK.IAO.0032		X		The ability of developers to successfully develop new homes in an area is 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.	Comments noted.
SK.IAO.0034			X		
SK.IAO.0035	X			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	Comments noted. Any future allocations will consider the relative sustainability of the settlement as well as identify constraints. All

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				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.	future options for future development will be available to comment at the draft plan stage.
SK.IAO.0037	X				
SK.IAO.0039	X			These measures should feature significantly in the strategic housing market assessment, together with development constraints (at a sub-district/ settlement specific level).	Comments noted. The SHMA will be updated as part of the Local Plan Review.
SK.IAO.0040			X	No specific comments to make.	
SK.IAO.0042	X			No reason to ignore this evidence. Consideration of these elements would bring a more robust evidence base to support the overall distribution.	Comments noted.
SK.IAO.0044		X		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 who pure aim is to sell for maximum profit.	Comments noted. Any future allocations will consider the relative sustainability of the settlement as well as identify constraints. This is key to a 'plan-led' approach to development. All future options for future development will be available to comment at the draft plan stage.
SK.IAO.0047		X		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.	Comments noted. Concerns regarding the question noted support for the a 'plan-led' approach welcomed.
SK.IAO.0049	X			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.	Comments noted. The Council must continue to allocate sites to meet housing targets set by National Government. Any future allocations will consider the relative sustainability of the settlement as well as identify constraints. All future options for future development will be available to comment at the draft plan stage.
SK.IAO.0054	X			Market capacity and deliverability (absorption rates) are a consideration in determining an appropriate spatial distribution.	Comments noted. The SHMA will be updated as part of the Local Plan Review.
SK.IAO.0055	X			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.	Comments noted.
SK.IAO.0029				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.	Comments noted. All proposed new sites will be assessed as part of the strategic housing land availability assessment study. The assessment of housing needs is set out by the standard methodology and the type of sites and delivery will be assessed as part of an updated housing trajectory.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0036				We agree.	
SK.IAO.0046		X		Any house built in South Lincs will sell - we are rehoming Peterborough.	Comments noted.
SK.IAO.0056	X			Yes. Developers meeting Zero Carbon standards should be preferred to those not complying. Marketing of Low Carbon Homes could be supported by local government.	Comments noted.
SK.IAO.0057			X	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.	Comments noted.
SK.IAO.0065	X				
SK.IAO.0066				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.	Comments noted.
SK.IAO.0067		X		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.	Comments noted. Support for the a 'plan-led' approach welcomed.
SK.IAO.0068				<p>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.</p> <p>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, 5 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 serviced 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</p>	Sites are invited to be submitted to the Council through our Call for Sites. More information can be found here .

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				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.	
SK.IAO.0069	X				
SK.IAO.0076	X			There needs to be a thorough analysis of delivery and need and the methodology that applies to allocations for the reasons previously explained.	Comments noted. All proposed new sites will be assessed as part of the strategic housing land availability assessment study. The assessment of housing needs is set out by the standard methodology and the updated strategic housing market assessment and the type of sites and delivery will be assessed as part of an updated housing trajectory.
SK.IAO.0079	X			There needs to be a thorough analysis of delivery and need and the methodology that applies to allocations for the reasons previously explained.	Comments noted. All proposed new sites will be assessed as part of the strategic housing land availability assessment study. The assessment of housing needs is set out by the standard methodology and the updated strategic housing market assessment and the type of sites and delivery will be assessed as part of an updated housing trajectory.
SK.IAO.0080		X		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.	Comments noted. Support for the a 'plan-led' approach welcomed.
SK.IAO.0081			X		
SK.IAO.0083	X				
SK.IAO.0084	X				
SK.IAO.0087		X		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.	Comments noted. All proposed new sites will be assessed as part of the strategic housing land availability assessment study. The assessment of housing needs is set out by the standard methodology and the updated strategic housing market assessment and the type of sites and delivery will be assessed as part of an updated housing trajectory.
SK.IAO.0089			X		
SK.IAO.0090	X			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.	Comments noted. All proposed new sites will be assessed as part of the strategic housing land availability assessment study. The assessment of housing needs is set out by the standard methodology and the updated strategic housing market assessment and the type of sites and delivery will be assessed as part of an updated housing trajectory.
SK.IAO.0091				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.	Comments noted. All sites will be assessed as part of the Local Plan Review.
SK.IAO.0092			X		

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0094				<p>It is considered that affordability should be a key factor in determining the level of growth required. (see response to Q7b)</p> <p>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.</p>	Comments noted on the risks of delay as a result of the Bourne Neighbourhood Plan allocation, this will be monitored and considered as part of the Local Plan Review.
SK.IAO.0096	X				
SK.IAO.0097	X				
SK.IAO.0103	X				
SK.IAO.0105	X				
SK.IAO.0106	X			The focus of the local plan should be about delivery of new homes in sustainable locations where there is an identified market for sales.	Comments noted.
SK.IAO.0108	X			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?	South Kesteven is connected to the Housing Market Area Peterborough sub region this has been evaluated as part of the Strategic Housing Market Assessment, this will be updated as part of the Local Plan Review.
SK.IAO.0110	X			Yes	
SK.IAO.0111	X				
SK.IAO.0112		X			
SK.IAO.0113		X			
SK.IAO.0114		X			
SK.IAO.0115		X			
SK.IAO.0116		X			
SK.IAO.0117		X			
SK.IAO.0118		X			
SK.IAO.0119		X			
SK.IAO.0120		X			

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0051				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.	Comment noted. Past delivery rates do inform the deliverability assessment of sites, however allocations are based on district wide needs and assessment of sustainability. Allocations are not based on previous market performance.
SK.IAO.0072	X			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. 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. 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.	Comments noted. The most recent Housing Delivery Test (January 2021) is 99%.
SK.IAO.0074	X			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). 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. Importantly, the Sustainability Appraisal (2020) does not raise any concerns regarding the deliverability of a new settlement. 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.' 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.	

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0075			X	<p>Please see attached. South Kesteven's adopted Local Plan sets out the following targets</p> <ul style="list-style-type: none"> • 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. <p>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.</p> <p>Based on previous Local Plan reviews, the planning strategy options are likely to include some or all of the following:</p> <ul style="list-style-type: none"> • 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. 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 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. 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. 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. 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. 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. 	Comments noted. Sites should be submitted through our Call for Sites process. More information can be found here .
SK.IAO.0104	X			<p>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).</p> <p>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.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.</p> <p>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.</p>	Comments noted. Sites should be submitted through our Call for Sites process. More information can be found here .
SK.IAO.0121	X			n/a	

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0088				<p>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 as 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.</p> <p>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:</p> <ul style="list-style-type: none"> · 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, 5 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 serviced 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. 	<p>Comments noted. Sites should be submitted through our Call for Sites process. More information can be found here.</p>

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0107				<p>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.</p> <p>Land to the North of Harrowby Lane</p> <p>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:</p> <ul style="list-style-type: none"> · 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 serviced 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. <p>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.</p>	Comments noted. Sites should be submitted through our Call for Sites process. More information can be found here .
SK.IAO.0124		X		n/a	

Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
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?					
SK.IAO.0003	X			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.	Comments noted.
SK.IAO.0004		X			
SK.IAO.0005		X			
SK.IAO.0006	X			<p>overcrowded conditions on council site in grantham which is substandard with inadequate small/ cramped pitches for families.</p> <p>-need for more private sites as witnessed by current appeals</p> <p>-latent need from those denied right to live in the district due to chronic policy failure and shortage of sites</p> <p>urgent need to update the 2016 gtaa (which is based on 2015 data)</p> <p>urgent need to allocate land to meet need identified in 2016 and future need</p> <p>urgent need to provide choice of sites by location, size, tenure, type for different households in attractive, appropriate locations.</p> <p>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.</p> <p>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 that you were in 2006. From reading the 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.</p>	Comments noted.
SK.IAO.0007			X	The travelling community should contribute to any costs.	Comments noted.
SK.IAO.0012		X			
SK.IAO.0014			X		
SK.IAO.0015				Not aware. We have no show people since the annual Fair was taken from us by SKDC	General comments
SK.IAO.0016		X			
SK.IAO.0017				Gypsy/Traveller/Travelling showpeople – Aware of need to accommodate but understand from local media that there is adequate provision to meet needs.	General comments
SK.IAO.0018			X		
SK.IAO.0022			X		
SK.IAO.0024			X		

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0028	X			<p>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 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.</p> <p>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.</p>	Comments noted.
SK.IAO.0031		X			
SK.IAO.0032		X			
SK.IAO.0034			X		
SK.IAO.0035		X			
SK.IAO.0039			X	<p>Not aware of any specific needs but agree it is appropriate to accommodate identified needs within any existing Local Plan allocations.</p> <p>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).</p>	Comments noted, support welcomed.
SK.IAO.0040			X	No specific comments to make.	
SK.IAO.0042			X	It is appropriate to accommodate identified needs within the existing Local Plan allocations if appropriate.	Comments noted, sites can only be allocated through the Local Plan process. Within the current Local Plan Policy M1 commits the authority to review the Local Plan and allocate and submit an updated Local Plan to the Planning Inspectorate by December 2023.
SK.IAO.0044		X			
SK.IAO.0047			X		
SK.IAO.0048	X			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	The GTAA has been published as evidence to support the current Local Plan at examination. An updated GTAA is being undertaken as part of the Local Plan Review. This evidence will be published to support the emerging Local Plan Review.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				<p>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.</p> <p>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.</p> <p>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%.</p> <p>In summary, the local plan states in H5:</p> <ul style="list-style-type: none"> 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; <p>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</p> <ul style="list-style-type: none"> c. the site is in reasonable proximity to shops, schools and health facilities; <p>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</p> <ul style="list-style-type: none"> d. the site is not identified as an area at risk of flooding in the Strategic Flood Risk Assessment (SFRA); <p>This is the only criteria which the application passes</p> <ul style="list-style-type: none"> 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. <p>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.</p> <p>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.</p>	
SK.IAO.0049			X		
SK.IAO.0053	X			<p>The local plan fails to address the needs of the Traveller community on several counts.</p> <p>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.</p> <p>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.</p> <p>For example, the local plan review ignores the fact that the planning application at Cold Harbour is under appeal.</p>	<p>The GTAA has been published as evidence to support the current Local Plan at examination. An updated GTAA is being undertaken as part of the Local Plan Review. This evidence will be published to support the emerging Local Plan Review.</p>

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>That would see an increase of the local population of the hamlet by nearly 500%.</p> <p>In summary, the local plan states in H5:</p> <p>a. the proposed site provides an acceptable living environment for its residents;</p> <p>b. the site has good access to the highway network and will not cause traffic congestion or safety problems;</p> <p>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</p> <p>c. the site is in reasonable proximity to shops, schools and health facilities;</p> <p>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</p> <p>d. the site is not identified as an area at risk of flooding in the Strategic Flood Risk Assessment (SFRA);</p> <p>This is the only criteria which the application passes</p> <p>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.</p> <p>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.</p> <p>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.</p>	
SK.IAO.0055			X		
SK.IAO.0036				We are not aware of any specific needs for Gypsy and Traveller accommodation in Stamford	Noted.
SK.IAO.0046		X			
SK.IAO.0056		X		No	
SK.IAO.0065		X			
SK.IAO.0067				<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>	Comments noted.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0069		X		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.	The GTAA commission consults directly with the Gypsy and Traveller community. Comments noted on the allocation on larger housing sites.
SK.IAO.0076		X			
SK.IAO.0077	X			<p>The local plan fails to address the needs of the Gypsy and Traveller community (GTAA) as follows.</p> <ul style="list-style-type: none"> • 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. 	Comments noted, within the current Local Plan Policy M1 commits the authority to review the Local Plan and allocate and submit an updated Local Plan to the Planning Inspectorate by December 2023. The GTAA commission consults directly with the Gypsy and Traveller community to identify needs, there is no requirement to consult with residents on the needs assessment. The GTAA has been published as evidence to support the current Local Plan at examination. An updated GTAA is being undertaken as part of the Local Plan Review. This evidence will be published to support the emerging Local Plan Review.
SK.IAO.0079		X			
SK.IAO.0081			X		
SK.IAO.0083	X				
SK.IAO.0084		X		The proposed Gypsy and Traveller site at Cold Harbour (at appeal) seems to be the most sensible and achievable method to meet the immediate demands for sites.	

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0086	X			<p>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%.</p> <p>In summary, the local plan states in H5:</p> <p>a. the proposed site provides an acceptable living environment for its residents;</p> <p>b. the site has good access to the highway network and will not cause traffic congestion or safety problems;</p> <p>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</p> <p>c. the site is in reasonable proximity to shops, schools and health facilities;</p> <p>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</p> <p>d. the site is not identified as an area at risk of flooding in the Strategic Flood Risk Assessment (SFRA);</p> <p>This is the only criteria which the application passes</p> <p>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.</p> <p>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.</p>	<p>Comments noted, within the current Local Plan Policy M1 commits the authority to review the Local Plan and allocate and submit an updated Local Plan to the Planning Inspectorate by December 2023. The GTAA commission consults directly with the Gypsy and Traveller community to identify needs, there is no requirement to consult with residents on the needs assessment. The GTAA has been published as evidence to support the current Local Plan at examination. An updated GTAA is being undertaken as part of the Local Plan Review. This evidence will be published to support the emerging Local Plan Review. Comments on the Cold Harbour planning application are noted but are site specific.</p>
SK.IAO.0089		X			
SK.IAO.0092			X		
SK.IAO.0096		X			
SK.IAO.0097		X			

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0099	X			<p>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.</p> <p>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.</p> <p>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)</p> <p>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)</p> <p>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.</p> <p>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%.</p> <p>In summary, the local plan states in H5:</p> <ul style="list-style-type: none"> 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. <p>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</p> <ul style="list-style-type: none"> c. the site is in reasonable proximity to shops, schools, and health facilities. <p>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.</p> <ul style="list-style-type: none"> 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. <p>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.</p> <p>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.</p>	<p>Comments noted, within the current Local Plan Policy M1 commits the authority to review the Local Plan and allocate and submit an updated Local Plan to the Planning Inspectorate by December 2023. The GTAA commission consults directly with the Gypsy and Traveller community to identify needs, there is no requirement to consult with residents on the needs assessment. The GTAA has been published as evidence to support the current Local Plan at examination. An updated GTAA is being undertaken as part of the Local Plan Review. This evidence will be published to support the emerging Local Plan Review. Comments on the Cold Harbour planning application are noted but are site specific.</p>
SK.IAO.0103		X			

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0108		X			
SK.IAO.0110		X		No, however we would expect to see these in the plan.	Noted.
SK.IAO.0111		X			
SK.IAO.0112		X			
SK.IAO.0113		X			
SK.IAO.0114		X			
SK.IAO.0115		X			
SK.IAO.0116		X			
SK.IAO.0117		X			
SK.IAO.0118		X			
SK.IAO.0119		X			
SK.IAO.0120		X			
SK.IAO.0121				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.	Comments noted.
SK.IAO.0078		X			
SK.IAO.0124		X			

Proposal 9 – Revisions to the Employment Policy

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
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?					
SK.IAO.0003			X		
SK.IAO.0007	X				
SK.IAO.0012			X		
SK.IAO.0014	X				
SK.IAO.0015	X			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	Comments noted. Sustainable development is about housing and employment and balance of all social economic environmental needs, and housing and jobs will be assessed to ensure that growth is sustainable.
SK.IAO.0016			X		
SK.IAO.0017			X		
SK.IAO.0018	X				
SK.IAO.0022	X				
SK.IAO.0024	X				
SK.IAO.0028	X			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.	comments noted.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0031	X				
SK.IAO.0032	X				
SK.IAO.0034			X		
SK.IAO.0035	X				
SK.IAO.0037	X				
SK.IAO.0039	X				
SK.IAO.0040	X			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.	We are currently reviewing our employment land evidence as part of the Local Plan review, this will include an evaluation of employment demand by use type and suitability of current and proposed employment sites within the district. This will inform the approach to allocations within the local plan review.
SK.IAO.0042	X			Updating the study will be vital to understanding the new needs of the area.	We are currently reviewing our employment land evidence as part of the Local Plan review, this will include an evaluation of employment demand by use type and suitability of current and proposed employment sites within the district. This will inform the approach to allocations within the local plan review.
SK.IAO.0044	X				
SK.IAO.0047	X				
SK.IAO.0049	X			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.	We are currently reviewing our employment land evidence as part of the Local Plan review, this will include an evaluation of employment demand by use type and suitability of current and proposed employment sites within the district. This will inform the approach to allocations within the local plan review. The impacts of Covid-19 are still to be fully understood. The planning system and the local plan review will respond accordingly.
SK.IAO.0055	X			Completion of the long-awaited Grantham east-west bypass will be key to the success of the planned South Gateway Opportunity.	Comments noted.
SK.IAO.0036				We agree	
SK.IAO.0050			X	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.	
SK.IAO.0056	X			Yes	
SK.IAO.0065	X				
SK.IAO.0069	X				
SK.IAO.0076	X				
SK.IAO.0079	X				
SK.IAO.0081			X		
SK.IAO.0083	X				
SK.IAO.0084	X				
SK.IAO.0089	X				

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0091				<p>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.</p> <p>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.</p> <p>Need for Employment Land</p> <p>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:</p> <p>“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”.</p> <p>In terms of office space, at paragraph 7.2m it makes the point that:</p> <p>“office demand has remained steady in South Kesteven with little growth in the market”</p> <p>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.</p> <p>The Inspector goes on to set out his reasons for finding that approach sound at Paragraph 44 of his Report, including:</p> <ul style="list-style-type: none"> - 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. <p>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.</p> <p>It would appear that this updated evidence is still not available.</p> <p>The Amount of Employment Floorspace at Exeter Fields</p> <p>In connection with the Exeter Fields allocation, the Inspector Comments at Paragraphs 168 -169 of his Report that:</p> <p>“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.</p> <p>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”.</p> <p>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</p>	<p>The adopted Local Plan’s employment allocations were deemed deliverable by the Inspector at the Local Plan Examination. The Council is reviewing its employment land evidence through an Employment Land Review, which will inform the emerging Local Plan and the District’s existing and future allocations.</p>

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				<p>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:</p> <p>“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”</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>The NPPF at Paragraph 120 is clear that land which is allocated for employment purposes should be regularly reviewed when it states that:</p> <p>“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:</p> <p>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</p> <p>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.</p> <p>The Need for Additional Flexibility</p> <p>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:</p> <p>“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”.</p> <p>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</p>	

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				<p>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”.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	
SK.IAO.0092	X				
SK.IAO.0096			X	I do not know the specific content of E1 and E2 to comment.	
SK.IAO.0097			X	I do not know the specific content of E1 and E2 to comment.	
SK.IAO.0103	X				

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0105	X			<p>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.</p> <p>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.</p> <p>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.</p> <p>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 21st century market place.</p>	<p>We are currently reviewing our employment land evidence as part of the Local Plan review, this will include an evaluation of employment demand by use type and suitability of current and proposed employment sites within the district. This will inform the approach to allocations within the local plan review. The impacts of Covid-19 are still to be fully understood. The planning system and the local plan review will respond accordingly.</p>
SK.IAO.0108	X				
SK.IAO.0111	X				
SK.IAO.0112	X				
SK.IAO.0113	X				
SK.IAO.0114	X				
SK.IAO.0115	X				
SK.IAO.0116	X				
SK.IAO.0117	X				
SK.IAO.0118	X				
SK.IAO.0119	X				
SK.IAO.0120	X				

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0073	X			<p>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. 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). 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. 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. 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.</p> <p>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'.</p> <p>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. 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. 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. The Site forms part of Area 6 in the Grantham Capacity and Limits to Growth Study (2015). The assessment established that all land within Area 6 consists of Grade 3 agricultural land. Grade 3 is classified</p>	<p>We are currently reviewing our employment land evidence as part of the Local Plan review, this will include an evaluation of employment demand by use type and suitability of current and proposed employment sites within the district. This will inform the approach to allocations within the local plan review.</p> <p>The impacts of Covid-19 are still to be fully understood. The planning system and the local plan review will respond accordingly.</p>

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				<p>as good to moderate quality agricultural land where yields are generally lower or more variable than on land in Grades 1 and 2.</p> <p>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. 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". 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. 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.'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.' 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,</p>	

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0075			X	<p>See the response to Question 2 re: Objectives.</p> <p>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:</p> <p>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?</p> <p>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.</p> <p>Response to Q2. 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.</p> <p>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.</p> <p>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.</p>	
SK.IAO.0085	X			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.	Comments noted.
SK.IAO.0101				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.	Comments noted. We are currently reviewing our employment land evidence as part of the Local Plan review, this will include an evaluation of employment demand by use type and suitability of current and proposed employment sites within the district. This will inform the approach to allocations within the local plan review.
SK.IAO.0121	X			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.	Comments noted.
SK.IAO.0124	X			n/a	
SK.IAO.0003			X		
SK.IAO.0007	X				
SK.IAO.0012	X				
SK.IAO.0014	X				

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0015				innovate and develop employment opportunities as a priority, not increase housing.	SKDC housing needs are for the district based on the standard methodology and is standard set by the Government for assessing housing needs. Sustainable development is about housing and employment and balance of all social economic environmental needs, and housing and jobs will be assessed to ensure that growth is sustainable.
SK.IAO.0017			X		
SK.IAO.0018	X				
SK.IAO.0022	X			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.	Comments noted. We are currently reviewing our employment land evidence as part of the Local Plan review, this will include an evaluation of employment demand by use type and suitability of current and proposed employment sites within the district. This will inform the approach to allocations within the local plan review.
SK.IAO.0024	X				
SK.IAO.0028	X				
SK.IAO.0031	X				
SK.IAO.0032	X				
SK.IAO.0034			X		
SK.IAO.0035	X				
SK.IAO.0037	X				
SK.IAO.0038		X		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.	Comments noted.
SK.IAO.0039	X			This would be a robust approach to setting appropriate allocations.	Comment noted.
SK.IAO.0040			X	No specific comments to make.	
SK.IAO.0042	X			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.	Comments noted, the impacts of Covid-19 are still to be fully understood. The planning system and the local plan review will respond accordingly.
SK.IAO.0044	X				
SK.IAO.0047	X				

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0049	X				
SK.IAO.0055	X			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.	Comments noted, the impacts of Covid-19 are still to be fully understood. The planning system and the local plan review will respond accordingly.
SK.IAO.0036				E3 does not cover Stamford.	Policy E3 allocated the employment site at Land East of Ryhall Road in Stamford within the adopted Local Plan.
SK.IAO.0056	X			Yes, Village Hubs for home working should be supported.	Comments noted.
SK.IAO.0065	X				
SK.IAO.0069	X				
SK.IAO.0076	X				
SK.IAO.0079	X				
SK.IAO.0081			X		
SK.IAO.0083	X				
SK.IAO.0084	X				
SK.IAO.0089	X				
SK.IAO.0092	X				
SK.IAO.0096			X	I do not know the specific content of E3 to comment.	
SK.IAO.0097			X	I do not know the specific content of E3 to comment.	
SK.IAO.0103	X				
SK.IAO.0105	X			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.	Comments noted.
SK.IAO.0108	X				
SK.IAO.0111	X				
SK.IAO.0112	X				
SK.IAO.0113	X				
SK.IAO.0114	X				
SK.IAO.0115	X				
SK.IAO.0116	X				
SK.IAO.0117	X				
SK.IAO.0118	X				
SK.IAO.0119	X				
SK.IAO.0120	X				
SK.IAO.0073	X			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.	Comments noted. We are currently reviewing our employment land evidence as part of the Local Plan review, this will include an evaluation of employment demand by use type and suitability of current and proposed employment sites within the district. This will inform the approach to allocations within the local plan review.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0075	X			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. 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? 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. Response to Q2. 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. 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. 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.	We are currently reviewing our employment land evidence as part of the Local Plan review, this will include an evaluation of employment demand by use type and suitability of current and proposed employment sites within the district. This will inform the approach to allocations within the local plan review. The impacts of Covid-19 are still to be fully understood. The planning system and the local plan review will respond accordingly.
SK.IAO.0085	X			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.	Comments noted.
SK.IAO.0101				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.	Comments noted. We are currently reviewing our employment land evidence as part of the Local Plan review, this will include an evaluation of employment demand by use type and suitability of current and proposed employment sites within the district. This will inform the approach to allocations within the local plan review.
SK.IAO.0121	X				
SK.IAO.0124	X				

Proposal 10 – Climate Change

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?					
SK.IAO.0003		X		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	Comments noted.
SK.IAO.0007	X				
SK.IAO.0012			X		

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0014		X		SKDC needs policy support for developments that are 'off grid' irrespective of scale.	Comments noted.
SK.IAO.0015				They only work if you insist developers stick to them when they apply for planning.	Comments noted.
SK.IAO.0016			X		
SK.IAO.0017		X		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.	Comments noted. The Council declared Climate Change emergency in 2019 the key objective of the Local Plan Review is to reduce the carbon reduction and develop planning policies which will support and mitigate the impacts of climate change. The 741 is based on the nationally set standard housing methodology.
SK.IAO.0018			X		
SK.IAO.0021		X		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).	Comments noted
SK.IAO.0022		X		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.	Comments noted.
SK.IAO.0024			X	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.	Comments noted. The Council declared Climate Change emergency in 2019 the key objective of the Local Plan Review is to reduce the carbon reduction and develop planning policies which will support and mitigate the impacts of climate change.
SK.IAO.0027		X		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.	Comments noted
SK.IAO.0028			X	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.	Comments noted. The Council declared Climate Change emergency in 2019 the key objective of the Local Plan Review is to reduce the carbon reduction and develop planning policies which will support and mitigate the impacts of climate change.
SK.IAO.0031			X		
SK.IAO.0032			X		
SK.IAO.0034			X		
SK.IAO.0035			X		
SK.IAO.0037			X	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	Comments noted.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				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.	
SK.IAO.0038	X				
SK.IAO.0039	X			This proposal appears to be future-proofed and can address the latest Government strategies (in line with recent announcements).	Comments noted.
SK.IAO.0040			X	No specific comments to make.	
SK.IAO.0042			X	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.	Comments noted. The Council declared Climate Change emergency in 2019 the key objective of the Local Plan Review is to reduce the carbon reduction and develop planning policies which will support and mitigate the impacts of climate change.
SK.IAO.0043		X		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.	Comments noted. The Council declared Climate Change emergency in 2019 the key objective of the Local Plan Review is to reduce the carbon reduction and develop planning policies which will support and mitigate the impacts of climate change.
SK.IAO.0044		X		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.	Comments noted.
SK.IAO.0047		X		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	Comments noted.
SK.IAO.0049				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).	
SK.IAO.0054		X		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 7th 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 7th October 2019), the Government also set out a preferred option to introduce a new	

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				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.	
SK.IAO.0055			X		
SK.IAO.0010				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. 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.	
SK.IAO.0036				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.	Comments noted. The Council declared Climate Change emergency in 2019 the key objective of the Local Plan Review is to reduce the carbon reduction and develop planning policies which will support and mitigate the impacts of climate change.
SK.IAO.0046		X		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.	Comments noted. The Council declared Climate Change emergency in 2019 the key objective of the Local Plan Review is to reduce the carbon reduction and develop planning policies which will support and mitigate the impacts of climate change.
SK.IAO.0050		X		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	Comments noted.
SK.IAO.0056		X		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.	Comments noted
SK.IAO.0057			X	We <ul style="list-style-type: none"> • support further work being done on sustainable travel options. See DNP16. • recognise the need for local action and look forward to guidance from SKDC. 	Comments noted.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0065		X		Retention of agricultural land and green spaces be a bigger aspect of future development. Much more emphasis on environment improvement in larger towns.	Comment noted.
SK.IAO.0069	X			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. 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.	Comments noted.
SK.IAO.0070		X		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.	Comments noted
SK.IAO.0081		X		No. As we have indicated in our answers 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.	Comments noted. The strengthened national policy on climate change will be reflected, where appropriate, through the Local Plan Review.
SK.IAO.0083	X				
SK.IAO.0084		X		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.	Comments noted. The strengthened national policy on climate change will be reflected, where appropriate, through the Local Plan Review.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0089		X		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).	Comments noted. The strengthened national policy on climate change will be reflected, where appropriate, through the Local Plan Review.
SK.IAO.0090			X	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.	Comments noted.
SK.IAO.0092				I would like to see greater emphasis on/ requirement for major new housing developments to have solar panels or ground source energy as part of the initial agreement to develop	Comments noted.
SK.IAO.0096	X			However, developers must be made to stick to the original submitted plan following application with no amendments.	The planning application process is not determined through the Local Plan.
SK.IAO.0097	X			However, developers must be made to stick to the original submitted plan following application with no amendments.	The planning application process is not determined through the Local Plan.
SK.IAO.0103		X		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.	Comments noted. The strengthened national policy on climate change will be reflected, where appropriate, through the Local Plan Review.
SK.IAO.0105			X	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 CO2 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.	Comments noted. The strengthened national policy on climate change will be reflected, where appropriate, through the Local Plan Review.
SK.IAO.0106			X	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	Comments noted. The strengthened national policy on climate change will be reflected, where appropriate, through the Local Plan Review.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				<p>requirement once in force.</p> <p>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 CO2 emissions compared to homes built today.</p> <p>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.</p> <p>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.</p>	
SK.IAO.0108		X		<p>See above re encouraging transport between (e.g.) Grantham and where employment is likely to be found.</p> <p>Home should be near where employment is, with sustainable transport links wherever possible.</p>	Comments noted
SK.IAO.0110		X		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.	Comments noted. The strengthened national policy on climate change will be reflected, where appropriate, through the Local Plan Review.
SK.IAO.0111	X				
SK.IAO.0112			X		
SK.IAO.0113			X		
SK.IAO.0114			X		
SK.IAO.0115			X		
SK.IAO.0116			X		
SK.IAO.0117			X		
SK.IAO.0118			X		
SK.IAO.0119			X		
SK.IAO.0120			X		
SK.IAO.0074	X				
SK.IAO.0075	X			<p>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.</p> <p>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 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.</p>	Comments noted.
SK.IAO.0098		X		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.	Comments noted. The Council declared Climate Change emergency in 2019. The key objective of the Local Plan Review is to reduce the carbon reduction and develop planning policies which will support and mitigate the impacts of climate change.
SK.IAO.0121		X		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.	Comments noted.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
				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 (CO2 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.	
SK.IAO.0078		X		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.	Comments noted. The Council declared Climate Change emergency in 2019 the key objective of the Local Plan Review is to reduce the carbon reduction and develop planning policies which will support and mitigate the impacts of climate change.
SK.IAO.0124			X		

Proposal 11 – Energy Performance Standards

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
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?					
SK.IAO.0003	X			see Q11b	
SK.IAO.0007	X			not provided.	
SK.IAO.0014				Code 4 does not exist any more. Leave this to the Building regs but create 'eco house' policy encouragement for 'off grid' houses.	Comments noted.
SK.IAO.0015			X		
SK.IAO.0016			X		
SK.IAO.0017	X			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.	Comments noted. The Council declared Climate Change emergency in 2019 the key objective of the Local Plan Review is to reduce the carbon reduction and develop planning policies which will support and mitigate the impacts of climate change. The 741 is based on the nationally set standard housing methodology.
SK.IAO.0018			X		
SK.IAO.0022			X		
SK.IAO.0024	X			Best practice for the type of development should be the aspiration	Comments noted.
SK.IAO.0028	X				
SK.IAO.0031		X			
SK.IAO.0032		X			
SK.IAO.0034			X		
SK.IAO.0035			X		
SK.IAO.0037			X		
SK.IAO.0038		X			
SK.IAO.0039	X				

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0040			X		
SK.IAO.0042		X			
SK.IAO.0043	X				
SK.IAO.0044	X				
SK.IAO.0047	X				
SK.IAO.0049	X				
SK.IAO.0054		X			
SK.IAO.0055	X				
SK.IAO.0029				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.	Comments noted.
SK.IAO.0036	X			Yes.	
SK.IAO.0046	X				
SK.IAO.0050	X			Yes, or higher, though I thought the Code had been withdrawn https://www.gov.uk/government/publications/code-for-sustainable-homes-technical-guidance	Comments noted.
SK.IAO.0056	X				
SK.IAO.0065	X				
SK.IAO.0069		X			
SK.IAO.0083		X			
SK.IAO.0084			X		
SK.IAO.0087		X		see response to Q11c - 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).	Comments noted. The Local Plan will be subject to a Whole Plan Viability Assessment.
SK.IAO.0089			X		
SK.IAO.0090			X		
SK.IAO.0092	X				
SK.IAO.0096			X		
SK.IAO.0097			X		
SK.IAO.0103	X				
SK.IAO.0108	X				
SK.IAO.0110	X				
SK.IAO.0111		X			
SK.IAO.0112		X			

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0113		X			
SK.IAO.0114		X			
SK.IAO.0115		X			
SK.IAO.0116		X			
SK.IAO.0117		X			
SK.IAO.0118		X			
SK.IAO.0119		X			
SK.IAO.0120		X			
SK.IAO.0074		X		Climate change is a key challenge faced by South Kesteven District Council and is at the centre of Government planning policies and guidance. 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. 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. 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. The new Local Plan should therefore not require higher energy performance standards than established by building regulations for residential development.	Comments noted. The Local Plan will be subject to a Whole Plan Viability Assessment.
SK.IAO.0098	X				
SK.IAO.0121	X			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.	Comments noted.
SK.IAO.0078	X				
SK.IAO.0124		X			
SK.IAO.0003	X			Incorporation of at least 1kw of solar panels 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 other areas or planning requirements.	Comments noted.
SK.IAO.0007	X				

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0012			X		
SK.IAO.0015			X		
SK.IAO.0016			X		
SK.IAO.0017	X			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.	Comments noted. The Council declared Climate Change emergency in 2019 the key objective of the Local Plan Review is to reduce the carbon reduction and develop planning policies which will support and mitigate the impacts of climate change. The 741 is based on the nationally set standard housing methodology.
SK.IAO.0018			X		
SK.IAO.0022			X		
SK.IAO.0024	X			Best practice for the type of development should be the aspiration	Comments noted.
SK.IAO.0028	X				
SK.IAO.0031		X			
SK.IAO.0032		X			
SK.IAO.0034			X		
SK.IAO.0035			X		
SK.IAO.0037			X	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 .	Comments noted.
SK.IAO.0038		X			
SK.IAO.0039			X	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.	Comments noted.
SK.IAO.0040			X	No specific comments to make.	
SK.IAO.0042		X		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.	Comments noted.
SK.IAO.0043	X				
SK.IAO.0044	X			Current standards should always be used – and if possible any up-coming standards should be incorporated.	
SK.IAO.0047	X			All development, residential or non-residential should be carbon neutral.	Comments noted. The Council declared Climate Change emergency in 2019 the key objective of the Local Plan Review is to

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
					reduce the carbon reduction and develop planning policies which will support and mitigate the impacts of climate change.
SK.IAO.0049	X			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)	Comments noted.
SK.IAO.0054		X		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 7th 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 7th 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.	Comments noted.
SK.IAO.0055	X			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.	Comments noted
SK.IAO.0036	X			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.	Comments noted
SK.IAO.0046	X			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.	Comments noted
SK.IAO.0050				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	Comments noted.
SK.IAO.0056	X			Yes. All non-residential property should meet the appropriate and agreed BREEAM standards.	Comments noted.
SK.IAO.0069		X			
SK.IAO.0083		X			
SK.IAO.0084			X		
SK.IAO.0089			X		
SK.IAO.0090			X		
SK.IAO.0092	X				
SK.IAO.0096			X		
SK.IAO.0097			X		
SK.IAO.0103	X			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.	Comments noted.
SK.IAO.0108	X				
SK.IAO.0110	X			Yes. Standards that are consistent with the resolution that Objective 13 delivers. BREEAM Outstanding should be targeted.	Noted.
SK.IAO.0111		X			
SK.IAO.0112		X			
SK.IAO.0113		X			
SK.IAO.0114		X			
SK.IAO.0115		X			

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0116		X			
SK.IAO.0117		X			
SK.IAO.0118		X			
SK.IAO.0119		X			
SK.IAO.0120		X			
SK.IAO.0073		X		Climate change is a key challenge faced by South Kesteven District Council and is at the centre of Government planning policies and guidance. Paragraph 12 of Planning Practice Guidance relating to Climate Change states that Councils are not restricted or limited in setting energy performance standards above building regulations for non-housing developments. 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. The new Local Plan should therefore not require higher energy performance standards in non-residential development.	Comments noted. The Local Plan will be subject to a Whole Plan Viability Assessment.
SK.IAO.0098	X				
SK.IAO.0121	X			Yes. The highest legally adoptable standards. As an example new schools have been built without a prime fossil fuel source ie no gas.	Comments noted.
SK.IAO.0124		X			

Representation Reference Number	Comments	Officers Response
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?		
SK.IAO.0014	Code 4 does not exist any more. Leave this to the Building regs but create 'eco house' policy encouragement fr 'off grid' houses.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.	Comments noted.
SK.IAO.0017	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.	The 741 is based on the nationally set standard housing methodology.
SK.IAO.0028	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.	Noted.
SK.IAO.0037	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 . If necessary due to viability issues, a higher energy performance level could be incorporated into the plan as an aspiration	Support welcomed.

Representation Reference Number	Comments	Officers Response
	– 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.	
SK.IAO.0038	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 ensure that higher energy performance requirements do not affect the viability and deliverability of schemes, resulting in underprovision of other contributions, including affordable housing.	Comments noted.
SK.IAO.0039	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.	Comments noted.
SK.IAO.0042	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	Comments noted.
SK.IAO.0044	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.	support welcomed.
SK.IAO.0049	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)	Support welcomed.
SK.IAO.0054	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.	Comments noted.
SK.IAO.0036	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.	Comments noted.
SK.IAO.0046	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.	Support welcomed.
SK.IAO.0050	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”	Support welcomed.
SK.IAO.0056	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.	Support welcomed.

Representation Reference Number	Comments	Officers Response
SK.IAO.0087	<p>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).</p>	Support welcomed. Comments on £/sqft noted.
SK.IAO.0089	No.	
SK.IAO.0090	<p>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.</p>	Support welcomed.
SK.IAO.0103	<p>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 21st 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.</p>	Comments noted.
SK.IAO.0110	<p>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;</p>	Comments noted.
SK.IAO.0121	<p>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-UKGBCresource-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</p>	Comments noted.

Representation Reference Number	Comments	Officers Response
	<p>£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</p> <p>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 time 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</p>	

Representation Reference Number	Comments	Officers Response
	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.	

Proposal 12 – Need for Caravan Accommodation

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
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.					
SK.IAO.0003		X			
SK.IAO.0007			X	This depends on approach to tourism. Or are we considering static residential caravans?	The Housing and Planning Act 2016 requires the periodical review of the need for sites to accommodate caravan accommodation e.g. park homes/mobile homes. The need for caravan accommodation will be considered through the review of the Strategic Housing Market Assessment.
SK.IAO.0012		X			
SK.IAO.0014		X			
SK.IAO.0015				Do you mean caravan storage or living in mobile homes? Do you mean sites for travellers?	The Housing and Planning Act 2016 requires the periodical review of the need for sites to accommodate caravan accommodation e.g. park homes/mobile homes. The need for caravan accommodation will be considered through the review of the Strategic Housing Market Assessment.
SK.IAO.0016		X			
SK.IAO.0017			X	SKDC -Grantham - caravan site along Gorse Lane not aware of other issues in this area	Comments noted.
SK.IAO.0018		X			
SK.IAO.0022			X		
SK.IAO.0028		X			
SK.IAO.0031			X		
SK.IAO.0032			X		
SK.IAO.0034			X		
SK.IAO.0035		X			

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0039			X	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.	Comments noted. The Housing and Planning Act 2016 requires the periodical review of the need for sites to accommodate caravan accommodation e.g. park homes/mobile homes. The need for caravan accommodation will be considered through the review of the Strategic Housing Market Assessment.
SK.IAO.0040			X	No specific comments to make.	noted.
SK.IAO.0042		X			
SK.IAO.0044		X			
SK.IAO.0049			X		
SK.IAO.0036		X		No.	
SK.IAO.0056		X			
SK.IAO.0065		X			
SK.IAO.0067				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.	The Housing and Planning Act 2016 requires the periodical review of the need for sites to accommodate caravan accommodation e.g. park homes/mobile homes. The need for caravan accommodation will be considered through the review of the Strategic Housing Market Assessment.
SK.IAO.0069			X	not provided	
SK.IAO.0083		X			
SK.IAO.0084		X			
SK.IAO.0089			X		
SK.IAO.0092			X		
SK.IAO.0096		X			
SK.IAO.0097		X			
SK.IAO.0103		X			
SK.IAO.0108		X			
SK.IAO.0110		X			
SK.IAO.0111		X			
SK.IAO.0112		X			
SK.IAO.0113		X			
SK.IAO.0114		X			
SK.IAO.0115		X			
SK.IAO.0116		X			
SK.IAO.0117		X			
SK.IAO.0118		X			
SK.IAO.0119		X			
SK.IAO.0120		X			
SK.IAO.0121		X		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.	Comments noted. The need for caravan accommodation will be considered through the review of the Strategic Housing Market Assessment.
SK.IAO.0078		X			

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0124		X			

Proposal 13 – Parking Standards

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
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.					
SK.IAO.0003			X		
SK.IAO.0004			X	Unsure on what these 'minimum parking standards' are to be able to comment.	Clarification sought
SK.IAO.0005			X	Unsure on what these 'minimum parking standards' are to be able to comment.	Clarification sought
SK.IAO.0007			X	Restrictions on parking and parking charges discourage people from visiting town centres - effects have been XXX for many years.	Comments noted.
SK.IAO.0011	X			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.	Support welcomed.
SK.IAO.0012	X			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.	Comments noted.
SK.IAO.0014	X			Long overdue!	
SK.IAO.0015	X			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.	Support welcomed.
SK.IAO.0016	X				
SK.IAO.0017		X		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	Support welcomed.
SK.IAO.0018	X				
SK.IAO.0022		X		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.	Objection noted.
SK.IAO.0024				Please see previous response regarding accessibility and not disadvantaging any groups of residents 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.	Comments noted.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0028		X		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.	Comments on guidelines rather than standards noted.
SK.IAO.0031			X	Any approach that may be adopted must be agreed between the Local Planning and Highways Authorities to avoid future confusion.	Noted.
SK.IAO.0032			X	Any approach that may be adopted must be agreed between the Local Planning and Highways Authorities to avoid future confusion.	Noted.
SK.IAO.0034			X		
SK.IAO.0035			X		
SK.IAO.0037			X		
SK.IAO.0038		X		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.	Comments noted.
SK.IAO.0039			X	No specific comments. Parking standards are considered to be a local/ non-strategic matter and would not have implications beyond the district.	Noted.
SK.IAO.0040			X	No specific comments to make.	
SK.IAO.0042	X			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.	Support welcomed.
SK.IAO.0043	X			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.	Comments noted.
SK.IAO.0044	X			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.	Comments noted. Specific issues identified. EV support welcomed.
SK.IAO.0047	X			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.	Comments noted. A long term assessment on the shift to EV is a key issues for the Local Plan Review.
SK.IAO.0049	X			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.	Comments noted.
SK.IAO.0054				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.	Comments noted. LPR will be in compliant with national policy.
SK.IAO.0036				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.	Comments noted.
SK.IAO.0046	X			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.	Comments noted.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0056	X			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.	Comments noted.
SK.IAO.0057	X			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. Parking standards are included at DNP 16.8, and at DNP Appendix E. See also DNP H1- Background Document - Residential Parking & Garage Standards 12.02.2020. (For clarity, space standards for garages quoted there should be internal not external dimensions.) The amended SKLP, for clarity and ease of interpretation, should recognise these local standards. We recommend: <ul style="list-style-type: none"> • the development of new parking standards for the district as a whole • provision being made for electric vehicle charging points 	Support welcomed.
SK.IAO.0065	X			More to be done to enforce rules not allowing parking on pavements.	
SK.IAO.0067				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.	Comments noted.
SK.IAO.0069	X			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.	Comments noted.
SK.IAO.0083	X			All new homes should have off road parking space.	Comments noted.
SK.IAO.0084	X				
SK.IAO.0089		X		Future car use is too difficult to predict.	
SK.IAO.0090			X	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.	Support for EV welcomed.
SK.IAO.0092			X		
SK.IAO.0096	X				
SK.IAO.0097	X				
SK.IAO.0103		X		All new households should have as a minimum sufficient parking spaces for at least one car per bedroom	Comments noted.
SK.IAO.0108	X			Parking should be off road and not interfere with cycling or walking provision.	Comments noted.
SK.IAO.0110	X			Yes.	
SK.IAO.0111	X			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.	Noted.

Representation Reference Number	Yes	No	Unsure	Comment	Officers Response
SK.IAO.0112	X			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.	Noted.
SK.IAO.0113	X			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.	Noted.
SK.IAO.0114	X			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.	Noted.
SK.IAO.0115	X			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.	Noted.
SK.IAO.0116	X			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.	Noted.
SK.IAO.0117	X			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.	Noted.
SK.IAO.0118	X			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.	Noted.
SK.IAO.0119	X			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.	Noted.
SK.IAO.0120	X			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.	Noted.
SK.IAO.0073	X			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.	Comments on guidelines rather than standards noted.
SK.IAO.0074	X			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.	Comments on guidelines rather than standards noted.
SK.IAO.0085			X	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." Maximum standards should only be set where there is a clear and compelling justification that they are necessary for managing the local road network.	Comments noted. LPR will be in compliant with national policy.
SK.IAO.0098	X			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.	Objection noted.
SK.IAO.0124	X			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.	Comments noted.

Any Other Comments

Representation Reference Number	Comment	Officers Response
	Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?	

Representation Reference Number	Comment	Officers Response
SK.IAO.0002	<p>With reference to you 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 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.</p>	<p>Lincolnshire County Council are the waste authority for South Kesteven District. The County Council will be consulted on the emerging Local Plan.</p>
SK.IAO.0003	<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 led to issues where the local community have questioned the validity of the original allocations. 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. 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. 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.</p>	<p>The existing Local Plan was adopted and found sound following a robust Examination conducted by an independent, government Planning Inspector. The Council is now seeking further development land to meet identified housing needs through the Local Plan Review. Each site received/identified will undergo robust site assessment prior to any further allocations being made.</p>
SK.IAO.0005	<p>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.</p>	<p>The Local Plan is an evolving document which includes multiple stages of consultation. The next consultation will be on the draft Local Plan which is scheduled to be published in late 2022. Decision making includes balancing representations received through consultation with up to date, robust evidence and planning judgement.</p>
SK.IAO.0008	<p>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.</p>	<p>Comments noted.</p>
SK.IAO.0014	<p>time to get the 'Planning Forum' up and running again.</p>	<p>Comments noted.</p>
SK.IAO.0015	<p>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.</p>	<p>The Local Plan is an evolving document which includes multiple stages of consultation. The next consultation will be on the draft Local Plan which is scheduled to be published in late 2022. Decision making includes balancing representations received through consultation with up to date, robust evidence and planning judgement.</p>
SK.IAO.0016	<p>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.</p>	<p>The Bourne Neighbourhood Plan has been given the responsibility to allocate land for around 100 houses in Bourne through Policy BRN1. The supporting text states that should the Neighbourhood Plan not do this within the first five years of the Local Plan being adopted, the Local Plan will make the required allocations through its first review.</p>
SK.IAO.0018	<p>The focus of new development in Grantham and the larger villages is supported.</p>	<p>Comments noted. In accordance with the Settlement Hierarchy, development is also focussed on the other towns of Stamford, Bourne and Market Deeping.</p>

Representation Reference Number	Comment	Officers Response
SK.IAO.0021	<p>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.</p>	Comments noted.
SK.IAO.0023	<p>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 hectareage 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.</p>	Comments noted.
SK.IAO.0027	<p>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.</p>	Comments noted.
SK.IAO.0028	<p>LCC notes that Historic Environment policies are amongst the list of those polices 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</p>	Comments noted.

Representation Reference Number	Comment	Officers Response
	<p>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:</p> <ul style="list-style-type: none"> • 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. <p>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</p> <p>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.</p>	
SK.IAO.0030	<p>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.</p>	Comments noted.

Representation Reference Number	Comment	Officers Response
SK.IAO.0038	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	Comments noted.
SK.IAO.0039	<p>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.</p> <p>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.</p> <p>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.</p>	Comments noted. South Kesteven Council will work with neighbouring authorities to meet its Duty to Cooperate obligations.

Representation Reference Number	Comment	Officers Response
SK.IAO.0040	<p>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).</p> <p>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.</p>	Comments noted.
SK.IAO.0043	<p>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.</p>	Comments noted.
SK.IAO.0044	<p>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.</p>	<p>The affordable housing policy details how the District's housing needs are to be met. The policy will be reviewed through the Local Plan review. The development of affordable housing by the Council specifically is not determined through a Local Plan review.</p>
SK.IAO.0055	<p>Finalise the good design policy SPD as it is highly relevant to SP3 and SP4.</p>	<p>The Design SPD has now been adopted.</p>
SK.IAO.0009	<p>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.</p> <p>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.</p> <p>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"?</p> <p>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.</p> <p>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.</p>	<p>The Education Authority, Highways Authority and the Clinical Commissioning Group, as well as other key infrastructure providers will be consulted on the Local Plan as it develops to ensure that sufficient infrastructure is planned for.</p>
SK.IAO.0010	<p>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.</p> <p>Nature Recovery Network</p> <p>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.</p> <p>Page 4 of 5</p> <p>Natural England recommended this is dealt with as a separate policy, or cross referenced in appropriate policies.</p>	Comments noted.
SK.IAO.0025	<p>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. Please note that Historic England have published advice notes. They may be of</p>	Comments noted.

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	<p>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: 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-environmentand-site-allocations-in-local-plans/ Guidance in relation to Sustainability Appraisals can be found here:- https://historicengland.org.uk/images-books/publications/strategic-environassessment-sustainability-appraisal-historic-environment/</p>	
SK.IAO.0029	<p>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 Barberrly 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. Barberrly 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.</p>	<p>Comments noted. To contact the Planning Policy team please email planningpolicy@southkesteven.gov.uk For more information on our call for sites process, please see here.</p>
SK.IAO.0036	<p>One of the biggest problems 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</p> <p>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.</p> <p>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.</p>	<p>Comments noted.</p>
SK.IAO.0046	<p>Please find attached a response to the review document. I have a number of concerns: -</p> <ul style="list-style-type: none"> . 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. 	<p>Comments noted. The Education Authority, Highways Authority and the Clinical Commissioning Group, as well as other key infrastructure providers will be consulted on the Local Plan as it develops to ensure that sufficient infrastructure is planned for.</p>

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	<p>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.</p> <p>The Local Development Framework Core Strategy, adopted on 5th 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.</p>	
SK.IAO.0056	<p>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?</p>	<p>Comments noted. Our Self Build Register will be reviewed and updated.</p>
SK.IAO.0057	<p>New Use classes order and its implications.</p>	<p>Comments noted.</p>
	<p>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.</p>	<p>Comments noted.</p>
SK.IAO.0062	<p>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.</p> <p>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. 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.</p> <p><i>The Site</i> 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. 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.</p> <p><i>Proposals</i> 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.</p> <p><i>Summary</i> 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.</p> <p>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</p>	<p>Sites should be submitted through the Council’s Call for Sites process. More information can be found here</p>

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	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.	
SK.IAO.0065	The Grantham Canal is a virtual Rubbish Tip. This area before it is too late should be created into another park to complement Wyndham Park on the other side of town a large number of homes and families would benefit from an enhanced green and environmentally friendly space.	Comments noted.
SK.IAO.0067	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.	Comments noted
SK.IAO.0069	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.	Comments noted.
SK.IAO.0070	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 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. 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” (paragraph 31). As such, the Council’s recognition that the evidence base with respect to the Employment Land Study needs updating (paragraph 1.13) 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 (paragraph 8c). 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 (paragraphs 170d and 174b). 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.	Comments noted.
SK.IAO.0081	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. 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. 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 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.	Comments noted.
SK.IAO.0082	I do not approve of any of your policies.	
SK.IAO.0089	In summary, <ul style="list-style-type: none"> 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 	Comments noted. It is a requirement of the National Planning Policy Framework for the Local Plan to look forward to a minimum of 15 years into the future from when it is anticipated to be adopted.
SK.IAO.0092	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.	Comments noted.

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	<p>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.</p> <p>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</p>	
SK.IAO.0094	Please see response to Call for Sites on behalf of Longhurst Group Ltd & Jabberwocky Investments Ltd in relation to land off Beaufort Drive, Bourne.	Comments noted.
SK.IAO.0095	<p>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). 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:</p> <ul style="list-style-type: none"> - 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. <p>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.</p>	Comments noted.
SK.IAO.0096	<p>When applying for planning clarity on the exact location must be detailed.</p> <p>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.</p>	The Bourne Neighbourhood Plan has been given the responsibility to allocate land for around 100 houses in Bourne through Policy BRN1. The supporting text states that should the Neighbourhood Plan not do this within the first five years of the Local Plan being adopted, the Local Plan will make the required allocations through its first review.
SK.IAO.0097	<p>When applying for planning clarity on the exact location must be detailed.</p> <p>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.</p>	The Bourne Neighbourhood Plan has been given the responsibility to allocate land for around 100 houses in Bourne through Policy BRN1. The supporting text states that should the Neighbourhood Plan not do this within the first five years of the Local Plan being adopted, the Local Plan will make the required allocations through its first review.
SK.IAO.0099	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.	Policy SB1 of the adopted Local Plan requires new residential and commercial developments to provide electric car charging points. The policy will be reviewed through the emerging Local Plan.
SK.IAO.0103	<p>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.</p> <p>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.</p>	Comment noted.
SK.IAO.0110	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.	Support noted.
SK.IAO.0111	<p>Re: Q5c- New Settlement. Note: Vision & Objectives for SK. 2.2 Proposal 1 (p.4) Grantham.</p> <p>Spitalgate Heath - a nationally designated Garden Village.</p> <p>P.13 Proposal 5 - Settlement Hierarchy, states that there are no proposals for a Garden Village in the Review. This appears contradictory. Need for clarification.</p>	Spitalgate Heath is a Garden Village allocated in the adopted Local Plan. There are no proposals for any additional Garden Villages through the review.

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SK.IAO.0064	<p>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 goodselves 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 Loo's". I would suggest 4 conveniences sited north - East- South West from the Town Centre. Temporary souldtion. Enclosed are copies which I wrote back in 2011. I do feel this is such an important subject, one which all humans require.</p>	<p>To discuss public conveniences, please contact 01476 40 60 80</p>
SK.IAO.0073	<p>It is agreed that the Local Plan Review should continue to direct growth towards the most sustainable settlement which is Grantham. 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. 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. 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. 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. 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. 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.</p>	<p>Comments noted. Sites should be submitted through our Call for Sites process. More information can be found here.</p>
SK.IAO.0074	<p>It is agreed that the Local Plan Review should continue to direct growth towards the most sustainable settlement which is Grantham. 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. 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. 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. 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. 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.</p>	<p>Comments noted. Sites should be submitted through our Call for Sites process. More information can be found here.</p>
SK.IAO.0075	<p>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. 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. 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</p>	<p>Comments noted.</p>

Representation Reference Number	Comment	Officers Response
	<p>Planning system underway, including likely further changes to the way in which housing needs are to be assessed and planned for. This is especially pertinent given that part of the scope of the review is on housing need as stated in the I&O document:</p> <p>“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.”</p> <p>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.</p> <p>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.</p>	
SK.IAO.0102	<p>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.</p>	Comments noted.

Representation Reference Number	Comment	Officers Response
SK.IAO.0033	<p>National Grid assets within the Plan area</p> <p>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.</p> <p>Electricity Transmission</p> <p>Asset Description</p> <p>4VK ROUTE (TWR 001 - 001B): 400Kv Overhead Transmission Line route: COTTAM - EATON SOCON - WYMONDLEY 2</p> <p>Gas Transmission</p> <p>Asset Description</p> <p>Gas Transmission Pipeline, route: HATTON TO PETERBOROUGH 1</p> <p>Gas Transmission Pipeline, route: HATTON TO PETERBOROUGH 2</p> <p>Gas Transmission Pipeline, route: SILK WILLOUGHBY TO STAYTHORPE PS</p> <p>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.</p> <p>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: 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.</p> <p>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 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</p>	

Representation Reference Number	Comment	Officers Response
SK.IAO.0001	<p>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.</p> <p>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.</p> <p>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. 2</p> <p>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.</p> <p>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.</p> <p>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.</p>	
SK.IAO.0121	Prepare a Sustainable Waste/Recycling Policy and Practice paper, setting performance reporting.	
SK.IAO.0122	Annotated Local Plan provided.	

Representation Reference Number	Comment	Officers Response
SK.IAO.0123	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!	Information on the Stamford Neighbourhood Plan can be found here .

Sustainability Appraisal Scoping Report

Representation Reference Number	Comments	Officer Comments
Comments about the Sustainability Appraisal Scoping Report		
SK.IAO.0018	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.	Comments received on the Sustainability Appraisal will be considered as the draft Local Plan and the accompanying Sustainability Appraisal are prepared.
SK.IAO.0027	See attached letter to rep. 0027	Comments received on the Sustainability Appraisal will be considered as the draft Local Plan and the accompanying Sustainability Appraisal are prepared.
SK.IAO.0030	<p>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:</p> <p>Biodiversity and Geodiversity Site located away from the three SSSIs in the vicinity of Ancaster. Biodiversity/geodiversity not considered to constrain development.</p> <p>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.</p> <p>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.</p> <p>Air, land, water and soil resources The small-scale nature of the proposal will not have a negative impact on resources.</p> <p>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.</p> <p>Population and community Ancaster has a range of social and community services and facilities and new residential development will help to support existing facilities. As identified within the SA, limiting growth in larger villages would have the potential to undermine their viability and vitality.</p> <p>Health and wellbeing Additional dwellings on this site in Ancaster would have the potential to support local leisure, recreational and health services in Ancaster.</p> <p>Transport 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.</p> <p>Economic vitality Residential development in this location can help support community services and employment opportunities.</p>	Comments received on the Sustainability Appraisal will be considered as the draft Local Plan and the accompanying Sustainability Appraisal are prepared.

SK.IAO.0031	<p>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.</p> <p>The Scoping Report concludes that land to the east of Bourne is at risk of flooding, whereas land to the west of town, such as the land at Park Farm, is less constrained by Flood Riaks. 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 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.</p>	Comments received on the Sustainability Appraisal will be considered as the draft Local Plan and the accompanying Sustainability Appraisal are prepared.
SK.IAO.0032	<p>The Sustainability Appraisal Scoping Report (SA) considers the level of growth promoted in the Issues and Options consultation. The SA specifically address 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, LV2- Renew and increase the focus for growth in the larger villages, LV3- Limit the growth in the larger villages.</p> <p>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:</p> <p>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.</p> <p>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 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.</p> <p>Water Quality: The SA suggest 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.</p> <p>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.</p> <p>Heritage - When discussing the Historic Environment, the SA raises concerns that development may impact on listed buildings with 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.</p>	Comments received on the Sustainability Appraisal will be considered as the draft Local Plan and the accompanying Sustainability Appraisal are prepared.
SK.IAO.0038	<p>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:</p> <ul style="list-style-type: none"> • 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. <p>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</p>	Comments received on the Sustainability Appraisal will be considered as the draft Local Plan and the accompanying Sustainability Appraisal are prepared.

	<p>to significantly increase the demand for habitat banks and biodiversity setting, and may lead to disproportionate implications for the viability of particular development types’.</p> <p>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.</p>	
SK.IAO.0044	<p>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.</p>	<p>Comments received on the Sustainability Appraisal will be considered as the draft Local Plan and the accompanying Sustainability Appraisal are prepared.</p>
SK.IAO.0049	<p>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)</p> <p>Building research Establishment may have a computer model to assist any appraisal.</p>	<p>Comments received on the Sustainability Appraisal will be considered as the draft Local Plan and the accompanying Sustainability Appraisal are prepared.</p>
SK.IAO.0055	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>Comments received on the Sustainability Appraisal will be considered as the draft Local Plan and the accompanying Sustainability Appraisal are prepared.</p>

<p>SK.IAO.0087</p>	<p>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.</p> <ul style="list-style-type: none"> · 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. <p>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.</p> <p>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.</p> <ul style="list-style-type: none"> · 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 	<p>Comments received on the Sustainability Appraisal will be considered as the draft Local Plan and the accompanying Sustainability Appraisal are prepared.</p>
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	<p>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.</p> <ul style="list-style-type: none"> · 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. <p>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.</p> <p>Biodiversity Net Gain</p> <p>The SA has assessed two options for delivering Biodiversity Net Gain (BNG) in the Local Plan Review:</p> <ul style="list-style-type: none"> · 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. <p>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 full 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.</p>	
SK.IAO.0090	<p>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.</p>	<p>Comments received on the Sustainability Appraisal will be considered as the draft Local Plan and the accompanying Sustainability Appraisal are prepared.</p>
SK.IAO.0094	<p>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</p>	<p>Comments received on the Sustainability Appraisal will be considered as the draft Local Plan and the accompanying Sustainability Appraisal are prepared.</p>

	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.	
SK.IAO.0051	<p>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:</p> <p>Option MT1: Continue the current Local Plan’s focus of growth on Stamford, Bourne and The Deepings.</p> <p>Option MT2: Renew and increase the focus of growth on Stamford, Bourne and The Deepings.</p> <p>Option MT3: Reduce the focus of growth on Stamford, Bourne and The Deepings</p> <p>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.</p> <p>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.</p>	Comments received on the Sustainability Appraisal will be considered as the draft Local Plan and the accompanying Sustainability Appraisal are prepared.
SK.IAO.0073	<p>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. 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). 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. 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. 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.</p> <p>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’.</p> <p>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. 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. 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. The Site forms part of Area 6 in the Grantham Capacity and Limits to Growth Study (2015). 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.</p> <p>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</p>	Comments received on the Sustainability Appraisal will be considered as the draft Local Plan and the accompanying Sustainability Appraisal are prepared.

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. 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". 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. 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.' 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.' 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,

<p>SK.IAO.0074</p>	<p>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. 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. 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:</p> <ul style="list-style-type: none"> 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)³⁵; and e) consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size.' <p>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).</p> <p>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.</p> <p>The preceding 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). 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.</p> <p>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. 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</p>	<p>Comments received on the Sustainability Appraisal will be considered as the draft Local Plan and the accompanying Sustainability Appraisal are prepared.</p>
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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.

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.

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.

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.

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).

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.

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
It is agreed that the impact on this theme is dependent upon the location of the development. 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.

Landscape
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. 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.

Historic Environment
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.

Air, land, water and soil resource

We concur with AECOMs conclusion that ‘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.’

It is also important to note that the Land north of A52 falls entirely within Grade 3 agricultural land (see paragraph 2.31 below).

Climate change

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.

Population and community

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.

Health and wellbeing

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.

Transport

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. 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.

Economic Viability

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.

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. 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. 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. 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. 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. 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’.

For the reasons outlined above, South Kesteven District Council should amend the settlement hierarchy to include a new settlement and Land North of A52.

SK.IAO.0075	<p>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. 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. 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.</p>	<p>Comments received on the Sustainability Appraisal will be considered as the draft Local Plan and the accompanying Sustainability Appraisal are prepared.</p>
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