

Your ref: SKPR-36 and SKPR-37
Our ref: JB67367
DD: [REDACTED]
Date: 24/04/2024

Planning Policy
South Kesteven District Council
Council Offices
The Picture House
St Catherine's Road
Grantham
NG31 6TT

Sent via email only.

Sent by email to: planningpolicy@southkesteven.gov.uk;

Dear Planning Policy,

**Representation to South Kesteven District Council
Regulation 18 Draft Local Plan 2021-2041
On Behalf of The Rathbone Trust
Land between A15 & Peterborough Road, Market Deeping, Lincolnshire
and Land West of Linchfield Road, Market Deeping, Lincolnshire**

Thank you for the opportunity to comment on the consultation of the Proposed Submission (Regulation 18) version of the South Kesteven District Council Local Plan 2021 – 2041 (“Local Plan”) that runs from 29th February up until 11:59pm on 25th April 2024. I write on behalf of Bidwells’ client, The Rathbone Trust, in response to the consultation.

Introduction

This representation is made on behalf of The Rathbone Trust, who has an ownership interest in the Land between A15 & Peterborough Road, Market Deeping and Land West of Linchfield Road, Market Deeping.

The wider site at Land between A15 & Peterborough Road is 6.67 hectares and allocated in part under the adopted South Kesteven Local Plan (SKDC) 2011-2036 (2020) under ‘Policy DEP1-H1: Towngate West (SKLP254)’ and the Deepings Neighbourhood Plan (2021) ‘Policy DNP1’ for an indicative number of 73 dwellings and an approximate density of 23 dwellings per hectare.

The site at Land West of Linchfield Road, Market Deeping is 32.98ha and allocated under ‘Policy DEP1-H2: Land off Linchfield Road, Market Deeping (SKLP253)’ and the Deepings Neighbourhood Plan (2021) ‘Policy DNP1’ for an indicative number of 680 dwellings and an approximate density of 30 dwellings per hectare.

The emerging Draft Local Plan 2021-2041 (February 2024) carries forward the allocations of these site under the reference ‘SKPR-36 (DEP1-H1): Towngate West’ and ‘SKPR-37 (DEP-H2): Linchfield Road’

[REDACTED]

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 for the same number of dwellings and density. An extract of the sites within the emerging policies map
 are identified below.

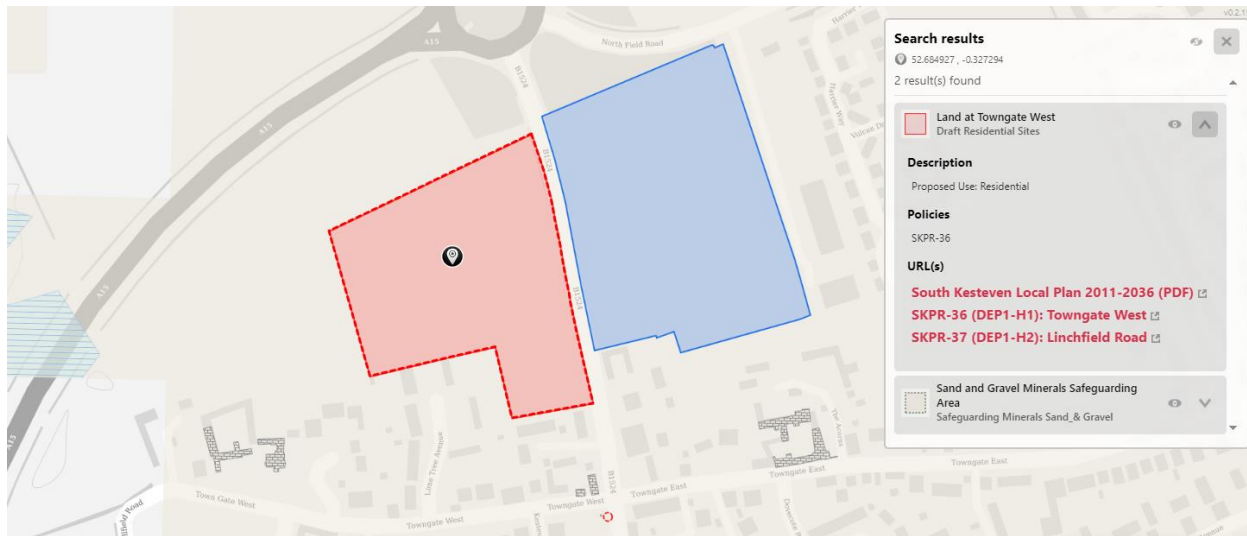


Figure: Site SKPR-36 (DEP-H1): Towgate West. Extract of SKDC Regulation 18 Version Policies Map (2024).

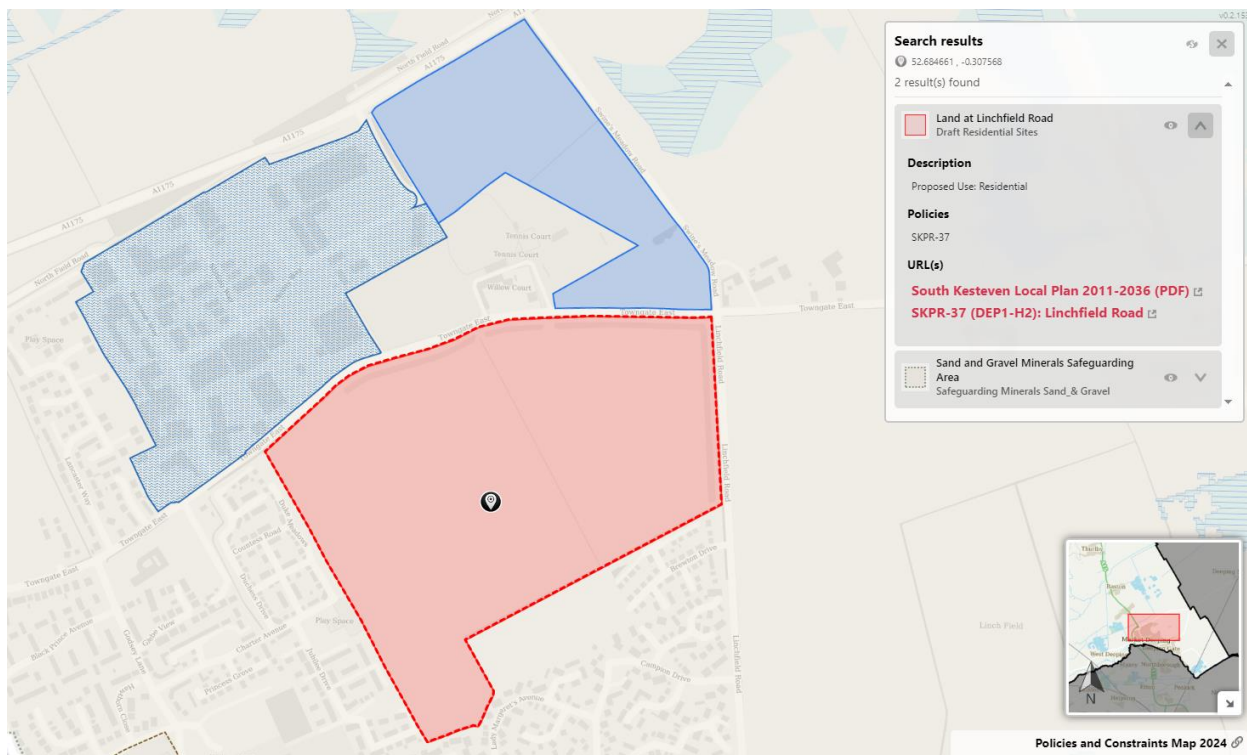


Figure: Site SKPR-37 (DEP-H2): Towgate West. Extract of SKDC Regulation 18 Version Policies Map (2024).

An outline planning application has now been submitted for Land between the A15 & Peterborough Road, under residential allocation DEP1-H1 'Towgate West' and the Deepings Neighbourhood Plan (2021) 'Policy DNP1'. Under this representation, we wish to request the amendment of Residential Allocation SKPR-36 (DEP1-H1) to encapsulate the extent of the application red line to reflect the comprehensive masterplanning proposals for the site.

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The National Planning Policy Framework (NPPF) (2023) at paragraph 35 sets out that Local Plans should be prepared against the four tests of 'soundness' are that the Local Plan should be:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on appropriate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies within the Framework.

Overall, we are supportive of the Local Plan and consider that the plan meets the tests of 'soundness'.

We are supportive of the Council's spatial strategy towards delivering new homes across South Kesteven.

Representation to The Local Plan

South Kesteven Local Plan 2021-2041: Vision and Strategic Objectives

The Local Plan sets out a vision five years beyond the current plan period to 2041. This includes a vision for South Kesteven to continue to be a vibrant part of Lincolnshire. *"The distinctive local character, unique local heritage and environmental and cultural assets will be a source of enjoyment of all and will be enhanced where possible... South Kesteven will provide a high quality of life, consisting of sustainable urban and rural communities where people want to live and work and are able to do so in quality and enhanced environments. The District will be a safe place to live with strong communities."*

For the Deepings, the emerging Local Plan identifies that they will have further developed its distinctive market town role. The Local Plan has been updated to identify that *"planned growth will take place through new developments to the east **and west** [Council's emphasis] of the own to meet local needs and respond to market demands."*

The new Local Plan sets out 15 no. overarching objectives. Objective 10 is retained which seeks to ensure that new residential development includes a mix and range of housing types which are suitable for a variety of needs, including the need for affordable and local-need housing in the District.

Overall, we are supportive of the Vision and Strategic Objectives as set out in the Local Plan. We support Objective 10 and consider that my Client's land interests at Market Deeping and residential allocations to the west of Peterborough Road and West of Linchfield Road can contribute towards achieving Objective 10. An outline application has now been made for Land between the A15 and Peterborough Road which supports the District's ambitions for sustainable growth and contribute to meeting affordable housing needs.

Support Vision and Strategic Objectives: We are supportive of the Vision and Strategic Objectives as set out in the Local Plan.

Planning Policies for South Kesteven

Policy SP1: Spatial Strategy and Paragraph 2.16: Delivering New Homes

Policy SP1 states that the Local Plan will deliver sustainable growth across the District and throughout the Plan Period (2021 – 2041), including allocations for housing and employment land. All allocations

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proposed in the Local plan are considered to be the most suitable and sustainable development options and provide a variety of site types and sizes to ensure choice is offered to the market and delivery is achievable.

The housing need for South Kesteven, using the Standard Method, is 14,020 new dwellings. To ensure the need is met in full, the minimum Local Plan requirement for South Kesteven is 14,020 dwellings across the period 2021 to 2041. This identifies an increase in housing targets (701 dwellings per annum to 2041 based on Local Housing Need, up from 650 dwellings per annum to 2036) and additional allocations in the Local Plan to help meet this additional housing need. These are included in addition to those which have previously been identified within the adopted Local Plan (2020). Our client's site coming forward supports housing delivery in Market Deeping and ensures that the site comes forward, as anticipated, to commence on site within the next 5 years.

The National Planning Policy Framework (NPPF) (2023) sets out the presumption in favour of sustainable development (paragraph 14), which should be the golden thread running through both plan-making and decision-taking. For plan-making, this means that local planning authorities should positively seek opportunities to meet the development needs of their area; and Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole or specific policies in the Framework indicate development should be restricted. The NPPF requires the Council to be proactively supporting sustainable development to deliver the homes needed by identifying and then meeting housing needs, in particular the Council should be significantly boosting the supply of housing (paragraph 60).

In view of the above, we are supportive of the continuation of Policy SP1 and the Council's spatial strategy towards delivery new homes across South Kesteven.

Support Policy SP1: We are supportive of Policy SP1 and spatial strategy to deliver new homes.

Policy H1: Housing Allocations

Policy H1 identifies a list of sites proposed for residential development over the plan period, as shown on the Policies Map. This includes the following sites:

- SKPR-36 (DEP1-H1): The Deepings – Towngate West; Site Area = 3.12ha; Indicative Number of Units = 73 dwellings.
- SKPR-37 (DEP1-H2): The Deepings – Land off Linchfield Road; Site Area = 32.98ha; Indicative Number of Units = 680 dwellings.

The draft Local Plan retains the two housing allocations within The Deepings 'DEP1-H1 (SKPR-36) and DEP1-H2 (SKPR-37)', in addition to new allocations in The Deepings. Overall, we are supportive of Policy H1 and the continued identification of DEP1-H1 and DEP1-H2 as residential allocations.

My client wishes to promote their land interests at Market Deeping for continued residential allocation through the Local Plan.

Policy SKPR-36 (DEP1-H1): Towngate West

The Residential Allocation SKPR-36 (DEP1-H1) identifies the site at Towngate West for an indicative unit number of 73 dwellings and an approximate density of 23 dwellings per hectare.

The Residential Allocation SKPR-36 states that the following development principles should be accorded to:

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- a. *A comprehensive masterplan is required for the site.*
- b. *Highway, footway, cycleway connections shall be provided throughout site which connect the site into the wider town.*
- c. *This site represents an important gateway location, with heritage and conservation features, this should be recognised in the design and layout of development proposals and proposals should seek to enhance the Peterborough Road frontage.*
- d. *Sensitive landscaping shall be incorporated along the western edge of the site.*
- e. *To ensure the development achieves good, high quality design, a design code will be prepared for the site.*
- f. *This site is situated within a Minerals Safeguarding Area. Before considering a planning application or allocation for this site a Minerals Assessment will be required.*
- g. *This site is within or includes a Green Infrastructure Area. Proposals on this site should incorporate the relevant principles for development within Green Infrastructure Areas set out in Policy EN3 Green Infrastructure.*

According to the Regulation 18 version of the Local Plan, the policy has been amended to include reference to Biodiversity Opportunity Areas and Green Infrastructure Areas.

My client wishes to promote their land interest at Land West of Peterborough Road, Market Deeping for residential allocation through the Local Plan. The site is partially allocated under residential allocation DEP1-H1 'Towngate West' and the Deepings Neighbourhood Plan (2021) 'Policy DNP1'. An outline planning application for the allocated site and wider site area, 6.67ha, has now been submitted to South Kesteven District Council for consideration. The submitted Site Location Plan and Illustrative Masterplan has been appended to this representation.

The Illustrative Masterplan (ref: UDS73162-A3-0201 Rev B) shows how proposed residential development of the site for up to 80 dwellings and an abundance of open space can be achieved on site. The proposed developable areas have been contained to the allocated site area, but in bringing forward development proposals for the site we sought an opportunity to deliver green infrastructure, open space, biodiversity net gain, the Deepings Green Walk, and wider public benefits. The Deeping Green Walk and open space in particular, has support from the local community and The Deepings Neighbourhood Plan Group.

As reflected within the amendments to the Policy wording of SKPR-36 to include reference to Biodiversity Opportunity Areas and Green Infrastructure Areas, extending the allocation area will reflect my Client's ambition to deliver approximately 48% of the site as publicly open space and a biodiversity uplift on site. This is in line with the 2024 mandatory biodiversity net gain requirements.

We respectfully request that the proposed residential allocation be extended to cover the whole extent of the site, as identified within the Site Location Plan and Illustrative Masterplan.

We consider that the proposed residential allocation of the entire site will contribute towards the housing needs of South Kesteven by providing a mix of market and affordable housing over the plan period and contributes to a deliverable supply of housing for the District. Residential development of the site can be delivered and achieved within the forthcoming five-year period, which will contribute towards maintaining the Council's five-year supply position.

The proposed development of my client's site is supported by an outline planning application accompanied by a detailed package of technical information to demonstrate that the proposed development will not result in any significant harm to matters of acknowledged importance, such as highway safety, flooding, ecology, arboriculture, heritage, archaeology or landscape and visual amenity.

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In view of the above, we consider that the technical evidence base accompanying the outline planning application has demonstrated that the proposed residential development of the site is in accordance with Residential Allocation DEP1-H1. The site represents an achievable, suitable, and deliverable allocation to support the necessary housing growth for South Kesteven and the Deepings in a sustainable location.

Support Policy H1 with Amendment: We are supportive of Policy H1 and the identification of SKPR-36 (DEP1- H1) as a residential allocation. We propose an amendment to the red line of to reflect the Site Location Plan and comprehensive proposals of the Illustrative Masterplan.

Policy SKPR-37 (DEP1-H2): Land West of Linchfield Road

The Residential Allocation SKPR-37 (DEP1-H2) identifies the site at Towngate West for an indicative unit number of 680 dwellings and an approximate density of 30 dwellings per hectare.

The Residential Allocation SKPR-37 states that the following development principles should be accorded to:

- a. *A comprehensive masterplan is required for the site.*
- b. *Highway, footway, cycleway connections shall be provided throughout the sites which connect the sites into the wider town. The existing footpath running through the sites should be incorporated into the development.*
- c. *The development should make contributions towards public transport, education, health and community facilities and open space provision.*
- d. *The development shall accommodate specialist housing needs through the provision of retirement housing, extra care or residential care housing.*
- e. *Sensitive landscaping shall be incorporated along the eastern edges of the site.*
- f. *To ensure the development achieves good, high quality design, a design code will be prepared for the site.*
- g. *This site is situated within a Minerals Safeguarding Area. Before considering a planning application or allocation for this site a Minerals Assessment will be required.*
- h. *This site is within or includes an area of Biodiversity Opportunity. Proposals on this site should incorporate the relevant principles for development within Biodiversity Opportunity Areas set out in New Policy 4: Biodiversity Opportunity and Delivering Measurable Net Gains.*
- i. *This site is within or includes a Green Infrastructure Area. Proposals on this site should incorporate the relevant principles for development within Green Infrastructure Areas set out in Policy EN3 Green Infrastructure.*

According to the Regulation 18 version of the Local Plan, the policy has been amended to include reference to Biodiversity Opportunity Areas and Green Infrastructure Areas.

My client wishes to promote their land interest at Land West of Linchfield Road, Market Deeping for residential allocation through the Local Plan. The site equates to an area of approximately 32.86 ha and the site is available for development.

The NPPF (paragraph 60) requires Local Planning Authorities to proactively support sustainable development to deliver the homes needed by identifying and then meeting housing needs, in particular the Council should be significantly boosting the supply of housing.

We consider that the proposed residential allocation of the whole site will contribute towards the housing needs of South Kesteven by providing a mix of market and affordable housing over the plan period and contributes to a deliverable supply of housing for the District. Residential development of the site can be

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delivered and achieved within the forthcoming five-year period and the remainder beyond the five-year period and within the plan period.

The proposed development of my Client's site would be supported by a planning application which would be accompanied by a detailed package of technical information to demonstrate that the proposed development will not result in any significant harm to matters of acknowledged importance, such as highway safety, flooding, ecology, arboriculture, heritage, archaeology or landscape and visual amenity.

In view of the above, we consider that the site represents an achievable, suitable, deliverable allocation to support to necessary housing growth within the plan period for South Kesteven and the Deepings in the context of paragraph 60 of the NPPF.

Support Policy H1 with Amendment: We are supportive of Policy H1 and the identification of SKPR-37 (DEP-H2) as a residential allocation for 680 dwellings.

Conclusion

Overall, we are supportive of the Local Plan and consider that the plan meets the tests of 'soundness'.

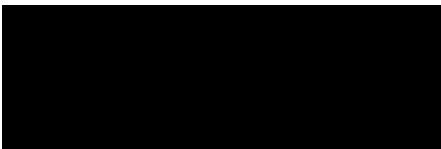
We are supportive of the Council's spatial strategy towards delivering new homes across South Kesteven and foresee the site to the west of Peterborough Road and Linchfield Road as a positive contribution to meeting SKDC's housing needs.

We are supportive of the residential allocation of my client's site under SKPR-36 (DEP1-H1): 'Towngate West' and 'SKPR-37 (DEP-H2): Linchfield Road' and this representation is supported by a Site Location Plan for both sites and Illustrative Masterplan for Land between the A15 & Peterborough Road. We wish to request the amendment of Residential Allocation SKPR-36 (DEP1-H1) to reflect the comprehensive masterplanning proposals for the site.

My client's sites represent achievable, suitable and deliverable allocations to support the necessary housing growth in the short-term and in the long-term within the plan period for South Kesteven and the Deepings in the context of local and national policy.

Should you have any queries in respect of my client's representation, please do not hesitate to contact me. My contact details are included in the letterhead. Alternatively, I look forward to receiving your written confirmation of my client's representation to the Local Plan and I look forward to receiving notification of all future planning policy consultations.

Kind regards



India Chard MRTPI
Senior Planner

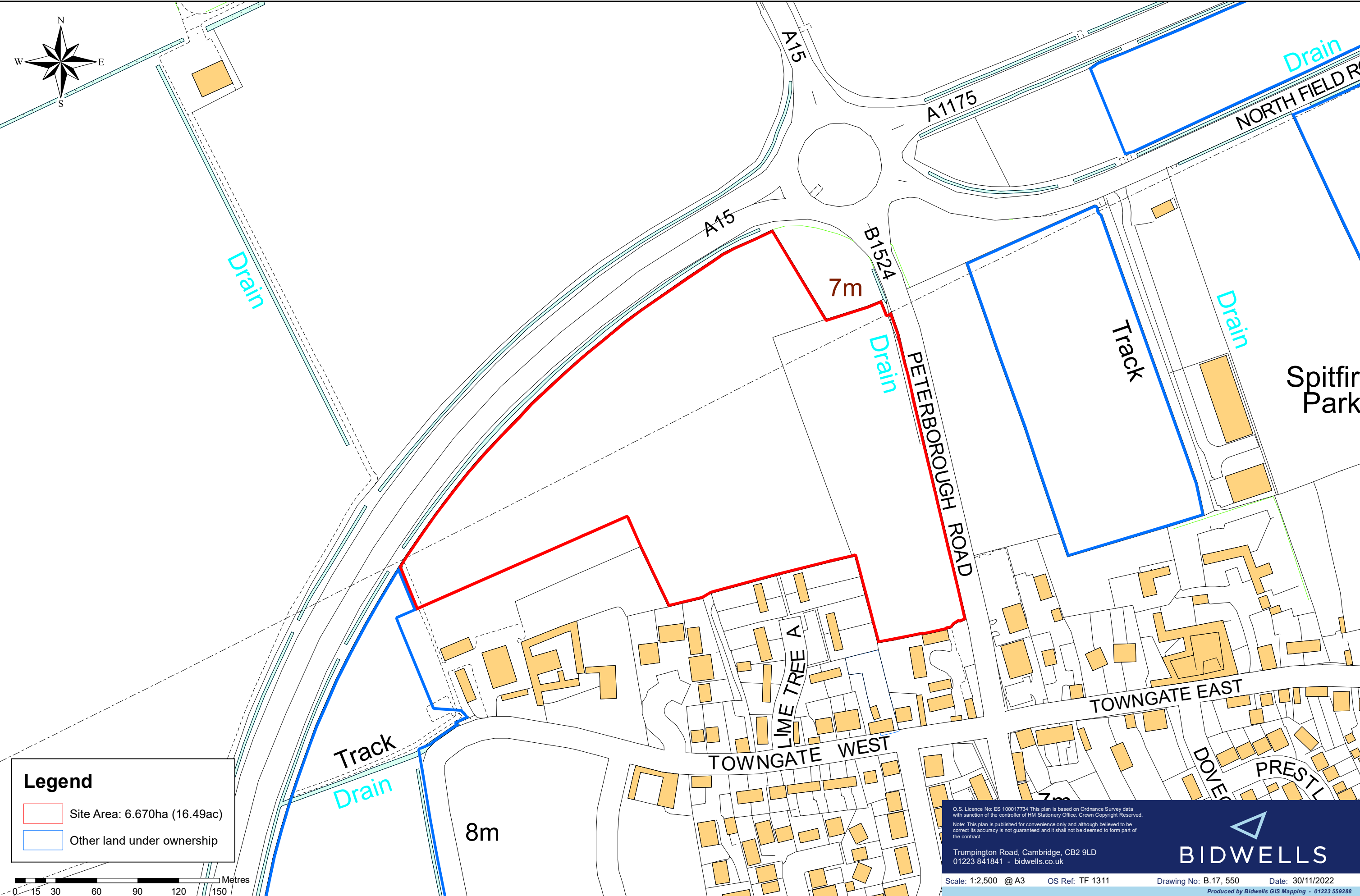
Signed for and on behalf of Bidwells LLP

Enclosures: As set out.

Copy: Client

APPENDIX 1: SITE LOCATION PLANS

Site Location Plan – Land between A15 & Peterborough Road, Market Deeping



Legend

- Site Area: 6.670ha (16.49ac)
- Other land under ownership

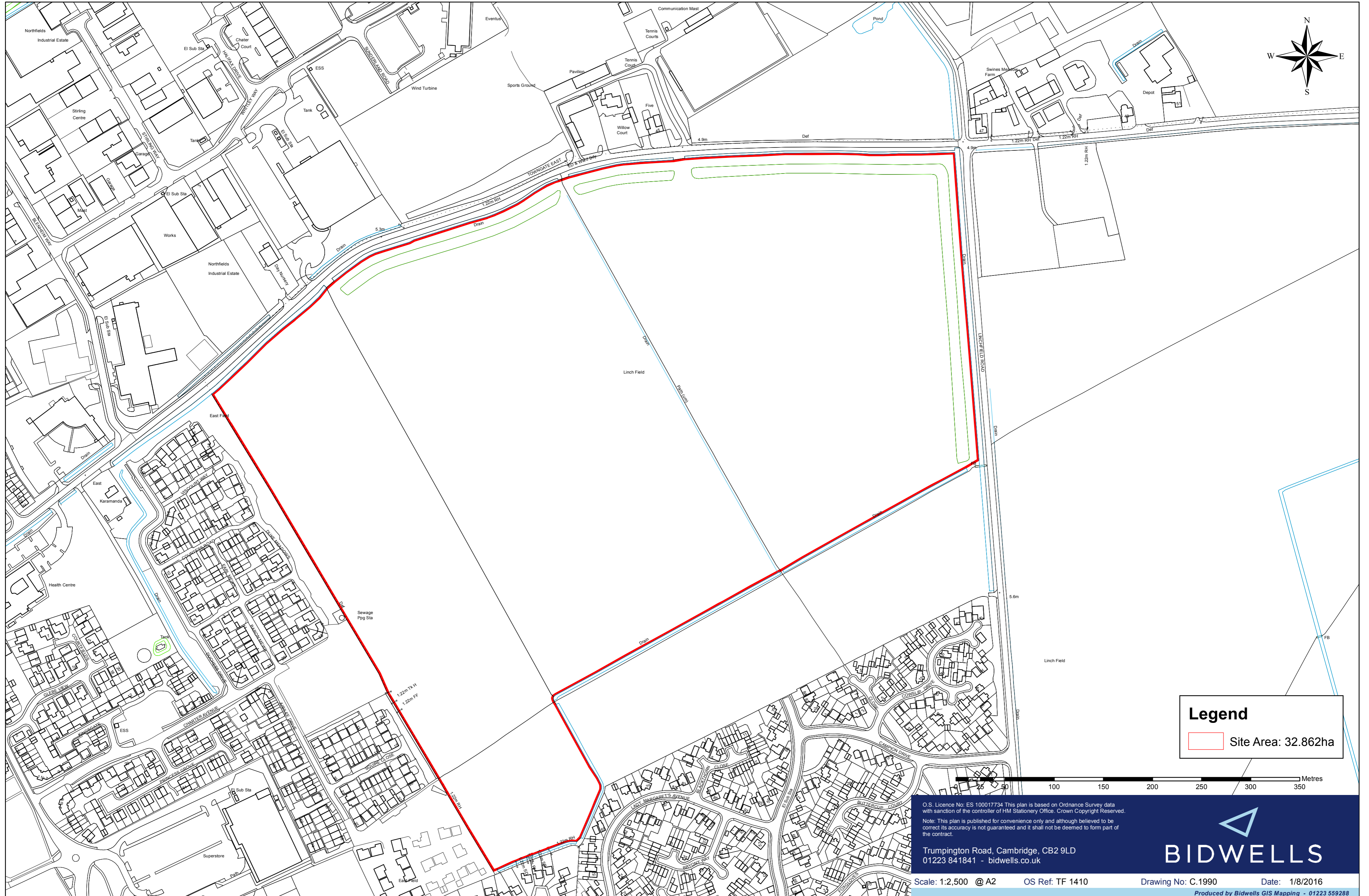
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Scale: 1:2,500 @ A3 OS Ref: TF 1311 Drawing No: B.17, 550 Date: 30/11/2022
 Produced by Bidwells GIS Mapping - 01223 559288

Location Plan - Land west of Linchfield Road, Market Deeping



Legend

Site Area: 32.862ha

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APPENDIX 2: ILLUSTRATIVE MASTERPLAN (SITE SKPR-36)



- KEY**
- Site Boundary
 - Public Rights of Way
 - Proposed Developable Area
 - Proposed Frontages
 - Tertiary Route
 - Proposed Primary Road w/Shared Footpath
 - Proposed Secondary Roads
 - Rural Courtyard
 - Proposed Primary Access
 - Pedestrian & Cyclist Access
 - Local Area for Play (LAP)
 - Deepings Green Walk
 - Footpath Link w/Green Corridor
 - Proposed Swales
 - Proposed SUDs Location
 - BNG-Focused Planting w/Native Hedgerow
 - Existing & Reinforced Planting
 - Retained Rural Grassland w/Biodiversity Enhancements

PLANNING ISSUE, NOT FOR CONSTRUCTION

Rev.	Date	Details
B	05/02/2024	FURTHER REVISIONS
A	20/06/2023	PRE-APPLICATION REVISIONS

GENERAL
 Do not scale from this drawing.
 All dimensions to be checked on site.
 This plan is to be read with all accompanying documentation.
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Rathbone Trust

BIDWELLS Urban Design Studio
 Bidwell House, Trumpington Road, Cambridge CB2 9LD

LAND BETWEEN A15 & PETERBOROUGH ROAD, MARKET DEEPIING
MASTER PLAN STRATEGY

Bar Scale: NOT TO SCALE	Job Code: 73162	OS License Number: 100017734
Project Phase: PLANNING	Date: 05.03.24	Drawn By: TB
Drawing Number: UDS73162-A3-0201	Checked By: DP	Revision: B

MARKET DEEPIING