

# South Kesteven District Council Local Plan Review

Representations to Regulation 18 Consultation

---

ON BEHALF OF COMMERCIAL ESTATES GROUP

April 2024

---

## Contents

1.	Introduction	3
2.	Background - Stamford Gateway	5
3.	Vision and Strategic Objectives	10
4.	Sustainable Development and Spatial Strategy Review	15
5.	Housing Policies	17
6.	Policy SKPR-266 (Stamford Gateway)	19
7.	Conclusion	24

## 1. Introduction

- 1.1 These representations have been prepared by Nexus Planning on behalf of Commercial Estates Group ('CEG') in response to the Regulation 18 consultation of South Kesteven District Council's Local Plan Review ('the Draft LPR').
- 1.2 CEG has an interest in all strategic and non-strategic matters informing the preparation of the Draft LPR. However, these representations are made specifically in the context of Land at Exeter Fields, Empingham Road, Stamford ('the site' or 'Stamford Gateway'), which is identified as a preferred option to deliver residential development under Draft LPR site allocation Policy SKPR-266.
- 1.3 These representations cover the following elements of the Draft LPR:
  - Vision and Strategic Objectives;
  - Sustainable Development and Spatial Strategy; and
  - Relevant Emerging Policies.

### Summary of Representations

- 1.4 In principle, CEG supports the approach taken by the Draft LPR in seeking to deliver strategic development within South Kesteven's most sustainable settlements and that Stamford Gateway aligns with this strategy and the objectives of the Draft LPR, through:
  - Delivering a large proportion of development within the district's second most sustainable location (in accordance with Draft LPR Objectives 5, 6, 8 and 13);
  - Ensuring development is accessible and located within close proximity to sustainable transport (in accordance with Objective 8);
  - The provision of housing to meet local needs (in accordance with Objectives 9 and 10);
  - Addressing the short-term housing needs of Stamford through its capacity to come forward quickly and provide a meaningful contribution towards delivering the housing needs of the District (in accordance with Objectives 9 and 10);
  - Providing an opportunity to deliver a high-quality attractive new development within Stamford, which protects and enhances valued and high-quality landscapes (in accordance with Objectives 12 and 13).
- 1.5 However, CEG suggest that in order to support the Draft LPR's vision and objectives even further, and in order for the LPR to be considered sound, the Council should consider making amendments to:
  - Ensure the vision reflects and is supportive of addressing the housing needs of the overall district;
  - Take a broader view of employment and how the need for jobs can be met across a range of sectors (in accordance with Objectives 1, 2 and 3);
  - Ensure that where possible site allocations are encouraged to deliver a mix of uses that will support sustainable communities (in accordance with Objectives 5, 6, 8 and 11);
  - Explore opportunities to exceed the minimum LHN figure to help to deliver additional affordable housing and ensure the reliable delivery of housing to meet local needs on sites already proposed for allocation. Draft allocation SKPR-266 has the potential to provide additional housing and therefore a greater contribution towards the district's overall and affordable housing needs (in accordance with Objective 9);
  - Take a proactive approach to identifying sites for later living and consider whether draft allocation SKPR-266 could provide the opportunity for specialist later living development (in accordance with Objective 10).

- 1.6 Generally, CEG is of the view that whilst the proposed allocation of the site is supported, the true potential of Stamford Gateway could be better reflected in the context of an overall strategy to provide sustainable growth.
- 1.7 CEG is committed to on-going engagement with the Council and will continue to work with the council to ensure that this site delivers against the both the stated LPR objectives and the requirements of the National Planning Policy Framework (December 2023) ('the Framework').

## 2. Background - Stamford Gateway

2.1 The site comprises a triangular shaped piece of vacant agricultural land, which is approximately 10 hectares ('ha') in size and is situated to the west of the market town of Stamford. It is bound by Empingham Road (A606) to the north; a recently constructed residential development by Taylor Wimpey (known as 'Lamberts Place', which incidentally was also promoted by CEG) to the east and south; and the A1 to the west. Vehicular access in the form of a farm gate is currently positioned to the north of the site off Empingham Road.

Figure 1: Site Location Plan (Google Earth)



2.2 In terms of planning designations, the site:

- is within a Mineral Safeguarding Area (Limestone);
- is located within Flood Zone 1;
- does not contain any historic assets, however two Grade II Listed buildings are located 500m to the south, beyond the A1.

2.3 The site is located within the settlement boundary on the western side of Stamford. It is within close proximity to a number of existing key services and facilities, including a primary school (within 50m).

2.4 The site is well served by public transport, with bus stops located within 200m of the site, providing regular services to Stamford town centre, Uppingham and Peterborough. Stamford Railway Station is located approximately 2km to the south east of the site and provides links to Birmingham, Leicester, Cambridge and Peterborough.

## Planning History

- 2.5 Prior to the adoption of the current Local Plan in January 2020, the site formed part of a mixed-use urban extension under Policy STM3 of the now-superseded Site Allocations and Development Policies DPD ('SADDPD') for development comprising approximately 400 new homes with up to 10ha of land for employment uses.
- 2.6 Pursuant to the above, outline planning permission (ref.12/0864) was granted in 2013 for:
- "A sustainable urban extension at Stamford West including a residential development (including affordable housing) a business park (10 hectares) and a local centre, with associated highways improvements, pedestrian and cycle links, landscaping and open space."*
- 2.7 The above outline planning permission was secured for the whole extent of the allocation and comprised 400 dwellings; a Local Centre; and 10 ha of employment space. Reserved matters followed for the residential element in 2015. These dwellings have since been built out in full by Taylor Wimpey.
- 2.8 Currently the residual land at the site is allocated under Policy E2 ('Strategic Employment Sites') in the adopted Local Plan. Policy E2 seeks to protect strategic employment sites.
- 2.9 CEG has marketed the residual employment land extensively for over ten years now in accordance with the agreed marketing exercise with SKDC Officers. The results of this exercise have been discussed with SKDC officers and demonstrate an insufficient level of interest for this site. This correlates with the patterns of market demand which indicate that Grantham, Leicester, Northampton and Peterborough are the predominant employment locations in the market area. Subsequently these locations are the principal focus for end operators.

## The Opportunity at Stamford Gateway

### Pre-Application Process

- 2.10 In February 2024, CEG submitted a pre-application request to the Council (Ref: S24/0159) which sought advice from the Council regarding the acceptability of bringing forward an outline application with all matters reserved except for means of access to the public highway.
- 2.11 An initial pre-application meeting was held with Officers on 23<sup>rd</sup> February 2024 before CEG engaged in the Council's Design PAD pre-application process. Officers undertook a site visit on 19<sup>th</sup> March 2024 before hosting a follow-up meeting where the applicant was invited to present details of the proposed development and its design evolution, on 20<sup>th</sup> March 2024. Collaborative discussions were held on each of those dates and both the iterative design process and pre-application discussions are ongoing and continue to move towards an agreed vision for the site.

### Proposed Development

- 2.12 CEG intends to provide a residential-led mixed-use development and at a high level, the proposals seek to deliver development as summarised below.
- Residential development comprising of up to 300 dwellings of a mixed size, type and tenure. The footprint of dwellings would vary depending on size and type of property. The heights of specific buildings would be reflective of the character of the area whilst communal open spaces could be interspersed throughout the development. Parking, garages and cycle spaces would be provided as appropriate;
  - Employment generating uses to bolster the social, economic and community value. CEG currently envisages that this will comprise a Care Home, a day nursery, a food store, retail units and provision for a GP Surgery.

2.13 The latest available Illustrative Layout, which has been modified to take on board feedback from Council officers, is provided at **Figure 2** below:

**Figure 2: Illustrative Site Layout**



2.14 The information provided within this section is intended to assist the Council in understanding the true development potential of the land at Stamford Gateway.

## Technical Considerations

### Highways and Transport

- 2.15 Principal access is proposed to be taken from Empingham Road to the north. This will either be in form of a new four arm roundabout or a signalised junction at the existing junction with Arran Road. Additionally, there will be a secondary point of cycle and pedestrian access further east along Empingham Road opposite Malcolm Sargent Primary School.
- 2.16 The proposed development will provide a number of convenient safe and secure pedestrian and cycle links to bus stops, education, employment and retail opportunities. This will act to encourage walking / cycling trips and active travel.
- 2.17 The trip generation of the proposed residential-led development will be significantly lower than the total approved trip generation envelope for the extant employment-led planning permission.

### Landscape and Visual Impact

- 2.18 The site's location in comparison to its surroundings places it within the context and surroundings of the settlement edge and in a peri-urban landscape at the gateway to Stamford. It is divorced from the wider, rolling agricultural landscape that extends to the west beyond the A1.
- 2.19 The proposals for residential and mixed-use development sit comfortably within the parameters that were tested for the previous outline application.
- 2.20 The heights of houses and mixed-use development associated with a local centre, care home and community uses will fit within the previously consented parameters. Importantly, the proposed uses (principally residential homes) are substantially lower and of a smaller scale and lower density to the previously consented uses (warehouses).
- 2.21 The proposals will seek to ensure that appropriate landscape buffers are incorporated to provide a vegetated edge and minimise any landscape impacts.

### Ecology

- 2.22 There are no statutory or non-statutory designated sites within the survey area, with the nearest site being located 250m (Great Casterton A1-A606 verge). Habitats within the site are generally considered to be of low ecological value with arable land making up most of the area.
- 2.23 The proposal will seek to provide the appropriate mitigation measures and a biodiversity net gain will be achieved.

### Flood Risk

- 2.24 The site is located entirely within Flood Zone 1 and within a Groundwater Source Protection Zone. The majority of the site is at very low risk of flooding from surface water.
- 2.25 It is considered that impacts that may result from the proposed development will not be significant, and any potential adverse impacts will be mitigated appropriately.



## Air Quality

2.26 The site is not located within or within close proximity to an Air Quality Management Area. It is therefore considered that impacts that may result from the proposed development will not be significant, and any potential adverse impacts will be mitigated appropriately.

## Noise

2.27 There are existing sensitive receptors located approximately 15m from the northern, eastern and southern site boundaries. However, it is considered that impacts that may result from the proposed development will not be significant, and any potential adverse impacts will be mitigated appropriately.

## Ground Conditions

2.28 No significant sources of contamination have been identified within or within close proximity to the site. Limited Made Ground could be present along the western boundary where the A1 lies, and around the pumping station in the north east.

2.29 The majority of the site is at high risk of radon with between 10% and 30% of properties affected. However, with the incorporation of full radon protection measures this is not anticipated to have a significant adverse impact.

## Historical and Archaeological Significance

2.30 A comprehensive programme of archaeological investigation has adequately characterised and recorded the archaeological resource within the site which identified localised areas of Iron Age – Roman iron smelting activity which relates to further activity beyond the site boundary to the east.

2.31 It is not envisaged that significant effects on archaeology will arise as a result of development.

## Summary

2.32 The information contained within this chapter confirms that the site is suitable for the delivery of development which would help to meet the Council's vision and objectives. CEG agree with the conclusions reached by the Council in that the site should be allocated for development but consider there to be scope for the draft allocation to be amended to better reflect the fact that the site is capable of achieving a greater quantum of residential development, plus a mixed-use local centre and care home.

2.33 The site has previously been found acceptable for development through its allocation for employment development in the adopted local plan. It therefore represents a suitable, available and achievable site for the delivery of residential-led mixed use development within the first five years of the Draft LPR Period, if not sooner.

## 3. Vision and Strategic Objectives

3.1 Paragraph 3.1 of the Draft LPR outlines that the Council's vision looks to maximise the potential of the district, through supporting the delivery of jobs, growing the economy, enhancing the role of the town centres, and enabling villages and smaller settlements to deliver appropriate forms of sustainable growth. The vision's key points of relevance to these representations presented within the vision are listed below:

- *The district will have a successful, diverse economy providing employment opportunities for the local workforce, equipped with a wide range of skills to meet employer needs. It will be an area of sustainable, high quality growth and a popular place to work, live, visit and invest in.*
- *The district will have drastically lower carbon emissions than present, and energy and transport infrastructure which supports low carbon lifestyles for South Kesteven residents.*
- *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.*
- *Stamford – The town will grow through a sustainable urban extension to the north providing a vibrant, well-designed, appropriately structured development that addresses local housing need and provides tangible benefits for both new and existing residents.*

3.2 CEG supports the Council's vision in seeking to create sustainable, accessible and attractive communities, through delivering employment opportunities to meet existing needs, and in directing development to the most sustainable locations within the district.

### Strategic Objectives

3.3 The Draft LPR has fifteen main objectives which seek to address economic, social and environmental aspects. CEG has assessed the compatibility of these objectives against the relevant sections of the Framework and believes them to be generally in accordance with it when read as a whole, but in particular in relation to:

- Paragraph 15, which requires local plans to provide a positive vision for the future of each area and a framework for meeting housing needs and other priorities;
- Paragraph 20, which outlines that strategic policies should set out an overall strategy for the pattern, scale and design quality of places;
- Paragraph 60, which outlines the Government's clear objective to significantly boost the supply of homes;
- Paragraph 63, which confirms that the needs of different groups of the community are to be reflected in planning policies;
- Paragraph 85, which requires planning policies to help create conditions in which businesses can invest, expand and adapt; and the need to support economic growth to meet local business needs whilst building on the strengths of an area;
- Paragraph 86, which sets out the need for policies to demonstrate a clear economic vision and strategy and address potential barriers, including lack of housing, to investment;
- Paragraph 109, which requires significant development to be located in sustainable locations to reduce the need to travel therefore reducing congestion and emissions and improving air quality and public health;
- Paragraph 110 which seeks to encourage sustainable travel and the creation of active travel infrastructure; and
- Chapters 11 and 12, which require effective use of land through good design and appropriate densities and the creation of high-quality, beautiful and sustainable places.

3.4 The ability of Stamford Gateway to help the Council meet these objectives is assessed in **Table 1** below, and where appropriate CEG sets out where Stamford Gateway has the potential to better assist the Council in achieving the objectives.

**Table 1: Summary of Stamford Gateway Contribution to Draft LPR Objectives**

Objective	Stamford Gateway Delivery of Objective
<p><b>Objective 1</b></p> <p>Objective 1 aims to welcome and encourage development that supports the sustainable growth and diversification of the local economy.</p>	<p>Stamford Gateway is well-placed, as acknowledged by the Council in seeking to allocate the site to help deliver these objectives. The Draft LPR allocates the site for 180 dwellings at a density of 30 dph.</p>
<p><b>Objective 2</b></p> <p>Objective 2 aims to develop a strong, successful and sustainable economy through providing a range of well-located sites and premises for employment; and promoting additional growth and diversification of the district's economy.</p>	<p>However, CEG considers that identifying the site's potential to deliver mixed-use development which could help to generate employment opportunities, subtle amendments to the policy wording of the draft allocation (SKPR-266) could help the plan better achieve the outcomes of Objectives 1, 2 and 3, as set out throughout these representations.</p>
<p><b>Objective 3</b></p> <p>Objective 3 aims to broaden and diversify the employment base of the district to meet the needs of a changing local economy by identifying and encouraging development and diversification opportunities for specific employment sectors within Grantham, Stamford, Bourne and The Deepings; and ensuring an adequate and appropriate supply of land and premises.</p>	<p>It is also considered that the site could deliver a greater yield of residential units were the density of the allocation increased to 40 dph (net of POS). This would enable the delivery of at least 260 dwellings. Further details of this are set out in Section 6 of the representation.</p>
<p><b>Objective 5</b></p> <p>Objective 5 aims to facilitate and sustain a network of sustainable communities which offer a sense of place, that are safe, inclusive and can respond to the needs of local people, establishing an appropriate spatial strategy that will guide the scale, location and form of new development across the district, providing the long term basis for the planning of South Kesteven.</p>	<p>CEG supports the Council in seeking to deliver future development at sustainable locations, particularly within Stamford. It is correct to recognise that delivery of residential-led mixed use development at Stamford Gateway will be able to help contribute to the achievement of this objective.</p>
<p><b>Objective 6</b></p> <p>Objective 6 aims to enhance the role and function of the Market Towns including Stamford.</p>	<p>Stamford Gateway is not only capable of delivering residential development, but also a successful mixed-use extension to Stamford. Development of this nature would create a sense of place and respond to local needs.</p> <p>The creation of a mixed-use community at Stamford Gateway will assist in place-making and enhancing the cohesiveness of areas where people can live and work.</p> <p>CEG supports the Council in establishing Stamford's role as a Market Town and seeking to deliver a large proportion of</p>

	<p>future development within this location. The provision of mixed-use development at Stamford Gateway will assist in creating sustainable communities and enhancing Stamford’s role in the hierarchy.</p>
<p><b>Objective 8</b></p> <p>Objective 8 aims to retain and improve accessibility for all to employment, services, community, leisure and cultural activities through integrating development and transport provision, ensuring new development is located where it is most accessible by a range of modes of transport, and ensuring choice and encouraging the use of public transport, walking and cycling, for as many journeys as possible.</p>	<p>Stamford Gateway is sustainably located in relation to existing services and facilities in Stamford and therefore its proposed allocation will help to achieve objective 8.</p> <p>CEG considers however that Stamford Gateway can play a greater role in the Council being able to achieve this objective by extending the proposed uses of the allocation to include mixed-use development, creating the policy conditions for the site to be able to deliver key services and facilities, which could better serve existing and future residents.</p>
<p><b>Objective 9</b></p> <p>Objective 9 aims to make provision for an adequate supply and choice of land for new housing, employment, retail, leisure, culture and other necessary development, to meet the needs of the District to the year 2041.</p>	<p>CEG considers whilst Stamford Gateway currently supports objective 9 of the Draft LPR, it has the potential to provide a more meaningful contribution to addressing housing affordability issues and ensure a reliable delivery of housing to meet local needs.</p> <p>The South Kesteven Local Housing Needs Assessment (September 2023) ‘the LHNA’ confirms that South Kesteven’s median affordability ratio for the year ending September 2022 (published March 2023) is 8.55, which is higher than the national average.</p> <p>Consideration should therefore be given to adopting a housing requirement that exceeds the minimum Local Housing Need (‘LHN’) figure. Planning Practice Guidance (‘PPG’) notes that the use of the Standard Method figure to inform the housing requirement, will only <u>start</u> to address affordability challenges rather than address them entirely. Consideration of a higher housing requirement would clearly therefore assist further in easing the strain caused by affordability and any additional requirement could partially be accommodated on well suited sites such as Stamford Gateway.</p>
<p><b>Objective 10</b></p> <p>Objective 10 aims 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.</p>	<p>There is a need for a range housing within South Kesteven, and CEG considers that Stamford Gateway can help the Council to align with Objective 10 through the provision of a range of house sizes and types to meet local affordable and market housing needs, and a care home.</p>



	<p>Ensuring the most efficient use of land within allocations will by consequence increase the amount of affordable housing delivered.</p> <p>Stamford Gateway could help to achieve a greater delivery of affordable units through increasing the yield set out within the policy which seeks to allocate the site, as set out throughout these representations.</p>
<p><b>Objective 11</b></p> <p>Objective 11 aims to support new and existing community infrastructure and contribute to improving the health and well-being of residents.</p>	<p>CEG considers that Stamford Gateway could support the achievement of objective 11 through its allocation as a mixed use development and deliver a range of uses which will generate significant social, economic and community value.</p>
<p><b>Objective 12</b></p> <p>Objective 12 aims to protect and enhance the district’s natural, historic, cultural assets, blue green infrastructure (including trees, woodland, and watercourses) and the built environment.</p>	<p>CEG considers that this objective is reflected within the draft allocation.</p> <p>The Draft LPR ensures that appropriate environmental objectives have been considered when selecting sites. It outlines that development at key allocations must also respond to landscape sensitives and heritage assets.</p> <p>As discussed within Section 2 of this representation, the allocation of the site at Stamford Gateway positively addresses these constraints and provides the opportunity to deliver a high-quality attractive new development within Stamford.</p>
<p><b>Objective 13</b></p> <p>Objective 13 aims to proactively plan for and reduce the impacts of, and address climate change through adaptation and mitigation and to move to a low carbon economy, in order for the district to play its part in meeting national ambitions to meet net zero carbon by 2050.</p>	<p>Stamford Gateway is sustainably located within walking distance from a number of services and facilities. In addition, the location would be made further sustainable through its mixed-use allocation.</p> <p>CEG has confirmed that Stamford Gateway is capable of delivering a sustainably designed scheme which will provide a number of ecological benefits, deliver green infrastructure and facilitate active travel.</p>

## Summary

3.5 CEG broadly supports the Council’s vision and objectives to deliver sufficient housing and employment development on sites which provide sustainable and active travel options along with maintaining and improving the quality of built and natural environments through:

- Delivering large proportion of development within the district’s second most sustainable location (in accordance with Objectives 5, 6, 8 and 13);

- Ensuring development is accessible and located within close proximity to sustainable transport (in accordance with Objective 8);
- Provision of housing to meet local needs (in accordance with Objectives 9 and 10); and
- Providing an opportunity to deliver a high-quality, attractive new development within Stamford, which protects and enhances valued and high-quality landscapes (in accordance with Objectives 12 and 13).

3.6 However, CEG encourages the Council to further consider how Stamford Gateway can further support the vision and objectives of the Draft LPR, and consider that the Council could:

- Ensure the vision reflects and is supportive of addressing the housing needs of the overall district;
- Ensure that housing allocations maximise the efficiency of each site to facilitate the delivery of market and affordable housing.
- Take a broader view of employment and how the need for jobs can be met across a range of sectors (in accordance with Objectives 1, 2 and 3);
- Ensure site allocations deliver a mix of uses that will support sustainable communities (in accordance with Objectives 5, 6, 8 and 11);
- Pursue opportunities to exceed the minimum LHN figure to enhance the contribution to housing affordability (in accordance with Objective 9); and
- Take a proactive approach to identifying sites for later living (in accordance with Objective 10).

## 4. Sustainable Development and Spatial Strategy Review

- 4.1 Policy SD1 (Sustainable Development) sets out that development proposals in South Kesteven will be expected to mitigate against the impacts of climate change and contribute towards creating a strong, stable and more diverse economy. The policy sets out a list of mechanisms which will assist development proposals in achieving this, including sustainable design methods and spatial considerations.
- 4.2 Policy SP1 (Spatial Strategy) confirms that the minimum Local Plan requirement for South Kesteven is 14,020 dwellings across the period 2021 to 2041. It also confirms that all allocations proposed in the Plan are the most suitable and sustainable development options and provide for a variety of site types and sizes to ensure choice is offered to the market and delivery is achievable.
- 4.3 The policy further states that the overall strategy of the Draft LPR is to deliver sustainable growth, including new housing and job creation, in order to facilitate growth in the local economy and support local residents. The focus for the majority of growth is in and around the sub-regional centre of Grantham and the three market towns.
- 4.4 Policy SP2 (Settlement Hierarchy) designates Stamford as a Market Town and confirms that priority will be given to the delivery of sustainable sites within the built up part of the town and appropriate edge of settlement extensions.
- 4.5 Section 2 of the Framework considers achieving sustainable development. Paragraph 7 states that:

*“The purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner.”*

- 4.6 Paragraph 11 discusses the presumption in favour of sustainable development and states that:

*“For plan-making this means that:*

- a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;*
- b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses.”*

- 4.7 The Council’s Sustainability Appraisal (February 2024) presents an assessment of the available sites in the district for development. This has informed the Council’s overall spatial strategy.
- 4.8 CEG supports the Council in seeking to mitigate against the impacts of climate change, in line with objective 13 of the Draft LPR.
- 4.9 CEG supports the Council in seeking to contribute towards creating a strong, stable and more diverse economy. However, CEG consider that for the Plan to even better align with Objectives 1, 2 and 3, it should acknowledge the range of employment sectors beyond B2 and B8 uses and allocate appropriate mixed-use development within sustainable locations including the district’s market towns, noting Stamford in particular as the district’s second largest settlement.
- 4.10 CEG supports the provision of housing planned for over the Draft LPR period. However, to further align with Objective 9 of the Draft LPR, CEG would suggest that the Council should explore opportunities to exceed the

minimum LHN figure to enhance the contribution to the housing affordability issue (through the delivery of affordable housing) that forms an inherent component of the cost of living crisis. The delivery of the minimum LHN figure will start to address the issue, but it may be possible to make a greater contribution towards addressing housing affordability in South Kesteven through maximising the potential of the proposed allocations.

- 4.11 It is clear that in its spatial strategy, the Council has had regard to encouraging development in locations with strong access to key services and facilities, and sustainable travel connections, which accords with paragraphs 7 and 11 of the Framework, as well as Objectives 1, 2, 3, 5, 6, 8, 11 and 13 of the Draft LPR.
- 4.12 CEG agrees that the proposed concentration of strategic growth within Stamford would provide an opportunity to consolidate its position as a market town, in accordance with Objective 6 of the Draft LPR.



## 5. Housing Policies

### Policy H1 (Housing Allocations)

- 5.1 Policy H1 sets out the sites proposed for residential development over the Draft LPR period. This includes Stamford Gateway (Exeter Fields) under policy code SKPR-266, with the site designated for the delivery of 180 units.
- 5.2 CEG supports the Council in addressing the short-term housing needs of Stamford through allocating sites which have the capacity to deliver housing quickly and provide a meaningful contribution towards housing figures alongside sites which will deliver units later in the Plan Period.
- 5.3 As per Section 3 of these representations, CEG considers that for the Draft LPR to more effectively achieve Objective 9, it could explore opportunities to exceed the minimum LHN figure in setting its housing requirement to more effectively address the issue of affordability and ensure a reliable delivery of housing to meet local needs.
- 5.4 CEG also considers that the Council could further investigate the proposed distribution of residential development across the district's most sustainable locations.
- 5.5 At present 49% of residential development is directed to Grantham despite Stamford also being well-placed to play a key role in the growth of the district across the Draft LPR period. CEG is supportive of directing growth towards sustainable locations and considers that additional growth could be achieved at Stamford on existing allocations, helping overall to better support Objectives 5, 6, 9 and 10 of the Draft LPR.
- 5.6 CEG again confirms that draft allocation SKPR-266 has the potential to provide a greater contribution towards the district's housing needs, which is discussed further under Section 6 of these representations.

### Policy H2 (Affordable Housing Contributions)

- 5.7 Policy H2 states that all developments comprising 10 or more dwellings (or an area of 0.5 ha or more) should make provision for 27-57% of homes to be affordable, depending on the outcome of the Whole Plan Viability Assessment.
- 5.8 The LHNA confirms that the need for affordable housing is estimated to be 402 homes per annum, which equates to around 57% of the overall housing need figure of 701 homes per annum calculated through the Government's Standard Method.
- 5.9 The LHNA suggests that if it were possible to deliver 402 new affordable homes each year, this could release around 214 private rented sector ('PRS') dwellings to the market which could be used to accommodate households in need of affordable rented housing supported by Housing Benefit / Universal Credit, or could be sold in the open market to increase the supply of properties available to potential home-owners, or sold to social landlords looking to buy up existing properties to let at affordable rents.
- 5.10 Should all of these theoretical 214 PRS properties be used to address identified affordable housing needs, the net effect would be to reduce the need for affordable housing to 188 homes per annum, equating to 27% of overall housing need. Whilst this is a theoretical illustration, it suggests that, even with PRS properties taken into account in supply, at least 27% of new housing provision is needed to be affordable housing.
- 5.11 CEG supports the Council in seeking to address its affordable housing need, however, it must consider the ability of market-led housing schemes to viably contribute the required level of affordable housing.

- 5.12 Should Policy H2 ultimately require a 57% affordable housing contribution, this would undoubtedly cause viability issues for developers and would result in the slowing down of overall housing delivery impacting on the Council's housing land supply and housing delivery test results, leaving it vulnerable to future speculative development were the 'presumption in favour of sustainable development' to apply.
- 5.13 Conversely, the Council could also be at risk from under provision of affordable homes should it opt for a policy which would secure only 27% of its minimum LNH requirement, as there is no certainty that all 214 PRS properties would be used to address identified affordable needs thus resulting in the Council falling short.
- 5.14 CEG therefore suggests that for the Council to effectively enhance the contribution to housing affordability issues and ensure a reliable delivery of housing to meet local needs, it should explore opportunities to provide additional housing above the minimum LHN figure (as set out previously) through maximising site capacity of the proposed allocations and maintaining an affordable housing contribution of 30% in line with adopted policy. This would allow for market housing to healthily contribute to the easing of affordable housing needs, thus better supporting Objectives 9 and 10 of the Draft LPR.
- 5.15 CEG once again advise that draft allocation SKPR-266 has the potential to provide a more meaningful contribution towards the district's affordable housing needs through increasing its capacity generally, which is discussed further under Section 6 of this representation.

#### Policy H4 (Meeting All Housing Needs)

- 5.16 Policy H4 states that new housing proposals shall enable older people and the most vulnerable to promote, secure and sustain their independence in a home appropriate to their circumstances, including through the provision of specialist housing across all tenures in sustainable locations. New housing proposals shall take account of the desirability of providing retirement accommodation, extra care and residential care housing and other forms of supported housing.
- 5.17 CEG supports the provision for specialist and supported housing in order to meet the estimated need of between 749 to 1,209 nursing and residential care bedspaces across the whole study area and suggests that the Council identify specific sites to deliver this requirement.
- 5.18 CEG confirms that draft allocation SKPR-266 has the potential to provide the opportunity for specialist later living development, in line with Objective 10 of the Draft LPR, and this is considered further in Section 6 of this representation.

#### Summary

- 5.19 To conclude, CEG supports the Council in addressing the short-term housing needs of Stamford through allocating sites which have the capacity to come forward quickly and provide a meaningful contribution towards delivering the housing needs of the district.
- 5.20 In order for the Draft LPR to more effectively achieve Objective 9, it could explore opportunities to exceed the minimum LHN figure in setting the housing requirement to help to deliver additional affordable housing and ensure the reliable delivery of housing to meet local needs. Draft allocation SKPR-266 has the potential to provide additional housing and therefore a greater contribution towards the district's overall and affordable housing needs.
- 5.21 CEG support the provision for specialist and supported housing and consider that draft allocation SKPR-266 could provide an opportunity to accommodate specialist later living development.

## 6. Policy SKPR-266 (Stamford Gateway)

- 6.1 Policy SKPR-266 allocates the site at Stamford Gateway for 180 dwellings at a density of 30 dph.
- 6.2 The draft policy sets out a series of development principles relating to design and layout of the gateway location, highway and footway improvements, boundary treatments and attenuation, minerals and green infrastructure. CEG considers the development principles to be reasonable but suggests the following **amendments** to add clarity to the policy wording, with a suggested revised policy set out below:
- a. This site represents a gateway location, and this should be recognised **through an appraisal of design proposals in a Design and Access Statement accompanying a planning application and where practicable**, in the design and layout of development proposals.
  - b. Highway, footway, cycleway connections should be provided throughout the site into the wider area. This should include footway improvements and crossing facilities on Empingham Road.
  - c. Suitable boundary treatment and noise attenuation shall be provided **in so far as it is evidenced and required** along the A1 edge of the site.
  - d. The site is situated within a Limestone Minerals Safeguarding Area. Before considering a planning application for this site, a Minerals Assessment will be required.
  - e. 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.
- 6.3 In addition, CEG considers that the site's 'Indicative Unit Numbers' and density should be increased to **260 dwellings and 40 dph (net of POS)** owing to the extensive capacity testing that is ongoing as part of work to bring forward an outline planning application on the site as explored within Section 2 demonstrating that it is capable of achieving a higher yield. Indeed, Chapter 11 of the Framework encourages an effective use of land as an appropriate mechanism to ensure the benefits of development are realised. CEG consider that the site can be developed at this higher density whilst retaining key views to and from landscape features and delivering policy compliant levels of open space.
- 6.4 The site will deliver a local centre which significantly aids the sustainability of the location, meaning that a step-change in density and resident numbers will be well catered for in terms of access to services and facilities. The local centre will create an element of activity in the area more commensurate with that of an urban area and so a density which reflects this activity could be comfortably accommodated.
- 6.5 Furthermore, the draft policy requires the site's gateway location to be recognised and given its lengthy frontage with Empingham Road, CEG considers that one way in which this could be marked is through development of a higher density addressing Empingham Road which would create a welcoming townscape similar to how the existing development three storey dwellings addresses the open space directly to the east of the site. These buildings are highly visible on the approach to Stamford from the A1 and the opportunity to bolster this placemaking feature through locating high density development towards Empingham Road is something CEG is looking to bring forward. Mirroring the high density development which addresses the open space feature to the east of the site is another key design driver and so this again increases overall site density. The proposed density of 40 dph is in accordance with the design objectives presented to the Council to date including through the Design PAD process.

## Site Suitability

- 6.6 The site is located to the western side of Stamford, within the settlement boundary, as illustrated in the Stamford Neighbourhood Plan. It is also in close proximity to some key services and facilities and is also served by public transport, with bus stops located within 200m of the site.
- 6.7 The site is not subject to any environmental constraints; it is located within Flood Zone 1; there are no statutory or non-statutory sites of nature conservation importance on or adjacent to Site; and it does not contain any TPO's.
- 6.8 The site does not contain any historic assets, with those closest to the site being two Grade II Listed buildings located 500m to the south, beyond the A1.
- 6.9 The Council's Sustainability Appraisal (February 2024) presents an assessment of the available sites in the district for development, this includes an assessment of the site under reference SKPR-266. It is noted that the site scores amber in relation to its proximity to a shop and GP surgery.
- 6.10 The site was assessed within the Council's Draft Site Assessment Report (February 2024), where it was considered that *'the Site offers a suitable and sustainable location for housing development within the market town of Stamford'*.
- 6.11 Based on the above, it is reasonable to conclude that development of the site would be compliant with Objectives 2, 5, 6, 8, 12 and 13 of the Draft LPR.
- 6.12 In term of the site's planning history:
- Prior to the adoption of the current Local Plan in January 2020, the site formed part of a mixed-use urban extension under Policy STM3 of the now-superseded Site Allocations and Development Policies DPD for development comprising approximately 400 new homes with up to 10ha of land for employment uses;
  - Pursuant to the above, outline planning permission (ref.12/0864) was granted in 2013 for:  
*"A sustainable urban extension at Stamford West including a residential development (including affordable housing) a business park (10 hectares) and a local centre, with associated highways improvements, pedestrian and cycle links, landscaping and open space"*; and
  - Currently the residual land at the site is allocated under Policy E2 ('Strategic Employment Sites') in the adopted Local Plan. Policy E2 seeks to protect strategic employment sites.
- 6.13 It is therefore evident that the Council accepts the suitability of the site for development.

## Land Use

- 6.14 The site is allocated as employment land under the current Local Plan; however the Council's Employment Land Study (February 2024) assesses the site under reference EMP S3 and confirms that the site is no longer suitable for employment development due to the wider site's residential development, concluding that it should be released as an employment allocation.
- 6.15 CEG agrees with this conclusion and has undertaken extensive marketing work to understand the presence of demand for employment uses. As established through this work, almost all enquiries historically have been related to commercial uses such as the local centre or from other developers to bring the site forward for residential-led mixed-use. Very few parties have expressed interest in bringing 'typical' employment uses forward within Use

Classes E(g), B2 and B8, and none of these parties in the most recent tranche of marketing have been interested in the site as a whole for employment-led purposes.

- 6.16 Looking at the above in further detail, through a formal ‘Expressions of Interest’ stage of the marketing carried out, only three firm bids for the site were received which included details of a financial offer, versus an overall 54 ‘Expressions of Interest’, equating to approximately 5% conversion to bid. The Expressions of Interest received were generally not to take the site as a whole and would not be compliant with the use class requirements set out in adopted planning policy, emphasising the limited nature of interest in the site from employment focussed developers and operators.
- 6.17 In terms of the firm offers received, none of these sought to provide adopted policy compliant employment uses on any more than 10% of the total site area which evidences the lack of demand for employment uses both at a strategic scale and on this site in particular.
- 6.18 Whilst CEG has undertaken its own analysis of demand, the South Kesteven Employment Land Study (October 2015) identifies that the net additional demand over the Local Plan period (2011 to 2036) is between 47ha to 79ha for all employment land. The Local Plan allocates 179.2ha of employment land as detailed under policies E1, E2 and E3.
- 6.19 The adopted Local Plan strategic allocations set out within Table 2 have had planning applications approved for employment land.

**Table 2: Strategic Allocations with Planning Permission**

Allocation	Site	Site Area	Application Reference	Description	Decision
GR-SE1	Part of Grantham Southern Gateway Strategy Employment Opportunity	26.16ha	S23/1504	Erection of buildings for B2/B8 and E(g)(i) use	Approved February 2024
RBP-E1	Roseland Business Park	9.01ha	S18/2384 S18/2386 S18/2387	Erection of buildings for B1/B2/B8 use	Approved November 2019

- 6.20 In addition to the above, further applications have been submitted and approved at Roseland Business Park for employment development.
- S21/0458 – Use of Land for B8 Outside Storage (8.27ha). Approved October 2021.
  - S21/0458 – Use of Land for B8 Outside Storage (9.7ha). Approved October 2021.
- 6.21 In combination, the above applications make up 53.14ha of employment land with planning permission awaiting decision/recently approved.

- 6.22 Whilst it is acknowledged that the above examples do not guarantee that those sites will come forward for employment development, they highlight that there is ample employment land available to meet the recommended 89.1ha as per the 2024 Employment Land Study.
- 6.23 This study further confirmed that no additional allocation of land should be required over the Plan Period to 2041 to respond to the future demand for employment space, however it recommends that it might be appropriate to release some existing allocated sites and allocate new sites.
- 6.24 Given the above brief analysis of demand and supply, it is evident that there is not the market demand for the site to come forward for employment, nor does the site play a critical role in the employment land strategy of the district. In this regard, the Council has a more than adequate supply of employment land even when discounting the site from consideration which further supports its re-allocation to residential use, in line with Paragraph 126 of the Framework which encourages local authorities to ensure that planning policies and decisions reflect changes in the demand for land.

### Potential Additional Uses

- 6.25 Whilst CEG supports the Council in taking a proactive approach towards development that will diversify the district's employment opportunities, the Council should also seek to preserve and grow those sectors which are currently performing strongly. This will maintain a sustainable level of economic growth and establish the district's success in these sectors.
- 6.26 CEG notes that 'employment' encompasses a range of sectors and South Kesteven has a strong presence within accommodation and food service activities; human health and social work activities; education and wholesale and retail trade, according to NOMIS data relating to the employee jobs by industry<sup>1</sup>.
- 6.27 Where sites are identified for development, consideration should be given to the appropriate mix of development, to aid delivery and viability, foster a modern mixed-use workplace and service environment on appropriate sites, and provide a broader base of employment opportunities alongside the core office, industrial and distribution sectors. Such sectors could appropriately include health and social care, hospitality, retail and leisure which complement residential uses.
- 6.1 CEG notes that this approach appears to have been adopted by the Council in its approach to the strategic allocations at Grantham, which include three mixed-use allocations (Policies SKPR-65, SKPR-268 and SKPR-278). Yet, Stamford which is established as the second largest town within South Kesteven, nor in fact any other Market Towns, have been allocated mixed use development, and their employment allocations are instead limited to B2 or B8 use.
- 6.2 Stamford Gateway is capable of delivering mixed-use development which will help to maintain the strength of those employment sectors in which South Kesteven is performing well. In order to facilitate this in planning policy terms, CEG encourages the Council to widen the uses for which the site is allocated to include those which are employment generating and/or provide key facilities for existing and future residents.

### Summary

- 6.3 CEG supports the provision of residential land within the district and at Stamford Gateway, however, encourages the Council to:

<sup>1</sup> <https://www.nomisweb.co.uk/reports/lmp/la/1946157153/report.aspx#tabempocc>

- Foster a positive approach towards mixed-use development which will support sustainable communities;
- Explore opportunities to exceed the minimum LHN figure to enhance the contribution to housing affordability issue and ensure a reliable delivery of housing to meet local needs; and
- Explore how draft allocations have the potential to provide the opportunity for specialist later living development.

6.4 CEG invites the Council to consider whether the site would better support the objectives of the Draft LPR through providing a greater quantum of dwellings and a variety of non-residential uses. How a proposal of this nature may take form and its associated benefits are discussed in more detail at Section 2 of this representation.

6.5 To conclude, CEG supports the Council in encouraging development towards the district's most sustainable settlements and specifically Stamford. CEG support the Council's view that the site is sustainably located and suitable for residential development.

6.6 However, CEG consider that the site could better support the objectives of the Plan through providing a greater quantum of development and delivering a wide range of additional land uses that have significant social, economic and community value. In this context, it is considered appropriate to review the potential contribution of site to meeting the development needs of the district.

## 7. Conclusion

7.1 CEG welcomes the Council's engagement in the plan-making process and supports the approach taken by the Draft LPR in seeking to deliver strategic development within the South Kesteven's most sustainable settlements. Land at Stamford Gateway aligns with the strategy and the objectives of the Draft LPR, through:

- Delivering a large proportion of development within the districts second most sustainable location (in accordance with Draft LPR Objectives 5, 6, 8 and 13);
- Ensuring development is accessible and located within close proximity to sustainable transport (in accordance with Objective 8);
- The provision of housing to meet local needs (in accordance with Objectives 9 and 10);
- Addressing the short-term housing needs of Stamford through its capacity to come forward quickly and provide a meaningful contribution towards delivering the housing needs of the District (in accordance with Objectives 9 and 10);
- Providing an opportunity to deliver a high-quality attractive new development within Stamford, which protects and enhances valued and high-quality landscapes (in accordance with Objectives 12 and 13).

7.2 However, CEG suggest that in order to support the Draft LPR's vision and objectives even further and ultimately enable the LPR to be 'sound', the Council should consider making amendments to:

- Ensure the vision reflects and is supportive of addressing the housing needs of the overall district;
- Take a broader view of employment and how the need for jobs can be met across a range of sectors (in accordance with Objectives 1, 2 and 3);
- Ensure that where possible site allocations are encouraged to deliver a mix of uses that will support sustainable communities (in accordance with Objectives 5, 6, 8 and 11);
- Explore opportunities to exceed the minimum LHN figure to help to deliver additional affordable housing and ensure the reliable delivery of housing to meet local needs on sites already proposed for allocation. Draft allocation SKPR-266 has the potential to provide additional housing and therefore a greater contribution towards the district's overall and affordable housing needs (in accordance with Objective 9);
- Take a proactive approach to identifying sites for later living and consider whether draft allocation SKPR-266 could provide the opportunity for specialist later living development (in accordance with Objective 10).

7.3 Whilst discussions with the Council's Development Management team are ongoing in relation to bringing forward the site for an outline planning application, CEG would welcome the opportunity to discuss in further detail how the site can make an even greater contribution to the site's ability to deliver on its vision and strategic objectives through small amendments to policy wording to facilitate additional growth within Stamford and in particular at Stamford Gateway.

7.4 CEG looks forward to continuing to engage in the plan-making process at future consultation stages.



Nexus Planning

