

South Kesteven Local Plan Review

Draft Local Plan Consultation (Regulation
18)

Representations prepared by Fisher German LLP
on behalf of the DIO

Project Title:

Prince William of Gloucester Barracks – The Defence Infrastructure Organisation

Contact Details:

[Redacted contact details]

1. Introduction

1.1 These representations are prepared by Fisher German on behalf of the Defence Infrastructure Organisation (DIO) in respect of their land interests at the Prince William of Gloucester Barracks, Grantham (PWoG). The site is a proposed strategic scale residential (Policy reference GR3-H4) and employment (Policy reference GR-E1) allocation in the extant South Kesteven Local Plan 2018. The land is illustrated at Figure 1 below. The DIO support the Draft Plan’s intention to continue to allocate the site, albeit now as an integrated mixed-use Policy (SKPR-65(GR3-H4)).

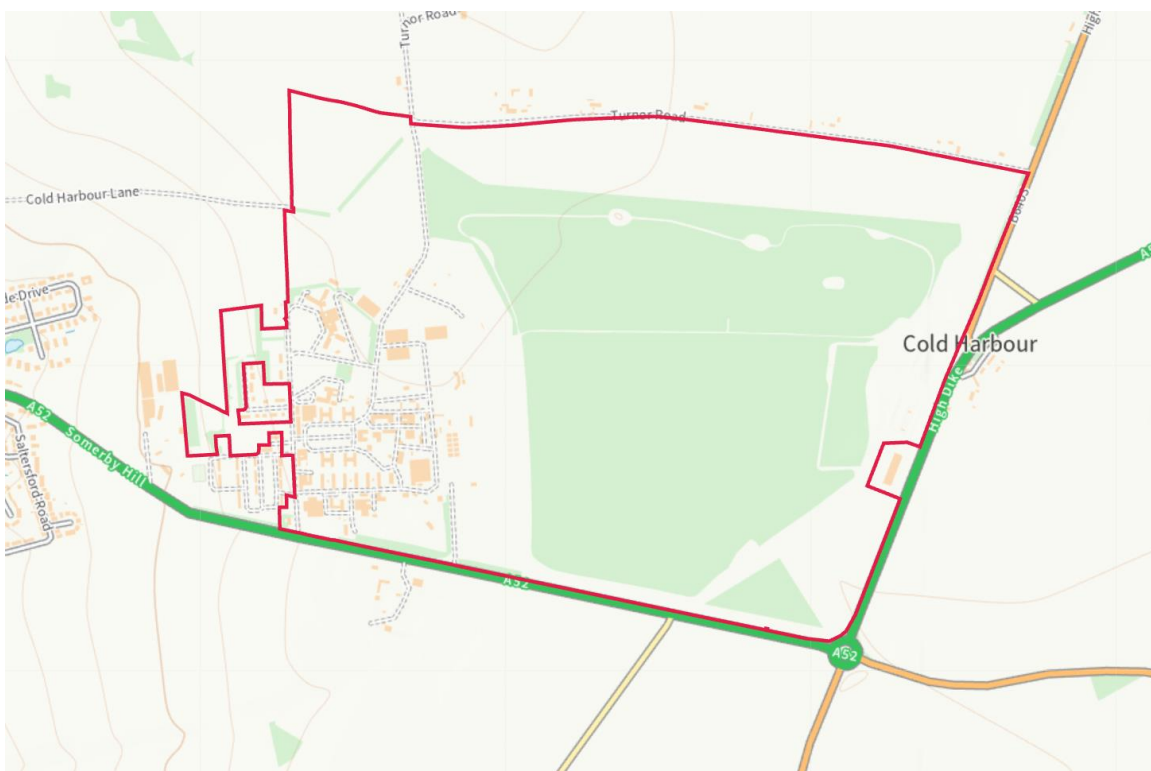


Figure1. Prince William of Gloucester Barracks Site Location

1.2 These representations are provided on a policy by policy base in the order that they appear in the Plan. For clarity these representations are written with regard for the tests applicable to Local Plans at Examination as per Paragraph 35 of the NPPF.

1.3 The Council have helpfully set out the extent to which policies have changed against the extant plan, with some policies being largely retained. However, just because Policies have not significantly changed does not mean that they are outside the scope of this Review, as clearly this Plan will be assessed against an updated NPPF (dated 2023) compared to that which the current

Plan was examined under (NPPF 2012). Thus, the Council should be open to commentary about policies which are currently proposed to remain largely, as per their extant counterparts to ensure continued compliance with applicable national policy.

- 1.4 The DIO make no comments in respect of Policy GR2 and ID2 at present due to the supporting evidence for the Policies not yet being available. The DIO will provide comments once the Infrastructure Delivery Plan and Infrastructure Delivery Schedule are published. It may be prudent therefore to consult informally on these evidence documents, and any potential amendments to these specific Policies ahead of Regulation 19 consultation. If published at Regulation 19 the opportunity to make changes to policies can only take place via Main Modifications.

2. Representations

Policy SP1: Spatial Strategy

	Yes	No
Do you consider the Policy is legally compliant	X	
Do you consider the Policy is sound	X	
Positively prepared?	X	
Justified	X	
Effective	X	
Consistent with national policy	X	

Representations:

- 2.1 Policy SP1: Spatial Strategy has been updated to reflect both the new updated Plan period (2021-2041) and the proposed housing requirement. The Council confirms it considers this to be a significant change to the policy, albeit one which we agree is entirely necessary for the Local Plan to be sound.

- 2.2 The Policy continues to affirm the spatial role of Grantham and the three market towns as the key locations for growth, with Grantham being a particular focal point. The Policy removes the previous reference to best and most versatile agricultural land, with it now being addressed in its own policy. We discuss these each of these proposed changes in turn below.

- 2.3 With regards to the Plan Period, the NPPF is clear at Paragraph 22 that where a Plan includes strategic policies, this should look ahead for a minimum of 15 years from adoption (i.e. not just the Plan period covering a period of 15 years, but 15 clear years post adoption). This is due to a need to “anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure”. The wording adopted by the NPPF is clear and unequivocal, that the 15-year period is expressed specifically as a minimum, which indicates it should be exceeded only. The NPPF could have adopted more flexible language but this requirement, which has been present in all iterations of the Framework since 2018, is clear this is a minimum threshold to deliver a sound plan period, and to be sufficiently consistent with National

Policy (Paragraph 35d).

- 2.4 The proposed Plan period is to 2041, with a current estimated adoption in 2026 in the most recent LDS. This provides a 15-year Plan period post adoption as required by Paragraph 22 of the NPPF. However, it provides limited contingency for any potential delays prior to submission or at examination which may delay the adoption date. Officers may be aware that the Charnwood Local Plan is already in its third year of examination, delays to the Bedford Local Plan will likely take a similar timescale prior to completion of examination, thus highlighting the for delay in bringing sound Plans through to adoption. Given this requirement can be read as being a matter of soundness the adoption of a slightly longer Plan period may assist the Council in safeguarding the Plan and provide a buffer from any potential delays up to and including examination, which are certainly not uncommon.
- 2.5 Turning to the Plan's proposed housing requirement, Paragraph 61 of the NPPF sets out that in order to determine the minimum number of homes needed, strategic policies should be informed by Local Housing Need (LHN), as derived from the Standard Method (as set out in the Planning Practice Guidance (PPG)). For South Kesteven, utilising the 2014 household projections and the most recent (2022) median workplace-based affordability ratios, this generates a Local Housing Need of 701 dwellings per annum. Over the proposed 20-year plan period; this equates to a Local Housing Need of 14,020.
- 2.6 The PPG sets out the scenarios when it would be advisable to both uplift and reduce the housing requirement, having used LHN as a starting point. The PPG advises that uplifts could be applied to reflect the following, albeit not an exhaustive list;
- growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);
 - strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or
 - an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;
- 2.7 We are not aware of any agreed growth strategy or strategic scale infrastructure provision needs to be delivered in South Kesteven, however the Council should be satisfied prior to Regulation 19

that there are no such matters which should be taken into account when finalising the housing requirement.

- 2.8 The Council can rely on a calculation of Local Housing Need for 2 years (PPG Paragraph: 008 Reference ID: 2a-008-20190220). On that basis it would be prudent for the Council to update the South Kesteven District Local Housing Needs Assessment (LHNA) 2023 now the 2023 affordability metric has been published utilising 2024-2034 as the base period, to provide coverage until 2026 where the Council anticipate adopting the Plan. Calculating on the above basis reduces the Local Housing Need from 701 to 687, which would provide additional assistance for the Council in demonstrating an ability to meet its housing needs, both in the initial 5-years, but also the overall quantum deliverable in the Plan period.
- 2.9 The DIO fully supports the continued identification of Grantham as the key focal point for growth in the District. This is commented on in further detail in response to Policy SP2,
- 2.10 The removal of specific parts of the Policy relating to agricultural land quality, with such points being moved to a new specific policy is considered to be logical approach and keeps what are clearly discrete matters separate. This should aid the function and legibility of the policy, particularly in relation to how the policy will be used within development management functions.

Policy SP2: Settlement Hierarchy

	Yes	No
Do you consider the Policy is legally compliant	X	
Do you consider the Policy is sound	X	
Positively prepared?	X	
Justified	X	
Effective	X	
Consistent with national policy	X	

Representations:

- 2.11 Policy SP2: Settlement Hierarchy has been updated to reflect updated evidence on settlement sustainability, as informed by the Settlement Hierarchy Review (2024). The DIO have no specific comments on the impacts this updated evidence has had on lower tier settlements. The DIO does however acknowledge and support the continued identification of Grantham as a Sub Regional Centre where the majority of development will be focused. The policies support for new development proposals on appropriate and deliverable brownfield and suitable greenfield sites, including through the provision of urban extensions is supported by the DIO.

Policy H1: Housing Allocations

	Yes	No
Do you consider the Policy is legally compliant	X	
Do you consider the Policy is sound	X	
Positively prepared?	X	
Justified	X	
Effective	X	
Consistent with national policy	X	

Representations:

- 2.12 The DIO fully support the continued identification of Prince William of Gloucester (PWoG) Barracks as housing allocation (SKPR-65 (GR3 -H4)). DIO are committed to the delivery of the site and are currently undertaking the significant quantum of background work required to support an outline planning application.
- 2.13 This work, whilst still developing, has indicated that the total capacity of the site will be reduced from the previous estimate of 4,000 dwellings. At the time the original site capacity was evidenced; the requirement for Biodiversity Net Gain (BNG) did not exist or had even been suggested. Detailed technical work has since been undertaken to reflect the need to positively deliver BNG. As a result, the total site capacity is estimated at 3,000 dwellings. **It should be noted that in respect of the Review Plan period, the proposed delivery of 1,745 dwellings to 2041 will not change and is still considered to be deliverable..**
- 2.14 Further detail on this matter is provided in response to Draft Local Plan Policy SKPR-65 (GR3-H4).
- 2.15 The proposed Policy changes reflect PWoG Barracks being a mixed-use allocation. The DIO have no objection to the site being transferred from essentially separate housing and employment policies to an integrated 'mixed-use' allocation.

Policy H2: Affordable Housing Contributions

	Yes	No
Do you consider the Policy is legally compliant	X	
Do you consider the Policy is sound		X
Positively prepared?		X
Justified		X
Effective		X
Consistent with national policy		X

Representations:

- 2.16 As currently written the draft Policy sets out that for developments of 10 or more dwellings, they should make provision for 27% to 57% affordable housing “depending on the outcome of the Whole Plan Viability Assessment”. This statement implies that the Whole Plan Viability Assessment has not yet been undertaken which is not the case; the SKDC Whole Plan Viability Assessment, dated January 2024 is included within the evidence, which accompanies the consultation draft (under the Infrastructure and Viability Assessment section).
- 2.17 As currently prepared the Whole Plan Viability Assessment is fundamentally flawed. Despite acknowledging at paragraph 6.30 that “the reason for making the differential in strategic sites is because they frequently have substantially higher strategic infrastructure and mitigation costs than smaller sites” the Assessment goes on to suggest that strategic sites could potentially deliver 30% affordable housing. This is compared to only 20% affordable housing provision being identified on smaller greenfield sites and 10% on brownfield.
- 2.18 The report concedes that it has not considered the infrastructure requirements, or costs of delivery of the strategic sites within the Assessment (Whole Plan Viability Assessment Paragraph 10.32I), but despite this still goes on to suggest an affordable housing requirement significantly above unconstrained green field sites. The reality is that these complex strategic sites, due to their significant infrastructure costs, are more likely to deliver affordable housing provision closer to the suggested brownfield requirements, than greenfield or even higher provision, as currently suggested by the Whole Plan Viability.

- 2.19 It may be that a strategic site, with no brownfield land, and in the south of the authority, with higher market values, for example Stamford North, is able to deliver at the proposed higher levels. However, in lower value areas, such as Grantham, complex strategic sites, comprising brownfield and greenfield land cannot deliver at the same level.
- 2.20 At paragraph 7.24 of the Whole Plan Viability Study the Council acknowledge a comment made to the technical consultation on behalf of the DIO in respect of abnormal allowances for brownfield land, but counter that *"the type of brownfield site that is typical in South Kesteven is not heavily contaminated and in need of extensive remediation or other costs. No change is made in this regard."* As such a request to increase build cost abnormal allowance of 5% of BCIS costs to 10% was rejected. Since July 2023 (the date of the first draft of the Whole Plan Viability Report) build costs have increased by 1.4% according to BCIS index. Given the ongoing increase and uncertainty over build costs, we would still expect an abnormal cost allowance on Brownfield Sites to be in the region of 7.5% - 10%. Secondly, specific to the Prince William of Gloucester Barracks (PWoG) site, this is not a standard brownfield site in the context of South Kesteven, as its contamination relates to its historic military uses not standard in the locality.
- 2.21 The appraisal of PWOG within the Whole Plan Viability assumes a nominal figure of £4,948,000 for abnormal costs. This is extremely low for a development of this scale and particularly having regard for known utility shortfalls in this part of Grantham which will require strategic and coordinated intervention. An estimation of the demolition costs alone for PWoG are in excess of £5 million. Large strategic sites by their very nature are timely and costly to deliver, normally requiring extensive infrastructure works and high abnormal costs. Whilst we appreciate the Whole Plan Viability calculations are very much high level, based on a number of assumptions, the current suggested requirement for strategic sites, particularly those serving the Grantham market, to deliver 30% on site affordable and developer contributions (s106) of £20,000 per unit is unrealistic, and not justified.
- 2.22 It is recognised that the Council acknowledges within the Policy that Grantham as a market area is more difficult than other parts of the District; and confirms that the Council will consider site specific viability assessments on brownfield sites and on sites within the Grantham residential allocations covered under Policy GR3, Grantham. This recognition of the market area is welcomed however, it is requested that further work is undertaken on the Whole Plan Viability, in liaison with the promoters of the Strategic sites, to ensure a true reflection of what is deliverable on these sites

is reflected within the Policy text. This should then seek to avoid the need for a viability assessment on every strategic site brought forward.

- 2.23 The DIO would welcome the opportunity to meet with the Council and its Viability consultants - to discuss the Local Plan Viability Assessment and share the known infrastructure costs associated with bringing the site forward to enable the Council to prepare fully evidenced and justified affordable housing requirements in the Regulation 19 version of the Plan. This will ensure transparency of what the sites and different market areas can deliver and ensure that expectations are managed when applications are brought forward to deliver the strategic sites. At present the emerging policy, and indeed its associated evidence base are not justified and cannot be considered sound.

Policy H4: Meeting all Housing Needs

	Yes	No
Do you consider the Policy is legally compliant	X	
Do you consider the Policy is sound		X
Positively prepared?	X	
Justified		X
Effective	X	
Consistent with national policy		X

Representations:

- 2.24 The DIO broadly supports draft Policy H4, save for the requirements relating to Part M4(2) Building Regulation standards.
- 2.25 It is noted and supported that the indicative housing mix is detailed within Table 4 contained within the reasoned justification, not the policy itself, and is clearly described and titled as indicative. It is therefore understood that whilst a material consideration in the consideration of a planning application, there remains scope for variation from the mix ascribed in Table 4. This approach is supported, as housing mix will be influenced by a range of factors, including the spatial and geographic context of the site, the housebuilder building the product, the Registered Provider (RP) acquiring and managing the affordable properties, market conditions, local need, design, etc. many of which will change over the course of the Plan period and therefore flexibility and treatment of the housing mix as indicative is supported.
- 2.26 The Registered Provider market is becoming increasingly complex in terms of the properties they will manage but also the costs of acquiring property. This is impacting many of the assumptions made in terms of viability and mix. In particular RPs are, in many locations, not wanting to assume management of 1-bedroom flats for example as it is a housing typology that has little demand in respect of occupation, particularly for larger residential schemes incorporating family housing. Such properties are normally more suited for town centre locations and wholly flatted developments where demand is higher and management simpler.

- 2.27 In respect of the proposed policy requirement to deliver 10% of new dwellings in line with the optional standards set out in Part M4(2) of the Building Regulations, the Council are reminded that the delivery of optional standards is supported by the PPG but are required to be justified. Firstly, it is noted that the viability evidence is not yet fully complete (as acknowledged within the summary of Proposed Changes relative to the policy) states *“the final policy will be informed by a Whole Plan Viability Assessment which will accompany the plan. The Whole Plan Viability Assessment assesses a range of developer contributions for different site typologies and locations across the district”*. To be justified there needs to be evidence of a demonstrable local issue both in terms of the number of people who require such housing and also evidence that there is insufficient existing stock to meet those needs. There appears to be no such evidence supporting the Plan at present; without such evidence, this policy requirement is not justified and should be deleted.
- 2.28 Notwithstanding the above, as the Council acknowledge, amendments to the building regulations may overtake proceedings in respect of the Local Plan policy, in which case DIO consider reference to Part M4(2) should be removed entirely to better facilitate the delivery of potential future changes to building regulations.

Policy H3: Self and Custom Build Housing

	Yes	No
Do you consider the Policy is legally compliant	X	
Do you consider the Policy is sound		X
Positively prepared?	X	
Justified		X
Effective		X
Consistent with national policy		X

Representations:

- 2.29 Policy H3 requires sites of 400 dwellings or greater to deliver 2% of their overall housing requirement as self/custom build housing. The Policy states that this requirement can only be absolved in circumstances where the plot/s have been marketed for at least 12 months but have not sold, at which point the developer may seek to have the plot returned to normal market use. It states that marketing should include, but not be limited to, utilisation of the Councils Self Build and Custom Build Register and the National Custom and Self-build Association (NaCSBA) portal or similar.
- 2.30 Whilst the DIO consider there may be circumstances where the delivery of Self-Build plots on larger sites is appropriate it is considered that such a requirement should be a target, not a definitive requirement. If it is to be a requirement, the Policy needs to provide greater flexibility in respect of its implementation to allow for site specific circumstances and to better respond to evidenced demand at that time, market conditions and site viability.
- 2.31 In respect of the need for Self-Build plots, the Council's Self-Build data as published within the AMR (South Kesteven District Council Authority Monitoring Report 1st April 2022 – 31st March 2023, Page 26) confirms that the Council has a 'need' for 207 plots (196 individuals and 3 groups containing 11 individuals) over the 7 monitoring periods since the requirements of the Self-build and Custom Housebuilding Act 2015 has been in effect. Whilst the first period was only between April and October 2016, this will have picked up latent demand thus is it considered to represent a full monitoring period. This equates to an average need of 30 plots per annum, or 300 plots over

the proposed 20-year plan period.

- 2.32 Subject to a sufficiently amenable policy environment, in an area such as South Kesteven's, it is considered that an annual supply of Self-Build permissions and custom schemes could meet the 30 dwellings per annum required to satisfy the requirements of the Self-Build act without the imposition of additional policy requirements of Policy H3 which could further constrain delivery of complex strategic sites. This is in part demonstrated by the number of single dwellings applications approved, totalling 16 within the last year, without any specific policy support for self-build schemes or other initiatives as discussed below. A policy enabling self-build schemes in suitable locations may assist in encouraging applications for self-build schemes or plots. Schemes for multiple plots or custom build houses have the potential to meet much of the identified needs in a single application.
- 2.33 Turning to delivery, the Council confirms a supply of only 8 dwellings across the 7-year monitoring period. However, it notes within the AMR at paragraph 4.30 that "monitoring is not currently available for single plots which may have come forward as custom/self-build housing within this base period". Paragraph 4.31 confirms that only permissions specifically indicating Self-build and Custom Housebuilding are counted, but there was no obligation for applicants to use such terminology and actual supply could be significantly higher. Whilst recent appeal decisions support this approach, and thus more accurate monitoring should be available in the future, it is unfortunately inconclusive as to what percentage of the need has been met since the inception of the register.
- 2.34 Given the lack of clear evidence of actual supply, it is considered that the proposed Policy requirement is not sufficiently justified. It is clearly an unacceptable position that the Council not having fully monitored delivery (e.g. single plot delivery) can be used as justification to impose such a planning requirement. Moreover, the 400 dwelling threshold is in itself not justified within evidence and nor has the financial implications of delivery been addressed in the Whole Plan Viability. The policy is not justified and thus not sound.
- 2.35 The Council does not hold information relating to the preferred location of self-build opportunities; thus it is impossible to critically examine where the evidenced demand for Self-Build plots is within the Authority. Experience suggests that Self-Build plots are more often than not sought in more

rural areas and it could be the case that there is no demand for plots in Grantham for example.

2.36 Whilst the Self-build and Custom Housebuilding Act 2015 places a requirement to deliver Self-Build plots to meet the needs of those on the register, this in itself is not justification for the policy intervention proposed., the Council should seek to support Self-Building in other ways including those set out within the PPG (Paragraph: 025 Reference ID: 57-025-20210508):

- supporting Neighbourhood Planning groups where they choose to include self-build and custom build housing policies in their plans;
- effective joint working across service delivery areas and with local delivery partners including Housing Associations, Arms Length Management Organisations and housing developers;
- using their own land (if available and suitable) for self-build and custom housebuilding and marketing it to those on the register;
- when engaging with developers and landowners who own sites that are suitable for housing, and encouraging them to consider self-build and custom housebuilding, and facilitating access to those on the register where the landowner is interested.
- working with local partners, such as Housing Associations and third sector groups, to custom build affordable housing for veterans and other groups in acute housing need.

Policy E2: Employment Sites

	Yes	No
Do you consider the Policy is legally compliant	X	
Do you consider the Policy is sound	X	
Positively prepared?	X	
Justified	X	
Effective	X	
Consistent with national policy	X	

Representations:

- 2.37 The DIO support the identification of PWoG Barracks (SKPR65 (GR3-H4)) as an employment generating site. DIO are committed to the delivery of the site and are currently undertaking the significant quantum of background work required to support an outline planning application for a mixed-use scheme.
- 2.38 It is recognised that the employment element of PWoG Barracks has been removed from Policy E2, and included as part of the site specific policy SKPR65 (GR3-H4) in order to reflect the mixed use nature of the scheme. DIO supports this change.
- 2.39 As detailed in response to Policy H1 and in response to SKPR65 (GR3-H4), the detailed work supporting a planning application, whilst still developing, has indicated that the total capacity of the site will be reduced from the previous estimate of 4,000 dwellings and 8 hectares of employment land. At the time the original site capacity was evidenced; the requirement for Biodiversity Net Gain (BNG) did not exist or had even been suggested. The detailed technical work which has since been undertaken to reflect the need to positively deliver BNG results in a need to reduce the total site capacity to approximately 3,000 dwellings and 2.5 hectares of employment generating uses; including a further 2.5 hectares of uses associated with the Local Hub.
- 2.40 The detailed technical work has also identified areas of the site which are ecologically sensitive and cannot accommodate development, without significant mitigatory credits being required as calculated through the BNG Metric. One of these parcels of land is adjacent to the roundabout at the A52/High Dike/B1176. The implication of this is that the employment generating uses have had to be relocated which ultimately also impacts the nature of the employment uses which might

be able to be delivered. DIO therefore support the recognition within the Policy “other employment generating uses” may be appropriate. It is however requested that for sites such as SKPR65 (GR3-H4), this flexibility is extended to include all Class E uses.

Policy E6: Loss of Employment Land and Buildings to Non-Employment Uses

	Yes	No
Do you consider the Policy is legally compliant	X	
Do you consider the Policy is sound	X Subject to clarification	
Positively prepared?	X	
Justified	X	
Effective	X Subject to clarification	
Consistent with national policy	X	

Representations:

- 2.41 As detailed in representations to E2 and SKPR65 (GR3-H4), the DIO fully support the identification of PWOg Barracks (SKPR65 (GR3-H4)) as a mixed-use, employment generating site. DIO are committed to the delivery of the site and are currently undertaking the significant quantum of background work required to support an outline planning application for a mixed-use scheme.
- 2.42 As detailed in response to Policy H1 and in response to SKPR65 (GR3-H4), the detailed work supporting a planning application, whilst still developing, has indicated that the total capacity of the site will be reduced from the previous estimate of 4,000 dwellings and 8 hectares of employment land. At the time the original site capacity was evidenced; the requirement for Biodiversity Net Gain (BNG) did not exist. The detailed technical work which has since been undertaken to reflect the need to positively deliver BNG results in a need to reduce the total site capacity to approximately 3,000 dwellings and 2.5 hectares of employment generating uses; including a further 2.5 hectares of uses associated with the Local Hub. It is requested in response to Policy SKPR65 (GR3-H4) that this reduction in employment land is reflected in the policy wording. This requested change is a particularly important point in the context of Policy E6.
- 2.43 Policy E6 provides the provisions wherein employment land will be allowed to change use to non-employment uses.
- 2.44 The Policy does not however explicitly define employment uses and as such is not considered to be effective. For clarity of implementation, the policy and/or the associated reasoned justification,

should be explicit as to what uses are considered to be employment and non-employment uses. If the position is to fall back to Policy E2 as currently drafted, then the Policy would allow for predominantly B-class uses and an allowance to deliver E(g) uses. However, as detailed in our response to Policy E2, to enable flexibility of delivery this should be extended to all uses within Class E. It is requested that Policy E6 is also rewritten to allow for other employment generating uses within class E to be delivered. Such an approach would assist in ensuring that employment land is not lost to other non-employment generating uses.

2.45 Paragraph 85 of the NPPF is clear that “planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development”. Paragraph 123 states that “planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses”. Clearly in this context, it is vital that the policy is sufficiently flexible to enable alternative uses where appropriate.

Policy SB1: Sustainable Building

	Yes	No
Do you consider the Policy is legally compliant	X	
Do you consider the Policy is sound		X
Positively prepared?	X	
Justified		X
Effective	X	
Consistent with national policy		X

Representations:

- 2.46 Policy SB1 relates to the application of advanced energy efficiency and water targets beyond those currently required through Building Regulations. The Policy makes it clear that where the requirements of Policy SB1 cannot be met, it is incumbent on the applicant to demonstrate exceptional circumstances that compliance with the policy is not viable or feasible. This approach is not supported.
- 2.47 In respect of water efficiency, The PPG (Housing: optional technical standards) sets out that whilst it is within the remit of an LPA to set technical requirements exceeding the minimum requirements of Building Regulations, this can only be done where the Authority holds evidence that there is a need for additional standards in their area. DIO consider that the evidence provided in support of Policy SB1 is out of date and is not sound. For example, the Council, at Paragraph 11.9 of the Regulation 18 document, points to the South Kesteven District Water Cycle Study (October 2016). This evidence is now very dated being over 7 years old and not considered sufficiently robust to justify this Policy requirement, particularly in the context that the Building Regulations already require a very high level of water efficiency for all new build development (125 litres per person per day).
- 2.48 If this element of the policy is to be retained, then updated evidence should be provided demonstrating that there remains a localised issue which requires such a significant policy intervention above and beyond the requirements already set out in Building Regulations.
- 2.49 Moreover, the impact of this Policy needs to be robustly considered within the Plan's viability evidence to consider its implications on site delivery and viability (the Viability Assessment at

paragraph 8.56 assumes only £7 per dwelling to deliver units to meet the enhanced Building Regulations (110l/day)). Until this is complete, the weight of evidence remains on the Council to demonstrate why the provision of higher standards is necessary in the locality, not on applicants on why it should not be delivered on a site-by-site basis. At present the Policy cannot be considered sound.

- 2.50 Whilst the PPG is silent respect of energy efficiency standards, the same logic can reasonably be applied, that there needs to be specific evidence of local need and evidence such measures will not unduly impact development viability.
- 2.51 Additional standards have been removed by the Inspectorate at examination where these have not been justified, see the Stevenage Borough Local Plan 2011-2031, which had increased standards removed (Main Mod 75) due to conflict with the PPG.

Policy: SKPR-65 (GR3-H4): Prince William of Gloucester Barracks (Mixed Use Allocation)

	Yes	No
Do you consider the Policy is legally compliant	X	
Do you consider the Policy is sound	X	
Positively prepared?	X	
Justified	X	
Effective	X	
Consistent with national policy	X	

Representations:

- 2.52 The DIO fully supports the continued identification of its land interests at Prince William of Gloucester Barracks, Grantham, as a suitable site for strategic development.
- 2.53 The proposed amendment to the Policy to incorporate the employment generating uses and reflect the mixed-use nature of the site is supported.

Biodiversity Net Gain and implications on Quantum of Development

- 2.54 The Council will be aware that the DIO have been working towards the submission of a comprehensive planning application for the site and undertaking detailed site-specific technical evidence. Most recently work has been undertaken to understand the implications of positively delivering Biodiversity Net Gain, alongside other planning requirements and enabling infrastructure.
- 2.55 This work has indicated that the total capacity of the site will be reduced from the previous estimate of 4,000 dwellings. The evidence that has been prepared and used to inform an emerging revised masterplan for the site, confirms total site capacity of approximately 3,000 dwellings. It is requested that this amendment is incorporated within the wording of the Policy. **It should be noted that in respect of the Review Plan period, the proposed delivery of 1,745 dwellings to 2041 will not change and is still considered to be deliverable.**
- 2.56 In terms of employment provision, the evidence prepared has again impacted the revised masterplan resulting in a reduction in employment generating uses from 8 hectares to 2.5 hectares; including a further 2.5 hectares of employment generating uses associated with the

Local Hub. The DIO remains committed to the delivery of employment generating uses on the site and considers these uses critical to ensuring the delivery of vibrant community.

- 2.57 The reduction in employment generating uses on the site will not ('our view') impact the overall soundness of the Plan. The Plan and the supporting evidence is clear that there is already sufficient provision through existing commitments to meet the 80 hectares of employment land needed to 2041; with 236 hectares of vacant land and a further 35 hectares of intensification opportunities. A comparatively small reduction at Prince William of Gloucester Barracks site does not unduly impact the overall supply position.
- 2.58 The Council's Employment Land Survey (2023) confirms that whilst the Prince William of Gloucester Barracks site is suitable for the development of employment uses, its location means that it is not optimally located in terms of existing accessibility to the A1. The Survey also acknowledges that the mixed-use nature of the site means there needs to be regard for the compatibility of uses. The Employment Land Survey also acknowledges that the site is not optimally located for high-value office space and therefore any office development is likely to be ancillary to other uses, rather than primary office provision.
- 2.59 In respect of the location of employment provision on site, it had originally been anticipated that the employment generating uses would take advantage of the site's location adjacent to the A52/High Dike/B1176 roundabout. Detailed technical ecological work has however, identified areas of the site which are ecologically sensitive and cannot accommodate development without undue impact in respect of the BNG metric. Therefore these areas are to be proposed and enhanced as part of the site's ecological, amenity and landscaping strategy. One of these parcels of land is adjacent to the roundabout at the A52/High Dike/B1176. The implication of this is that the employment generating uses have had to be relocated, which ultimately also impacts the nature of the employment uses which might be able to be delivered. The flexibility associated with employment uses on site, as sought through representations to Policy E2 and E6 are required to ensure compatibility with neighbouring uses.
- 2.60 As such, it is likely that employment uses will be relocated from the land adjacent to the A52/High Dike/B1176 roundabout as initially envisaged. This will further impact the uses suitable for development and having regard for comments in relation to Policy E2 and E6 it should be made

clear that employment generating uses are acceptable on the site alongside those in Class E(g)(i)& E(g)(iii) envisaged by the Employment Land Study.

Requested Policy Amendment

Indicative Unit Numbers of 3,000 dwellings (approx. 1,745 anticipated to be constructed by 2041) including employment generating uses of 2.5 hectares.

And:

- a. *New employment generating uses of approximately 2.5 hectares to be located within the sustainable community and to ensure compatibility with surrounding residential areas.*

- 2.61 The Policy description that the proposed development at Prince William of Gloucester will comprise new homes together with employment generating uses and extensive open space provision is supported. The description also references “substantial tree planting”. Having regard to the nature of the site, the lack of requirement for this on other Strategic sites and given the need to ensure compliance with criteria g of the Policy anyway, the inclusion of “substantial tree planting” is not considered justified or necessary in describing the proposed development. It would be better, and more accurate to reflect parts of criteria g which refers to the retention of woodland on the site which will create a unique scheme which will set the Prince William of Gloucester development apart from other Strategic sites. Moreover, due to the imposition of BNG, which has arisen since the last plan was adopted, any losses will need to not only be mitigated on a 1 to 1 basis, but instead replaced at a rate commensurate to deliver a 10% increase.

Requested Policy Amendment

The proposed development will comprise new homes together with employment generating uses, local services and community uses, open space and opportunities for the incorporation of green infrastructure.

Policy Criteria

- 2.62 Turning to the policy criteria itself, DIO have no objection to the retained wording of the policy, most of which is logical and reflects the Statement of Common Ground previously agreed through the extant Local Plan.

Criteria vi..

- 2.63 The updated requirement to include a Minerals Assessment is noted. However, due to the proximity of existing residential development this would restrict significantly where on the site mineral extraction could take place reducing the scale of any extraction to that which is not commercially viable.
- 2.64 In this context whilst the site may contain some mineral, its extraction is unlikely to viable, nor would it deliver the range of benefits which will provided by the development of the site for residential and wider uses. We are aware of extraction sites being approved in the vicinity and there being more suitable locations for extraction being explored through the development of the emerging Lincolnshire Minerals and Waste Plan, which does not include this site. On this basis whilst the DIO are prepared to undertake a Minerals Assessment to support any application in accordance with the Minerals and Waste Plan, there is no requirement for there to be a policy requirement in the Local Plan to produce such evidence as this amounts to duplication of policies and thus conflict with NPPF Para 16f.

Requested Policy Amendment

Delete criteria vi.

Whole Plan Viability Assessment

- 2.65 The DIO have detailed concerns with the Whole Plan Viability Assessment in response to Policy H2. These concerns are not repeated here however, the DIO would like to reiterate that they would welcome the opportunity to meet with the Council and its Viability consultants to discuss the Local Plan Viability Assessment and share the known infrastructure costs associated with bringing the site forward to enable the Council to prepare fully evidenced and justified affordable housing requirements in the Regulation 19 version of the Plan. This will ensure transparency of what the sites and different market areas can deliver and ensure that expectations are managed when applications are brought forward to deliver the strategic sites.

Disposal Date

- 2.66 The Council will be aware that Prince William of Gloucester Barracks forms part of the Defence Estate Optimisation Programme for which there is a timetabled release of sites. The site's formal disposal date is 2029. DIO remain committed to the delivery of the site and are currently working

up a planning application to facilitate delivery of the site as soon as the formal disposal date is met.

- 2.67 Opportunities may exist for delivery of earlier phases of development ahead of the formal disposal date. DIO will continue to keep this under review and will submit an indicative phasing programme with the planning application.

Removed Policy M1

	Yes	No
Do you consider the Policy is legally compliant	X	
Do you consider the Policy is sound	X	
Positively prepared?	X	
Justified	X	
Effective	X	
Consistent with national policy	X	

Representations:

2.68 The DIO support the removal of Policy M1.

2.69 The NPPF states at Paragraph 16f that plans should “serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)”. Paragraph 33 of the Framework states:

“policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future”.

2.70 In this context unless there is sufficient local reasoning for other review clauses to be initiated, then there is no longer any reason to commit to a Local Plan Review within the Local Plan itself.

Policy GR2: Sustainable Transport in Grantham

Representations:

- 2.71 DIO make no comments in respect of Policy GR2 at present due to the supporting evidence for the Policy not yet being available. DIO will provide comments once the Infrastructure Delivery Plan and Infrastructure Delivery Schedule are published.
- 2.72 It may be prudent to consult informally on these evidence documents, and any potential amendments to Policies ahead of Regulation 19 consultation. If published at Regulation 19 the opportunity to make changes to policies can only take place via Main Modifications.
- 2.73 We welcome continued discussion with the Council in respect of the potential impacts of such evidence documents and their interaction with PWoG (Policy SKPR-65 (GR3-H4)).

Policy ID2: Transport and Strategic Transport Infrastructure

Representations:

- 2.74 DIO make no comments in respect of Policy GR2 at present due to the supporting evidence for the Policy not yet being available. DIO will provide comments once the Infrastructure Delivery Plan and Infrastructure Delivery Schedule are published.
- 2.75 It may be prudent to consult informally on these evidence documents, and any potential amendments to Policies ahead of Regulation 19 consultation. If published at Regulation 19 the opportunity to make changes to policies can only take place via Main Modifications.
- 2.76 We welcome continued discussion with the Council in respect of the potential impacts of such evidence documents and their interaction with PWoG (Policy SKPR-65 (GR3-H4)).