



ALLISON  
HOMES

# Land at Peterborough Road, Market Deeping

South Kesteven Local Plan Regulation 18 Representations

April 2024



# 1. Introduction

Allison Homes are the developer promoting the land at Peterborough Road, Market Deeping for residential use of around 100 dwellings.

These representations are made in relation to the promotion of the land at Peterborough Road, Market Deeping ('the site'), for proposed residential-led development. These representations address topics within the South Kesteven District Council (SKDC) Local Plan Regulation 18 consultation, and its supporting evidence base, accordingly.

The purpose of these representations is to assist SKDC ('the Council') in formulating an approach within the emerging Local Plan that is both consistent with national planning policy and the tests of soundness. In this regard, our representations are mindful of the tests of soundness set out at paragraph 35 of the National Planning Policy Framework ('NPPF') (December 2023).

At this early stage of plan-making, it is important that the Council pursues an approach that is consistent with national policy, effective, justified, and positively prepared, in order for the Local Plan to be found sound at examination. These representations comprise our recommendations to assist the Council in achieving such an approach as emerging plan progresses toward adoption.

## **Policy Context**

South Kesteven District Council (SKDC) adopted its Local Plan in January 2020. Setting out the spatial strategy to meet development needs up to 2036.

The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) requires local planning authorities to review local plans at least once every 5 years from their adoption date to ensure that planning policies remain relevant and effective.

The Inspector's final report on the current Local Plan committed the Council to undertake an early review of the Local Plan from April 2020.

In this regard, Allison Homes supports the Council's commitment to the preparation of a new local plan to cover the South Kesteven administrative area.

Our representations are set within the context in which we seek to highlight, where relevant, the opportunities that are presented for the emerging Local Plan to continue to allocate the land at Peterborough Road, Market Deeping for residential development of around 100 dwellings.

We trust that the comments made within these representations assist the Council in creating an approach that is positively prepared, justified, effective and is in line with national policy.

## 2. Land at Peterborough Road, Market Deeping

Land at Peterborough Road, Market Deeping is proposed a draft allocation within the Regulation 18 Draft Local Plan for the provision of approximately 15ha of employment use. However, Allison Homes propose to bring this site forward to contribute towards the housing needs of the district.

### **Site Characteristics and Context**

Market Deeping is identified as one of the key market towns in the district, that provides additional services for the villages and residents of the district. The town provides additional services and facilities such as healthcare, secondary education, supermarkets, and employment sites (e.g. the Northfields Industrial Estate).

The site being promoted by Allison Homes is located at Peterborough Road to the north of the town and benefits from access to the highway networks A15 and the A1175. The site has been allocated for employment use in the Regulation 18 Plan (site reference: SKPR-55). The site was previously allocated for employment use in the adopted Local Plan in addition to the land adjacent to the east (Employment Land Study Reference: EMP D2 – Spitfire Way, The Deepings). However the land to the east has since been released and has come forward for residential development. Additionally, the land immediately west of the site, on the opposite side of Peterborough Road has also received an allocation for residential use (site reference: SKPR-36). It is our view that this site should be released from its employment allocation and allocated for residential development.

The site is under part ownership of Allison Homes and does not have any prospects of being brought forward as employment land. The site is therefore not available for employment purposes. This site is suitable to bring forward residential purposes to assist in providing much needed housing and assist in creating an attractive gateway into Market Deeping from the North in combination with the residential development by the allocation of site SKPR-36 to the west.

Technical work has been undertaken to demonstrate the suitability of the site for residential development, and the opportunities and benefits which can be provided by Allison Homes in doing so.

An Employment Land Review Assessment has been undertaken by Marrons in regard to the site. The assessment states that the site has been allocated for some considerable time and does not have any prospect of being brought forward for employment use. The site has been subject to a previous lapsed planning permission for B1 and B2 use, however there was little developer or market interest which further demonstrates that this site has little to no prospects of being brought forward for employment use. It was found within the assessment that this is also partially due to the little demand for logistics sites in particular within either Bourne or Market Deeping, with the majority of demand being towards Grantham. Therefore, the release of this site from employment use, will allow the land to contribute towards the District's housing need whilst having no impact on the future delivery of employment provision in other more suitable parts of the District around the Grantham Sub-Regional centre.

Crestwood Environmental have carried out a Preliminary Ecological Appraisal (PEA) Report for the site. The Appraisal found that the habitats within the site were of low ecological importance and the hedgerows and broadleaved woodland to the north of the site are of moderate ecological importance. It is recommended that the areas of hedgerows and woodland are retained, with the addition of native floral species to assist in increasing the biodiversity within the site. Through the development of this site for residential use, there is the opportunity to include public open space which it is suggested be seeded with species-rich wildflower seed mix, which will not only improve biodiversity, but also benefit wildlife and provide visual amenity for residents.

An Archaeological Desk-Based Assessment has been carried out by Allen Archaeology Limited. It was found that the earliest activity recorded in the site area is of late Neolithic to Bronze Age era, with Bronze Age and Iron Age settlement evidence being recorded nearby the site. The assessment finds that the site was most likely woodland or agricultural land during the Anglo-Saxon period following evidence of pottery and ridge and furrow nearby the site, and the Roman Car Dyke being located along the eastern boundary of the site. The assessment concludes that the site has a moderate archaeological potential which is of regional significance. Trial Trenching has been carried out where 16 trenches were excavated which found a low density of archaeological features and only one pit could be dated to the Bronze Age. Bronze Age pottery sherds and worked flint were found within Trench 9, and three trenches adjacent to the eastern boundary identifies a former watercourse which has been sealed. Nevertheless, the trial trenching has not identified any factors which could be considered as a constraint to the future development of this site.

AWA Tree Consultants have prepared an Arboricultural Report and Impact Assessment to inform the design and development of this site. The Report identified 16 individual trees, and 5 groups of trees, shrubs or hedges. Of the trees surveyed, 3 are category U, 4 trees are category A, 6 and 1 tree group are category B, and the remaining are within Category C. the removal of 2 trees will be required, one within category B and one within category A as they are within the footprint of the new development. These trees would require to be removed if the site were to come forward as an employment site as currently allocated. Additional trees within category U and low value C are also required to be removed as their retention and protection is not suitable. As part of a residential development the trees of a good quality could be retained as part of the soft landscaping with additional trees planted to offset the impact of the trees being removed and to create biodiversity enhancements.

## **Summary**

This site is being promoted by Allison Homes for residential development. The land has no prospects of being developed for employment use and such a use would not be in keeping with the residential nature of the surrounding land use to the east, west, and south. Market Deeping is a suitable location for housing growth due to its identification as a Market Town in the Local Plan and the plentiful supply of existing employment, services and facilities that residents would need. By being developed for residential, this will allow for opportunities such as providing improved biodiversity within the site and creating a sustainable, high-quality environment.

We consider and request that the Council reallocate the site for residential purposes as part of the Regulation 19 stage of the plan. The site is suitable, available and deliverable for residential purposes within the early part of the plan period.

### **3. Evidence Base**

In this section the Evidence Base that has formed the foundation of the emerging Local Plan will be reviewed and discussed. This primarily consists of the Sustainability Appraisal that has been prepared by AECOM, in addition to the Employment Land Study that has been carried out.

#### **Sustainability Appraisal**

An Interim Sustainability Appraisal ('SA') has been prepared by AECOM on behalf of South Kesteven District Council to inform and assist the Regulation 18 draft Plan.

An initial scoping report informed the Sustainability Appraisal which identifies a range of sustainability issues to focus on in site assessment. Additionally, a Points of the Compass exercise was completed by AECOM, which assesses settlements in the district, to identify the most appropriate locations for growth within each suitable settlement. We agree that the Sustainability Appraisal and Points of the Compass exercise are necessary to find the most sustainable locations for growth.

The Appraisal scores the individual sites through 5 Red Amber Green (RAG) Rules which provides the benefit of clearly showing which sites have been scored highly and are therefore most appropriate to be allocated.

The Sustainability Appraisal has provided a largely positive assessment of the site, particularly within the assessment of community wellbeing. This section of the assessment as shown that the site is within suitable distance of employment, primary school, healthcare, and the town centre of Market Deeping. It is also recognised within the assessment that there is suitable access to public transport within proximity of the site, this will provide additional access to the town centre to access further facilities. The combination of good access and nearby services will reduce the need to travel by private car from the site and will therefore assist in tackling climate change.

#### **Employment Land Study**

The Employment Land Study (ELS) has been prepared by AECOM on behalf of SKDC to set out a detailed evidence base in which an appropriate supply and mix of employment land and premises can be planned for within the Local Plan Review.

The ELS focuses on the employment land use classes as defined by an Office and Industrial Land, B2 and B8 and does not consider retail uses.

The study undertook an Economic Development Needs Assessment to consider different approaches and which would be the most suitable to determine future land requirement for employment. The three scenarios considered include:

- Scenario 1 – Labour Demand: using employment forecasts sources from Experian, the change in employment in South Kesteven (by industrial) is translated into the associated change in floorspace and land requirements.
- Scenario 2 – Labour Supply: this scenario uses population forecasts to understand the level of additional workforce that will be available on the labour market. Additional workforce is allocated to industries and translated into associated change in floorspace and land requirements.
- Scenario 3 – Past Take-Up: this scenario considers past net absorption of employment floorspace in South Kesteven and projects historical trend over the Plan Period. Future change in floorspace is then converted into future land requirement.

The preferred approach adopted by the Council is Scenario 1 Labour Demand, which is a business-as-usual approach and considers established forecasting assumptions which consider wider trends influencing growth in South Kesteven.

Considering the scenarios assessed as part of the ELS and the allowances for windfall losses and churn, this identifies an overall land requirement for employment purposes of between 79.5 – 89.1 Ha, depending on the scenario chosen.

Chapter 9 of the ELS considers sites across all areas within the district and recommends whether these should be: released from employment purposes, allocated for employment, not allocated or retained as an existing allocation. Following consideration of all these sites across the whole of South Kesteven, this generates a net gain of 46 Ha, which comfortably meets the requirement outlined.

Although it is recognised the Council can easily meet their identified employment target the ELS goes on to consider how the Council should take into consideration the merits of each site. Furthermore, the conclusions and policy recommendations of the ELS recognise there is strong market interest in employment land and growth in both the demand for B2 and B8 use.

The study concludes that a flexible approach should be taken which takes into account the merits of each individual site and what they would be most suited for.

The ELS highlights that the Council can remove allocations for sites which are more suitable for development. The sites which have been identified for release from employment provision are mostly located in the market towns. Within the Stamford Sub Area approximately 91% of the sites listed within Chapter 9 of the ELS were to be either deallocated or released, this is due to other development taking place on these sites, namely residential. This therefore highlights how small employment sites allocated closer to the market town within the District are needed for other uses and highlights how other sites which are more favourable to the market will come forward in their place, in more suitable locations around the Grantham sub-regional centre.

We contend that Land at Peterborough Road, Market Deeping is one such site that should be released for housing. The site is too small to be an employment site of beneficial use to the market and it does not have the capacity to provide the scale of units for B8 and B2 units in particular that the market currently requires.

In addition to highlighting the need for larger strategic sites, the ELS highlights the need for employment sites to be close to the strategic highway network and sources of labour to help generate jobs which will allow upskilling of the local workforce. Land at Peterborough Road, Market Deeping, whilst close to some labour within the town, is remote from the strategic highway network and as such is not considered suitable to be allocated for employment purposes.

## **4. Vision and Development Management policies**

This section makes comments on the duration of the Plan Period alongside the Vision of the Draft Local Plan as well as other policies including in the Local Plan Review.

### **Chapter 2 - South Kesteven District - Plan Period**

The Regulation 18 consultation document highlights in paragraph 2.1 that the plan period for the emerging Local Plan will run from 1st April 2021 through to 1st April 2041. It is positive to see that the Council are seeking to plan for the longer period and preparing a document which covers 20 years. We are however concerned that upon adoption the Council may feel to meet the minimum requirements as outlined in paragraph 22 of the NPPF (2023).

Paragraph 22 of the NPPF requires “strategic policies should look ahead over a minimum 15 year period from adoption” and in our view the emerging SKDC Local Plan will not meet this. In order to provide a minimum 15 year period from adoption the plan will need to be adopted by 31st March 2026 at the very latest in order to provide the required time period. However, as the Local Plan has already experienced delays, it is reasonable to assume that further delays in timescales will be encountered.

By taking a positive and proactive approach to delivering to the plan period, the Council is able to ensure that the plan is robust and credible with the opportunity to deliver more housing across South Kesteven to meet local needs. We encourage the Council to extend the plan period by at least another two years to a time horizon of 2043 which will allow for any further delays in plan making whilst still ensuring that the minimum time period can be achieved.

### **Chapter 3 - Vision and Strategic Objectives**

Chapter 3 of the Regulation 18 Consultation sets out the Vision and the Objectives the Plan seeks to meet and provide.

The Vision provided has been updated to reflect the Council’s commitment to fight climate change, and create a successful and strong economy, whilst building sustainable communities that provide a high quality of life. The suggested Vision is realistic in its ability to be delivered through the provision of high quality housing and creating a strong economy.

We are support of the overall Vision in increasing the importance of tackling Climate Change as well as creating sustainable, diverse, and safe communities across the district. To strengthen the Vision to further ensure it is considered as sound, the Plan period should be increased, and the Vision should be amended accordingly to account for the additional years of the plan period.

The draft Plan also provides the strategic Objectives for the Local Plan moving forwards.

We consider that Objective 9 should be amended to take into the consideration in the extension of the Plan period, and increased need for housing across the district. However, we are pleased to see that the Council have provided an approach and set Objectives which are largely pro-growth whilst requiring the provision of diverse and sustainable communities.

#### **Chapter 4 - Sustainable Development in South Kesteven**

Policy SD1 – The Principles of Sustainable Development in South Kesteven

Policy SD 1 seeks to deliver sustainable development in South Kesteven.

Although we are broadly supportive of the approach set out in Policy SD1, we would suggest that any further revisions to the policy provide greater clarity as to the expectations of how development proposals are to meet criteria within the policy. At the moment, it is unclear as to whether these requirements have to be met by development proposals and the relationship between them.

#### **Chapter 6 - Spatial Strategy**

Chapter 6 of the Regulation 18 consultation looks into the Spatial Strategy that has been taken that has informed the Local Plan.

Policy SP1 – Spatial Strategy

Policy SP1 outlines that the Local Plan is to deliver sustainable growth across the District. We are broadly supportive of the approach to propose development across the District in locations which are suitable and sustainable. This approach will allow for greater certainty that the needs of the District can be met in a positive and robust manner. Market Deeping is classed as a Main Town and it is clear that further housing growth should be allocated to settlements within this tier that are the most sustainable.

Policy SP1 is clear that the Council is using the Standard Method for identifying housing need as the starting point which we support and are not aware of any justified and objective evidence which suggests a lower figure should be used.

#### **Chapter 7 - Housing Need**

It is pleasing to see the Council have used the Government's Standard Method in calculating the need for housing, in addition to the use of a 21% uplift, resulting in a total housing requirement of 16,975 dwellings. To meet this requirement, the Council propose to allocate an additional 2,901 dwellings across 23 sites. We

contend that Land at Peterborough Road, Market Deeping would be a suitable site to put forward to assist the Council in meeting its housing requirement.

#### Policy H2 – Affordable Housing

We acknowledge the importance of providing affordable housing options on large sites as this ensures a range of accommodation to come forward across South Kesteven.

The policy as presented in the Regulation 18 document includes a ranging percentage requirements which we understand will be refined as a result of the Whole Plan Viability Assessment. Alongside the Regulation 18 Local Plan, the Council have published a Whole Plan Viability Assessments prepared dated January 2024 which has been prepared by HDH Planning & Development Ltd and assumes a consistent 30% level of affordable housing for testing purposes along with a defined mix of tenure type. We are therefore unsure why the emerging policy has not reflected this evidence base at this stage.

Ahead of the Regulation 19 document, it will be essential that the Council provide clarity as to the level of affordable housing and the mix of tenures that are required to meet needs.

#### **Site Assessment**

A Site Assessment has been carried out to demonstrate where there is suitable land for development. The assessment has used the Red Amber Green (RAG) method which we agree is appropriate in finding the most suitable land for development.

#### **SKPR-55: Land at Peterborough Road, PE6 8DF**

The Council's assessment of the site has recognised that the site has suitable and good access to the existing highway network, and that there would be minor impact caused by the development on the local road network. The assessment has also identified that there are a number of services available within proximity of the site, in particular the access to healthcare and primary education from the site. The site also benefits from the nearby employment site, which would provide residents with nearby employment opportunities, further reducing the need for residents to travel.

In regard to flood risk, the assessment identified that the site was subject to surface water flood risk. However, the site is located within Flood Zone 1 and following a review of the surface water flood risk, there is a minimal area within the centre of the site at a low-medium risk of surface water flooding. The impact the development may have of flooding can be mitigated through design and the inclusion of Sustainable Drainage Systems.

Overall, the assessment of the site is positive and correctly identifies the access to key services and facilities. This assessment demonstrates that the location of this site is ideal for residential development due to the local services that the site benefits from. With this site providing residential development and being located within proximity to key services, this will also assist the Council in their vision of combating climate change.

## **Chapter 9 – Employment and Economic Prosperity**

This chapter outlines the Council's approach in delivering a strong and sustainable economy in South Kesteven. The Council seek to achieve this through good quality employment land which is attractive to businesses and in appropriate locations.

### **Policy E2 – Other Employment Sites**

The Regulation 18 Local Plan combines the new strategic employment allocations with the existing allocations within Policy E2 and continues to recognise Grantham as a key location for both residential and economic growth. This supports Chapter 6 of the NPPF which seeks to provide for local needs, including through the creation of clusters of specific employment requirements in suitable and accessible locations.

It is evident from the Employment Land Study and the Sustainability Appraisal that the Grantham Sub Regional Centre is a key location for strategic employment growth both regionally and nationally, with strong accessibility onto the highway network. Therefore we support the Draft Plan in recognising and providing the economic needs in the suitable location of Grantham. However, we consider the land off Peterborough Road at Market Deeping is not a suitable location to provide the required B8 units that are set out as required through the Employment Land Study.

The Employment Land Study outlines how the Draft Local Plan had allocated significantly more land than the requirements outlined in the ELS. The ELS also identifies that there is a need for B8 Units in the district, of which the site being promoted by Allison Homes at Market Deeping is not available or suitable to provide for.

Policy E2 releases BO-E1 and ST-E1 from their previous employment allocations following the findings of the ELS. The release of these sites result in the continued over allocation of employment land across the district. Due to the plentiful supply of employment land available to the Council, the site at Peterborough Road, Market Deeping should also be released as an employment allocation and be provided with a residential allocation for around 100 units, to contribute towards the housing requirement.

### **Policy E6 – Loss of Employment Land and Buildings to Non-Employment Uses**

The ELS discusses the sites which have been brought forward for non-employment uses, namely BO-E1 and ST-E1, which been developed for residential use. The ELS outlines a total of 141 Ha of employment land which has been released across the District from employment purposes.

We generally support the reasons for release as detailed within Policy E6 however we consider the Council's approach to Policy E6 could be more flexible in allowing the release of certain employment provisions. It is clear the Council have identified more than enough land to meet the employment requirement of the District in more suitable locations, therefore the locations in more urban built up areas which are smaller in nature would be better suited to meet the housing needs of the District instead of employment. This supports the aspirations of the NPPF for seeking employment land which is well located and which is attractive to businesses. Therefore if the land is not attractive to businesses in a certain location then it is viewed as more beneficial for this to be released.

We consider that Land at Peterborough Road, Market Deeping should be released from employment use and be allocated for residential use. Policy E6 sets out the following reasons to allow release from employment land use:

- a) the site is vacant and no longer appropriate or viable as an employment site – this may include the need for an effective, robust and proportionate marketing of the land and buildings to be undertaken; or
- b) redevelopment would maintain the scale of employment opportunities on the site, or would deliver wider benefits, including regenerating vacant or unutilised land; or
- c) the alternative use would not be detrimental to the overall supply and quality of employment land within the district; or
- d) the alternative use would resolve existing conflicts between land uses.

Criterion a requires that land to no longer be appropriate for use as an employment site. The site being promoted by Allison Homes is considered to no longer be appropriate for employment following the partial release of the land east of the original allocation in addition to the site having no prospects of being brought forward for employment use by Allison Homes. Furthermore, criterion c requires that the alternative use would not cause adverse impacts to the supply and quality of employment land in the district. As discussed within the ELS, the Council have over allocated the amount of employment land required and therefore the release of this site for residential use would not have a detrimental impact on employment land supply across the District. The release of this site would not impose any adverse impacts on delivery of the remaining employment sites identified for growth, and this area has been seen to be suitable for residential growth through the site partial release of site EMP D2 as well as through the allocation of the site to the west for residential development (site reference: DEP1-H1). The site is further shown to not be appropriate for employment use through the refusal of application S21/2138 for the development of a discount food store. Although the site is allocated for employment use, the previous outline application (S14/3585) made for the site has since lapsed and the reserved matters application has been withdrawn (S18/1547), further demonstrating the site has little prospects or demand in being brought forward for employment use.

Further to the above, Policy E2 sets out the aim of focusing growth within the district to Grantham and that land should be provided in appropriate locations. As discussed above, the site is not in an appropriate location and is not available or suitable to be brought forward for an employment use. The emerging Local Plan should continue to focus employment in Grantham and along the A1, which will also assist in creating a cluster and hub of employment, such as the Grantham Southern Gateway in addition to the creation of an employment hub at Gonerby Moor, Grantham.

### **The Deepings Neighbourhood Development Plan**

The Deepings Neighbourhood Development Plan was made in 2021 and provides further information and policies for growth within the areas of Market Deeping and Deeping St James.

Policy DNP4: Protecting Local Employment Opportunities provides criteria for employment developments to meet to be considered suitable and supported. Criteria d requires the proposal to not generate unacceptable impacts on the amenity of existing residential housing. With the land to the east having delivered residential units and the land to the west allocated to bring forward residential development, development of the site

(SKPR-55) for employment risks adverse impacts on the residential areas. Whereas, if the site was to be brought forward for residential use, the impacts of noise, sound and air quality would no longer be present and would lead to the creation of a development that would more closely assimilate with the surrounding land uses. The policy continues to only safeguard the land at Hard's Lane for employment use and no other specific area.

Further to this, Peterborough Road has been identified as an important Gateway into the town under Policy DNP10. The Neighbourhood Plan requires the identified Gateways to provide strong and visually attractive entrances into the Deepings. This site can assist in providing an attractive entrance into the town from the A15 through the provision of a well-designed, high quality housing scheme that would be in keeping with the local character if the site were allocated to provide residential housing.

## **5. Conclusions**

Allison Homes has prepared this response to the Local Plan Review undertaken by South Kesteven District Council ('SKDC').

These representations are made with respect to the ongoing promotion of Land at Peterborough Road, Market Deeping for residential development. The site is being promoted by a housebuilder, is available, suitable and deliverable within an early part of the plan period.

Allison Homes request that the Council release the site as a proposed employment allocation and allocate the site for residential purposes as it would make a meaningful contribution to the District's housing requirement over the plan period and provide for an attractive gateway into Market Deeping from the North.

Allison Homes considers that the approach set out in the Local Plan Consultation Document to allocate Land at Peterborough Road, Market Deeping is not sound as the site is not available. Releasing the site and allocating it for housing would be an approach that we would fully support and enable the plan to be found sound. The approach undertaken with regard to the housing requirement, and the associated Spatial Strategy, is consistent with national policy, effective, justified, and positively prepared.