



Town Clerk: Mrs Gail Darnes

24 April 2024

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

Dear Sir/Madam

Market Deeping Town Council Response to South Kesteven District Council Local Plan Review 2021-2041. Regulation 18 – Draft Local Plan Consultation.

Having reviewed the Draft South Kesteven Local Plan, Market Deeping Town Council (MDTC) fully support the comments below, which were made by members of the MDTC Planning and Highways Committee. This response is in addition to those of the Deepings Neighbourhood Plan Group (DNP) who will also submit a joint response on behalf of the Deepings i.e. Market Deeping and Deeping St. James. The DNP Group's comments are also supported by Market Deeping Town Council.

**Vision for the Deepings (page 19)** Object – a Rewrite is requested

To achieve the adopted community Vision for Deeping, the statement should read "any future development should be restricted to land to the north and east of the town/parish." This means that any proposals to the west are deemed to be inappropriate. We advise this should be made clear and specifically expressed with a rewrite of the first paragraph.

There are numerous sites already allocated within the current Local Plan that have yet to be developed in addition to alternative sites available that would clearly indicate that this allocation is not in fact required at this stage. Deeping has five substantial sites allocated in the current Plan that are still awaiting approval for development totalling up to 900-1000 dwellings. The plan should read that "these will need to be progressed first before any other sites are required." Please also refer to the corresponding overarching Vision expressed in the adopted Deepings Neighbourhood Plan.

### **H1 Housing Allocations**

Allocation SKPR-144 (Land to the west of Millfield Road) should be removed from the Deepings Residential allocation as it is inappropriate, unnecessary and does not meet the criteria of the Site Assessment for all the reasons given below:

Councillors object to the inclusion of this site for the following reasons:

• In line with the current policy for developing edge of settlement sites there is a clear absence of significant popular local support (as required by SP4a.) There is also a long history of the community rejecting this land for development.

- There is ready availability of an acceptable alternative site (not yet allocated) at Land North of Spalding Road, SKPR-248). Having reviewed the Draft Site Assessment Report Feb 2024, we would question the decision to reject SKPR-248 as a preferred site at this stage. SKPR-248 should be included in the Plan instead of SKPR-144 (if another site is required).
- The proximity of the proposed site to the Protected Green Lane as adopted in the Neighbourhood Plan Policy DNP12 would contradict the requirement for any development to be in keeping with the rural character and appearance of Millfield Road.
- Development of 200+ houses would not be in keeping with the character of the area and would be inappropriate in size and scale to the existing 15 houses adjacent to the site on Millfield Road conflicting with policy SP4b/SP3d.
- The development proposed would impact negatively on the current semi natural open space contradicting with policy EN1.
- The availability of such Semi-Natural Greenspace in The Deepings has also been identified as
  a deficiency within the SKDC Open Space and Recreation Study 2023 (paras 7.44, 6.33) so
  should in fact be retained in Deeping according to SKDC policy.
- The proposed development would create a significant increased risk of surface water flooding. This has been flagged as a RED constraint within the SKDC Draft Site Assessment Report in relation to any development of this site. It should also be noted that alternative sites have been rejected on this basis.
- The proposed site has been flagged as a RED constraint in respect of the Minerals and Waste Policy within the SKDC Draft Site Assessment Report. It should also be noted that alternative sites have been rejected on this basis.
- The proposed site does not provide ready or easy access to public transport network or amenities such as doctors and schools.
- The proposed site is adjacent to a designated Important Gateway to the Deepings (Policy DNP10). Development would directly contradict the requirement to avoid unacceptable and insensitive impact on the surrounding countryside.
- Millfield Road is currently subject to a Quiet Lane Status designation and development in line with what is being proposed would not be in keeping with this status.
- No vehicle access to any proposed development should be considered from Millfield Road to protect the character of this rural route as per policy DNP 12.3.

**Allocation SKPR-26 (Priory Farm Land, Deeping St. James)** is a potentially acceptable site. We understand this allocation is supported by Deeping St James Parish Council.

### **H2** Affordable Housing Contributions

We welcome the update and trust that contributions will be proactively sought to deliver affordable housing in the Deepings.

## H5 Gypsies and Travellers/H6 Travelling Showpeople

Although 'risk of flooding' is now included in policy EN5 and applicable across the Local Plan, we consider that the nature of traveller accommodation and the likelihood of independent foul water management within the sites, makes these communities particularly vulnerable to flood water and we wish to see this aspect remain as a key criterion in the assessment of sites. If suitable sites with acceptable facilities already exist, we would recommend initial expansion of these sites as a matter of policy in order to provide the additional pitches in a timely way.

### **SP4 Development on the Edge of Settlements**

Councillors have queried whether this is a significant change from the previous version of the policy and consider that all development on the edge of settlements – employment and residential should be subject to the same tight restrictions and criteria as policy SP3.

### **E2** Employment Sites

Councillors support the proposal to retain SKPR-55 (DEP-E1) and SKPR-284 (DEP-SE1) as essential employment development sites. We object to any proposals that seek to change SKPR-55 into residential development on the grounds that: a) it is required for employment use and b) it is not needed for housing.

### **EN3 Green Infrastructure**

Councillors welcome all proposals and policies to increase and improve Green Infrastructure for community health, wellbeing, active transport, improved connectivity with neighbouring settlements, and opportunities for enhancing the visitor economy. The Deepings Green Walk provides a long-term strategy for improving our local Green Infrastructure and all references and acknowledgement of this by SKDC and any developers will be appreciated.

#### **EN6 The Historic Environment**

This greater focus on historic assets is appreciated as there are currently many under-appreciated Heritage and Archaeological Assets within The Deepings area that are at risk due to proposed nearby developments affecting their context e.g. The Car Dyke.

### **DE1 Promoting Good Quality Design**

Councillors are aware that the Deepings Neighbourhood Plan Group has commissioned a substantial project to produce a Design Code for The Deepings. This work is due to be completed in summer 2024. Deepings has experienced far too much ordinary and uninspiring development and the promotion of good design is a mission close to our hearts. We very much welcome the policies that support us to refuse development that is not well designed.

# **OS1 Open Space**

Improved clarity and quantification of the types of Open Space will help to ensure a sufficient variety of open spaces are included in all development plans. Inclusion of 'Recreation' is helpful.

# Policies still to be Reviewed

We await final versions for consideration once the position on Climate Change and Biodiversity Net Gain has been researched and the studies completed.

Yours faithfully

Gail K Darnes

Gail Darnes, Town Clerk
On behalf of Market Deeping Town Council