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For and on behalf of
Stamford Property Company Ltd

**Representations to the South Kesteven District Council Regulation 18 – Draft Local Plan
2021 – 2041 Consultation**

**Prepared by
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1.0 INTRODUCTION

- 1.1 These representations have been prepared by **DLP Planning Ltd ('DLP')** on behalf of our client, **Stamford Property Company Ltd**, in response to the South Kesteven District Council Regulation 18 Draft Local Plan 2021 – 2041 Consultation.
- 1.2 The emerging Local Plan sets out the key issues facing South Kesteven and contains policies and sets out proposed locations for sustainable growth and investment across South Kesteven up to 2041.
- 1.3 This response has been formulated on the following policies and documents:
 - Policy E2: Strategic Employment Sites
 - SKPR-282 (STM1-H2) – Stamford East
 - SKPR-266 – Stamford Gateway (Exeter Fields)
 - Employment Land Study (2024)
 - Draft Site Assessment Report (2024)

2.0 REPRESENTATIONS

Policy E2 – Employment Sites

- 2.1 The overall spatial strategy for job growth is based off those policies contained within the current South Kesteven Local Plan (2020) and where appropriate, these policies have been updated to ensure that national, regional and local economic aims have been considered. This has resulted in current local plan policies E2 and E3 being combined with the Local Plan Review which identifies three allocation policies to respond to the outcomes of the Employment Land Study (2024) which has established an up-to-date need of industrial and office floorspace in the district up to 2041.
- 2.2 Policy E1 contains a bespoke policy for the key ‘Grantham Southern Gateway’, whilst policy E2 identifies the ‘other’ employment allocations within the district. Policy E3 identifies existing and protected employment sites.
- 2.3 The Local Plan Review sets out that these allocations have been endorsed by the Employment Land Study (2024) and are strategic in location and provide a choice to the market so that businesses and job growth are not constrained by the lack of suitable available sites.
- 2.4 With specific relation to the market town of Stamford, we strongly disagree that policy E2 seeks to provide a choice to the market for both existing and new businesses.
- 2.5 Specifically in respect of the deallocation of Exeter Fields, Empingham Road it is unclear how the conclusion to deallocate the site has been reached. The Employment Land Study (2024) identifies that it is unsuitable because *‘it is constrained by existing residential, and community uses whilst being already intensively used’*. However, upon review of the Employment Land Study (2015) which supports the allocations in the current Local Plan, the site faced similar constraints but was deemed suitable for employment use. There is therefore an inconsistent approach as to the application of the ‘suitability’ of the site from the previous study, particularly when the constraints have not changed.
- 2.6 Additionally, the Employment Land Study (2024), refers to the site being ‘intensively used’, however further clarification on this matter is required as the site is currently a vacant and underutilised parcel of land currently in agricultural use. While it is understood that the site is surrounded by residential development, the site itself is not constrained or used in connection

with this built form and therefore we question how it is being used intensively.

- 2.7 We are also aware that the site is actively being marketed as an employment site by both Eddisons and BNP Paribas Real Estate Advisory and Property Management UK Limited and we are aware that there has been interest in respect of the purchase of this site to be used for employment purposes.
- 2.8 It is also not clear from the RAG assessment as to the criteria considered behind each site-specific assessment and we request the Council publish their assessment methodology for transparency and clarity.
- 2.9 With the proposed deallocation of Exeter Fields, there remains only one proposed allocation within Stamford for employment uses – land East of Ryhall Road.
- 2.10 Like Exeter Fields, this site is also bound by residential allocations to its northern and southern boundaries with no means of access proposed through either of those estates. The only access available to this site is through the existing employment site to the immediate west and we understand that any access to this site would require third party land.
- 2.11 Paragraph 9.33 of the emerging Local Plan sets out that within the market towns, Stamford is to provide for high quality, modern office and ancillary uses. It is further noted that whilst the redevelopment of suitable previously development land and sites within the town centre will be a priority, it is acknowledged that additional employment land may also need to be identified.
- 2.12 As one of the three market towns within the district, and as one of the most sustainable locations within District to accommodate growth, there appears to be a significant imbalance in the proposed residential to employment allocations and a significant lack of evidence to justify the deallocation of Exeter Fields and we strongly object to this strategy.
- 2.13 No allocations have been identified specifically for modern office use and nor are there any indications of suitable town centre sites or previously developed land that will offer such facilities.
- 2.14 We would also seek further clarity on the inclusion of Foundry Road as an existing allocation (not identified within the current Local Plan) and the site area that has been cited for this (8.3 hectares). This seems significantly large and inaccurate when compared to the Employment

Land Study (2024) which cites a site area of 2.4 hectares.

2.15 Excluding Foundry Road, the emerging Local Plan proposes a total of 12.6 hectares of employment land in Stamford, some 25 hectares less than what is presently allocated/retained in the current Local Plan (37.6 hectares). This reduction is significant and goes against the Council's strategy to offer a choice to the market.

2.16 We would therefore strongly urge the Council to reconsider its allocations within Stamford to allow suitable alternatives within the market and better choice to potential businesses and purchasers seeking to relocate to the area.

SKPR-282 (STM1-H2): Stamford East

2.17 Our client strongly objects to the loss of employment land to residential on land identified as Stamford East. Our client formally objected to the Bellway Homes application (LPA Ref: A22/1591) on the basis of poor pedestrian connectivity to the wider area; poor quality design; the dominance of the car in the street scene and the increase in vehicular movement onto Uffington Road with inappropriate mitigation proposed.

2.18 These concerns remain and coupled with the loss of employment land, is exacerbating the lack of alternative options to both existing businesses and future occupiers in the market. This conflicts with the strategy for the emerging Plan which sets out that one of its key aims is to provide a choice to the market so that businesses and job growth are not constrained by the lack of suitable available sites.

SKPR-266 – Stamford Gateway (Exeter Fields)

2.19 As outlined earlier within these representations, we have significant concern in respect of the imbalance of residential to employment land within Stamford and the reliance on a single, land locked allocation to deliver new job growth.

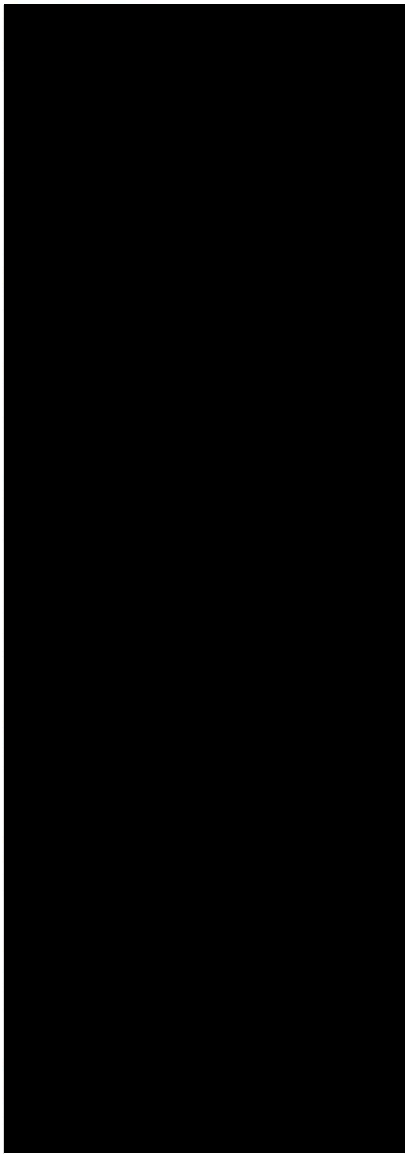
2.20 We query the outputs within the Draft Site Assessment Report (2024) and the Employment Land Study (2024) which identify that the deallocation of this site is on the basis that the site is unsuitable for employment use due to adjacent residential development. Those constraints remain unchanged since the Employment Land Study (2015) which deemed this part of the site suitable for employment use.



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2.21 We are also aware that the site is being actively market for employment uses and there has been interest in the site for such use.

2.22 We therefore strongly object to this policy and loss of employment site.



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