Site Delivery Statement

Land at St Martin's Way, Ancaster

Persimmon
Together, we make your home

Marrons

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Project Name	Land at St Martin's Way, Ancaster
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Our Vision

Land at St Martin's Way is sustainably positioned on the edge of Ancaster adjacent to the train station. The site presents an exciting opportunity to create a new sustainable development that can sit within a network of green spaces, celebrating the character of the village. The high-quality development will allow the creation of a strong sense of place and community, encouraging sustainable lifestyles and positive interactions amongst existing and new residents.

01 Introduction & Background

1.1 Introduction

Marrons have been instructed by Persimmon Homes to prepare this Site Delivery Statement to demonstrate the deliverability of Land at St Martin's Way, Ancaster for residential development.

This document demonstrates how the site, having taken account of all known constraints and considerations, is deliverable. Technical information has been assembled by Persimmon Homes to support the site including information relating to topography, highway and transportation, archaeology, noise, ecology, landscape and utilities.

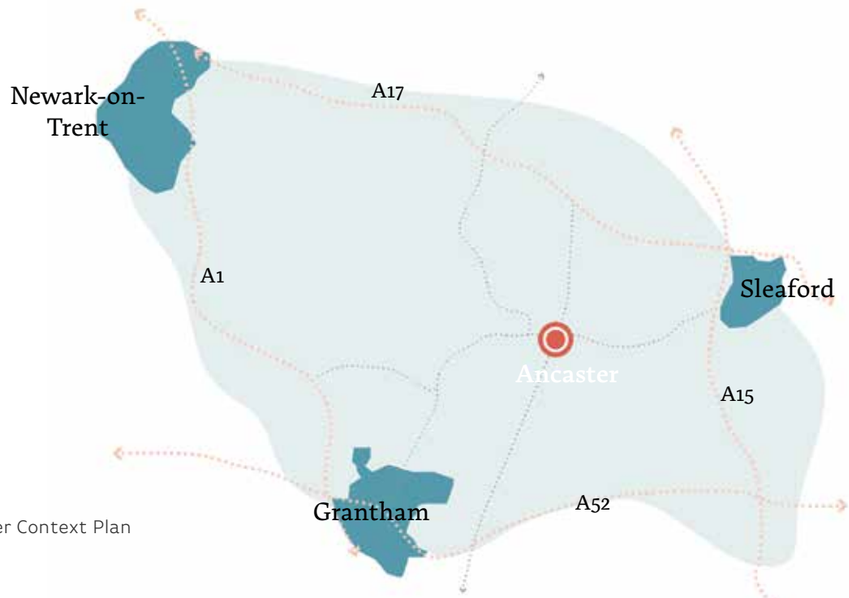
More specifically the analysis of the site's locality and context have fed into and informed the preparation of a Concept Masterplan included within the document. This in turn demonstrates the ability of the site to deliver approximately 65 dwellings on the site.

1.2 The Wider Context

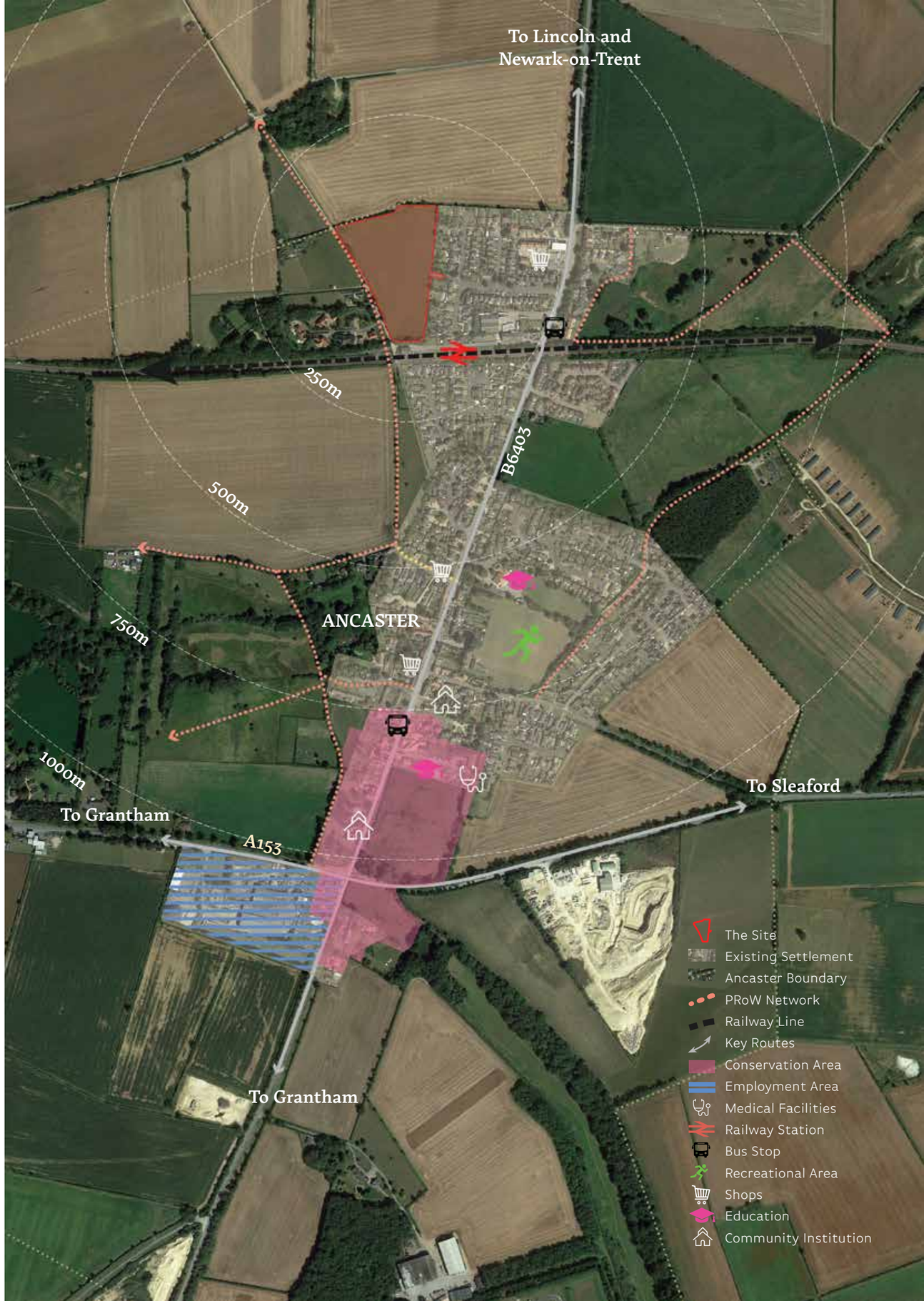
The site is located in the village of Ancaster within the District of South Kesteven, Lincolnshire. The village of Ancaster is strategically well positioned between the larger settlements of Sleaford, Grantham and Newark-on-Trent.

1.3 The Local Context

In the local context, the site is located in the north-western corner of Ancaster, c.590m north of Ancaster village centre.
The site is well situated to benefit from access to a number of local services and facilities which can be accessed by sustainable modes of transport, including nearby bus stops and railway station to Grantham and to further afield cities and towns. The day-to-day local services are connected from existing pedestrian infrastructure and PRoWs. The adjacent plan shows the accessible services and amenities within the proximity of the site.



Wider Context Plan



Site Location Plan >

1.4 The Planning Context

The Development Plan for South Kesteven comprises the South Kesteven Local Plan ("SKLP") adopted in 2020. The SKLP identifies the scale and distribution of land for housing and other forms of development across the District to 2036. Policy M1 of the SKLP commits the local planning authority ("LPA") to an early review, which commenced in April 2020 and is currently anticipated for adoption by Spring 2026.

The Local Plan Review ("LPR") will identify the scale and distribution of land for housing and other forms of development to 2041. The LPR is currently at Regulation 18 (Draft Plan) stage. Its emerging housing requirement set out in Draft Policy SS1 is based upon the Standard Method for calculating housing need and a Local Housing Needs Assessment undertaken in November 2023, which identify a need for 701 dwellings per annum ("dpa") or 14,020 dwellings over the plan period to 2041.

National planning policy is clear that the Standard Method produces a minimum figure only and that there are factors, such as maximising affordable housing delivery and the need to align homes with jobs, which could result in a housing requirement higher than the baseline figure indicated by the Standard Method.

The Local Housing Needs Assessment estimates an affordable housing need of 402 dpa in South Kesteven when the District has, over the last ten years, delivered an average of only 120 dpa. Similarly, the LPR's employment land requirement is considerably in excess of the figure advanced by the Employment Land Study. These factors both indicate that the housing requirement should be higher than the figure produced by the Standard Method.

As regards distributional strategy, the LPR continues the SKLP's intensive focus on Grantham as a location for strategic growth, with the town accommodating approximately half of all planned housing provision to 2041. Given this top-heavy approach to the spatial strategy, it is logical that the LPR also makes provision for smaller, more deliverable sites elsewhere within the District, including its strategic apportionment of growth to the Larger Villages, of which Ancaster is one of the largest and most sustainable, as indicated by the LPR's evidence base. Apportionment of growth to Ancaster and the Larger Villages will also assist in sustaining local services and secure much-needed affordable housing delivery.

At a strategic level, therefore, the allocation of the Land at St Martin's Way, Ancaster is fully justified by the evidence.

At a settlement and site level, the LPA has prepared detailed evidence in relation to site selection in order to underpin the LPR. This has included an assessment of broad areas of growth around the District's key settlements such as Ancaster, which provides a basis for understanding the strategic constraints.

On the whole, the assessment evidence indicates that the north west direction of growth at Ancaster is one of, if not the least, constrained broad directions at the settlement. Furthermore, the site-specific evidence reflected through the Draft Site Assessments and the Interim Sustainability Report, identify no materially adverse impacts arising from the development of the Site for housing.

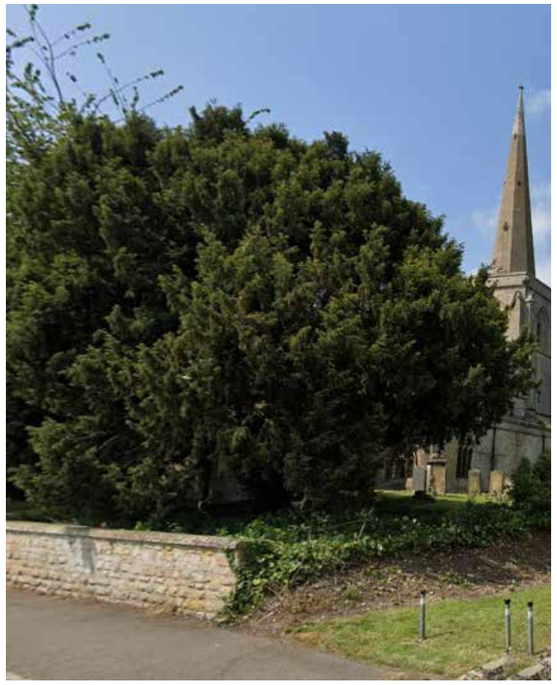
Draft Policy SKPR-283 of the LPR sets out a series of criteria to be observed in respect of development proposals for the Site. These relate to pedestrian links, vehicular access, site layout, landscaping, archaeology, green infrastructure and mineral safeguarding.

Persimmon has already sought technical advice in respect these matters and this has been fed into the masterplanning exercise presented elsewhere in this Document. In summary, the matters raised by Draft Policy SKPR-283 can be easily and fully addressed at the planning application stage and would not undermine the Site's potential to yield a well-designed, landscape-led and deliverable scheme for approximately 65 dwellings.

As described elsewhere within this Document, Persimmon is one of the country's largest housebuilders with an excellent track record of delivering strategic sites through the planning process which are then built out rapidly to meet housing need.

1.5 The Opportunity

The site is a logical and deliverable extension to Ancaster, one of the area's key rural settlements which is also well-placed geographically to provide new homes for the district.



Local area photos

02 Delivering the Site

2.1 The Site

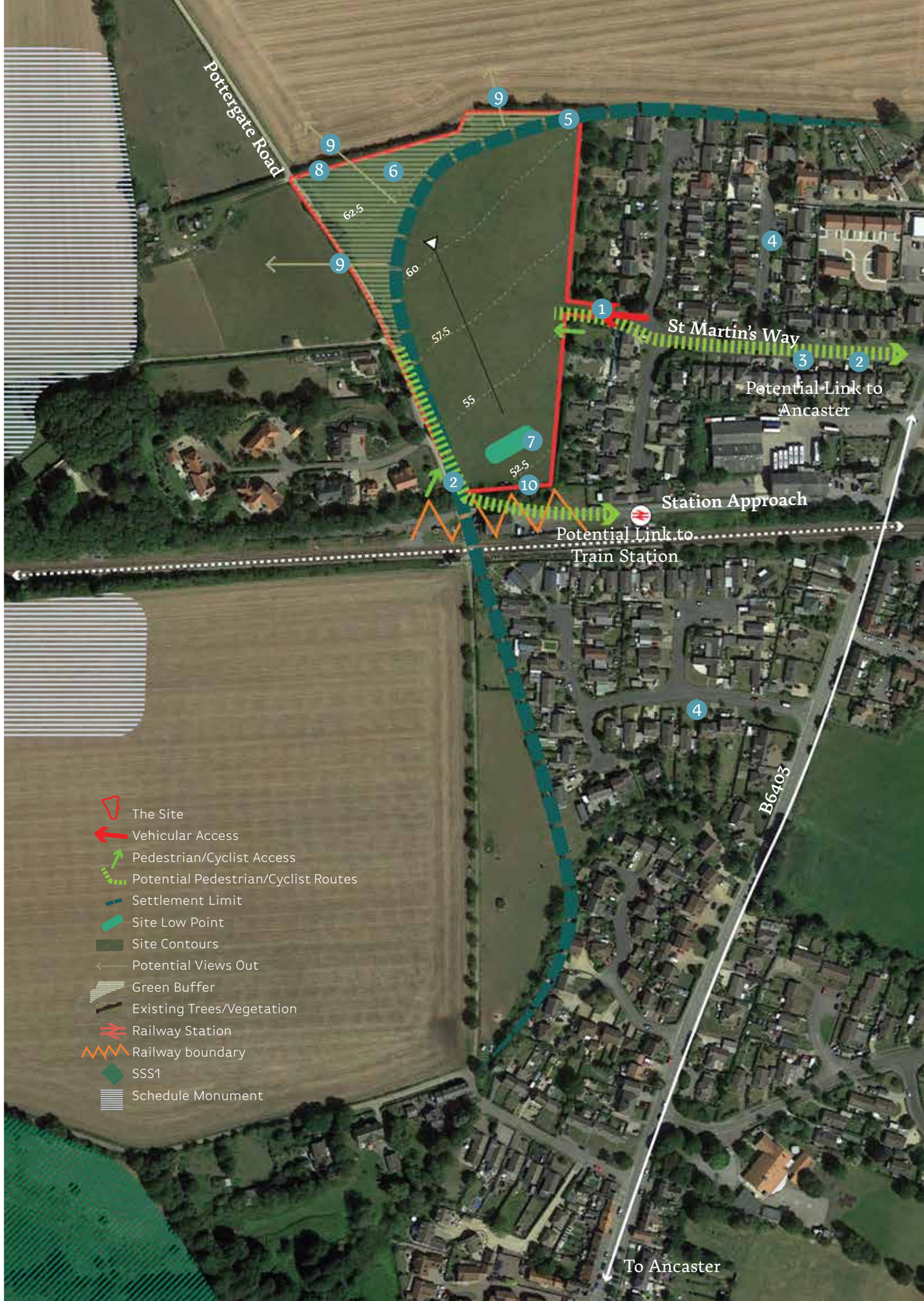
The site extends to approximately 2.7 hectares. It comprises an agricultural field adjoining existing residential development to the south-east and by agricultural fields to the north and north-west. Ancaster train station is located adjacent to the south boundary on the regional Grantham to Sleaford railway line.

A country lane, Pottergate Road, runs along the length of the site's western boundary with recent residential development located south-west of the site off Pottergate Road.

2.2 Summary of Assets and Opportunities

As shown on the Opportunities and Constraints Plan, the Site is largely unconstrained and presents a number of unique opportunities for residential development, as follows:

1. Primary access to be taken from St Martin's Way.
2. Access to the existing public rights of way network to be retained and enhanced via a network of new footpaths.
3. Pedestrian and cyclist access to the existing footpath and cycleway network connecting the Site to nearby amenities including Ancaster train station, via sustainable modes of travel.
4. Opportunity to provide much needed market rate and affordable housing to the local area.
5. Opportunity to create a natural extension of Ancaster.
6. Opportunity to create a strong green buffer to the settlement alongside creating new amenity space for the community to enjoy.
7. The Site's gently slopes towards the south, sustainable drainage systems (SuDS), including an attenuation basin at the Site's low point, will manage surface water runoff and benefit wildlife and landscape amenity.
8. The retention and enhancement of existing trees and hedgerows will support the creation of a green, attractive and biodiverse place.
9. Views towards open countryside will be retained where possible.
10. Appropriate mitigation measures to be implemented to offset the impact of noise from the nearby train station/railway line.



Opportunities and Constraints Plan >

2.3 Design Concept and Principles

The Concept Masterplan for the Site is presented opposite. This has been informed by the vision and technical analysis previously undertaken in relation to the Site, along with the following design principles:

1. Provision of approximately 65 dwellings. These dwellings will be delivered in a range of types and tenures to meet local demand.
2. Development will be structured to create a legible and permeable place that prioritises people and ensures streets and spaces are overlooked where possible.
3. Access to the Site will be achieved via St Martin's Way where a current corridor exists between nos. 45-48 St Martin's Way.
4. Pedestrian / cyclist access points are proposed along the edges of the Site, connecting the Site to the train station and its surroundings and providing access to the wider public rights of way network.
5. Development will back on to and respond appropriately to the existing residential development.
6. The northern and western boundaries of the Site will respond to the adjoining countryside.
7. The proposals provide accessible multi-functional open space that caters to a range of ages and uses, encouraging time outdoors and interaction with nature, in turn supporting the health and wellbeing of the community.
8. The retention of existing trees where possible that will help provide a green and attractive setting for the new homes whilst supporting a net gain in biodiversity. The provision of attenuation feature within the southern area of green open space further supports biodiversity and habitat creation.
9. A green corridor along the western boundary of the Site connects the two areas of public open space. New footpaths will be incorporated within areas of open space providing green routes for pedestrians and cyclists and further supporting healthy lifestyles.
10. The provision of new tree planting within public open space to further support biodiversity of the Site and help in mitigating the impacts of climate change.
11. A green buffer is retained towards to railway line to the south, in order to mitigate any adverse impacts.

Proposed Primary Access Point

Concept Masterplan >

2.4 Movement & Access Strategy

The movement and access strategy outlines the site access strategy and identifies potential integration measures to enhance local connectivity between the potential development site and local amenities.

The proposal is expected to comprise:

- 65. Units;
- Single vehicular access to the site from St Martin's Way; and,
- Numerous walking and cycling access points from Station Approach and Pottergate Road.

It is a future aspiration to improve accessibility to and from the potential development site for pedestrians, cyclists, and public transport users. However, it should be acknowledged that the existing site already benefits from good accessibility to the surrounding area.

Walking

- Pedestrian access to the potential development site will be afforded via footways connecting to the existing infrastructure on St Martin's Way as well as pedestrian permeable points connecting to Pottergate Road.
- Pedestrian access towards the local services and facilities in Ancaster will likely concentrate movements along the B6403 and via St Martin's Way.
- To aid pedestrian movements, it would be appropriate to provide uncontrolled pedestrian crossing facilities at key points to facilitate access and accommodate likely desire lines. The proposal involves provision of dropped kerb crossings, with tactile paving, at numerous points along St Martin's Way and across the B6403.
- It is considered that the width of the footway along the eastern side of the B6403 underneath the railway bridge is particularly narrow, and less accessible to vulnerable users It is therefore suggested that the footway is widened from 0.7m to c1.7-2.0m and accompanied by dedicated crossing facilities and tactile paving either side of the bridge to facilitate safe pedestrian movements. .
- It should be noted that an adjacent residential development (application ref: S21/1045) is providing improved crossing facilities along the desire line for the potential development site.

Highway Improvements

Cycling

- Cycle access to the potential development site is currently aided by the presence of the Pottergate Road restricted byway and Station Approach.
- To aid cycle access to the potential development site, cyclist permeable points are to be installed at various points along the Pottergate Road which lead to Station Approach.
- The access points would serve to accommodate cycle movements and provide future residents with direct access to the centre of Ancaster and destinations beyond.
- The way finding signage would be located at the geographical extremities of the north-western corner of the potential development site to the centre of Ancaster in the south, as well as key junctures along Station Approach and the B6403.

Public Transport

- Access to the potential development site via public transport connections is aided by the close proximity of bus stops and Ancaster railway station.
- The closest bus stops to the site named 'The Railway Inn' along the B6403 (c.290m east of the potential development site) operate as hail and ride stops. This means that, whilst buses serve riders at the location, the actual stops are non-existent. It is therefore suggested that the bus stops are formalised as flagpoles.

The locations of the suggested and approved improvements are illustrated in the adjacent Plan.

2.5 Ecological Enhancement

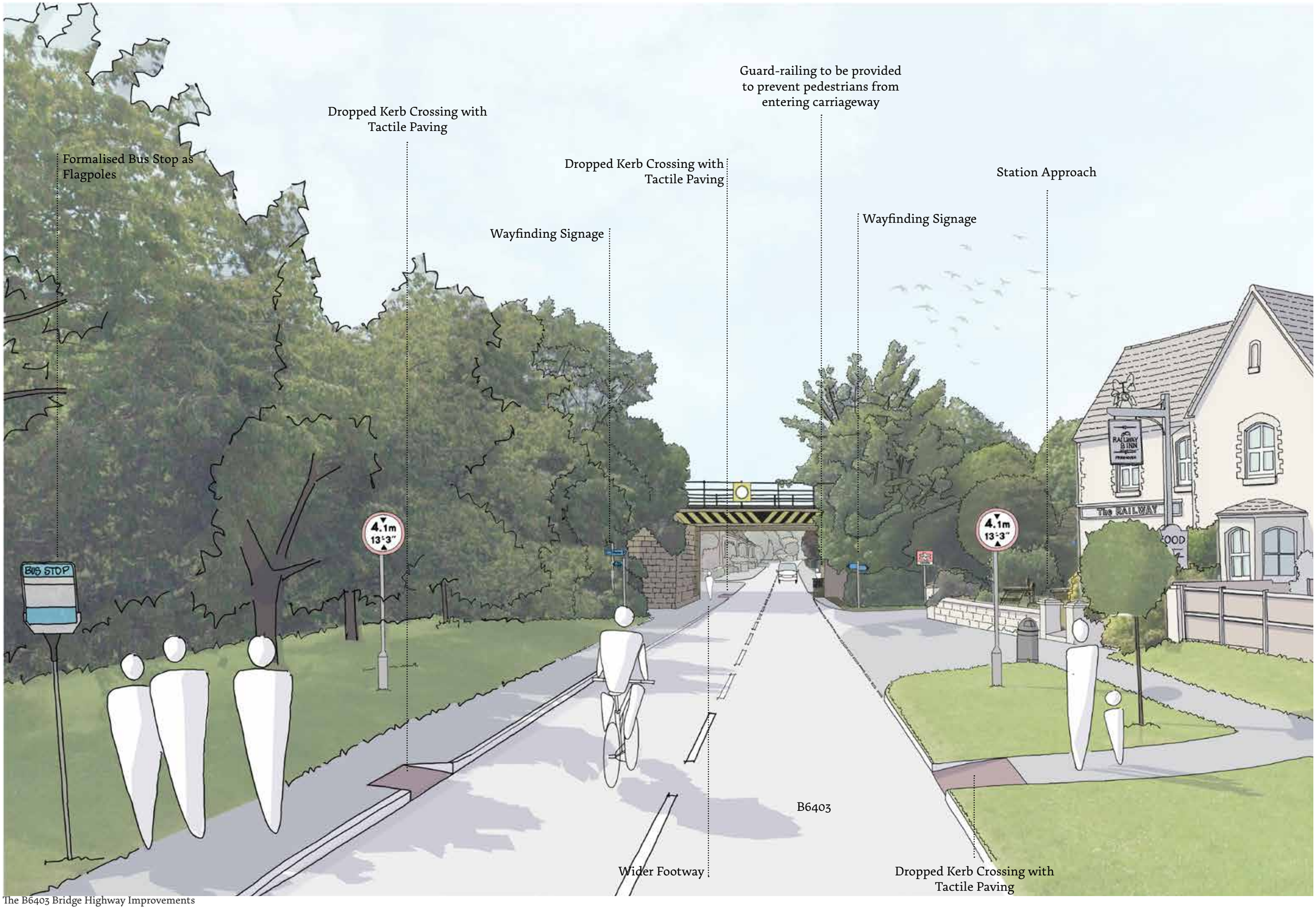
The proposed development will result in the replacement of species-poor semi-improved grassland land with residential housing with gardens, with associated drainage features, soft and hard landscaping, and areas of public open space.

The development will look to provide ecological enhancement, by retaining and enhancing existing vegetation on the site and its boundaries. The provision of Public Open Space on the site allows for multi-use green spaces that can serve as SUDs, landscape and ecology improvement areas.

Designated sites

No international designated sites are located within 15km of the site.
Four SSSI sites are located within 2km of the site and two have been highlighted by Natural England as potentially affected by residential development, therefore it is recommended that Natural England are consulted on the development proposals.
Although, given the distance from the proposed development, its scale and limited public access, no significant impacts to its designation quality are anticipated to arise from the proposed development of the site.


View of the Site



The B6403 Bridge Highway Improvements

2.6 Landscape Strategy

The objective of the Landscape Strategy is to set the development into the host landscape in a manner that achieves a sympathetic and successful assimilation in the countryside at the settlement edge.

There are four key objectives for Landscape Strategy:

- To make an important contribution to integrating the development with the host landscape of the immediate setting;
- To create a public asset of attractive green space to serve the needs of the development;
- To ensure the effects of the development are limited and contained in a manner that makes an attractive and effective new edge to the settlement;
- To aid in the biodiversity value of the site through the integration of existing trees and vegetation and the incorporation of new planting and sustainable drainage features.

Considering that there are no Tree Preservation Orders on or adjacent to the site, the site is not covered by any landscape or nature conservation designation that would suggest an increased value or sensitivity to change and there are potential views to the north into the site, the landscape strategy is seeking to:

1. Retain existing landscape features such as boundary vegetation which will be enhanced through infill planting where necessary.
2. Create areas for high quality landscaping, green space and areas for play to the north and south of the site.
3. Provide a landscaped buffer, with new and enhanced planting along the northern boundary, providing a green edge to the development and softening the transition between new development and the agricultural land to the north. This would mitigate the views to the north and also create a green edge to development with the countryside.
4. Provide within the built development additional tree planting to help soften the overall appearance of the development.
5. Provide a landscape buffer to the western boundary ensuring that Pottergate Road retains it's rural character.
6. Set back the development from the southern boundary, partly to provide a suitable location and setting for the sustainable drainage design but also to mitigate potential noise impact from the railway line.
7. Provide a SuDs feature in the southern portion of the site, set within an area of naturalistic planting.
8. Provide a surface water attenuation feature which is included within the open space, which gives opportunities for additional biodiversity habitat as well as recreational opportunities.

2.7 Noise

A noise survey on the Site has been completed and shows the site is suitable for development from a noise perspective, as the risk of adverse noise effect is negligible, even without mitigation.
Even if mitigations measures are not required, a green buffer from the railway line is provided towards the south of the site.

2.8 Archaeology

An archaeological desk-based assessment has been completed. No schedule Monuments and Archaeological Assets are located within the site.
There is a Scheduled Monument (Roman marching camp) approximately 500m to the west of the site. A handful of Listed Buildings are located in the southern part of Ancaster, within and around the Ancaster Conservation Area. It is considered that the site is suitably separated from these heritage assets by existing topography, intervening landscaping and built development.
Field evaluation, comprising geophysical survey in the first instance, will be necessary to establish the archaeological interest of the Site and determine the need or otherwise for mitigation work.

Landscape Strategy Plan >

The proposals have been informed by the Design Guidelines established in the Rutland & South Kesteven SPD. We have shaped the development following the guidance presented within Building for a Healthy Life and NPPF.

2.9 Building for a Healthy Life

Integrated Neighbourhoods

Natural Connections
- The proposals respond to the Site's edges, backing on to existing residential development and providing a green buffer in response to the adjoining countryside.
- A network of connected streets is proposed that provide direct routes to homes and connect to the wider movement network.
- The retention and enhancement of vegetation that supports the movement of wildlife across the Site.
- Footpaths/cycleways have been designed to respond to desire lines, connecting homes with the PRoW network and facilities and amenities within and beyond the Site, including public transport connections.

Walking, Cycling and Public Transport
- The proposals seek to prioritise pedestrian and cyclist movement, providing accessible routes that are car free and overlooked thus encouraging sustainable modes of travel
- Streets will incorporate cycle friendly routes that accord with LTN 1/20.
- Homes will be provided with accessible cycle parking.
- Movement routes have been designed to ensure residents have access to and benefit from the Site's proximity to the train station.

Facilities and Services
- Walking and cycling routes follow desire lines and connect with the wider pedestrian movement and PRoW network to provide car free routes to local amenities and facilities.

Homes for Everyone
- A mix of housing types and tenures are proposed to meet the needs of the local community.
- Homes will be designed to meet the ever changing needs of residents and new technologies.
- All homes will benefit from access to private outdoor amenity space.
- A percentage of homes will be affordable. Housing will be designed to be tenure blind, aiding social interaction.

Distinctive Places

Making the most of what's there
- Existing Site features will be retained where possible to aid in the creation of a distinctive character.
- Views toward the surrounding countryside will be celebrated through the orientation of streets and houses and provision of green open space.

A Memorable Character
- A local character analysis will ensure inspiration is taken from the local architectural and landscape character to create a distinctive place.

Well-defined Streets and Spaces
- Streets will benefit from active frontages to ensure natural surveillance is maximised.
- The building lines, set backs and boundary treatments will be well considered to ensure the level of enclosure that is appropriate to each street type.

Easy to find your way around
- A perimeter block structure is proposed aiding permeability and accessibility.
- A clear street hierarchy will aid the creation of a legible place. This will be reinforced by key buildings at appropriate locations.

Streets for All

Healthy Streets
- Streets will prioritise people over cars with low traffic speeds and the incorporation of continuous footpaths/cycleways that follow desire lines.
- The provision of street trees and well considered materials will create an attractive and safe environment that encourages slow driving speeds.

Cycle and Car Parking
- Homes will be provided with secure and easily accessible cycle parking.
- Car parking will be policy compliant. Homes will be provided with EV charging points.
- There will be minimal use of parking courtyards - where these are required they should comprise no more than 8 parking spaces and be overlooked.

Green and Blue Infrastructure
- The retention and enhancement of existing trees and vegetation will aid in the biodiversity value of the site. New planting will be well considered to further support the sites biodiversity value.
- The Landscape Strategy will be multi functional and overlooked. Sustainable drainage systems and features will be incorporated, further aiding the biodiversity value and creating a healthy environment for people and wildlife.

Back of Pavement/Front of Home
- Boundary treatments will reflect the local character and will balance the creation of defensible boundaries with providing opportunities for neighbourly interaction.

2.10 NPPF Compliance

The National Planning Policy Framework (NPPF), published in December 2023, reflects the Government's desire to protect the environment and to promote sustainable growth. The purpose of the NPPF is to provide a framework for planmaking and decision-taking in relation to planning applications. It is a material consideration in planning decisions.

Paragraph 2 confirms that the NPPF does not change the statutory status of the development plan as the starting point for decision-taking. Paragraph 11 goes on to state that development proposals that accord with the development plan should be approved without delay.

The NPPF makes clear that the purpose of planning is to help achieve sustainable development. The creation of high-quality buildings and places is identified in paragraph 126 as being fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creating better places in which to live and work and helping make development acceptable to communities.

Paragraph 130 is clear that planning decisions should ensure that developments will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development. Development should be sympathetic to local character, history, and establish a strong sense of place.

The arrangements of streets, spaces, building types and materials can create attractive, welcoming and distinctive places to live, work and visit. The paragraph goes on to state that developments should ensure they optimise the potential of sites to accommodate and sustain an appropriate amount and mix of development and support local facilities and transport networks.

03 Persimmon – The Right Delivery Partner

PERSIMMON'S VISION & PLACEMAKING FRAMEWORK

Our vision is to be Britain's leading home-builder, with quality and customer service at its heart, building the best value homes on the market in sustainable and inclusive communities.

Our vision to create great places and homes has been published in our internal guide, the Placemaking Framework, published in June 2022. Ten following Placemaking Pledges, outlined within the guide, are embedded in every development we work on to make sure we create lasting sustainable communities with great design, the right house types, and value green open spaces.

Context - We will ensure all opportunities, constraints and local context are taken into account throughout the design process and positively reflected in our proposals.

Built Form - We will ensure we think in 3D and consider how buildings, streets and spaces work cohesively together.

Identity - We will ensure that the places we create respond to and reinforce the character of the local area as well as creating our own distinctive and memorable identity.

Public Spaces - We will ensure we create high quality public spaces and safe streets which promote social interaction and support the wellbeing of future residents.

Nature - We will ensure we respond positively to the natural environment and act in response to the climate change emergency. We will also embrace the opportunities that the natural environment offers for health and wellbeing.

Use - We will seek to support a sustainable mix of uses relevant and proportionate to the sites context, including a suitable mix of housing which also incorporates affordable housing where required. We will plan for sustainable places which have good access to local services and facilities.

Movement - We will ensure our developments are designed to prioritise sustainable travel with a hierarchy of well-considered routes that are easy to move around, whilst also taking into account car parking and services.

Resources - We will ensure sustainability sits at the heart of our placemaking including promoting sustainable modes of travel and walkable neighbourhoods as well as delivering our pathway to net zero via the energy performance of our homes.

Lifespan - We will design places with legacy and long term stewardship firmly in mind including future management and maintenance arrangements for our customers.

Homes and buildings - We will provide attractive, high quality homes alongside suitable amenity spaces to enable a sustainable development that supports the lifestyles of our customers, enables adaptation and promotes health and well-being.

Our Placemaking Framework ensures that all our developments create a sense of place for our customers and put communities at the heart of our developments.

ENVIRONMENTAL, SOCIAL AND CORPORATE GOVERNANCE

Environmental

As one of the UK's largest house builders, we recognise that we have a key role to play in minimising our environmental impact through our operations, supply chain and the homes and communities we build.

We have been planning our transition to low carbon design and heating solutions and how to best improve energy efficiency in our homes, with our customer experience being a key consideration. We are currently conducting four studies into the future homes standard, which will ensure our customers are provided with the best available product following the phasing out of gas heating in 2025:

1. Zero carbon house – Germany Beck, York

Partnership with the University of Salford to evaluate of how to achieve greater reductions in carbon emissions in a practical, repeatable and cost-effective way.

2.Infra-red heating system trial, Whittlesey, Cambridge

The development of two properties with a method of infra-red heating which is exceptionally efficient. The properties have recently been sold and we are tracking the building performance and customer experience.

Persimmon aims to be net zero homes in use by 2030, and net zero in our operations by 2040.

3. Zero Carbon Homes Trial, Backbridge, Malmesbury

We are constructing a highly thermally efficient timber frame zero carbon home utilising our new Future Homes Standards (FHS) wall cassettes from Space4, together with zero carbon heating from air source heat pumps.

4. Trial of Air Source Heat Pump, Lawrence Weston, Bristol

We have undertaken a large-scale trial at our Lawrence Weston development using ASHOP and a higher great of insulation, to provide us with valuable practical insights into the use of timber frame and ASHP against the FHS carbon emissions reduction.

Supply Chain Efficiency

We are committed to responsible sourcing of materials and look to use supply chain systems which minimise the environmental impact associated with the production of key commodities, such as timber:

- Our bricks and roof tiles are produced at our own Brickworks and Tileworks in Harworth, Doncaster. The bricks produced here typically use 28% less carbon to manufacture compared to clay bricks, with a total lifetime saving of 2.4 tonnes of CO_2 per house brick.
- Our investment in our sister brand, Space4, which has recently gained permission for the biggest timber factory in the UK, demonstrates our commitment to offering fabric first solutions for new, sustainable homes.

Social

We are a national businesses with a local presence. The Persimmon Community Champions campaign supports local charities, groups and sports clubs. Every operating region in Persimmon donates at least £6,000 every three months to local organisations.

We look to provide opportunities for all, working with young people to develop new skills and experience. We often employ local Apprentices on our development sites, and are an accredited National Vocational Qualification assessment centre. The first for a UK housebuilder.

As an accredited Living Wage employer, we undertake pay reviews annually and take pride in paying local contractors and external companies promptly and fairly.

We have partnered with Women in Construction to help increase the number of women entering the construction and housebuilding industries.

Corporate Governance

Our mission is to build homes with quality our customers can rely on at a price they can afford. At the forefront of our business objectives are safety, customer care and social responsibility.

'Homes for all' - £285,774 is our private average selling price which is over 20% lower than the UK national average

We invested c.£2.3bn in communities over the last five years

COMING HOME

Sustainable

We will look to create developments that work in harmony with the local environment and sustain the balance of the natural work in which they site. We seek to achieve sustainability as follows:

- Sustainability through design, looking to enhance biodiversity on-site as far as possible, and through the use of SuDS
- Sustainability through materials, complying with the 2025 future homes standard including features such as air source heat pumps, solar panels and waste water heat recovery panels
- Creating a haven for wildlife by working with our landscape consultants to ensure that planting is beneficial for pollinators, native wherever possible, and that infrastructure supports and encourages wildlife and biodiversity.

Safe

We recognise that houses are places that people can live in comfortably, with security and privacy from unwanted intrusion. As an NHBC 5* housebuilder, we consistently build high-quality homes which our customers are happy to recommend. We are one of the only ten companies to have been awarded a Certificate of Commitment and Progress as the first stage to achieving Building a Safe Future Champion Status.

All our schemes are designed in line with Secure by Design Principles.

We invested £506,000.000 in local communities in 2022 with 2,868 affordable homes delivered

Stable

We seek to create communities that are provide opportunities for all, offering a range of house types and tenures that reflect local need, including affordable housing. In turn this helps create a stable community in which people can take pride in calling their home.

Sociable

We propose increasing and enhancing walking routes through the schemes we work on, allowing new and existing residents better links to existing community facilities.

The provision of play areas and areas of public open space offer space for residents to meet and socialise. All spaces will benefit from good natural surveillance and be managed by a residential management company in perpetuity, ensuring they are areas in which residents can relax.

All Persimmon homes benefit from their own private garden. Homes provide space to relax and socialise regardless of whether they are affordable or market properties.

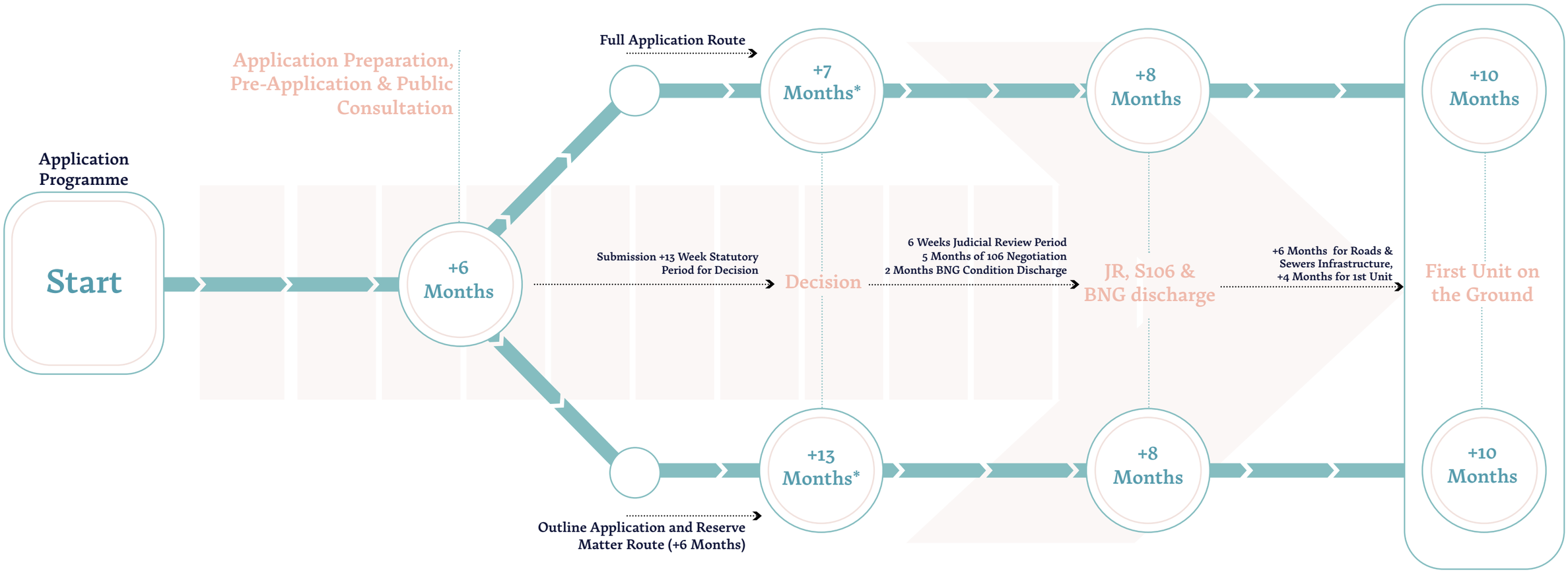
Satisfying

Through our Placemaking Framework, we seek to ensure our schemes create a sense of place, maximising the site's natural attributes, providing infrastructure and housing that meets local needs and that is adaptable to technological enhancements and changing needs of residents.

04 Next Steps & Summary

4.1 Next Steps

This section set out a potential timeline for the delivery of the scheme.



The timeline shown is approximate only, and it is working towards the LPA's timescales of the adoption of the plan. The site has the capabilities to be delivered earlier than the proposed timeline. Persimmon is looking forward to working with the Local Authority on bringing the site forward at an appropriate rate.

*The timeline recognises 4 months additional time towards the allowance of the 13 Weeks Statutory Determination.

4.2 Summary

In summary, the proposal included in this Site Delivery Statement aims to:

- Appropriately responds to the adjacent context within Ancaster, forming a natural and logical extension of the Village.
- Positively responds to the existing landscape character of the site including mature and young planting towards the perimeter of the site and enhancing the site's ecological value.
- Provides 65 new dwellings, including a mix and variety of house types and sizes to meet the needs of housing requirements in the area.
- Creates inclusive, well designed, high quality public open spaces.

This Site Delivery Statement shows how the Site, based on technical information and analysis of the locality of Ancaster, can be successfully delivered within appropriate timescales.

Site Delivery Statement Produced By:

Marrons

Persimmon
Together, we make your home

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

On behalf of Persimmon Homes East Midlands

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1. INTRODUCTION

1.1 Marrons is instructed by Persimmon Homes East Midlands ("Persimmon") to prepare and submit representations to the South Kesteven Local Plan Review ("LPR") Draft Plan Consultation. Persimmon is promoting Land at St Martin's Way, Ancaster ("the Site") for residential development. The Site is proposed for housing allocation for approximately 65 units within the Draft Plan under reference SKPR-283.

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 Marrons. 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, as well as the key benefits of the Site's delivery.

1.3 In further support of the Site's promotion, Marrons on behalf of Persimmon has produced a Site Delivery Statement **(Appendix 1),** which builds on the work of the previous Vision Document and develops proposals for the Site informed by a comprehensive suite of technical evidence. The Site Delivery Statement has been informed by a comprehensive Strategic Movement and Access Strategy by The Transportation Consultancy (**Appendix 2**).

1.4 These representations have been produced by Marrons on behalf of Persimmon 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 representation, we comment on the soundness and legal compliance of the LPR, as well as its evidence base. Our representations are to be read alongside the representations made directly by Persimmon Homes East Midlands in respect of the development management focused policies of the emerging LPR.

2. VISION AND PLAN OBJECTIVES

2.1 We broadly support the LPR's Vision to 2041 for South Kesteven. In particular, we welcome the description of the role and function of the District's villages, with the Vision setting out that the more sustainable villages (i.e. Larger Villages), will continue to provide the necessary day-to-day services to ensure rural communities have a choice in terms of homes, work and recreation. To strengthen this part of the Vision still further, we would recommend that the role the Larger Villages play in supporting surrounding rural communities is also referenced and in particular, the need such communities have for affordable homes recognising that the villages are least affordable parts of the Plan Area.

2.2 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.

2.3 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.

2.4 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.

2.5 In this regard, whilst we are generally supportive of the overall thrust of the Plan's Vision and the Plan Objectives subject to the comments above, we would observe that there should be a better integration between these 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 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. Draft 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." Neither of these arguments are 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 of 15,080 over the plan period.

<u>The Plan Period:</u>

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 to 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 which the LPR should address. The social challenges identified include areas of the District 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.

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.

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, the LPR's Objectives such as the reduction of out-commuting, and providing 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 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.

3.27 We would strongly encourage the local planning authority to investigate the linkages between the overall planned level of economic growth and housing provision to ensure an alignment between the two and to incorporate an uplift to the Standard Method figure as appropriate as part of the LPR's housing requirement.

Housing Distribution

3.28 At a strategic level, we generally support the LPR's approach to the distribution of housing. However, 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.

3.29 Pursuing such a top-heavy spatial strategy 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 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.

3.30 In this context, it is welcome that the LPR has made provision for strategic growth in other parts of the Plan Area including at the Larger Villages, which Policy SP1 sets out will provide a "supporting role" in meeting development needs. That supporting role is more pronounced in that such settlements not only support their own communities, but also fulfil the role of being a service centre to smaller settlements around them. We also welcome the recognition within the Draft Plan that development within the Larger Villages may help to retain or improve the range of services available within those villages.

3.31 For the reasons identified above, notwithstanding the significant scale of housing development proposed at Grantham, we support the broad distribution of growth insofar as it provides proportionate growth to the District's Larger Villages amounting to approximately 15% of overall housing provision to 2041. Such an approach will allow the District's rural settlements to grow proportionately; to

experience much-needed affordable housing delivery; as well as balance out the spatial strategy by creating a ready supply of deliverable small and medium sized sites that can come forward rapidly to address housing needs as they will be supported by existing services, infrastructure and facilities.

Conclusions on Policy SP1

3.32 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. We also have concerns as to whether the local housing need figure has been calculated from the correct base, 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.

3.33 We consider the strategic distribution of housing growth proposed by the LPR to be heavily-weighted in favour of Grantham which will provide opportunities but also risks of stalled delivery. It is therefore welcome that the LPR makes provision for a stock sites in the District's Larger Villages recognising that such sites are likely to be more deliverable on the ground, are likely to come forward more rapidly to meet housing needs and will help underpin the viability and vitality of the District's rural area. In this respect, we support the strategic apportionment of growth to the Larger Villages and consider that Policy SP1 is sound in this regard.

4. POLICY SP2 – SETTLEMENT HIERARCHY

4.1 We support Policy SP2 as it identifies a robust settlement hierarchy that is justified against the evidence base. We specifically support the identification of a number of Larger Villages which have good levels of services and accessibility and their inclusion within the hierarchy. As to the general soundness of Policy SP2, with a few exceptions, it is largely based on the current settlement hierarchy in the adopted Local Plan which was examined and found to be sound relatively recently in 2020. Nonetheless, the LPR has appropriately been informed by the Settlement Hierarchy Review dated February 2024.

4.2 The Settlement Hierarchy Review is generally robust and competent. It ranks the performance of all villages according to the presence or absence of fundamentally important services and facilities with a weighted score for those services and facilities that are most important for day-to-day living. In specific regard to Ancaster, we support the identification of this settlement as a Larger Village and generally as a location for proportionate housing growth. This status is clearly substantiated by the evidence base, which ranks the settlement as the second most sustainable village in the District.

5. POLICY H1 – HOUSING ALLOCATIONS

5.1 Policy H1 proposes a series of housing allocations to deliver LPR's spatial strategy. As set out above, Policy H1 identifies Persimmon's land interest at Land off St Martins Way, Ancaster as a proposed allocation for approximately 65 dwellings. Given that the Site is available, deliverable and viable for residential development, this decision is welcome and Persimmon supports the general thrust of Policy H1.

5.2 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

5.3 We welcome the Site's generally positive assessment within the draft Site Assessment Report.

Site Delivery:

5.4 The Site Deliverability Timetable is accurately stated as short-term (0-5 years), which is clearly appropriate given its modest size and the fact that it is in the control of Persimmon Homes, a major national housebuilder.

Wastewater Recycling Centre Capacity:

5.5 The Environment Agency has commented that the Site lies within the catchment of the Ancaster Water Recycling Centre (WRC) and that growth at the Site and in the village generally may cause capacity issues. We would note that from the comments on other emerging allocations, this is not an issue unique to the Site or to Ancaster and that any appropriate upgrades to the WRC are the responsibility of the sewage undertaker. It is also unclear at this point whether WRC will experience capacity issues given that the Infrastructure Delivery Plan (IDP) is still under production and will not be available for comment until Regulation 19 stage. Accordingly, there is no evidence to suggest that this will affect the Site's ability to come forward.

Ecology:

5.6 In respect of ecology matters, the input into the Draft Site Assessment Report is generic and seems to address a number of different sites rather than the subject Site. It is observed within the Report that the sites (presumably those

allocations are proposed at Ancaster) are in close proximity to a number of Sites of Special Scientific Interest (SSSIs).

5.7 In fact, whilst there are four SSSIs within 2km of the Site, only two of these are identified by Natural England as having any potential to be affected by residential development (the Moor Close Cemetery and the Moor Closes Reserve SSSIs). These are identified by Lincolnshire Wildlife Trust as comprising old pasture fields which are mostly low-lying and wet, with a rich, wet meadow and marsh flora.

5.8 The Wildlife Trust identifies that the SSSIs have a waymarked route which visitors are required to keep to so this area is clearly subject to existing management arrangements to deal with visitor pressure. It is unlikely that the proportionate development planned at the Site or in Ancaster generally would result in an adverse impact upon the SSSIs and it is noted that Natural England nor any other technical consultee has commented otherwise.

Access and Highways:

5.9 We note that the Site has appropriately been assessed by the Local Highway Authority as only having a minor impact on the surrounding road network and that safe and suitable access for all users can be achieved.

Mineral & Waste Policy:

5.10 The Site has been assessed as “Red” in respect of the above on the basis that it lies within a Limestone Mineral Safeguarding Area. This is not an unusual issue in the Plan Area and can be adequately addressed at the planning application stage. However, even if the Site did host a viable mineral resource, its size and proximity to existing residential development would likely make any extraction operation unfeasible.

Other Constraints:

5.11 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 generally the Site performs well in respect of its proximity to key services and facilities that are available in Ancaster, clearly demonstrating the Site’s sustainability credentials.

5.12 Akin to the SSSI issue discussed above, the Site is rated as “Red” given its proximity to three Local Wildlife Sties (LWS), namely High Dike, Wilsford Lane and Moor Closes (South). However, this is misleading given that notwithstanding

the proximity, there would be no material impact upon these designations from residential development. The closest LWS (High Dike) is not accessible on foot, Willsford Lane has a dedicated hardstanding footpath to accommodate visitor traffic, and the Moor Closes LWS is in private ownership with only a public right of way and thus has limited access.

Sustainability Appraisal

5.13 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:

5.14 The Ancaster broad area assessment considers the principal constraints and sustainability themes associated with each broad area for growth. Area Anc1, which broadly lies to the north of the village, is clearly the least constrained at a strategic level, with the key sustainability themes identified as biodiversity; landscape; soils; and water.

5.15 In relation to biodiversity, it must be said that in relation to impact to off-site ecological designations, there is no convincing evidence that such impacts will occur for the reasons discussed above in relation to the Draft Site Assessments.

5.16 In relation to landscape, Anc1 is identified as lying within the Southern Lincolnshire Edge Landscape Character Area based upon the most recent Landscape Character Assessment (LCA) dating from 2007. That character area is generally adjudged as having a medium-high sensitivity to residential development, but the same applies to all other broad locations around Ancaster. The LCA is also so broad in scope and given the lack of any finer-grained assessment, its conclusions alone cannot be relied upon for specific sites or even specific broad locations in certain settlements.

5.17 In relation to soils, the assessment in this regard is informed by the Regional Agricultural Land Classification Maps published by Natural England. This is a particularly broad tool and as acknowledged by the SA itself, does not distinguish between Grade 3a (which is Best and Most Versatile) and Grade 3b, which is not. That said, the immediate periphery of Ancaster is characterised by Grade 3 agricultural save for a swathe of Grade 2 land to the north west within Anc1, but this does not adjoin the settlement. It is not considered that the areas

immediately adjoining Ancaster at Anc1 would be anymore constrained in this regard than other broad areas around the village.

5.18 In relation to Anc1, there is a small area of Flood Zone 3 which does not overlap with any of the proposed site allocations. The SA also identifies that Anc1 is within Groundwater Source Protection Zone 3, a designation shared with all other broad areas at the village and a matter that can be dealt with at the planning application stage via the suitable technical studies and, where necessary, planning conditions.

Site Assessment: SPKR-283

5.19 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-283.

5.20 In respect of biodiversity and geodiversity, there are two "Red" ratings given based on proximity to off-site ecological designations, namely the Moor Closes SSSI and the High Dike LWS. However, proximity is a poor predictor of actual impact and we have already described above how development of Site SPKR-283, both by itself and cumulatively with other development at Ancaster, is unlikely to have an adverse impact on any off-site ecological designations. The SA's treatment of this matter should therefore be revisited.

5.21 Given the distance of SPKR-283 to designated heritage assets, only one "Red" rating has been recorded in respect of the Site's distance to a Scheduled Ancient Monument (SAM), namely the Roman Marching Camp to the west of the village, which is stated by the SA as being 214m away. Once again, a "Red" rating in relation to a constraint which the Site has no physical, visual, functional or other relationship with, which is some distance away and which it is separated from by established built and natural features, is not robust and we would request that this aspect of the assessment is reviewed.

5.22 In relation to land, soil and water resources, the Site has been rated "Red" for an overlap with Grades 2 and 3 agricultural land and a limestone mineral safeguarding area. Firstly, it does not appear on the basis of the map produced by AECOM as part of the broad area assessments that there is any overlap with Grade 2 agricultural land whatsoever whereas the detailed site assessment records a 15% overlap. We would therefore request that this element of the assessment is reviewed for accuracy.

5.23 A “Red” rating has also been given in relation to most of the Site being located Grade 3 agricultural land but as set out above, only Grade 3a is considered Best and Most Versatile and the Natural England maps do not enable a distinction to be made between Grade 3a and 3b. This uncertainty should be reflected in the site assessment. As set out above in relation to mineral safeguarding, this is not a constraint at a site level because even if it did host a viable mineral resource, the Site is too close to existing development to support a feasible extraction operation.

5.24 In respect of the community well-being and transportation categories, the distance of the Site to key services and facilities has been assessed with three “Red” ratings having been given in relation to proximity to employment, secondary school and a town centre. Whilst the distances involved may be correct, these judgements have to be contextualised in respect of the overall settlement hierarchy and spatial strategy, which is to direct a level of housing growth to Larger Villages such as Ancaster, which the Settlement Hierarchy Review notes is the second most sustainable Larger Village in the District. Accordingly, it is not realistic to expect that the Site will be in close proximity to those services and facilities such as town centres or secondary schools which characterise much higher order settlements.

Conclusions on Policy H1

5.25 Overall, we consider that the draft allocations selected have been subject to a reasonable and proportionate assessment and that, in particular, the proposed allocation of Site SPKR-283 is justified by the evidence. That said, there are a number of factors recorded as constraints or as potential negative effects associated with developing the Site which would not, in fact, occur. Accordingly, we consider that the next round of consultation should be supported by a more open-textured, less formulaic assessment of Sites against the SA Objectives which considers actual effects and impacts rather than simple distance.

6. CONCLUSION

6.1 Persimmon is promoting Land at St Martins Way, Ancaster (SPKR-283) for residential development compromising approximately 65 dwellings. A Vision Document and a Site Delivery Statement (appended to these representations) demonstrate how a high quality development can come forward quickly, which meets the detailed criteria of Policy SKPR-283 and would not result in any materially harmful impacts.

6.2 Whilst Persimmon is broadly supportive of the overall thrust of the LPR, there are a number of matters that should be addressed prior to the next stage of consultation. The most pressing of these is the LPR's housing requirement, which has been calculated on the basis of the Standard Method with little consideration as to whether uplifts are required to address affordable housing delivery or economic growth.

6.3 The spatial strategy in relation to the LPR's broad distribution of housing is sound. The apportionment of housing growth to the Larger Villages will ensure balanced growth across the District; will enhance the deliverability of the LPR; and underpin the viability and vitality of rural areas by securing the delivery of affordable housing and encouraging the influx of new residents.

6.4 In respect of the evidence which has underpinned selection of the preferred sites, there are no significant flaws in terms of the process of how this has been undertaken, but we take issue with some of the conclusions made in respect of the effects of developing SKPR-283 for housing, which are in a number of ways unsupported by evidence and we would encourage the local planning authority to supplement and revise its assessment where noted above.

6.5 We trust that the above comments and the enclosed documents will be of assistance to the local planning authority in the preparation of the LPR.