

27th August 2025

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

Dear Sir/Madam,

Re: South Kesteven Local Plan Regulation 18 – Proposed Housing and Mixed-Use Allocations Consultation

Introduction

These representations to South Kesteven's Draft Local Plan Regulation 18 (DLP) consultation have been prepared by Rosconn Group (RG).

Rosconn is a land promotion company acting for the landowners of land to the east of Linchfield Road, Market Deeping ('The Site'), identified as **Site: SKPR-330** in Council documentation. RG have an agreement with the landowners to promote the Site for residential development by seeking its allocation within the emerging South Kesteven Local Plan.

These representations are therefore primarily focused on the strategic matters relevant to meeting the future housing needs of the District, as well as those matters specific to the Site, which has been identified as draft allocation within the DLP for approximately 840 dwellings. These representations are also supported by the accompanying Vision Document, Concept Plan and technical reports (Sustainable Transport Strategy Note, Archaeology and Heritage Statement and Flood Risk and Drainage Note).

Meeting Identified Need

Clearly the changes as a result of the new NPPF being published in December 2024, just after the first Regulation 18 was consulted on, has required the Council to review the implications for its emerging Plan. The principal change has been in relation to the Standard Method, the Government's method for determining housing need. For South Kesteven, the requirement increased to 886 dwellings per annum, 185 higher than the figure used for the previous Regulation 18 Draft Plan. In general terms, this means the Council are intending to allocate additional land to accommodate a further 3,700 dwellings in order to ensure compliance with the NPPF.

Instead of preparing a completely new Regulation 18 Draft Plan, the Council have taken the sensible decision to publish a discreet consultation document that focusses solely on



addressing the principal change in circumstances in respect of housing and mixed use allocations, rather than duplicating content that has already been subject to consultation in 2024. RG considers this approach is appropriate, ensuring that the emerging Local Plan responds effectively to the revised housing targets and is in compliance with the NPPF. As such, RG fully **supports** this approach.

Spatial Strategy (Policies SP1 and SP2)

RG are aware that this current consultation is focused solely on housing and mixed use allocations, but as RG were not involved in the promotion of the Site previously, it is considered relevant to comment on the overarching Spatial Strategy of the DLP, as this helps provide context to the decisions the Council have now made in respect of meeting the Government's revised Standard Method for housing need.

Policies SP1 and SP2 of the 2024 Regulation 18 Draft Local Plan set the spatial strategy for the distribution of new development with the principal objective of directing such growth to the most sustainable locations. The Settlement Hierarchy, informed by up to date evidence, identifies the most sustainable settlements within the District where the majority of growth is proposed to be directed, these being Grantham, Stamford, Bourne and The Deepings. It is notable that Policies SP1 and SP2 of the Draft Plan are virtually identical to the equivalent policies within the adopted Local Plan, a plan which was subject to scrutiny and found sound by an independent Planning Inspector in January 2020. Clearly some updates to these policies are necessary to reflect the current circumstances, such as the different plan period and overall housing requirement, and no doubt Policy SP1 will be revised at Regulation 19 Stage.

The effective continuation of the adopted Local Plan Spatial Strategy within the DLP also has a similar result in how the quantum of growth has been distributed through the Settlement Hierarchy, as can be seen by comparing Tables 6 and 7 in the DLP with their equivalent within the adopted Local Plan. This shows that the majority (i.e. over 75%) of the overall housing growth will continue to be directed to the 4 Main Towns, being the most sustainable locations in the District. Inevitably, there are slight variations in the percentage of growth directed to each individual settlement as decisions have been made on the basis of up to date evidence. This evidence has informed as site selection taking account of factors such as the availability of land, physical constraints, scope for mitigation and other wider objectives.

Key evidence base documents that support the DLP consultation are the Sustainability Appraisal Addendum (SA) which is focused on the key changes made to the proposed housing and mixed use allocations, the Draft Site Assessment Report (SAR) which explains how the 'preferred sites' have been selected, and the Habitats Regulations Assessment (HRA) which deals with the legislative requirement to assess whether the DLP will have any adverse effects on Habitats sites.

RG consider that the Council's approach to the DLP and the supporting evidence which accompanies it provide a robust framework towards helping demonstrate a legally compliant and sound Local Plan at Examination. RG therefore **fully supports** the overarching Spatial Strategy as proposed within Policies SP1 and SP2 as set out within the Regulation 18 Draft Plan published in 2024.

Proposal SKPR-303 – Land east of Linchfield Road, Market Deeping

RG are clearly in full **support** of the proposed allocation of **Proposal SKPR-330**, but we have sought to review the Council's evidence base and provide further evidence where relevant to help demonstrate the suitability and sustainability of the Site. We have also undertaken a detailed assessment of the Site, its surroundings and the local planning policy context in both



adopted and emerging development plans to prepare an initial Concept Masterplan that provides a high-level vision of how the development could look. This is supported by a Vision Document to help explain the approach that has been adopted, but it should be acknowledged that RG fully intend to work with the Council, the local community and key stakeholders moving forward to further develop the Concept Masterplan to ensure this achieves a high quality development that will integrate successfully with the town, and maximise the benefits for both existing and future residents.

Sustainability Appraisal Addendum

As highlighted above, the DLP is supported by evidence that has informed site selection, aligned to the proposed spatial strategy. We have reviewed these in the context of Proposal SKPR-330 and where necessary, provided additional information. The first of these is the SA and we have reviewed the Site's assessment under the nine SA themes as follows:

- **Biodiversity and Geodiversity** – the SA confirms that the Site is not located within 5km of any European designated site, nor within 2km of any nationally designated SSSI. Furthermore there are no local biodiversity or geodiversity sites that overlap with or in close proximity to the Site. An Ecological Survey has been undertaken within the Site which confirms it is of low importance but there is good opportunity for enhancing on-site biodiversity in line with BNG requirements.
- **Landscape** – the SA confirms the Site is not affected by any national or local landscape designations. The Council's Landscape Character Assessment (LCA) confirms that the Fens Character Area, within which Market Deeping is located, has a **Low-Medium** sensitivity to residential development, the lowest category within the District. The LCA also confirms that new development at the edge of Market Deeping would also be **Low to Medium** sensitivity, with the town having no distinctive form due to a lack of notable landscape features around it. Proposal SKPR-330 includes a requirement to provide a comprehensive masterplan, a design code, landscape screening to the eastern edge of the development and to preserve/enhance the Green Walk in accordance with the Deepings Neighbourhood Plan (DNP). All of these policy requirements will help mitigate landscape impact and deliver positive benefits, and are issues we have sought to address within the enclosed Concept Master Plan.
- **Historic Environment** – the SA confirms the Site does not contain any above ground heritage assets and our enclosed Archaeology and Heritage Statement has determined there are no heritage assets nearby and as such, no issues regarding setting, the closest being a scheduled monument over 500m from the Site. There is however archaeological potential based on nearby evidence, and as such, Proposal SKPR-330 includes a requirement to undertake pre-commencement investigations – RG will progress this in liaison with the County Archaeologist.
- **Air, Land, Soil and Water Resources** – the SA confirms there are no Air Quality issues affecting the Site. It is however one of 12 proposed allocations that overlap with mineral safeguarding areas (MSA), albeit the SA acknowledges that large areas of the District are covered by MSA so the allocations are unlikely to have a significant impact on the integrity of mineral resources. Notwithstanding, Proposal SKPR-330 includes a requirement to undertake a Minerals Assessment. RG have commissioned such an assessment which concludes that there is no overriding need for pre-extraction due to the current landbank, such extraction is unlikely to be acceptable in environmental terms and would not be viable in any case. Discussions will be progressed with the Minerals Authority in order to ensure the evidence is acceptable. In terms of agricultural land quality, it is acknowledged that many of the allocations are located wholly or partially within the Best and Most Versatile category. The Site is likely to include some Grade 2 and/or Grade 3a, but not Grade 1 land.



Notwithstanding, it is accepted that the proposals would lead to the loss of some BMV - this clearly needs to be considered in the context of all other issues when selecting the most suitable sites that align with the spatial strategy. In this regard, it is notable that the town is surrounded by Grade 2 and Grade 3 land, so the Site's use of a high proportion of lower quality Grade 3 land is preferable to other potential sites wholly within Grade 2. Finally, there appear to be no issues in terms of water resources in relation to the Site, albeit it is noted that the Water Cycle Study is yet to be published.

- **Climate Change** – the SA acknowledges that the delivery of 19,672 dwellings in the Plan period will have an impact on GHG emissions, but the proposed spatial strategy seeks to limit this through directing growth to the most sustainable locations, including the Market Towns in particular. The enclosed Sustainable Transport Strategy Note provides a detailed assessment of the locational sustainability credentials of the Site. Policies to secure energy efficient design, renewable energy and encouragement of sustainable travel will also contribute to mitigating impacts. Proposals for the Site, located at one of the most sustainable developments in the District, will secure high levels of energy efficiency and use of renewable energy in accordance with policy requirements.
- **Population and Community** – the SA confirms that proposed allocations in the 4 Main Towns that will provide affordable housing and are close to a range of services and facilities, such as the Site, will deliver positive effects.
- **Health and Wellbeing** – as above, the SA confirms that proposed allocations in the 4 Main Towns close to services and amenities, are beneficial as people are likely to make more healthier journeys. They are also accessible to existing open green space, helping improve mental and physical health. The Concept Masterplan indicates significant areas of public open space within the Site and pedestrian/cycle linkages to help encourage healthier travel choices. Again, positive effects are likely as a result of allocating the Site for residential development.
- **Transport** – similarly, the SA finds that locating 11 of the 21 sites at one of the 4 Main Towns will contribute most towards the delivery of sustainable patterns of development, with residents having easier access to more sustainable forms of travel, as well as having access to a wider range of services, facilities and employment opportunities on foot. The Site is one of these 11 sites and is therefore considered to be a highly sustainable location for residential development, as demonstrated by the enclosed Sustainable Transport Strategy Note, the Concept Masterplan and accompanying Vision Document.
- **Economic Vitality** – whilst a wholly residential allocation, the Site will have significant positive economic impacts, including during construction, the provision of new housing enabling local employers to access local labour and the expenditure of new residents helping to support the vitality and viability of the town centre and local businesses.

Site Assessment Report

Whilst the assessment of the Site within the SAR largely covers many of the issues covered by the SA as detailed above, it is firstly noted that overall, the Site performs positively against the majority of the 'Major' and 'Other' Constraints. There are however a number of specific areas where we would like to provide further commentary, as follows:

Major Constraints:

- **Site Delivery Timetable** – an 'Amber' score is given on the basis that the Site will be delivered in the Medium Term (5-10) years. Whilst the allocation envisages the delivery of 840 dwellings which is likely to take in excess of 5 years to deliver in full, it is expected that housing will start delivering within the first 5 years of the Plan's adoption. The SAR



confirms that a 'Green' score is given to sites that are able to deliver housing within the first 5 years to help maintain a 5 year housing land supply. The Site can assist in this regard and the SAR should therefore be revised to a '**Green**' score.

- **Surface Water Flood Risk** – a 'Red' score has been given on the basis that the Site contains some areas of SW flood risk. Whilst a SFRA is still in preparation and will provide further evidence, only small areas of the Site are affected by this constraint and the Concept Masterplan demonstrates that built form can avoid these areas without limiting the estimated capacity of the Site. Whilst the site lies within Flood Zone 1 and therefore at least risk of fluvial flood risk, the issue of SW flood risk is covered within the enclosed Flood Risk and Drainage Note and the Vision Document and will be investigated further as part of the SUDS strategy for the Site to ensure neither existing or future residents are at risk of flooding for the lifetime of the development.
- **Proximity to Designated Sites** – as above, the SA confirmed that the Site is not located within proximity to any European designated nature conservation sites, but a 'Red' score has been given due to the Site being within 5km of a SSSI. Whilst it is unlikely that development of the Site will directly impact these assets due to their distance and intervening uses, further detailed investigations are taking place to confirm this and if necessary, suitable mitigation will be identified.
- **Does the site have suitable access** – an 'Amber' score has been given on the basis that the SAR considers that only part of the Site has a suitable access to the local road/highway network. The Site has an extensive road frontage to both Linchfield Road and Towngate East and whilst there may only currently be agricultural access to the land, it is capable of delivering safe access to the Site. The enclosed Sustainable Transport Strategy Note includes detailed designs for 2 new vehicular access points on to Linchfield Road, designed by our Highway Consultant to meet relevant highway standards. We therefore consider that the SAR score should be revised to '**Green**' in this instance.
- **Site Affected by Minerals and Waste Policy** – as above, a Minerals Assessment has been completed and evidences why this is not a constraint to development.

Other Constraints:

- **Overlap with Agricultural Grade 2** – as above, whilst the Site is likely to contain some Grade 2 agricultural land, with the remainder Grade 3, this does not preclude development on its own and is a factor to be considered alongside all other factors, including the need to achieve wider sustainability objectives, such as directing growth to the most sustainable locations such as Market Deeping.

The SAR concludes on its assessment of SKPT-330 by stating that it "Offers a suitable and sustainable location for housing development within The Deepings", and advises that:

- Highways, footways and cycleways are provided to connect to the wider town – this can be achieved. Please refer to the Concept Masterplan and Vision Document;
- Public right of way to be retained - this can be achieved. Please refer to the Concept Masterplan and Vision Document;
- A Transport Assessment is required – this is presumably a requirement for any future planning application, which will be provided. It is also noted that a Strategic Transport Assessment is in preparation that will assess the proposed allocations and wider cumulative effects.



Habitats Regulations Assessment

The HRA assesses both the policies and allocations proposed by the DLP to identify any implications for European Designated Sites. This effectively concludes that the Local Plan can be screened out or otherwise, an Appropriate Assessment has been undertaken and found that no adverse effects would arise.

Development Principles

In respect of the residential allocations at Market Deeping, RG **support** the draft allocation of **Site ID: SKPR-330 – Land East of Linchfield Road, Market Deeping** for circa 840 dwellings. The enclosed **Vision Document** and initial **Concept Plan** have been prepared and accompany these representations, but a review of the 'Development Principles' set out within the DLP and the key findings of our site-specific evidence base is provided as follows:

Development Principles:

- *A comprehensive masterplan is required for the site* – we have prepared an initial Concept Masterplan for the Site but RG wish to highlight that this Plan will evolve following input from on-going site assessments, as well as engagement with the Council, the local community and other key stakeholders. The initial Concept Masterplan has however been prepared to demonstrate how a comprehensive development of the Site could look, this objective further aided by the fact the land is within a single ownership.
- *To ensure the development achieves good, high quality design, a design code will be prepared for the site* – RG are fully agreeable to developing a Design Code for the Site to help achieve high standards of design, which is likely to be developed alongside the Masterplanning exercise.
- *A Transport Assessment is required* – RG agree that a Transport Assessment will need to accompany any future planning application to ensure the impacts of the development on the highway network are safe and acceptable, and where necessary mitigation is provided.
- *Highway, footway, and cycleway connections should be provided through the site which connect the site into the wider town, and SKPR-37 (DEP1-H2): Linchfield Road* – RG fully agree that it will be necessary to demonstrate how the Site can integrate successfully with the wider town and the adjacent development to the west. The enclosed Sustainable Transport Strategy has helped inform the accompanying Concept Masterplan by identifying opportunities to maximise connectivity for pedestrians and cyclists from the Site to both the adjacent housing allocation and the wide range of services and facilities within the town.
- *A public right of way passes through the site – this should be retained and incorporated into the development of the site where possible* – the Concept Masterplan has identified how the existing PROW can be retained, alongside using this opportunity to create a wider network of pedestrian friendly routes within and adjoining the Site.
- *The development should make contributions towards public transport, education, health and community facilities and open space provision* – RG agree that contributions may be necessary to support the increase in demand for local services and facilities where there is insufficient capacity. This will be determined at the application stage but RG does not consider that such contributions would make the proposals unviable.
- *Heritage Impact Assessment required, and pre-commencement investigations to be carried out due to the potential for archaeological remains on the site* – whilst the enclosed Archaeology and Heritage Statement confirms there will be no impact on above ground assets, pre-commencement investigations in light of the archaeological potential of the general area will be necessary. This can be agreed at the application stage, but RG have



commissioned an initial Geo-Physical survey to help inform discussions with the County Archaeologist.

- *Landscape screening to the eastern edge of the site will be required to reduce the impact of views into the site from the open countryside* – RG’s Concept Masterplan recognises the need to provide a sensitive landscaped edge to the proposed development. It is however notable that there are limited longer distance views of the site due to the flat topography and intervening features, so greatest visibility will be more localized and seen in the context of the existing town.
- *The development should positively preserve and enhance the Deepings Green Walk in accordance with the Deepings Neighbourhood Plan* – the Concept Masterplan and Vision Document demonstrate how this objective has been positively embraced, integrating an off-road greenway around the outer perimeter of the Site through areas of landscaping and water features to add interest. This is considered to align with the DNP objective of linking publicly accessible green space along a route around the town to encourage non-car-based movement away from trafficked routes.
- *This site is situated within a Minerals Safeguarding Area. Before considering a planning application or allocation for this site a Minerals Assessment will be required* - as above, a Minerals Assessment evidences that the integrity of mineral resources will not be compromised by development of the Site.

In summary, RG consider that these submissions help demonstrate how the emerging proposals for the Site can achieve the Council’s requirements to create a sustainable, high quality development which is deliverable within the Plan period.

Conclusion

In summary, the DLP and its supporting evidence base provide a clear strategy to meeting the future housing needs of the District. Key elements of the spatial strategy are an extension of that already independently examined and found sound by the Inspector for the currently adopted Plan. Supported by up to date evidence including an SA, this approach remains the most sustainable option, hence the majority of growth continuing to be focused in the 4 Main Towns, including Market Deeping.

The proposed allocation of RG’s land at Market Deeping fully aligns with the strategy adopted by the emerging Local Plan by delivering growth that can be supported by a wide range of services, facilities and public transport infrastructure, and which can also directly benefit the wider host community and create a more sustainable pattern of development.

Land east of Linchfield Road, Market Deeping is an unconstrained site that is well related to the existing settlement, capable of bringing forward the scale of residential development envisaged by the DLP. Rosconn are committed to working with the Council, the local community and other key stakeholders to ensure the proposals fully align with local objectives and which maximise benefits. Rosconn are also keen to work with the local community to help inform the emerging Concept Plan for the Site, alongside the preparation of a Design Code to help secure high standards of design that reflect the local distinctiveness of the town.

RG consider that the DLP has been well evidenced and provides the basis of a Development Plan capable of being found sound at Examination. RG therefore fully support the overall DLP and the specific allocation of their land at Market Deeping and look forward to working with the Council to help support its adoption in due course.



Yours sincerely,



Encs.

- Vision Document
- Concept Masterplan
- Sustainable Transport Strategy Note
- Archaeology and Heritage Statement
- Flood Risk and Drainage Note