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# Representations to the South Kesteven Local Plan Review (Draft Plan – Regulation 18) Consultation

On behalf of Rosconn Strategic Land

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## 1. INTRODUCTION

- 1.1 Marrons is instructed by Rosconn Strategic Land (“RSL”) to prepare and submit representations to the South Kesteven Local Plan Review (“LPR”) Draft Plan Consultation. RSL is promoting Land to the South of Old Great North Road, Stamford (“the Site”) for residential development. The Site is assessed within the Draft Plan’s evidence base under reference SKPR-66.
- 1.2 Representations were submitted to support the promotion of the Site to the previous LPR Issues and Options consultation, alongside a Vision Document by Define (**Appendix 1**). The Vision Document demonstrated how the Site is technically deliverable for residential development and how it could be brought forward with no material adverse impacts arising.
- 1.3 These representations have been produced by Marrons on behalf of RSL to provide a comprehensive response to the LPR Draft Plan consultation published by South Kesteven District Council (the local planning authority) for comment. Within these representations, we comment on the soundness and legal compliance of the LPR, as well as its evidence base.

## 2. VISION AND PLAN OBJECTIVES

- 2.1 We support the general thrust of LPR’s Vision to 2041 for South Kesteven in terms of its aspiration to create the right balance of jobs and homes, as well as ensuring that development is sustainable in terms of location and in addressing climate change. However, we object to the description of the role and function of Stamford within the Vision.
- 2.2 As regards Stamford, the Vision states that housing provision at the town will focus on addressing “local housing need.” Stamford is a sustainable market town with a range of services and facilities. It is second only to Grantham in sustainability terms. Restricting the role and function of Stamford to only accommodating “local housing needs” is not commensurate with its position in the settlement hierarchy and this element of the Vision should be reconsidered.
- 2.3 In relation to Plan Objective 4, we broadly support the establishment of an appropriate spatial strategy to guide the scale, location and form of development and the need to provide a long-term basis for the planning of South Kesteven. However, for the reasons outlined below in relation to our comments on the plan period, we question whether a plan period to 2041, which only extends the current plan period by five years, would provide for a sufficiently long-term basis for planning in the area.
- 2.4 In relation to Plan Objective 6, we would question whether it is appropriate for the Plan Objectives to “ensure” that Grantham is supported as the main focus for new housing. This Plan Objective appears to pre-judge the LPR’s spatial strategy, which can only be arrived at after considering a wide range of factors. In reality, under the proposed apportionment of housing within the LPR, Grantham will host 49% of growth to 2041 meaning that, in proportionate terms, other areas will still have a significant role to play in meeting housing need. We recommend that the role and function of other parts of the Plan Area in the spatial strategy are elaborated upon within Plan Objective 6.
- 2.5 Plan Objective 9 makes reference to the provision of an “adequate supply and choice of land for new housing.” We consider that this Plan Objective plays down a key element of national planning policy which is to “boost significantly” the supply of housing, not merely achieving an adequate supply. The provision of housing goes beyond offering a choice in the market but rather defining and addressing needs in a manner that addresses the challenges experienced by the Plan Area and also delivers the Plan’s ambitions.
- 2.6 In this regard, we would observe that there should be a better integration between the Plan Objectives and the District’s economic, social and

environmental challenges summarised at Table 1 of the Draft Plan. The social challenges noted by Table 1 include the need for specialist housing to support an aging population as well as affordable housing, noting that there are certain parts of the Plan Area, namely Stamford, with very high houses prices. We consider that the Plan Objectives and the wider Vision should clearly articulate how such challenges will be addressed.

### 3. POLICY SP1 – SPATIAL STRATEGY

#### **The Housing Requirement**

- 3.1 The National Planning Policy Framework (“NPPF”) (December 2023) sets out at paragraph 16 that Plans should be prepared positively, in a way that is aspirational but deliverable and should be prepared with the objectives of achieving sustainable development in mind.
- 3.2 Paragraph 60 of the NPPF sets out that in order to support the Government’s objective of significantly boosting the supply of housing, it is important that a sufficient amount and variety of land can come forward where it is needed. In addition, paragraph 60 also sets out that the needs of groups with specific housing requirements should also be addressed and that the overall aim in respect of plan-making should be to meet as much of an area’s identified housing need as possible.
- 3.3 Paragraph 61 of the NPPF sets out that to determine the minimum number of homes need, strategic policies should be informed by a local housing needs assessment, conducted using the Standard Method.
- 3.4 Paragraph 63 of the NPPF clarifies that within the context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups include those who require affordable housing.
- 3.5 Paragraph 67 of the NPPF establishes that strategic policy-making authorities should establish a housing requirement figure for their whole area and that this requirement may be higher than the identified housing need if, for example, it includes for provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment.
- 3.6 Paragraph 22 of the NPPF establishes that strategic policies should look ahead over a minimum 15 year plan period from adoption, in order to anticipate and respond to long-term requirements and opportunities arising from major improvements in infrastructure. Where a Plan’s strategy includes new settlements or significant extensions to existing villages and towns, paragraph 22 sets out that strategic policies should be set within a vision that looks further ahead (at least 30 years) to take into account the likely timescales for delivery.
- 3.7 The Planning Practice Guidance (“PPG”) clarifies that a local housing needs assessment is the first step in the process of deciding how many homes need to be planned for and that this should be undertaken separately from assessing land

availability, establishing a housing requirement figure and preparing policies to address this such as site allocations.

3.8 The PPG sets out that there are circumstances and factors where it might be appropriate to plan for a higher housing requirement than that indicated by the Standard Method. These circumstances are summarised below.

- *The Standard Method does not attempt to predict the impact of changing economic circumstances or the impact other factors might have on demographic behaviour.*
  - *Circumstances where it may be appropriate to plan for a greater level of housing growth than the LHN includes, but is not limited to:*
    - *Growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth*
    - *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.*
- *There may also be situations where previous levels of housing delivery in an area, or previous assessments of need, are significantly greater than the outcome of the Standard Method.*
- *Total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by eligible market housing led developments. An increase in the total housing requirement included in the plan may need to be considered where it could help deliver the required number of affordable homes. [Emphasis Added]*

#### Calculating Local Housing Need:

3.9 Policy SP1 of the LPR sets out the scale of housing need and a general strategy for its distribution over the plan period to 2041. Policy SP1 identifies a housing requirement of 14,020 dwellings which equates to 701 dwellings per annum (dpa).

3.10 The calculation of Policy SP1's housing requirement figure is informed by a Local Housing Needs Assessment (LHNA) by AECOM dated September 2023. The LHNA uses the Standard Method based on the latest affordability ratios and other

inputs available at that time (November 2023) to produce the result of 701 dpa. In other words, the housing requirement in Policy SP1 is analogous to South Kesteven’s local housing need (“LHN”) figure calculated using the standard Method.

- 3.11 Prior to the current consultation in respect of the Draft Plan, the LHN for South Kesteven was calculated to amount to 754 dpa which the LHNA confirms was the correct figure as at April 2020. As confirmed by paragraph 1.13 of the Draft Plan, the preparation of the LPR commenced in April 2020.
- 3.12 As set out in PPG, assessing baseline housing need is the “first step in the process of deciding how many homes need to be planned for.” Accordingly, the LHN or baseline housing need figure for South Kesteven should align with the point at which the LPR was initiated given that understanding the LHN is the first step in the plan-making process.
- 3.13 The LHNA at paragraph 3.27 does refer to this issue by explaining that firstly, 754 dpa would represent a rate of housebuilding not experienced in South Kesteven since the 2008 recession and secondly, that 754 dpa was not “confirmed as the new Local Plan target.” These arguments are not convincing.
- 3.14 Firstly, the housing trajectory presented on page 47 of the Draft Plan expects that as many as 1,400 completions per annum will be delivered in some years. In addition, capping the housing requirement based on past delivery would also clearly not reflect the Government’s objective to boost significantly the supply of housing. Secondly, as recognised within the LHNA itself, the Standard Method does not produce a housing requirement or a “target.” Rather, it informs a baseline assessment of housing need which is the first step in the process in deciding how many homes should be planned for. That process clearly should have been undertaken some time ago prior to the current consultation in relation to a full Draft Plan.
- 3.15 In our view, LHN figure should not be re-calculated midway through the plan preparation process and the figure used should be that which aligns with the date at which the LPR was commenced, unless there are good reasons not to. The LHN and therefore the housing requirement for South Kesteven should be at least 754 dpa resulting in a total housing requirement of 15,080 over the plan period.

The Plan Period:

- 3.16 The plan period for the LPR extends to 2041. Paragraph 22 of the NPPF requires strategic policies to look ahead at least 15 years from adoption. The most recent Local Development Scheme (LDS) for South Kesteven dated May 2023 anticipates adoption of the LPR by Spring 2026, which would dictate a plan period to 2041 as



a minimum. The end year for the LPR therefore provides virtually no room for delay, noting that a delay has already occurred against the timescales given in the LDS, given the current consultation on the Draft Plan was anticipated to be undertaken in Winter 2023/2024.

- 3.17 The timeframe specified at paragraph 22 of the NPPF is a minimum figure. As it stands, the LPR would look only five years beyond the end year of the adopted Local Plan (2036) and it is questionable whether such a short timespan would enable the LPR to anticipate and respond to long-term challenges and opportunities. As set out in the housing trajectory at page 47 of the Draft Plan, housing completions will drop below the 701 dpa from 2036/2037 with substantial drop-off in completions occurring in 2038/2039 and every year thereafter. The LPR would therefore not appear deliver sufficient housing completions to meet annualised need significantly beyond 2036.

Affordable Housing Need:

- 3.18 The Draft Plan sets out at Table 1 a series of challenges affecting the District to be addressed through the plan-making process. The social challenges identified include areas of the District such as Stamford with high house prices and a shortage of affordable housing. The LHNA estimates an annual need for affordable homes of 402 dwellings per annum which equates to 57% of the annualised housing requirement figure of 701 dpa.
- 3.19 Policy H2 of the adopted Local Plan sets out a requirement of 30% affordable housing provision on sites of 11 or more dwellings or where proposals would result in greater than 1000 sq m floor space except in Grantham, where the requirement is 20%. Based on these figures, it seems very unlikely that the local planning authority will be able to seek anywhere close to 57% affordable housing provision particularly not given the fact that slightly under half of the LPR's overall housing provision will be located at Grantham, which has a generally less buoyant housing market than other parts of the District, such as Stamford.
- 3.20 Paragraph 8.68 of the LHNA tangentially considers the relationship between affordable housing needs and the overall housing requirement. In this regard, the LHNA simply states that the NPPF and the PPG do not require the Standard Method to be uplifted to meet all affordable housing needs. We do not agree with this statement.
- 3.21 The PPG unambiguously states that an increase in the total housing requirement included in the plan may need to be considered where it could help deliver the required number of affordable homes. That is clearly the case here given that the overall level of housing requirement proposed will plainly not meet affordable

housing needs identified within the LHNA yet nowhere within the Draft Plan or its evidence base has an uplift to the Standard Method derived figure of 701 dpa been considered. That runs contrary to the advice of the PPG and paragraph 60 of the NPPF, which states that the overall aim of plan-making should be to meet as much of an area's identified housing need as possible. There is no explanation within the Draft Plan or within the evidence base as to why it is not possible to meet affordable housing needs in full.

- 3.22 Having regard to the Government's live tables on affordable housing supply, South Kesteven has seen an average of 120 affordable completions per annum over the last ten years. That is 70% below the LHNA's estimate of affordable housing need so clearly a significant increase in overall housing provision is required over and above previous trends if affordable housing needs are to be met. Policy SP1's housing requirement does not secure this. There is no explanation as to why it is not possible to uplift the housing requirement to secure a greater amount of affordable provision. In our view, the housing numbers associated with any uplift to account for affordability factors should be focused in sustainable locations and in areas where housing affordability is the worst, such as Stamford.

Economic Growth:

- 3.23 The PPG states that the Standard Method does not attempt to predict the impact of changing economic circumstances or the effect other factors might have on demographic behaviour. Accordingly, it is appropriate to consider in formulating the overall housing requirement whether it is sufficient to meet the economic aspirations of the LPR and whether sufficient homes will be provided to support the number of jobs anticipated.
- 3.24 As part of the LPR's evidence base, the local planning authority has commissioned an Employment Land Study (ELS) by AECOM dated February 2024. In summary, the ELS establishes a need for 79.5ha of employment land to 2041. Against this, the ELS identifies 236ha plus a further potential 35ha of vacant land currently designated for employment uses. As such, taking the ELS findings at face value, there is already a considerable overprovision of employment land against minimum employment land requirements identified in the ELS.
- 3.25 In spite of the above, the LPR has appropriately taken into account wider economic growth aspirations, Plan Objectives such as the reduction of out-commuting, and the need to provide appropriate choice and competition in the market. As such, the LPR identifies 338ha of employment land which is significantly in excess of the figure suggested by the ELS and would represent a considerable stepped change in the overall levels of economic development in the District. There is no particular consideration within the LHNA or the other parts of

the evidence base as to whether the LPR's considerable pipeline of economic growth merits an uplift to the minimum Standard Method figure to achieve an appropriate alignment of homes and jobs.

- 3.26 In fact, having regard to the ELS and the LHNA, it appears that the preparation of neither document has been informed by the other and there is a blatant disconnect between the economic needs and housing needs evidence base. Clearly, given the significant uplift in employment land identified through the LPR over and above the baseline employment need identified in the ELS, it is appropriate to consider the same approach in respect of housing to achieve an alignment of homes and jobs. We question whether the housing requirement informed by the minimum possible figure will support the District's economic growth ambitions.
- 3.27 The LHNA also sets out anticipated population growth in South Kesteven is expected to be led by the older population, with a projected 87.8% increase in households with a person aged 65 or above expected between 2011 and 2041. In the context of an aging population and ambitious economic growth plans, it stands to reason that providing additional homes could assist in addressing matters of housing affordability and attracting working age individuals to the area.
- 3.28 We therefore consider that the housing requirement is unsound for want of consistency with national policy and considerably underestimates housing need, meaning that it is not positively prepared. Whilst we note the c.20% delivery buffer included against the minimum need figure identified, a supply-side buffer is not a substitute for formulating a sound housing requirement having proper regard to national policy and guidance.

### **Housing Distribution**

- 3.29 A cornerstone of the LPR's strategy is to direct the greater proportion of housing and economic growth to Grantham, as the area's Sub-Regional Centre. Approximately half of all housing growth up to 2041 will be directed to the town, with new allocations in the LPR supplementing already sizable commitments.
- 3.30 Pursuing such a top-heavy spatial strategy clearly entails risks of delayed or non-delivery and in this respect, it is noteworthy that research such as the Government's "Independent Review of Build Out" has identified that market absorption rates as exerting great influence on the speed of build out. That is even more the case in respect of Grantham, which is a relatively small town with a relatively self-contained housing market.
- 3.31 In this context, it is welcome that the LPR has made some provision for strategic growth in other parts of the Plan Area, but certain highly sustainable settlements such as Stamford have been largely overlooked in accommodating the growth

strategy to 2041, with the result that the overall strategy, already heavily weighted in favour of Grantham, is more top-heavy than it needs to be, which risks stalled delivery.

- 3.32 We note the LPR has yet to be supported by a detailed housing trajectory and proportionate evidence in respect of infrastructure delivery and capacity has yet to be published. That is despite the fact that even current allocations at Grantham such as Poplar Farm are struggling to deliver completions due to infrastructure issues. Accordingly, the realistic timing and rate of delivery of strategic sites in and around Grantham is poorly understood and this represents a substantial risk to the LPR's overall strategy and maintaining an adequate deliverable supply of housing land over the course of the plan period.
- 3.33 The overreliance on Grantham as a source of housing supply has been borne out in the current plan period by ever more tenuous five year housing land supply figures, which have been verified yearly via an Annual Position Statement (APS). The latest 2023 APS records a five year supply of 5.01 years or a surplus of 8 dwellings against the minimum requirement. It is conceivable that the LPR's supply of smaller, rural sites on the edge of the Larger Villages could help underpin the five year housing land supply in the short-term, but it is likely these will be delivered relatively quickly in the early parts of the plan period. This is the picture painted by aggregated housing trajectory for the LPR which, as set out above, shows a substantial drop-off in completions after 2036.
- 3.34 In order to redress the balance of development in the District, we would recommend that further growth be directed towards Stamford. Whilst Stamford shares the second tier of the settlement hierarchy alongside Bourne and The Deepings, Stamford is the largest of the three towns by far and benefits from a railway station, connectivity to the A1 and, as set out above, a community in significant need of more housing options, including affordable provision.
- 3.35 Whilst it is recognised that the Stamford North Sustainable Urban Extension will go some way towards underpinning the town's role in the spatial strategy, Stamford will only contribute to meeting 13% of the overall housing provision to 2041 compared to 49% at Grantham and 15% at the Larger Villages. It is plain to see from these differentials that Stamford is not playing a role commensurate with its position in the settlement hierarchy.
- 3.36 The Stamford Capacity and Limits to Growth Study (2015) comprehensively considered directions of growth around Stamford. Aside from the broad direction to the north of the town which would play host to the now allocated Stamford North SUE, the Study identified alternative potential directions of growth that would not clash with strategic constraints, such as the area to the north west of the town. As such, it is clear from the evidence base that there are available and suitable

development options in and around Stamford which can be brought forward without generating significant adverse effects.

### **Conclusions on Policy SP1**

- 3.37 Policy SP1's housing requirement is flawed as it has used the minimum Standard Method figure with little substantive consideration as to whether this should be uplifted to account for the factors set out in the NPPF and the PPG.
- 3.38 We also have concerns as to whether the local housing need figure has been calculated from the correct base year, given that the preparation of the Local Plan Review commenced in April 2020 and Policy SP1's housing requirement has been informed by a fresh calculation undertaken using the Standard Method in late 2023. In addition, we question whether the plan period to 2041 gives the LPR sufficient scope to respond to long-term opportunities and challenges as required by paragraph 22 of the NPPF. For these reasons, we recommend that the housing requirement and the duration of the plan period is revisited.
- 3.39 We consider the strategic distribution of housing growth proposed by the LPR to be heavily-weighted in favour of Grantham and this risks stalled delivery and unbalanced growth. The comparatively limited role of Stamford in the spatial strategy as the District's second largest settlement is difficult to understand and not commensurate with the town's position in the settlement hierarchy. The evidence base clearly indicates that, at a strategic level, there are suitable directions of growth at the town and so the LPR's apparent approach of restraint toward Stamford is clearly not justified by the evidence.
- 3.40 We would note in passing that the Interim Sustainability Report by AECOM which accompanies this round of consultation has not specifically tested growth or distribution scenarios, so it has been impossible to assess how the selected spatial strategy in terms of both scale and distribution of growth performs against the reasonable alternatives. We note that further evidence in this regard will be available at Regulation 19 stage, but at this stage it is hard to say what considerations have informed the overall levels and apportionment of housing growth proposed by the LPR.
- 3.41 The LPR should be based on an appropriate strategy with that strategy having been arrived out following assessment of options through the SA process. This means looking at broad distribution options for growth and then considering how individual sites fit within that broad distribution. Given the overall ambition to focus most growth at Grantham and the linked decision to place Grantham in its own tier within the settlement hierarchy at odds with the Settlement Hierarchy Background Paper (as discussed below), the plan preparation process has missed a step and

selected a set of sites to fit a pre-determined spatial strategy rather than considering a range of growth scenarios on a consistent basis to select an appropriate strategy.

#### 4. POLICY SP2 – SETTLEMENT HIERARCHY

- 4.1 Policy SP2 identifies a settlement hierarchy. In general terms, we support the identification of Stamford as a “Market Town” or a second-tier settlement, where it is grouped with the Deepings and Bourne.
- 4.2 We note, however, that Policy SP2 does not follow the updated settlement hierarchy for the LPR presented in the Settlement Hierarchy Review Paper (February 2024), which identifies a single tier of market towns comprising Grantham, Stamford, Bourne and The Deepings. In other words, Grantham does not enjoy its own tier in the settlement hierarchy as a Sub-Regional Centre in this version of the hierarchy.
- 4.3 Based upon the wording of Policy SP2 and the content of the Settlement Hierarchy Review paper, it would appear that Grantham’s designation as the Sub-Regional Centre and its identification at the top of the settlement hierarchy in Policy SP2 is more related to the general ambition to apportion the majority of growth to this location rather than a reflection of its sustainability credentials relative to other market towns, such as Stamford.
- 4.4 In our view, the settlement hierarchy should be established separately from the strategy for apportioning growth through the District and we support the Settlement Hierarchy Review’s proposal to include Stamford in the same tier of Grantham, given the relative availability of services, facilities and infrastructure within each settlement. Policy SP2 should be updated accordingly.

## 5. SITE ASSESSMENT EVIDENCE

- 5.1 Policy H1 proposes a series of housing allocations to deliver LPR’s spatial strategy. As set out above, Policy H1 does not propose to allocate RSL’s land interest at Land to the South of Old Great North Road, Stamford.
- 5.2 Given that the Site is available, deliverable and viable for residential development which can be delivered with no adverse impact arising, we object to the decision not to allocate the Site, as this decision is not justified by the evidence.
- 5.3 In respect of the site assessment evidence underpinning the selected allocations, this is to be found principally in the Draft Site Assessment Report dated February 2024 and the Sustainability Appraisal (SA) for the South Kesteven Local Plan Review by AECOM dated February 2024. We offer the following comments on these evidence base documents.

### **Draft Site Assessment Report**

#### **Site Delivery:**

- 5.4 The site delivery timeframe is accurately assessed as “short-term” (0-5 years), which is clearly appropriate. RSL is ultimately owned by Bellway Homes, one of the country’s largest housebuilders with a significant track record of delivery. The Site is therefore available to come forward immediately.

#### **Flooding:**

- 5.5 The Report notes that the Site has a small overlap Flood Zone 2 and an area of surface water flood risk that is equally limited. This should not result in an adverse assessment as there are many such sites that have similar or greater overlaps with flood risk areas, including those proposed for allocation. Ultimately, sensitive masterplanning can avoid the very small areas of the Site at risk of flooding and any residual risk can be addressed through a site-specific Flood Risk Assessment.

#### **Ecology:**

- 5.6 It is observed within the Report that the Site is in close proximity (0km – 5km) of a designated nature site. Further details are not given, but the closest designation to the Site is the Great Casterton Road Site of Special Scientific Interest (SSSI), which is designated for its grassland quality and limestone-based plants. The SSSI comprises a very small area of about 1 hectare and whilst it appears publically accessible, it is subject to a management regime



which includes the prohibition of dog walking and has established grassy footpaths for pedestrians to follow. Given the substantial amount of open space and habitat enhancement that would be delivered alongside the development of the Site, it is highly unlikely that residents would opt to travel to the SSSI rather than make use of the on-site areas of public open space. The risk of an impact is therefore very minimal and the “Red” assessment should be revisited.

#### Highways and Access:

- 5.7 It appears that the ultimate decision not to allocate the Site is that its development has the potential to have a major impact on the Strategic Highway Network (SRN) and significant mitigation measures would be required. This conclusion is simply not supported by the evidence.
- 5.8 The only comment made in relation to this matter is that the Site would generate 100 or more trips and is close to the SRN (namely the A1). The Report explains, however, that this aspect of the assessment is only a screening threshold to flag where strategic development *might* have an impact on the SRN. There are other sites proposed for allocation which are assessed as potentially having the same level of impact.
- 5.9 There are comments from the Local Highway Authority in relation to SKPR-66 but only to observe that a Transport Assessment would be required and that the access sits within the neighbouring authority of Rutland.
- 5.10 With no other technical evidence having tested the Site’s impact upon the highway network, the decision not to allocate the Site on these grounds is unjustified.

#### Mineral Safeguarding:

- 5.11 The Site lies within a limestone Mineral Safeguarding Area (MSA). This is not a unique situation and there are other sites within this designation which have been proposed for an allocation. Even if the Site did host a viable mineral resource, it is unlikely that it would support a viable extraction operation given its proximity to existing residential properties.

#### Heritage:

- 5.12 We note that, appropriately, heritage has played no role in the decision not to allocate the Site, albeit two “Red” ratings have been given for proximity to listed buildings and to a Scheduled Ancient Monument. It is recognised that beyond

the Site's northern boundary lies the conservation area of and listed buildings associated with Great Casterton.

- 5.13 RSL has incurred considerable cost preparing a detailed masterplan and vision document informed by appropriate technical evidence setting out how the adjacent heritage constraints can be addressed. In short, this involves providing a considerable standoff and new landscaping between the proposed developable areas concentrated to the south east of the Site and the heritage assets mentioned above. For that reason, no material harm would occur to these adjacent designations, subject to appropriate masterplanning.

Other Constraints:

- 5.14 A variety of other constraints have been considered within the Draft Site Assessment on a "distance to site" basis with RAG ratings being applied based on distance. We would observe that the Site performs excellently in respect of its proximity to key services and facilities all of which are identified as being within reasonable walking and cycling distance.

**Sustainability Appraisal**

- 5.15 The Sustainability Appraisal (SA) Interim Report comprises two principal parts. Firstly, it contains detailed assessments of the potential development sites submitted as part of the "Call for Sites" process and secondly, it has carried out a "Points of the Compass Appraisal," which assesses broad locations for growth around the District's 20 main settlements. It is noted that detailed spatial strategy options and growth scenarios will be considered at Regulation 19 stage.

Broad Area Assessment:

- 5.16 The Broad Area assessment carried out for Stamford is not comprehensive and does not give a full picture of the town's strategic constraints or capacity for growth. There has been no consideration or discussion of the broad area to the north west of the town, despite the findings of the earlier Stamford Capacity and Limits to Growth Study (2015) that this broad direction was relatively unconstrained. In fact, this entire area is obscured by the map key and not discussed at all in the analysis of the broad directions, which is a considerable shortcoming of this work. It does not form a robust basis for site selection.

Site Assessment: SPKR-66:

- 5.17 As with the Draft Site Assessments, the site-specific assessments within the SA have been undertaken on a straightforward "distance to constraint" basis without

a finer grained assessment of how the site in question may or may not contribute to SA objectives. This methodology has given a relatively skewed picture of what are, in respect of the SA objectives and constraints more generally, high performing sites such as Site SPKR-66.

- 5.18 There are no particular technical matters discussed within the detailed SA appraisal of the Site that have not already been raised above. However, the RAG scoring between the SA assessment of the Site and the Draft Site Assessments is inconstant, particularly as regards distance to facilities. For example, the SA scores distance to shops as “Red” whereas the Draft Site Assessments scores “Amber” for the same distance. Similarly, the SA “Red” scores distance to a bus *route*, which it states is 3,205m away but then provides a “Green” score for a bus *stop*, which it states as being 337m. Clearly, this illogical.
- 5.19 The analysis presented in the Draft Site Assessments as regards distances to key services and facilities is more robust and the SA’s assessment should be revised accordingly.

## 6. CONCLUSION

- 6.1 RSL is promoting Land South of Great North Road, Stamford (SPKR-66) for residential development. A Vision Document (appended to these representations) demonstrates how a high quality scheme could come forward swiftly and would result in no materially harmful adverse impacts.
- 6.2 RSL has a number of fundamental concerns in respect of the soundness of the housing requirement and the spatial strategy.
- 6.3 The housing requirement has been formulated on the basis of the minimum local housing need figure calculated using the standard methodology. It has been calculated from an incorrect base year. Despite significant evidence of unmet affordable need and a considerable amount of employment floorspace planned as part of the LPR, no substantive consideration has been given to increasing the housing requirement over and above the minimum amount indicated by applying the Standard Method, contrary to the advice of the NPPF and PPG.
- 6.4 The spatial strategy in relation to the LPR’s broad distribution of housing is too heavily weighted towards Grantham and fails to recognise Stamford’s significant role within the settlement hierarchy as a sustainable market town, with capacity to accommodate strategic growth.
- 6.5 In respect of the evidence which has underpinned selection of the preferred sites, there are significant flaws in how SKPR-66 has been assessed and the decision not to allocate this Site for residential development is not justified.
- 6.6 For the reasons set out above, the LPR’s housing requirement is unsound for want of compliance with national policy and does not provide for development needs, meaning that it is not positively prepared.
- 6.7 The LPR’s spatial strategy does not deliver adequate growth at Stamford commensurate with its sustainability credentials, given that it is the second most sustainable settlement in the District and this decision is not justified against or consistent with the LPR’s evidence base.



**Ermine Fields**

# **Vision Document**

**NORTH-WEST STAMFORD**

AUGUST 2022

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# Introduction

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This vision document is prepared by Rosconn Strategic Land mtg and relates to 14.13 hectares of land to the west of Old Great North Road, Stamford.

It sets out a high level vision for the future of this land, focusing on how housing, parkland and movement routes could create a high quality legacy serving both local people and their environment.




It illustrates how a bespoke, high quality form of development could create a beautiful scheme, that enhances the local environment and draws out the best qualities from the local streets and buildings alongside parks and footpaths.

This document should be read in conjunction with planning representations made by Marrons Planning.



**Figure 1**  
Stamford Wide Location Plan





**LEGEND**

-  Site Boundary
-  District Boundary
-  Distance Markers 0.5/1.0/2.0/3.0km



**Landscape**

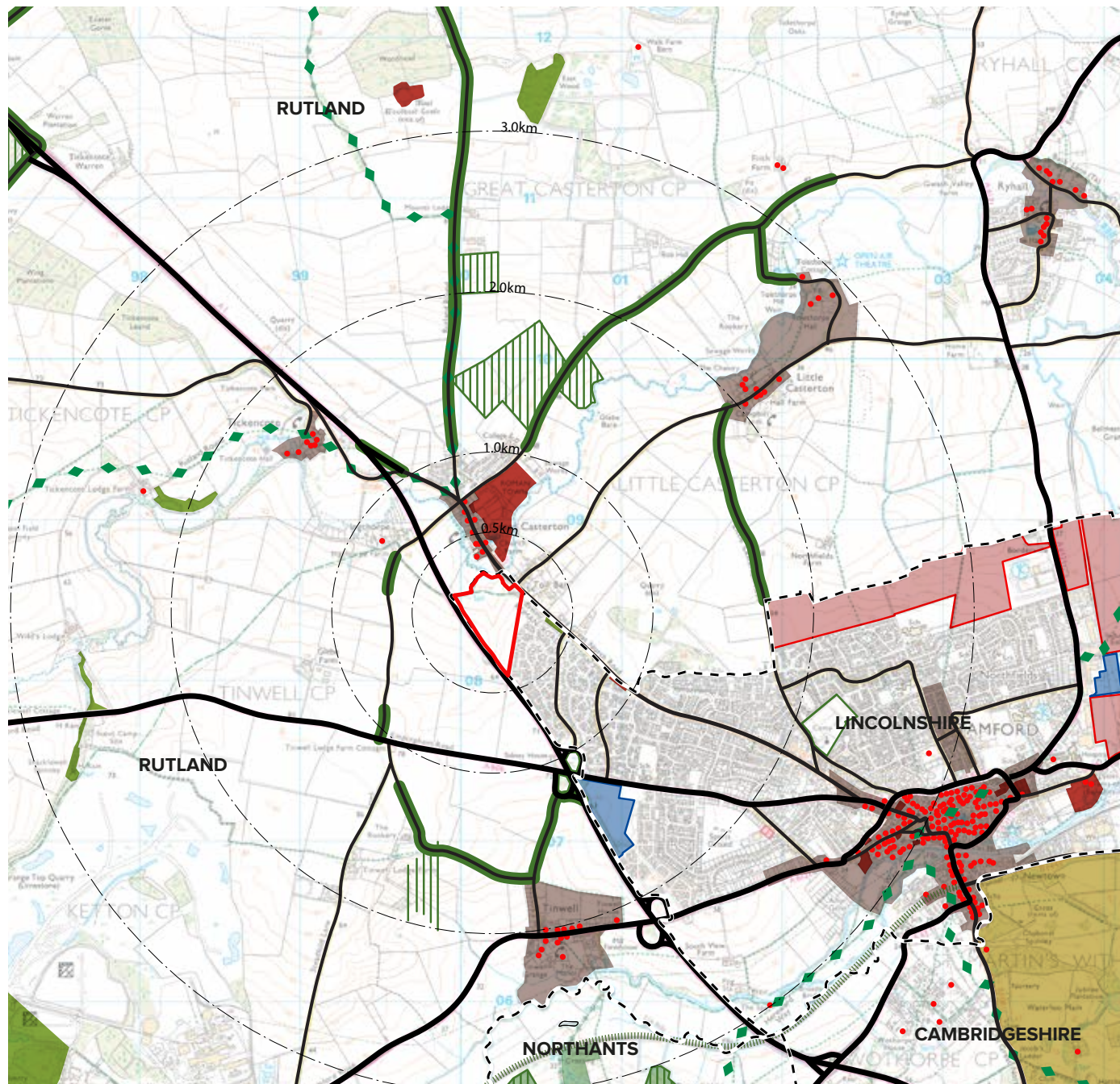
-  Ancient Woodlands
-  Local Wildlife Sites
-  SSSI

**Historic**

-  Historic Parks & Gardens
-  Ancient Monument (Policy ENV4)
-  Conservation Area (Policy ENV1)
-  Listed Buildings (not illustrated in CA as numerous)

**Land-Use**

-  Housing Allocation
-  Residential Allocation



SCALE 1:25,000





02.

# Vision

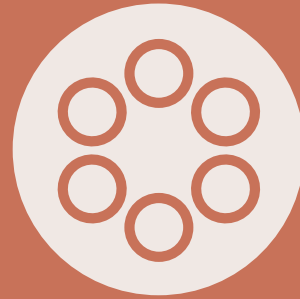
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Our ambition is to create an exemplary new community that demonstrates how a sensitive design approach can benefit the health and wellbeing of local people whilst enriching the character and function of the environment.

This ambition is realised through the following emerging three design principles.



To **assimilate** built form successfully into the landscape by creating a landscape led framework that enhances the biodiversity and recreational value of the site whilst promoting a wildlife recovery approach to its green infrastructure.



To **connect** communities together to support social inclusion, sense of place and belonging, both through physical connections, mutually beneficial uses and shared resources.



To create **beautiful** streets, buildings and spaces as evident in parts of Stamford, whilst protecting the **identity** of Great Casterton as an independent village, set in a rural landscape.

“

Beauty is not just a matter of how buildings look (though it does include this) but involves the wider ‘spirit of the place’, our overall settlement patterns and their interaction with nature. It involves both the visual character of our streets and squares, and also the wider patterns of how we live and the demands we make on our natural environment and the planet.

We should therefore be advancing the cause of beauty on three scales, promoting beautiful buildings in beautiful places, where they are also beautifully placed.

Quote taken from

Pg 10 of the ‘Living with Beauty’ BBBBC report Jan 2020

Images Ref. Adam Architects

Row 1 – Cecil Square, Stamford

Row 2 – Nansledan, Newquay

Row 3 – Poundbury, Dorset

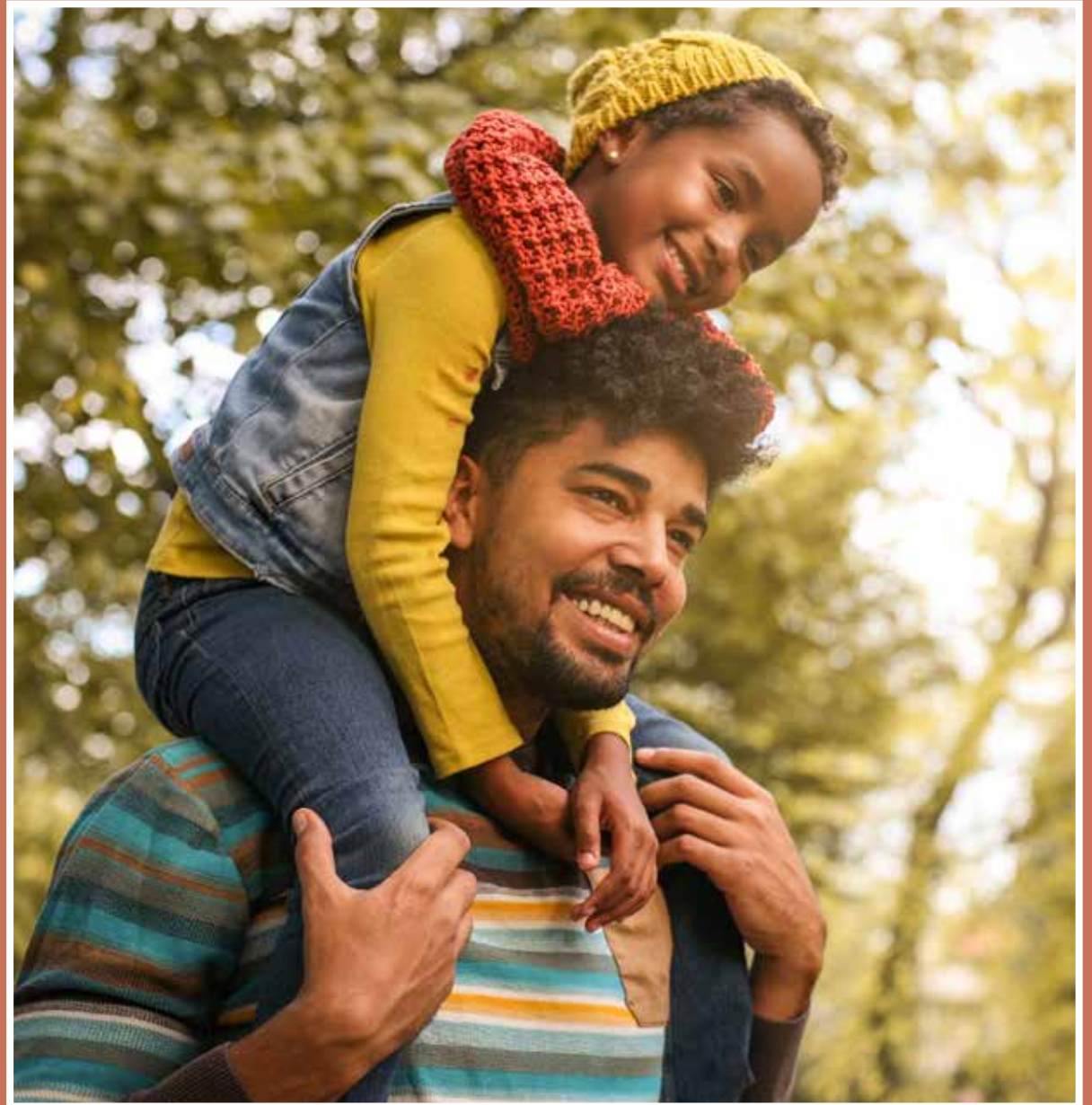


03.

# Design Principles

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The design principles are explored further on the following pages.





## ASSIMILATING INTO THE LANDSCAPE

Our vision assimilates into its context by:

- A** Creating a robust landscape enclosure to the east, north and north-west site boundaries. Robust native woodland belts create a sense of enclosure to this site edges, including reflecting in part historic field patterns.
- B** Responding to the site topography to ensure built form flows along contours ensuring a comfortable and natural fit.
- C** Proving a new naturalistic park with full public access to the north, with a focus on biodiversity enhancement and informal recreation.





## CONNECTING COMMUNITIES

Our vision connects communities by:

- A** Retaining and enhancing the existing public footpath network whilst creating a legible network of interesting streets and spaces within the site.
- B** Aligning streets and paths to naturally connect into the existing park and play area to the north east – connecting the existing community of Stamford directly to the site.
- C** Establishing new naturalistic parkland to the north to maintain separation from Great Casterton and allow the existing and future community to enjoy this natural resource, thereby reinforcing social cohesion.





## CREATING BEAUTY AND REINFORCING IDENTITY

Our vision creates beauty and reinforces identity by:

- A** Creating beautiful streets and spaces. The central spine within the scheme is a largely shared surface street with a traditional limestone character of an intimate scale with a number of small and interesting spaces that relate to community uses and pocket parks. This route aligns with the Church of St Peter and St Paul to reinforce the separation from Great Casterton but also to appreciate this historic landmark in the landscape.
- B** Delivering beautiful buildings through a traditional urbanism approach, whilst establishing a new community hub landmark building along its central spine.
- C** Ensuring clear separation exists between Stamford and Great Casterton, both through physical distance, but also through the parkland, landscape and movement routes between the two settlements, reinforcing the clear distinction between them.



04.

# Indicative Masterplan

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## ASSIMILATING INTO THE LANDSCAPE

- 1 Existing vegetation retained and protected within the site.
- 2 Native tree and shrub planting to create robust landscape framework.
- 3 Street trees and hedgerow boundaries to line streets and create a green street character.
- 4 Integrated swales and rain gardens within street corridors to manage water sustainably.
- 5 New public parkland with naturalistic approach including wetland, meadow and native tree planting to establish significant biodiversity enhancement and informal recreation.



## CONNECTING COMMUNITIES

- 6 Use existing access to the adjacent public park and play area to connect existing and proposed Stamford residents.
- 7 Align proposed streets with the existing play area to have the potential for a number of new connections.
- 8 Establish well overlooked play space and a community hub within the proposed scheme for existing and proposed communities to benefit from.
- 9 Create an area of new public parkland accessible to existing and new residential of Stamford and also residents of Great Casterton to maximise social inclusion and connections.



## CREATING BEAUTY AND PROTECTING IDENTITY

- 10 Establish a series of streets and spaces that are beautifully placed and designed, and inspired by the character, form and materials of Stamford.
- 11 Create a centrally aligned street, with some pedestrian only zones, that creates a direct visual connection to the Church of St Peter and St Paul - connecting to the site's context, whilst appreciating the separation of Stamford and Great Casterton.
- 12 Deliver local building landmarks at site entrances, northern edge and along the central view corridor street through its use of limestone, linked buildings and traditional form.
- 13 Protecting the identity of Great Casterton by establishing a new naturalistic parkland with public access that protects in perpetuity a significant area of separation between Great Casterton and Stamford, whilst increasing the visual separation through the naturalistic form of this parkland, with native woodland and meadow.







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Street trees and hedgerow boundaries to line streets and create a green street character.

Establish a community hub within the proposed scheme for existing and proposed communities to benefit from.

A centrally aligned street, with some pedestrian only zones, that creates a direct visual connection to the Church of St Peter and St Paul – connecting to the site's context, whilst appreciating the separation of Stamford and Great Casterton.



New public parkland with naturalistic approach including wetland, meadow and native tree planting to establish significant biodiversity enhancement and informal recreation.

Making it accessible to existing and new residential of Stamford and also residents of Great Casterton to maximise social inclusion and connections.

Utilising the parkland to protect the identity of Great Casterton, with public access that protects in perpetuity a significant area of separation between Great Casterton and Stamford, whilst also increasing the visual separation.

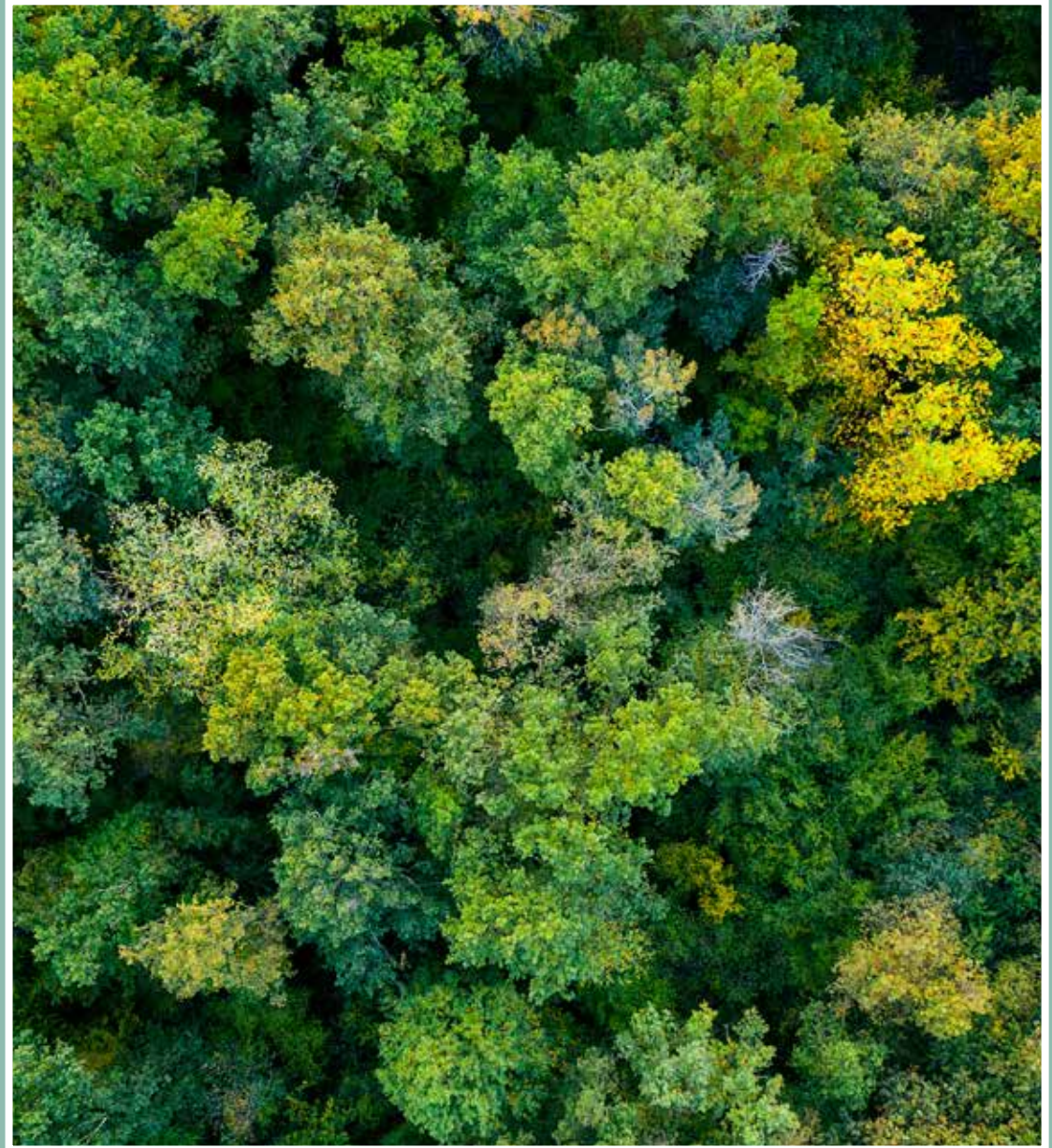
05.

# Conclusions

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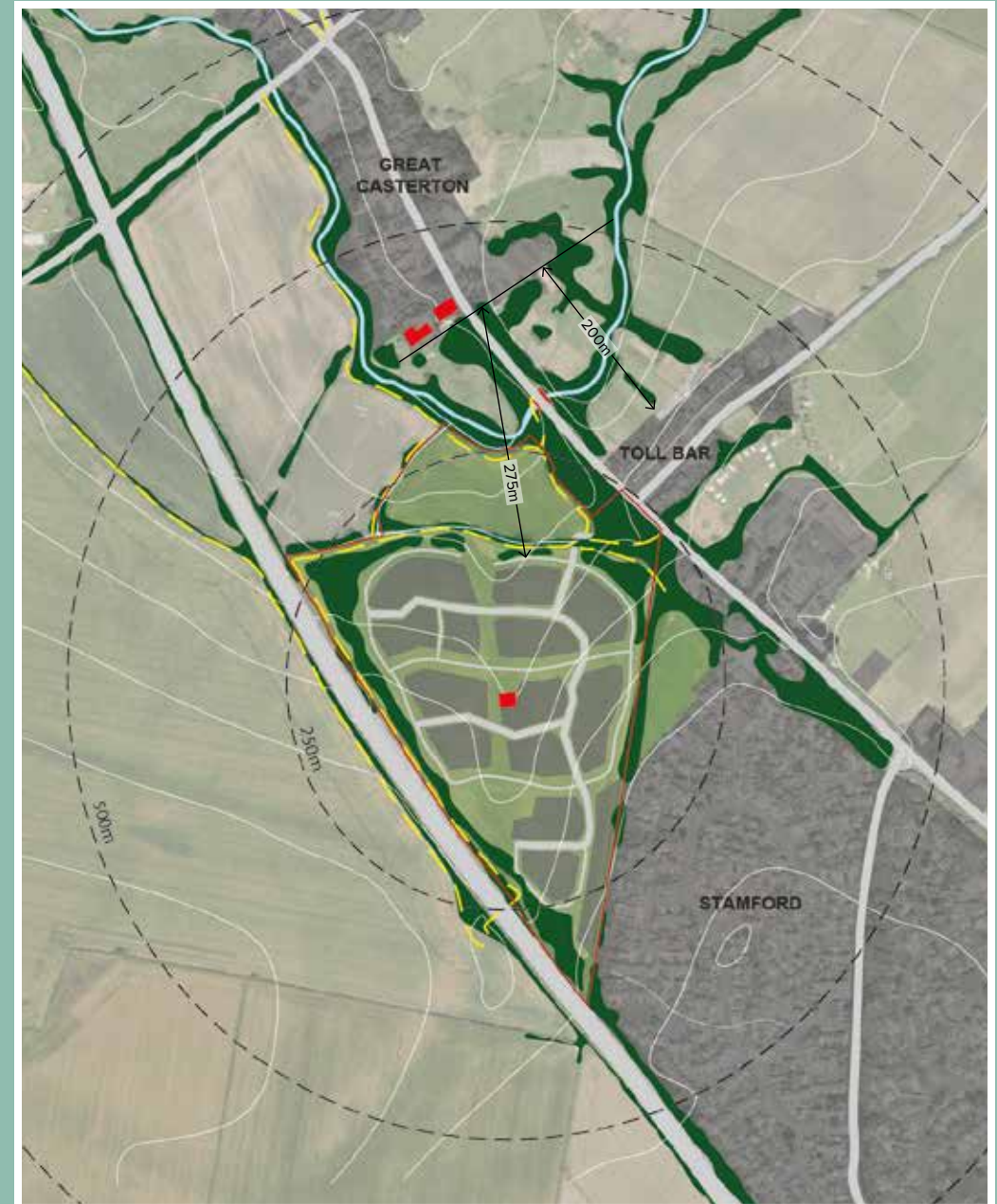
This document sets out a high level vision for land north east of Stamford, on behalf of Rosconn Strategic land and should be read in conjunction with representations made by Marrons Planning.

It illustrates how an exemplary new residential community can be delivered in a highly sustainable location, with its underlying design principles evolving from an appreciation of its context and character, benefitting the health and well being of local people whilst enriching the character and function of the environment.



This is realised through the following three design principles:

1. **Assimilating** built form successfully into the landscape by creating a landscape led framework that significantly enhances the biodiversity and recreational value of the site whilst promoting a wildlife recovery approach to its green infrastructure.
2. **Connecting** communities together to support social inclusion, sense of place and belonging, both through physical pathways, naturalistic open space and mutually beneficial (community) uses.
3. Creating **beautiful** streets, buildings and spaces as evident in parts of Stamford, whilst protecting the **identity** of Great Casterton as an independent village, set in a rural landscape.





**Define.**

