

24 April 2024



Planning Policy
Planning Department
South Kesteven District Council
St Peters Hill
Grantham
Lincolnshire
NG31 6PZ
Via email only: planningpolicy@southkesteven.gov.uk

Roger Smith
[Redacted]
[Redacted]
[Redacted]
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Dear Sir/Madam

**New Local Plan 2041: Regulation 18 Consultation response in respect of Priory Farm, east of Broadgate Lane, Deeping St James
On behalf of The Dean and Chapter of the Cathedral Church of Christ in Oxford of the Foundation of King Henry the Eighth (our “Client”)**

Savills is instructed by our Client to submit a representation in relation to the above consultation. This follows on from previous submissions promoting this site to the Local Plan 2036.

The Site

The site extends to approximately 8.5 hectares and currently comprises an agricultural field. The topography of the site is generally flat. The site is located east of Broadgate Way, from which it can be appropriately accessed. The site is bounded by tree planting on the eastern side, hedging on the northern side, residential properties on the western side, and Back Lane to the south. The tree planting on the eastern side of the site is structural planting that provides a natural boundary to visually contain the proposed development by screening the site from the countryside beyond.

The Deeping St James Conservation Area lies to the west on the opposite side of the B1162.

The site is within easy walking distance of the Deeping St James Community Primary School, the Deepings Secondary School, local shops at Rycroft Avenue and a bus stop at Broadgate Lane which is served by bus services to Spalding and to Stamford.

The site is well related in scale and location to the existing built up area. Development would not project further east than the existing housing to the north, bounded by Ascendale.

The site provides an opportunity to provide land for affordable housing, public open space, and financial contributions to improve local community facilities.

In making this representation our Client is aware that this Regulation 18 version of the Local Plan proposes to allocate part of this site for housing. This is discussed in more detail below, but this representation is primarily focused on promoting the entire site.

The site is within a single ownership and is available for development. The site is therefore deliverable within the first five years of the new Local Plan. Our Client has developed a Responsible Ownership Policy for Property (ROPP) which is applied to development land within its control. This means that, from inception, there is a keen focus on environmental and social benefits for the local community.

The development is promoted to be a low carbon development, in design, delivery, use and future use.



The Proposed Allocation

This representation is supported by the following Drawings:

- Drawing No: DWG.01- Allocation Site Boundary
- Drawing No: DWG.01 – Wider Development Boundary
- Drawing No: A101b (DWG.02) – Illustrative Masterplan – SKPR26
- Drawing No: A101b (DWG.02) – Illustrative Masterplan – wider site
- Drawing No: A101b (DWG.03) – Facilities Plan

These two drawings effectively show the same proposal with “Illustrative Masterplan – SKPR26” a small scale excerpt to show one way how the SKPR26 site proposed for allocation could be delivered. “Illustrative Masterplan – wider site” is whole scheme our Client is promoting in this representation.

Illustrative Masterplan – SKPR26

This proposal shows 18 units provided on a site of 0.777 hectares. It has developed using the following design principles:

- Appropriate development form – Development to the north of the primary access road is predominantly made up of semi-detached dwellings, with a strong/formal building frontage. This is similar to the characteristics of the existing context to the north. Development to the south of the access road introduces more detached dwellings and a relaxed development structure. This is reflective of the context to the west of Broadgate Lane and south of Back Lane, and also responds to the landscape setting to the east of the site.
- Retained, integrated and enhanced green network - The Illustrative Masterplan retains the existing trees along Broadgate Lane where possible. The existing treeline to the north of the site is extended along the eastern site boundary with intermittent breaks to provide a sensitive response to the wider landscape.
- Promote, preserve and enhance the green infrastructure - The Illustrative Masterplan provides the opportunity for pedestrian connections through new landscape corridors and provides active frontage/surveillance/additional planting onto key routes (for example, Back Lane).
- Permeable Development - The movement network is laid out in a permeable pattern with noticeable changes in character, using building form, frontages and parking solution, when transitioning from primary streets to secondary streets.
- Streets as Places - The design promotes streets as places and promotes active travel modes. For example, within and alongside streets, in particular the primary, there is the opportunity for cycle movement, integrated SuDs, and tree planting.
- Integrating Connections - The proposed pedestrian routes connect with the informal and formal contextual movement network. For example, the opportunity for a pedestrian connection into Back Lane or through the wider ownership to the existing pedestrian route to the north. These allow for easy access to the local facilities nearby, as shown on the Facilities plan.
- Frontages - The illustrative proposal provides strong frontages onto key routes, streets and spaces. For example, along Back Lane buildings have been orientated to ensure they provide active frontage towards the Green Lane.

Illustrative Masterplan – wider site

The wider site provides approximately 164 dwellings on a net developable area of 5.47 hectares. This equates to an average net density of 30 dwellings per hectare. This is consistent with the proposed approach in the Local Plan that proposals on sites over 4 hectares in size should assume a 60% developable area.

The proposal incorporates the same design elements as the SKPR26 proposal and also these additional high-level principles:

- The wider illustrative masterplan integrates the existing landscape features into the development and uses landscape cues to inform its structure.
- Opportunity for a variety of open space typologies within the green network which can be utilised by the new community and enhance the site's biodiversity.
- The Illustrative masterplan demonstrates how an integrated SuDs solution could deal with the surface water on the site. Integrating such an approach will also provide biodiversity benefits as well as a diversity of open space typologies.
- The eastern built form line of the wider illustrative masterplan responds to the existing development context to the north. In the southeast, a large open space is provided, and the building line is set back which responds appropriately to the existing context to the south of Back Lane. The informal development form in the south responds appropriately to the Green Lane and helps re-affirm a sense of landscape openness.
- Densities vary appropriately in response to their context. For example, development to the east, fronting the countryside, could comprise of predominantly detached dwellings of a relaxed layout to maintain a sense of openness. In the west of the masterplan and along the primary road an increased number of semi-detached and terraced housing relate to the site's western context and formally front the primary road.
- As a key street the primary road could be utilised as a transport corridor to provide safe and easy access to contextual amenities

These principles, and the subsequent scheme have been developed to meet the relevant site wide principles of the draft Policy SKPR26.

Draft Local Plan

Given our Client's land interest in Deeping St James, the proposed allocation on Priory Farm Land at Policies H1 and SKPR-26 is **fully supported**. The support for this allocation is offered without prejudice to our Client's overall position that these policies of the Local Plan should include the entire site as a new allocation. This can be done without any conflict with proposed Spatial Strategy as discussed below.

Spatial Strategy – Policy SP1

This policy confirms that the Council's Housing need is a minimum 14,020 dwellings across the plan period 2021 – 2041, equating to 701 dwellings per annum. This need is derived from the Standard Method Calculation. Paragraph 61 of the NPPF (2023) is clear, stating, "*To determine **the minimum number** of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The outcome of the standard method is an **advisory starting-point** for establishing a housing requirement for the area.*" (Emphasis added).

Therefore, our Client welcomes the inclusion of a 21% buffer to the minimum Standard Method figure as a positive step by the Council to try to ensure that enough homes will come forward to provide a genuine choice of sites for new residents.

Nonetheless, it is noteworthy that as of October 2023 the Council reported a 5.01-year housing land supply. As such, the supply position is very marginal and susceptible to supply side shocks that may not be within the Council's control. The Council should continue to be ambitious in its planned housing growth and be flexible when further sites become available in appropriate locations, such as the Priory Farm site being promoted by our Client.

As drafted, this Policy does not appear to make any allowances for demand for housing driven by economic growth and this relationship should be made clearer. The Greater Lincolnshire Local Enterprise Partnership (GLLEP) has published a Strategic Economic Plan 2014 -2030 that seeks to drive economic growth in the region.

It is not clear how this Plan can be achieved without corresponding growth in housing. The Spatial Strategy of this Plan needs to match the ambition of the GLLEP.

Our Client fully supports the Council's intentions in this policy to, "...focus for the majority of growth is in and around the sub-regional centre of Grantham and the three market towns..." Our Client considers that Deeping is one of the most appropriate locations for growth in the district and welcomes the draft Plan's recognition of this.

Settlement Hierarchy – Policy SP2

Our Client **fully supports** the classification of the Deepings as second only to Grantham in the hierarchy. The policy notes, "*Development which maintains and supports the role of the three market towns of Stamford, Bourne and the Deepings, will be allowed, provided that it does not compromise their nature and character. Priority will be given to the delivery of sustainable sites within the built up part of the town and appropriate edge of settlement extensions.*"

This site is precisely the type of development to which Policy is worded to offer in-principle support. As such, our Client considers that the extent of the Priory Farm allocation can be extended to include the whole site being promoted without any conflict with the draft Local Plan.

Residential Development on the Edge of Settlements – Policy SP4

If not allocated in the Plan, the principle of our Client's site would fall to be assessed against this draft Policy which our Client **does not support** in its current form. The policy requires, "*demonstrate clear evidence of substantial support from the local community through an appropriate, thorough, and proportionate pre-application community consultation exercise. Where this cannot be determined, support (or otherwise) should be sought from the Town or Parish Council or Neighbourhood Plan Group or Forum, based upon material planning considerations.*"

Our Client fully accepts the need for extensive and positive pre-application engagement on development proposals but does not consider that the success of a planning application can be dependent on the outcomes of a process over which an applicant does not have control.

An applicant will always enter into pre-application discussions in good faith but has no control over the intentions of those who choose to engage in response. As drafted, this Policy is open to abuse from "bad actors" and is conflating the process of preparing an application with the planning merits of a proposal.

Therefore, this Policy should be amended to remove the requirement of public support. The remaining criteria of this Policy are reasonable and supported.

Housing Allocations – Policy H1

Beyond the support for the Priory Farm allocation, our Client has some concerns about the approach taken to this Policy. The distribution of new housing across the district seems to be somewhat at odds with the Settlement Hierarchy of Policy SP2.

That hierarchy is based on Grantham and the market towns being the most sustainable locations for growth, yet 20% of the new housing is directed to the villages (large and small). In contrast, only 8% of the housing is allocated to the Deepings.

Given the extensive range of facilities available in the Deepings, our Client considers that the town should be the focus of a greater proportion of the planned growth than is currently proposed. Growth should be focused on these larger settlements as this will help create a critical mass of new residents that help the Council justify the need for new infrastructure such as, road improvements, new or extended schools and leisure facilities.

By spreading the growth out as is currently proposed, the risk is that it becomes so piecemeal that major infrastructure projects can no longer be justified. Furthermore, a development strategy that spreads new housing out too far will likely result in a greater reliance on the private car, as people need to travel between settlements for school, work and leisure.

Relatedly, it is important to note that people who need affordable housing are much less likely to have access to a private car to travel for school and work. As such, focussing development on the most sustainable settlements is crucial for providing housing for those least able to afford it in the best locations.

Our Client considers that the wider Priory Farm site is extremely well located to allow access to the key facilities of Deeping St James and should be included in full as site SKPR-26.

Policy H2 - Affordable Housing Contributions

Our Client is fully committed to providing a policy-compliant level of affordable housing at Priory Farm but is cautious about the wide range of potential affordable requirements in Policy H2 as currently drafted. This uncertainty is anathema to potential development partners.

Our Client considers it paramount that this Policy is subject to a comprehensive viability review to demonstrate the 27 - 57% provision is achievable. Furthermore, as is currently the case, individual sites should be able to provide their own viability case to justify a non-policy compliant level of affordable housing.

Biodiversity Opportunity and Delivering Measurable Net Gains- NEW Policy 4

Our Client **fully supports** this Policy that seeks to use national standards to achieve biodiversity net gain. As shown on the plans accompanying this representation, our Client has set aside part of the site to provide new habitats that will provide a policy-compliant level of net gain.

Sustainable Building – Policy SB1

As drafted, this Policy requires, “*New development should strive to be zero carbon ready through minimising energy use and choice of low carbon energy sources. New development should demonstrate how carbon dioxide emissions have been minimised...*” Our Client **supports** this aim and as discussed, our Client’s own ROPP confirms a commitment to low carbon developments.

Nonetheless, the requirements of this Policy should be tested by the whole Plan viability assessment given the implications for development of achieving net zero. The policy needs to be drafted in such a way that its requirements fall away as they are superseded by national planning guidance and Building Regulations.

In the longer term our Client considers national legislation is the appropriate mechanism to deliver net zero, so again Policy SB1 should be drafted in a manner that means its requirements fall away once national guidance/regulations catch up and overtake the Policy.

Summary

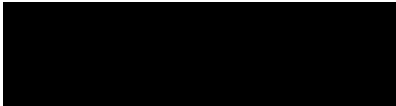
Our Client welcomes and fully supports the Priory Farm allocation but considers that there is clearly scope for the whole of our Client's land to be included in the allocation in a way that is wholly consistent with the proposed Spatial Strategy.

The plans provided demonstrate how a high-quality extension to Deeping St James can be delivered in this highly sustainable location, providing affordable housing, open space, SuDS features and new landscaping and habitats.

The land at Priory Farm is available, achievable and deliverable in the Plan period given the commitment of our Client to maintaining a long-term involvement in this development.

It is located in a suitably sustainable location consistent with the Spatial Strategy and the Settlement Hierarchy contained in this Regulation 18 document.

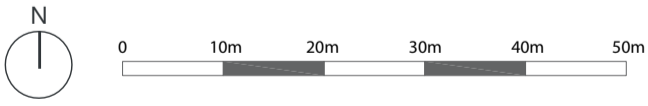
Yours faithfully,



Roger Smith
Director

Enc

cc. V Pouncey / G Wordsworth - Savills



DEEPING, ST JAMES
CHRIST CHURCH, OXFORD

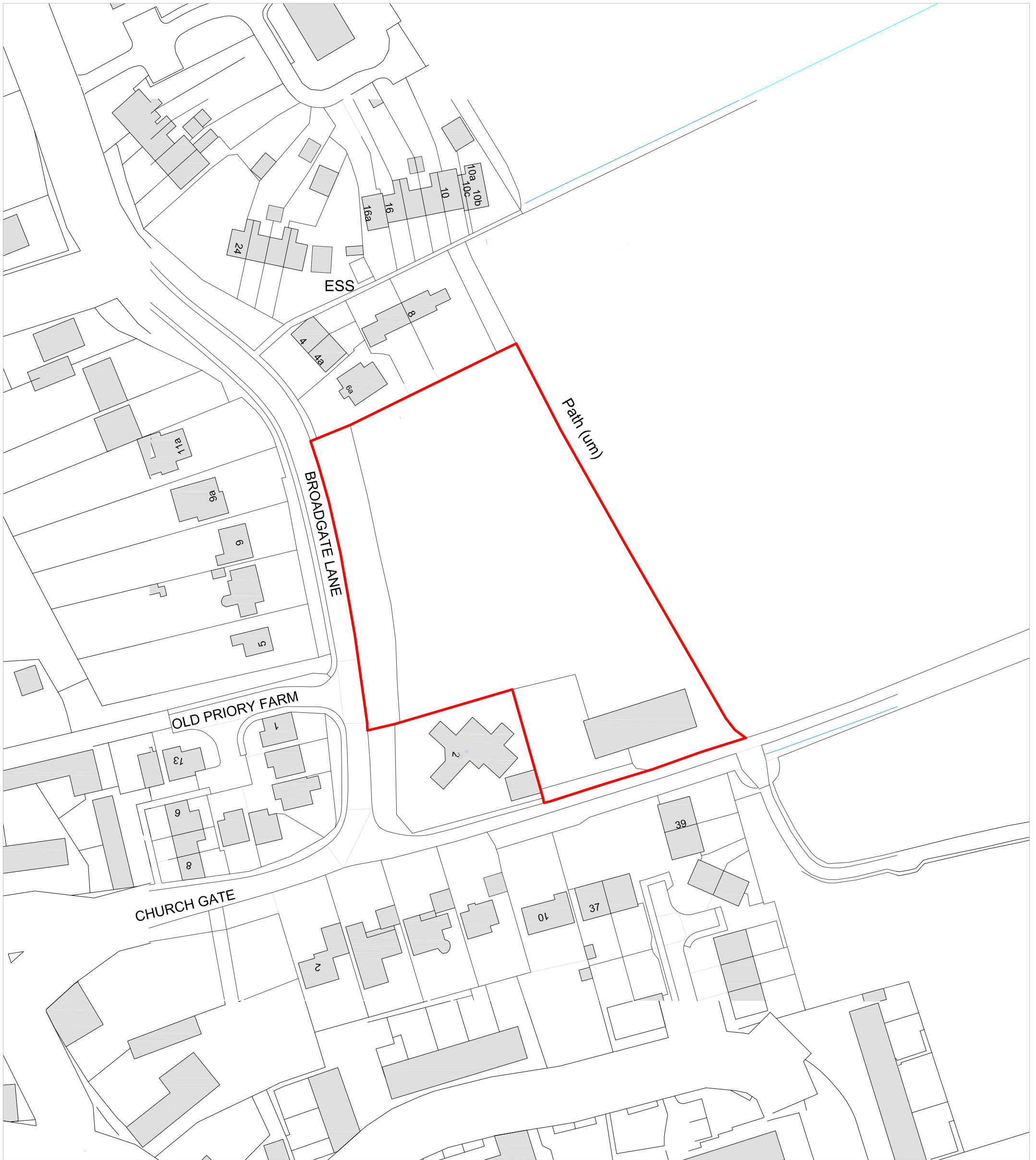
AI01B (DWG.02)
Illustrative Masterplan (SKPR26)

Drawn by: ML
Checked by: AR
Job No. OXPL177499
Date: 16/04/24
Scale: 1:750@A3

- | | | |
|--|---|---|
| SKPR-26 Proposed Residential Allocation Site Boundary | Primary Access | Potential Emergency Access |
| Retained Existing Tree Corridor | Green Corridor - Proposed Landscape Screening/Planting & SuDs | Opportunity to Integrated Planting and SuDs Features into Streets |
| Proposed Planting and Active Frontage Along Back Lane (Green Lane) | Proposed Pedestrian Connection through Landscape Corridor | Existing Informal Pedestrian Connection |
| Existing Pedestrian Connection | Opportunities for Pocket Play | |

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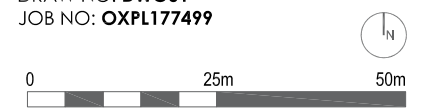




 SKPR-26 Allocation Site Boundary

Deeping St James, Christ Church Oxford

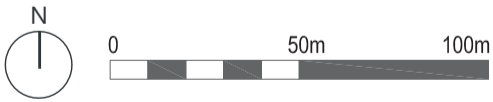
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Drawn By: ML Checked by: AR
Date: 28/03/24 Rev: -
Scale: 1:1,000@A3

**URBAN
DESIGN
STUDIO**





- SKPR-26 Proposed Residential Allocation Site Boundary
- Opportunity for Integrated Play and Formal Open Space
- Integrated Pedestrian Paths and Linkages
- Potential Pedestrian Link to Rycroft Avenue

- Wider Development Boundary
- Retained Existing Eastern Boundary Planting
- Integrated SuDs Solutions (Streets, Open Space, Landscape Corridor etc.)

- Primary Access
- Opportunity for Landscape Corridor and Informal Open Space
- Primary Road - Opportunity to Integrated SuDs, Planting and Active Travel.

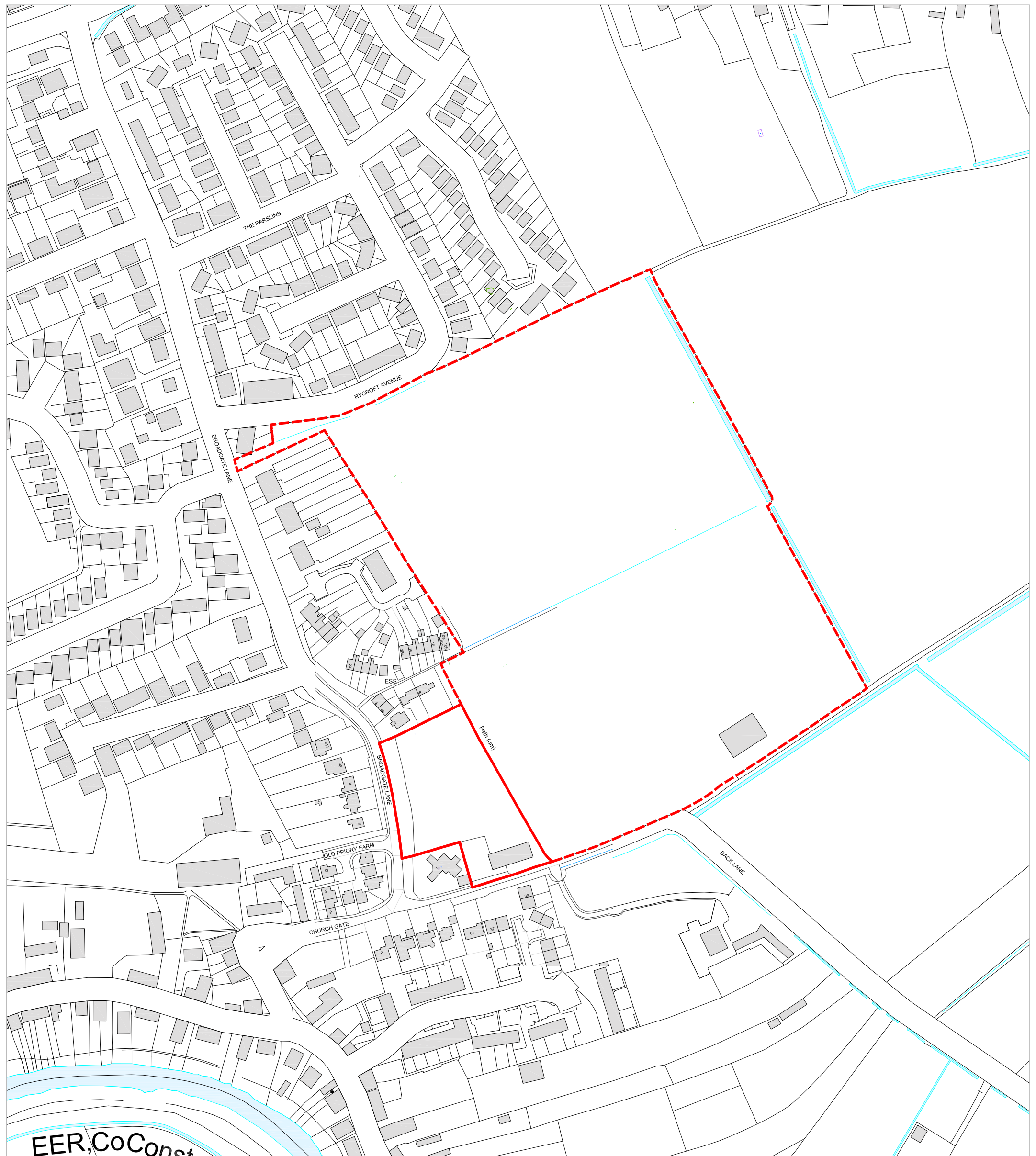
DEEPING, ST JAMES
CHRIST CHURCH, OXFORD



AI01B (DWG.02)
Illustrative Masterplan (Wider Site)

Drawn by: ML
Checked by: AR
Job No. OXPL177499
Date: 16/04/24
Scale: 1:2,000@A3

**URBAN
DESIGN
STUDIO**

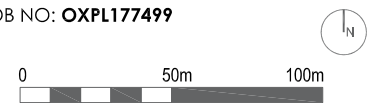




-  SKPR-26 Allocation Site Boundary
-  Wider Development Boundary

Deeping St James, Christ Church Oxford

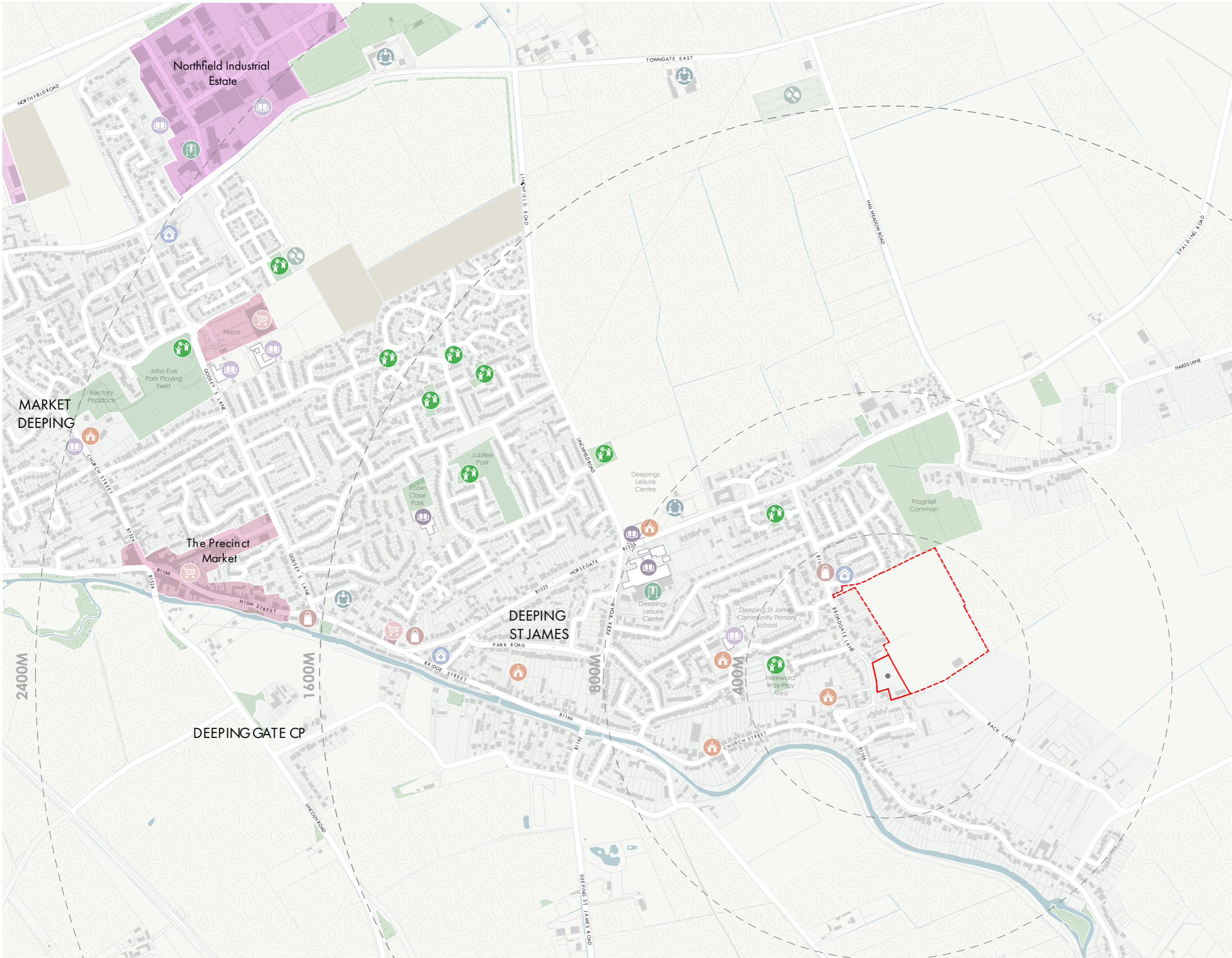
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**URBAN
DESIGN
STUDIO**





BOUNDARIES:

- SKPR-26 Proposed Residential Allocation Site Boundary
- Wider Development Boundary

FACILITIES:

- Pre and Primary School
- Secondary School
- Retail Use/Area
- Supermarket
- Play Area
- Park/Common/Accessible Green Space
- Gym/Leisure Use
- Community Building
- Health/Medical Use
- Religious Building
- Allotment
- Existing Built Form
- New Residential Development
- Industrial Area

**DEEPING, ST JAMES
CHRIST CHURCH, OXFORD**

**AI02 (DWG.03)
Facilities Plan**

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