

# South Kesteven Local Plan Representations.

## Draft Local Plan Regulation 18 Consultation

On behalf of Hallam Land Management & Barratt  
Developments PLC

Date: April 2024 | Pegasus Ref: P22-2687

Local Authority Ref: SKPR-82: Land South of Harrowby Lane, Grantham, NG31 9HB

Author: Clare Clarke and Harry Clayton

---



# Contents.

1. Introduction.....	3
2. Chapter 4 – Sustainable Development in South Kesteven.....	4
Draft SD1: The Principles of Sustainable Development in South Kesteven .....	4
3. Chapter 6 – Spatial Strategy.....	5
Draft Policy SP1 – Spatial Strategy.....	5
Spatial Strategy .....	5
Plan Period.....	5
Draft Policy SP2 – Settlement Hierarchy.....	6
Draft Policy SP4: New Residential on the Edge of Settlements.....	6
4. Chapter 7 – Meeting Housing Needs.....	8
Draft Policy H1: Housing Allocations.....	8
Housing Supply Buffer .....	8
Distribution of New Allocations .....	8
Deliverability .....	9
Eastern Growth of the Sub-Regional Centre of Grantham .....	9
Land South of Harrowby Lane, Grantham.....	9
Draft Policy H2: Affordable Housing Contributions .....	11
Draft Policy H4: Meeting All Housing Needs .....	12
Draft Policy H3: Self and Custom Build Housing.....	12
5. Chapter 10 – Protecting and Enhancing the Natural and Built Environment .....	14
Draft New Policy 4: Biodiversity Opportunity and Delivering Measurable Net Gains .....	14
6. Chapter 13 – Infrastructure and Developer Contributions.....	15
ID1: Infrastructure for Growth.....	15
ID2: Transport and Strategic Transport Infrastructure .....	15
7. Chapter 11 – The Built Environment.....	16
Draft Policy SB1 – Sustainable Building.....	16

## Appendices contents.

Appendix A: Land South of Harrowby Lane, Grantham Concept Masterplan.....	17
Appendix B: Land south of Harrowby Lane, Grantham Concept Masterplan (400 homes).....	19



# 1. Introduction

- 1.1. These representations are submitted by Pegasus Group on behalf of Hallam Land Management and Barratt Developments PLC in response to the Draft South Kesteven Local Plan Regulation 18 Consultation.
- 1.2. These representations relate to our client's interests at Land South of Harrowby Lane, Grantham (reference SKPR-82). The site was submitted through the 'Call for Land' exercise and is included in the Draft Site Assessment Report (February 2024). A concept masterplan for the site is shown in Appendix A.
- 1.3. The site is capable of delivering a mix of uses, including a local centre, new primary school and up to 2,880 homes. The site offers a sustainable location for strategic development with excellent connectivity provided by the existing Public Rights of Way network that run westwards into Grantham and the potential to deliver a new bus routes connecting the site with Grantham Town Centre, providing access to its wide range of facilities and services.
- 1.4. The site provides a strategic option which complements the proposed strategy and strategic sites already allocated to the east of Grantham. Whilst the Council has not identified the site as a draft allocation to meet the immediate housing needs in the District, there is an opportunity for the Local Plan to set out a longer term vision for Grantham and identify this area as a broad location for future growth. These representations will set out the case for the site in this context and outline the benefits it could deliver.
- 1.5. There is also an opportunity to deliver a smaller scale of development of 400 homes in the short term as a standalone development. A concept masterplan for the smaller scheme is shown in Appendix B. This smaller non-strategic option would not compromise the wider proposals but is also not reliant on the wider development to achieve a sustainable development in this plan period if the wider site is not considered as part of this Local Plan update.
- 1.6. The site is in single ownership and being promoted jointly by Hallam Land Management and Barratt Developments PLC. Both companies have a strong track record in delivering strategic sites. There are no technical or legal issues with the site, making it is a viable and deliverable option.
- 1.7. A Vision Document for the site is included with these representations. This document covers the appraisal work undertaken, including a Landscape Appraisal and a Highways Assessment, and shows how this has informed an early-stage Concept Masterplan for the site. The document sets out in more detail the potential of the site to provide homes and infrastructure and deliver sustainable growth.
- 1.8. The remainder of this response sets out our representations. The document and policy/section/paragraph the representations relate to, are clearly set out.



## **2. Chapter 4 – Sustainable Development in South Kesteven**

### **Draft SD1: The Principles of Sustainable Development in South Kesteven**

- 2.1. Draft Policy SD1 has been strengthened to incorporate the Council's commitment to reach net zero carbon by 2050. This draft policy expects proposals to mitigate against the impacts of climate change and contribute towards creating a strong, stable and more diverse economy.
- 2.2. This includes development proposals proactively minimising the need to travel, locating development where services and facilities can be accessed more easily through walking, cycling or public transport and proactively supporting strong, vibrant and healthy communities, by providing a supply of housing.
- 2.3. This draft policy is supported.

### 3. Chapter 6 – Spatial Strategy

#### Draft Policy SP1 – Spatial Strategy

- 3.1. The proposed update to Policy SP1: Spatial Strategy reflects the new plan period and housing need. It sets out that the Local Plan aims to deliver sustainable growth across the District and throughout the plan period, with new growth being planned through housing and employment land allocations.

#### **Spatial Strategy**

- 3.2. The policy sets out that the overall strategy of the Local Plan is to deliver sustainable growth, with the focus for the majority of growth in and around the sub-regional centre of Grantham and the three market towns, with Grantham being a particular focal point.
- 3.3. The identification of Grantham as the focus of growth is supported. This reflects the evidence and provides a basis for supporting the long term economic success of the town. Grantham has existing infrastructure, employment, services and facilities, which new development can benefit from and which will minimise the need to travel.

#### **Plan Period**

- 3.4. The Plan period is proposed to run from 1st April 2021 through to 1st April 2041.
- 3.5. This is not considered to be a long enough plan period to ensure the plan provides a 15 year time horizon from the adoption of the plan, in line with paragraph 22 of the NPPF.
- 3.6. The current Local Development Scheme, published in May last year planned this current Regulation 18 consultation for Winter 2023/24 and anticipated the Regulation 19 consultation on a Publication Local Plan this summer and Submission in Winter 2024/25. The Examination in Public process was then expected to take a year, with adoption in Spring 2026. This is an ambitious timetable which is already proving difficult to achieve.
- 3.7. The current Regulation 18 consultation has been delayed and is taking place in Spring 2024, which in turn will delay the Pre-Submission consultation, which is now unlikely to take place before the end of the year as it will take time to review the consultation responses and finalise the evidence base. This would suggest Submission in Spring 2025 at the earliest, delaying adoption until at least the Summer or Autumn 2026.
- 3.8. This would mean adoption part way through the monitoring year 2026/27, leaving less than 15 years from adoption.
- 3.9. The Council will be submitting the Local Plan close to the government's 30 June 2025 deadline for submitting plans under the current system before the planning reforms come in. The potential for delays is therefore increased by the potential for capacity issues within the Planning Inspectorate to respond to the influx of Local Plans.
- 3.10. The Council can avoid further unnecessary delays during the Examination process by extending the plan period now to at least 2042, and given the potential for further delays to 2043. At this stage in the process this change can be made without undermining the overall



strategy or creating the need for additional consultation, as there will be further consultation at the Regulation 19 stage.

- 3.11. The latest affordability ratios data reduces the Council's standard method Local Housing Need figure by 14 to 687 homes a year. This means two additional years on the plan period would only require an additional 1,094 new homes (280 less homes over the current 20 years plus two additional years at 687). Once the two strategic sites which deliver beyond the plan period, are taken into account, delivering approximately 250 homes a year between them (based on the trajectory shown in the consultation document), this is reduced to 594 homes in total. This scale of development could be accommodated now and avoid issues with the soundness of the plan at Examination and a further early review.
- 3.12. Our client's site, south of Harrowby Lane in Grantham, offers a sustainable option for delivering between 400 – 1,000+ homes in the plan period and at the Sub-Regional Centre, to assist with the resilience against current and potential delays. The addition of two years can be accommodated without the need to revisit the evidence base if it is informed by a high level review of any potential implications. This could be done before submission of the plan and avoid more significant work being needed and further consultation later in the process.

## **Draft Policy SP2 – Settlement Hierarchy**

- 3.13. This Draft Policy focuses the majority of development in Grantham, in order to support and strengthen its role as a Sub-Regional Centre. New development proposals will be supported on sustainable greenfield sites which includes urban extensions, where development will not compromise the town's nature and character. This draft policy is supported.
- 3.14. This has been updated to reflect the conclusions of the Settlement Hierarchy Review (2023). This study continues to support Grantham as a Market Town at the top of the settlement hierarchy, which is supported.

## **Draft Policy SP4: New Residential on the Edge of Settlements**

- 3.15. This draft policy supports proposals for new residential development on the edge of a settlement when in accordance with all other relevant policies, provided that the policy criteria are met.
- 3.16. The inclusion of a policy for new development on the edge of sustainable settlements, including Grantham, is supported and provides the Council with a means to assess opportunities to maintain sufficient housing supply through the plan period.
- 3.17. Criteria (a) requires clear evidence of substantial support from the local community through an appropriate, thorough, and proportionate pre-application community consultation exercise.
- 3.18. Whilst pre-application community consultation is supported and is considered to be an important part of the process of preparing an application, demonstrating substantial support for any new housing development is considered unrealistic and too subjective.
- 3.19. The planning system is built on the principle of public benefit and the need to balance the needs of community as a whole, taking account of the social, economic and environmental



benefits and impacts of development. Those in need of housing are often silent in the planning process and there is a risk that this criterion will only benefit the loudest voices, often those objecting to new development due to potential or perceived impacts.

- 3.20. As this is an existing policy criterion, it would be helpful to consider and reflect on the evidence of whether this policy has been successful in supporting new development in sustainable locations.
- 3.21. Criteria (d) requires proposals to meet a proven local need for housing and address a specific targeted need for local market housing.
- 3.22. It is suggested that this criterion is broadened to allow for sites to come forward to address need across the District as a whole rather than proven local need in areas. This would better reflect the spatial strategy which directs development to the most sustainable locations and provides further flexibility to ensure the housing supply is maintained throughout the plan period.

## 4. Chapter 7 – Meeting Housing Needs

### Draft Policy H1: Housing Allocations

- 4.1. The government's Standard Method is used to determine the minimum number of homes needed for South Kesteven across the plan period. The Standard Method for South Kesteven establishes a need of 14,020 dwellings from 2021 to 2041, equating to 701 dwellings per annum.
- 4.2. The proposed site allocations for residential development are detailed within Draft Policy H1: Housing Allocations. In line with the broad strategy, the Local Plan makes allocations in the most suitable and sustainable sites across the district, focussing on Grantham, Stamford, Bourne, The Deepings, and the Larger Villages.

#### Housing Supply Buffer

- 4.3. The draft Local Plan proposes using the standard method figure as the basis of the housing requirement and 20% buffer in the land supply to ensure the Council delivers at least the minimum Local Plan requirement of 14,020 homes. The purpose of the buffer is to provide developers with a greater choice of sites and a contingency in case sites are not delivered within the timeframes anticipated.
- 4.4. This inclusion of a 20% buffer is supported.

#### Distribution of New Allocations

- 4.5. Within the consultation document, Table 2: Meeting Housing Need sets out completions, commitments and new allocations against the settlement hierarchy. It would be helpful to confirm there is no double counting and that the commitments column does not include adopted Local Plan allocations with planning permission as these are included in the next column.
- 4.6. Table 2 and Table 3: Current Percentage distribution of development shows that almost 50% of growth over the plan period will be focused in Grantham and this is supported.
- 4.7. The tables also highlight that a large proportion of the new allocations are directed to the Larger Villages. Almost the same number of the new homes are proposed in the Larger Villages (1,002 new homes) as are proposed in Grantham (1,044), despite this being the Sub-Regional Centre and the focal point for growth. Whilst it is important to consider this in the context of the existing commitments, Table 3 highlights that this focus of new allocations in the Larger Villages means a total of 15% of the overall growth is directed to this level of the hierarchy, more than the towns of Stamford, Bourne and The Deepings.
- 4.8. It is considered important that opportunities in the towns are revisited ahead of this scale of development being proposed further down the hierarchy. Our client's site, Land South of Harrowby Lane, Grantham, has been considered as a whole but the potential for part of the site to come forward during this plan period ahead of the larger strategic site has not yet been considered and may offer an alternative to the focus of new allocations in the Larger Villages. Appendix B shows the potential for a smaller scale of development, delivering 400 homes.



- 4.9. The attached vision document sets out the opportunity for this first phase, which would not undermine the wider masterplan for strategic development in the location but would also not be reliant on it to deliver a sustainable site.

#### **Deliverability**

- 4.10. The deliverability of the proposed allocations will need to be clearly demonstrated as part of the Regulation 19 consultation and a more detailed trajectory provided showing individual site trajectories. It is essential that the Council is realistic about the lead in times for starting on site, build out rates and that the potential for competition to slow delivery.

#### **Eastern Growth of the Sub-Regional Centre of Grantham**

- 4.11. The allocations within the adopted Local Plan on land at Spitalgate Health (GR3-H1) and Prince William of Gloucester Barracks (GR3-H4) are on land at the edge of the Grantham and are proposed to be carried forward within the update to the plan.
- 4.12. This is supported and creates an opportunity for additional growth to the eastern edge of Grantham as the supporting infrastructure and urban form extends eastwards and opens up new opportunities to enable the continued focus of development at Grantham as the Sub-Regional Centre and support the long term economic success of this town.

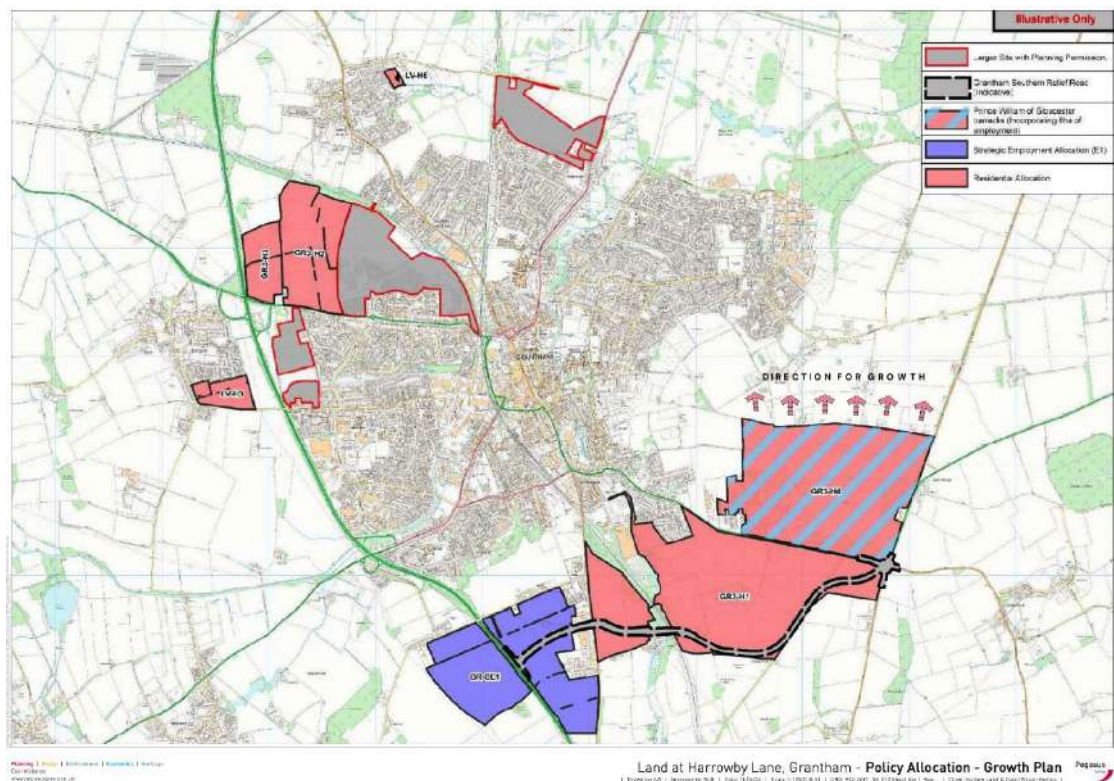
#### **Land South of Harrowby Lane, Grantham**

- 4.13. This representation is made on behalf of Hallam Land Management and Barratt Developments PLC in relation to their land interests at Land south of Harrowby Lane, Grantham. This site provides an opportunity to deliver a sustainable extension to the eastern side of Grantham, at the top of the settlement hierarchy for South Kesteven District Council.
- 4.14. The site has the potential to deliver up to 2,880 homes, a primary school and a local centre (see concept masterplan in Appendix A) but also provides an opportunity to deliver a smaller 400 homes development in the short term (see concept masterplan in Appendix B).
- 4.15. A Vision Document for the site is submitted with these representations which sets out more details on both the wider scheme and also the potential for a smaller site of 400 homes which could be delivered as a first phase of the wider development or as a standalone sustainable development.
- 4.16. This site is an opportunity to not only create a new residential community with a range of housing typologies that are well connected to the town centre through high-quality pedestrian and cycle routes, but also an exciting chance to deliver over 70 hectares of public open space, including 'Hall's Hill Park'. Halls Hill Park would offer a range of uses and wildlife enhancement, providing future and existing residents with access to high quality public open space supporting healthy lifestyles whilst ensuring biodiversity net gain is achieved.
- 4.17. The proposal aims to create active travel as priority across the development, ensuring cycling and walking is desirable, direct and safe and creating a preferred method of transport. This will be supported through the provision of day to day serves within the site and segregation of cycling infrastructure and priority crossings. There is also the potential for new bus routes to serve the development.

- 4.18. The site is of a scale that will support the provision of a primary school, local centre and new recreation facilities. It is also well located to benefit from the broad range of facilities available in Grantham including employment, larger supermarkets, sports, leisure and health facilities. The adjacent allocations of Spitalgate Heath Garden Village and Prince William of Gloucester Barracks also provide complementary provision including employment, secondary school, local centres and sheltered housing.
- 4.19. The Land south of Harrowby Lane, has been subject to a range of technical assessments over a number of years and this means the constraints and opportunities are well understood. The working concept masterplan shown in Appendix A responds to a range of technical assessments and provides the basis for stakeholder engagement to ensure the scheme is comprehensively planned.
- 4.20. Such growth will align with the Settlement Hierarchy and deliver further growth in Grantham which will support and strengthen its role as a sub-regional centre within the district. The land at Harrowby Lane, can provide significant economic benefits whilst in construction and when operational. This includes a large proportion of jobs and economic growth through an estimated £43.2 million in community infrastructure contributions.

#### Strategic Option for a 30 Year Vision

- 4.21. It is considered this site should be reconsidered ahead of the Regulation 19 consultation, as a suitable longer term strategic direction of growth beyond the current plan period to complement the existing proposed development to the east of Grantham. The existing commitments within the Local Plan allocations under Policy H1: Housing Allocations within references GR3-H1 (Garden Village) and GR3-H4 (Prince William of Gloucester Barracks) create the context for this site to form part of a series of connected planned developments for the continued eastern expansion of Grantham.
- 4.22. Paragraph 22 of the NPPF states that where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery. The land to the south of Harrowby Lane, Grantham provides an opportunity to do this. It is therefore suggested that if this site is not allocated as part of the Local Plan update, then this area could be identified as a Direction for Growth as part of a longer term strategy for Grantham alongside the Garden Village and Barracks developments.
- 4.23. The diagram below shows how this could be shown on the Policies Map or a diagram within the emerging Local Plan. Oadby and Wigston Local Plan provides a good example of an authority that have adopted a plan with a future direction of growth shown on the Policies Map.
- 4.24. This site would create an option for the district to anticipate and respond to long-term requirements and opportunities through a development opportunity that is deliverable and complements existing plans.



### Alternative Site Option for Assessment – 400 Homes

- 4.25. It is also requested that the smaller scheme shown in Appendix B and set out in the attached Vision Document is also considered as a separate option which could complement the current strategy and allow the Council to reduce the pressure on Large Villages and / or extend the plan period to provide additional resilience to current and potential delays through the Examination process.
- 4.26. The site has no significant technical constraints and is supported by a range of technical assessments which show there are no issues that would prevent the site being delivered in the short term. It is in single ownership and being promoted by Hallam Land Management and Barratt Developments PLC, a local housebuilder.
- 4.27. This smaller non-strategic option could be treated as a first phase of the wider Direction for Growth. It would not compromise the wider proposals but is also not reliant on the wider development to achieve a sustainable development in this plan period if the wider site is not considered as part of this Local Plan update.

## **Draft Policy H2: Affordable Housing Contributions**

- 4.28. The consultation document sets out that all developments comprising 10 or more dwellings (or an area of 0.5ha or more) will be required to make provision for between 27–57% affordable housing. The exact requirement is to be established following the outcome of the Whole Plan Viability Assessment.
- 4.29. This approach of using the Whole Plan Viability Assessment to inform the policy requirement is supported, as a potential requirement of up to 57% is a significant concern for viability of development and would not be supported.

- 4.30. The overlap in the policy requirement for First Homes and affordable ownership housing is explained in the supporting text but should be made clearer in the policy to avoid confusion.

### **Draft Policy H4: Meeting All Housing Needs**

- 4.31. This draft policy requires all major developments for residential development to provide appropriate type and sized dwellings to meet the needs of current and future households in the District.
- 4.32. It is important for the policy to recognise that there are other factors that will need to be taken into account when considering the housing mix on a site. It is suggested that the draft policy includes reference to having regard to housing market evidence, economic conditions and viability, character and design and site-specific circumstances, all of which may affect the most appropriate mix for a site. It is important that the policy allows for a flexible approach that will support the deliverability of development.
- 4.33. The housing mix sought is a factor that should be considered in the Whole Plan Viability Assessment as this will have an impact on site viability and the level of affordable housing that it is possible to support.
- 4.34. The draft policy also requires residential development above a threshold of 10 or more dwellings to provide at least 10% of new dwellings to be 'Accessible and Adaptable' in line with the optional standards set out in Part M4(2) of the Building Regulations.
- 4.35. Paragraph 16f of the NPPF advises that Local Plans should avoid unnecessary duplication. As noted in the consultation document, the Government response to consultation on raising accessibility standards for new homes states that the Government proposes to mandate the current M4(2) requirement in Building Regulations as a minimum for all new homes, with M4(1) applying in exceptional circumstances. This will be subject to a further consultation on the technical details and will be implemented in due course through the Building Regulations.
- 4.36. If the Government implements proposed changes to Part M of the Building Regulations, the Council's proposed approach would represent an unnecessary duplication of Building Regulations.
- 4.37. If the Council wishes to adopt the optional standards for accessible and adaptable dwellings, sufficient robust evidence needs to be presented to justify this approach in accordance with the Planning Practice Guidance which outlines the evidence necessary to justify a policy requirement for optional standards. Planning policies for accessible housing need to be based on evidence of need, viability and a consideration of site specific factors.
- 4.38. There is an extra cost in delivering M4(2) which may vary between affordable and open market dwellings. This policy must therefore also be included in those considered as part of the Whole Plan Viability Assessment to ensure that any proposed approach does not compromise viability of development.

### **Draft Policy H3: Self and Custom Build Housing**

- 4.39. Draft Policy H3 sets out a requirement for sites of 400 or more units, to include at least 2% of the plots for self and custom build housing.



- 4.40. A key issue to consider is whether large scale sites are where the self-builders and custom-builders want to be located and what happens if plots are not taken up. This approach to requiring a percentage of larger sites is unlikely to meet the aspirations of the majority of those on the self-build register. The demand is likely to be for small scale sites within rural areas rather than plots within more urban sites. It is important that the aspirations of self-builders are considered in the preparation of this policy to ensure it is effective.
- 4.41. The proposed policy also needs to consider local needs/demands, health and safety risks of empty plots or plots being delivered later than the rest of the development and design impacts, for example how to avoid creating long term gaps in the street scene.
- 4.42. Whilst there is general support for the concept of self-build/custom housing, it is considered that the policy should support this through a criteria based policy which encourages the delivery of such plots where they are thought out, fully justified, and flexible.

## 5. Chapter 10 – Protecting and Enhancing the Natural and Built Environment

### **Draft New Policy 4: Biodiversity Opportunity and Delivering Measurable Net Gains**

- 5.1. This requires all qualifying development proposals to deliver at least 10% measurable biodiversity net gain attributable to the development. The net gain for biodiversity should be calculated using Natural England’s Biodiversity Metric.
- 5.2. The 10% requirement is supported and is in line with the statutory legislation implemented under Schedule 14 of the Environment Act 2021.
- 5.3. The proposal to exhaust all on-site opportunities before considering off-site provision of biodiversity net gain is not supported. It is not always the best approach to deliver biodiversity enhancements on site; this can create pockets of enhancement that are less beneficial to biodiversity than focusing these enhancements in strategic locations. This means on site improvements or improvements close to the site may be less beneficial than focusing enhancements within an important corridor for example.



## 6. Chapter 13 – Infrastructure and Developer Contributions

### **ID1: Infrastructure for Growth**

- 6.1. Draft Policy ID1 requires all development proposals to demonstrate that there is, or will be, sufficient infrastructure capacity (including blue green infrastructure) to support and meet the essential infrastructure requirements arising from the proposed development.
- 6.2. The developer will be expected to deliver the necessary infrastructure provision for the local communities affected either by direct provision or through a proportionate contribution towards the overall cost of the provision of local and strategic infrastructure required by the development either alone or cumulatively with other developments.
- 6.3. Infrastructure is critical to successful growth and this policy approach is supported and is aligned with the Community Infrastructure Levy Regulations. Our client's site, Land south of Harrowby Lane, Grantham offers an opportunity to deliver significant new infrastructure for the benefit of existing and new residents.

### **ID2: Transport and Strategic Transport Infrastructure**

- 6.4. Draft Policy ID2 requires new development to contribute to transport improvements in line with appropriate evidence, including the Infrastructure Delivery Schedule, the Local Transport Plan and local transport strategies. The policy also requires the provision of a Transport Statement/Assessment and/or a travel plan as appropriate.
- 6.5. Our client's site, Land south of Harrowby Lane, Grantham offers an opportunity delivery well connected and sustainable growth to the east of Grantham, further supporting the expansion of infrastructure on this side of the town. Development here would be supported by a detailed Transport Assessment and Travel Plan to ensure travel is minimised and sustainable travel is maximised.



## 7. Chapter 11 – The Built Environment

### Draft Policy SB1 – Sustainable Building

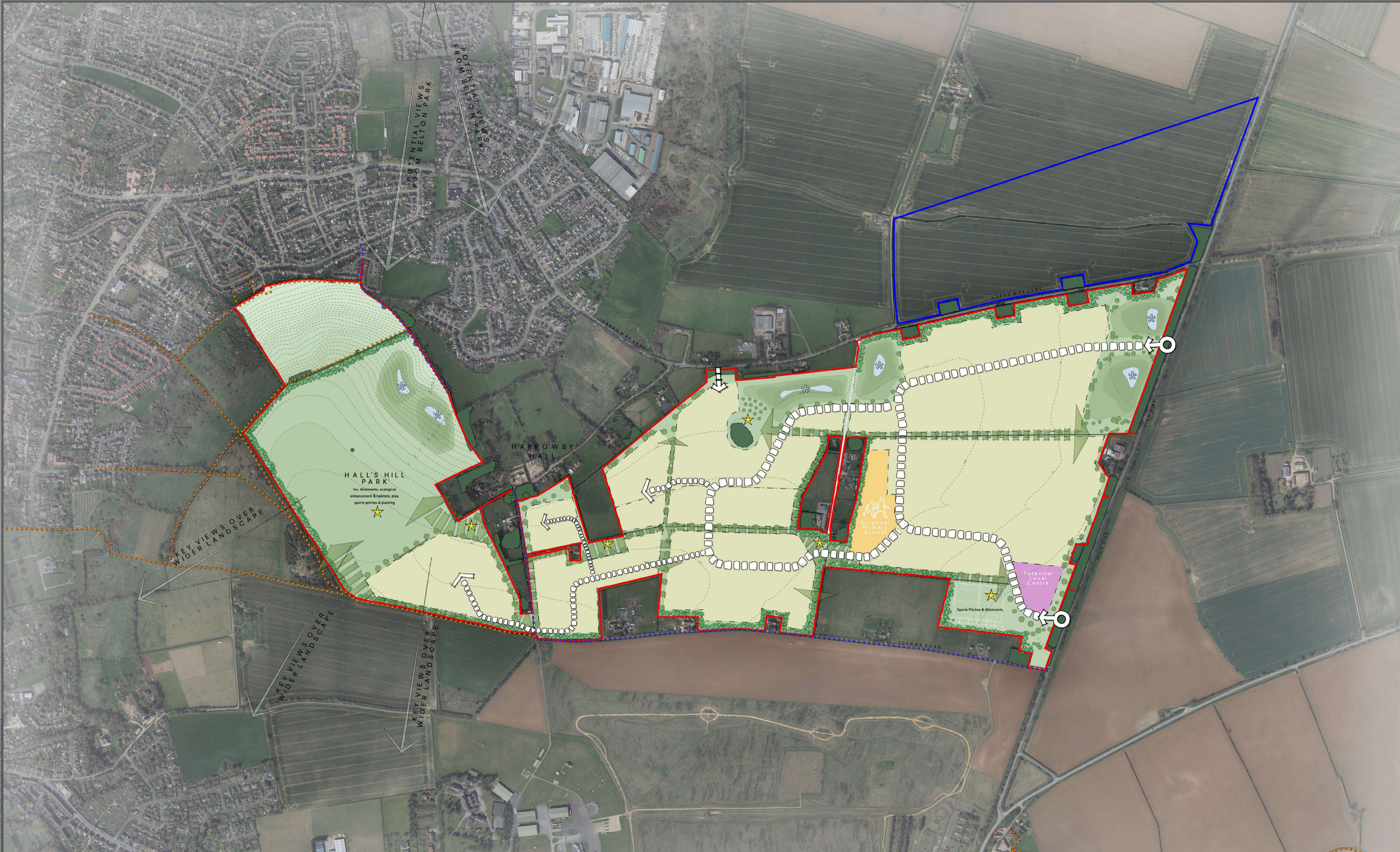
- 7.1. Draft Policy SB1: Sustainable Building expects all development proposals to mitigate against and adapt to climate change, to comply with national and contribute to local targets on reducing carbon emissions and energy use unless it can be demonstrated otherwise in exceptional circumstance.
- 7.2. In relation to energy emissions (Part 1) and Low-carbon travel (Part 3) it requires new development to strive to be zero carbon through minimising energy use and choice of low carbon energy sources. The current national policy within Paragraph 158 of the NPPF outlines that 'Plans should take a proactive approach to mitigating and adapting to climate change'.
- 7.3. The Written Ministerial Statement Planning: Local Energy Efficiency Standards – 13th December 2023 informed councils that the government expects examiners to reject local plans that go beyond current national policy provisions. The Statement sets out that any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale that ensures that development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework.
- 7.4. It is suggested that the policy should reflect the national position and include the terminology 'proactive approach' rather than to 'strive to be zero carbon'.
- 7.5. In relation to Part 2 (Water Resources) this expects new development to seek to achieve a 'water neutral position' and promote enhanced sustainability. To achieve this a series of standards are expected to be achieved by the new development. The expected standard for new housing to be as water efficient as possible and in line with the Building Regulations optional requirement for a target of 110 litres per day and if this cannot be met it must be demonstrated why this standard cannot be achieved.
- 7.6. Building Regulations require all new dwellings to achieve 125 litres per day per person (Part G) and it is considered that water efficiency is a matter most appropriately dealt with through Building Regulations.





# Appendix A: Land South of Harrowby Lane, Grantham Concept Masterplan





- Site Boundary (0.850ha)
- Ownership Boundary
- Proposed Primary School (Circ. 2.5ha)
- Proposed Local Centre (Circ. 1.5ha)
- Residential Development (Circ. Area: 88.37ha, Circa 2,800 dwellings based on 30% of development area @ 35/dw average density)
- Public Open Space
- Proposed SUDs
- Site Access
- Potential Emergency Access
- Primary Streets
- Public Rights of Way
- Restricted Byway
- Retained Trees & Hedgerows
- Proposed Buffer Planting
- Proposed Landscaping
- Green Corridors
- Retained Trees & Hedgerows
- Proposed Play Spaces







## **Appendix B: Land south of Harrowby Lane, Grantham Concept Masterplan (400 homes)**







Town & Country Planning Act 1990 (as amended)  
Planning and Compulsory Purchase Act 2004

