



The Stamford Neighbourhood Plan Regulation 16 Publication Stage Consultation

This consultation seeks your views on the published version of the Stamford Neighbourhood Plan and whether it meets the basic conditions¹. All comments will be sent to an independent examiner who will examine the plan. If the examiner determines that the plan meets the basic conditions, then a referendum shall be held on whether to 'make' the Neighbourhood Plan.

The Neighbourhood Plan can be viewed on our website at;

<http://www.southkesteven.gov.uk/stamfordplan>

If you wish to comment on the Neighbourhood Plan, please complete this form and return it to the Planning Policy team by one of the methods below.

You can return completed forms by either:

- e-mail to planningpolicy@southkesteven.gov.uk or
- post to

Planning Policy and Partnerships Team
South Kesteven District Council
Council Offices
St. Peter's Hill
Grantham NG31 6PZ

Comments on the Neighbourhood Plan must be submitted no later than the 19th of April 2021.

Completing the Form

Please clearly state to which part of the Neighbourhood Plan your response relates, whether you are supporting, objecting or commenting, what your reasons for this are and what changes, if any, to the Neighbourhood Plan you consider necessary.

If you are commenting on more than one part of the Neighbourhood Plan, please use a separate response form for each.

Data Protection

The information on this form will be processed in accordance with the Data Protection Act 2018 and used for the purposes of preparing the Neighbourhood Plan. However, please be aware that copies of responses, including the name and of the author will be made available for public inspection and to third parties and cannot be treated as confidential. Personal information such as telephone numbers, emails or private addresses will not be published. By submitting a response you confirm that you agree to this and accept responsibility for your comments.

¹ <http://planningguidance.planningportal.gov.uk/blog/guidance/neighbourhood-planning/the-basic-conditions-that-a-draft-neighbourhood-plan-or-order-must-meet-if-it-is-to-proceed-to-referendum/>



1) Your Contact Details: (Please Note – an Email address is a mandatory requirement)	
Name:	James Cullingford
Company/Organisation Name (If applicable):	Lambert Smith Hampton on behalf of F.H. Gilman & Co in Administration
Address:	[REDACTED]
Telephone No:	[REDACTED]
Email Address (Mandatory):	[REDACTED]

2) Please indicate to which part (or Policy) of the Neighbourhood Plan your response relates:
Map 1 Stamford Neighbourhood Plan Area
Policy 1: Integration of New Residential Allocations
Policy 2: Additional Residential Development
Policy 3: Housing Type and Mix on New Developments
Policy 4: Enabling Employment Opportunities
Appendix 1: Stamford Character Study
Appendix 2: Criteria for demonstrating Community Support for New development on the Edge of Stamford

3) Please indicate if the response is: please mark with an “x”			
Supporting:	x	Objecting:	x



4) Please indicate your reasons for this. Please be as precise as possible and ensure any relevant evidence and supporting information is included (continue on separate sheet if needed)

Please see attached letter



5) Please set out what changes to the Neighbourhood Plan you consider to be necessary included (continue separate sheet if needed):

Map of Neighbourhood Plan Area

The eastern boundary of Plan Area should be amended to follow the line of Newstead Lane to the east.

Policy 1

Reference to 'Stamford East' should be included in the policy title.
Reference to 'up to two and half storeys' should be removed from criteria i).

Policy 2

Clarity is required regarding sites outside, but adjacent to, the Plan Area boundary.
The wording of criteria 2.1 should be amended to better reflect wording of SKDC Policy SP4

Policy 3

Clarity is required as to whether the policy applies to allocated residential sites.
Additional wording should be added to state 'subject to viability' to allow sufficient flexibility.

Policy 4

Criteria relating to the redevelopment of allocated employment sites for non-employment uses should be included within the Policy.

Appendix 1

Clarity required regarding green links proposed in Stamford Character Study.

Appendix 2

Clarity required regarding how applicant can demonstrate "positive overall support".

Signed: 

Date: 14/04/2021

14th April 2021

Planning Policy Team
South Kesteven District Council
St Peters Hill
Grantham
Lincolnshire
NG31 6PZ

Dear Sir/ Madam,

Stamford Neighbourhood Plan – Regulation 16 Consultation (March 2021)

I write on behalf of our client, F.H. Gilman & Co in Administration, in response to the recently published Stamford Neighbourhood Plan (Regulation 16) Consultation Document ('the Plan').

As the Council is aware, our client owns an extensive area of land (approx. 17ha) to the north of Uffington Road, part of which is allocated for residential (STM1.2) and employment (ST.E1) development in the adopted South Kesteven District Council ('SKDC') Local Plan.

The plan below shows the extent of land within our client's ownership (edged in red) in the context of the SKDC Policies Map. However, it should be noted that approx. 0.8ha of land was recently transferred to Aldi, following the approval of planning permission (Ref: S20/0955) for a new food retail store at the front of the site.

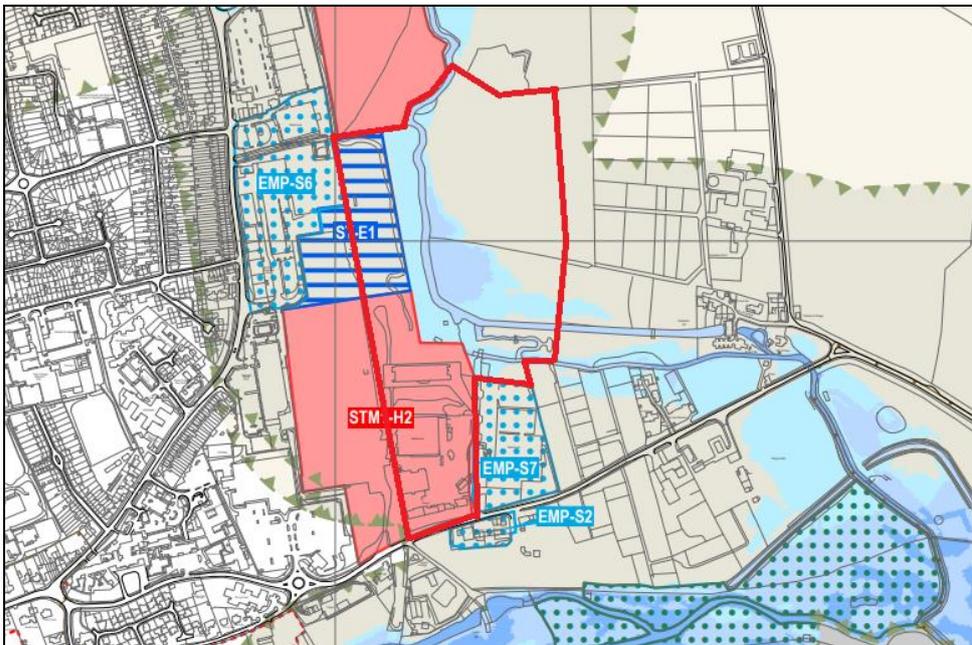


Fig1: Land north of Uffington Road (SKDC Policies Map)

We have examined the consultation document and respond accordingly with regards to our client's interests.

Map 1 Stamford Neighbourhood Plan Area

Page 13 of the Plan contains a map showing the boundary of the Stamford Neighbourhood Plan Area.

The extract of the map below shows that the eastern boundary of the Plan Area (edged in red) does not cover all of the land within our client's ownership (edged in blue).

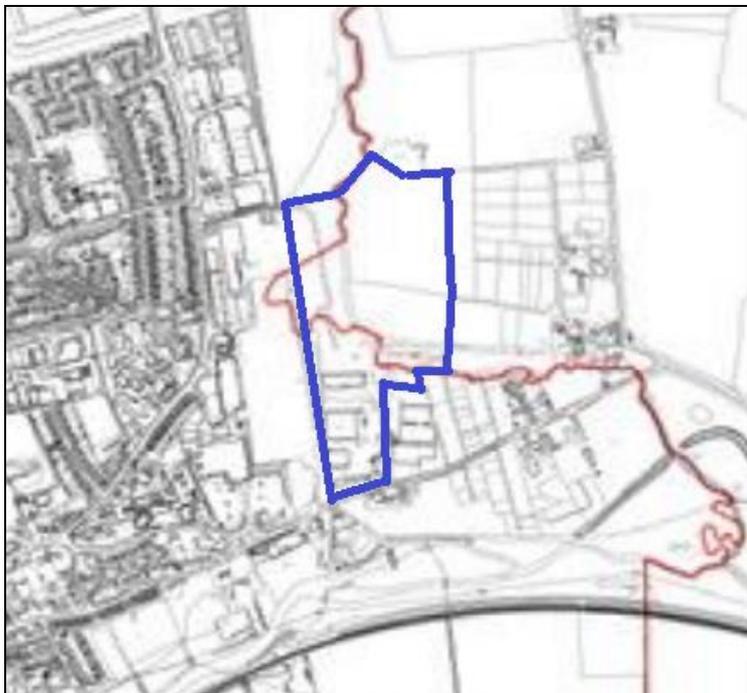


Fig 2. Neighbourhood Plan Area Boundary

In particular, the eastern boundary does not fully encompass the area of land allocated for employment in the SKDC Local Plan (ST.E1), nor does it cover the wider expanse of green field land to the north and east of the River Gwash. In this regard, it is unclear whether land outside of, but adjacent to, the Plan Area boundary would be subject to the policies of the Plan. For example, Policy 2 refers to 'development on the edge of Stamford', but it is unclear whether this applies only to sites within the defined Plan Area. Furthermore, Policy 10/ Map 8 of the Plan identifies the 'locally important landscape views' around Stamford. However, the extract of the map below shows that 'view 3 - north' relates to land to the north of Uffington Road, which falls outside of the defined Plan Area.



Fig 3. Locally Important Landscape Views

Whilst we understand that the boundary of the Plan Area corresponds to the boundaries of Stamford's four Parishes, we would suggest that a more logical eastern boundary would be Newstead Lane to the east. In this regard, we highlight that online Planning Policy Guidance (PPG) suggests that existing infrastructure or physical features can assist in defining a natural boundary to a neighbourhood plan area.

Given the above, we suggest that the eastern boundary of the Plan Area is amended to follow the line of Newstead Lane to the east. This would not only provide clarity in respect of our client's site, but also ensure that the Plan is not ambiguous with regard to development on the edge of Stamford.

Policy 1: Integration of New Residential Allocations

We are generally supportive of the wording of Policy 1, which sets out the development principles for the residential allocations in the SKDC Local Plan.

We note that whilst the policy wording refers to both residential allocations (STM1-H1 and STM1-H2), the policy title only refers to 'Stamford North'. For clarity, we suggest that the title of Policy 1 refers to both 'Stamford North' and 'Stamford East'.

As a general point, we suggest that the policy wording is not too prescriptive and allows sufficient flexibility to allow development proposals to respond to site specific constraints and characteristics. In this regard, we request that reference to buildings of '*up to two and half storeys*' at criteria i) is removed as it is considered to be too prescriptive.

Policy 2: Additional Residential Development

We are generally supportive of Policy 2 which acknowledges the pressure for releasing additional sites for residential development in and around Stamford. However, we reiterate that clarity is required as to whether Policy 2 is applicable to land adjacent to, but outside of, the Plan Area boundary.

Policy 2 deals with proposals for development on the edge of Stamford and sets out the criteria where this will be supported. In this regard, criteria 2.a states that proposals for development on the edge of Stamford must demonstrate '*support from the community **and** Stamford Town Council through the criteria identified in Appendix 2*'.

We acknowledge that criteria 2.a is broadly in accordance with Policy SP4 of the SKDC Local Plan, which states that proposals for development on the edge of Stamford must demonstrate '*clear evidence of substantial support from the local community*'. However, Policy SP4 goes on to state that '*where local community support cannot be determined, support (or otherwise) should be sought from the Town or Parish Council or Neighbourhood Plan Group or Forum, based upon material planning considerations*'.

In line with SKDC Policy SP4, we request that the word '*and*' is removed from of Criteria 2.a of Policy 2 and that additional wording is added to better reflect Policy SP4.

Policy 3: Housing Type and Mix on New Developments

The supporting text at paragraph 8.24 implies that Policy 3 is not relevant to the residential allocations at Stamford North and Stamford East. However, this is not made clear in the wording of Policy 3. As such, we request that the supporting text or wording of the Policy is amended to provide greater clarity in this regard.

We note that Policy 3 states that '*a minimum of 30% of affordable housing will be required*' on proposals for 11 or more dwellings. We consider that this wording does not allow sufficient flexibility and suggest that additional text is added stating that the 30% figure would be subject to a viability assessment in order to provide more certainty in terms of delivering housing, particularly on brownfield sites.

Policy 4: Enabling Employment Opportunities

The supporting text at paragraph 9.16 states that '*Policy 4 sets out the criteria by which protected employment sites may be considered for redevelopment for non-employment creating uses. It takes account of locational and viability issues, which are regarded as being the key issues that can affect the attractiveness of an employment site to the market.*

We highlight that the above supporting text is not reflected in the wording of Policy 4, which only refers to enabling employment opportunities outside of the identified employment sites.

With regard to our client's land, it is considered that the current employment allocation (ST.E1) is not an appropriate location for employment development, particularly given the residential allocations to the north and south and the high abnormal costs associated with the site. As such, it is considered highly unlikely that the site will come forward for employment uses. It is, therefore, important that the Plan provides clear guidance on the criteria for the redevelopment of protected employment sites for non-employment uses to allow sufficient flexibility within the Plan to respond to market signals.

We request that the criteria for the redevelopment of protected employment sites for non-employment uses is added to the wording of Policy 4, and that a further opportunity is provided for comments.

Appendix 1: Stamford Character Study

The Draft Stamford Character Study (April 2019) at appendix 1 includes an aspiration for two 'Green Links' which run through our client's site and connect into existing green ways and other pedestrian routes and the surrounding countryside.

The extract plan from the Draft Character Study below shows the proposed location of the green links running through our client's land.



Fig 4. Extract of the Draft Stamford Character Study

The study shows that the western green link would follow the alignment of the former railway line on the western boundary of our client's site and lead north through the Stamford North allocation to the village of Belmesthorpe. The other green link would run east-west through the site and along the River Gwash connecting up with existing pedestrian routes.

Despite the identification of the green links within the Draft Character Study, there is no reference to them within any of the policies of the Plan.

Given the significant implications of the green links could have on the overall development area of our client's site, we consider that further clarity should be provided within the Neighbourhood Plan on this matter.

Appendix 2: Criteria for demonstrating Community Support for New development on the Edge of Stamford

Appendix 2 sets out the criteria for demonstrating community support for new development on the edge of Stamford in relation to Policy 2 and states that applicants must demonstrate ‘*positive overall support*’ from the local community.

As noted above (in relation to Policy 2), we consider that the wording of the criteria is amended to better reflect SKDC Policy SP4 which advises that, where local community support cannot be determined, support should be sought from the Town Council, based upon material planning considerations.

Whilst we agree that thorough and proportionate community consultation should be undertaken prior to the submission of proposals for new development on the edge of Stamford, it is highly unlikely that such development, on existing green field land, would generate ‘*positive overall support*’ from the local community. Moreover, we consider that the requirement for ‘positive overall support’ is subjective and lacks clarity.

Paragraph 8.8 of the Plan notes that previous public consultation in relation to the Neighbourhood Plan has highlighted residents’ concerns about the level of growth proposed in Stamford. We are, therefore, concerned that simply stating that proposals must demonstrate positive overall support from the local community could stymie proposals for sustainable development and cause SKDC to under deliver in respect of the housing delivery test. In this regard, if SKDC deliver under 75% of their housing delivery target over a three year period, they would be subject to the ‘*presumption in favour of sustainable development*’, which would render all local planning policies for housing out of date and would leave the Council vulnerable to more speculative applications on the edge of Stamford. As such, it is important that there is clear leadership and direction from the Town Council within the Plan towards appropriate sustainable development on the edge of Stamford, particularly in cases where support from the local community cannot be determined.

Given the above, we request that further detail is added to the criteria set out in Appendix 2 that clarifies the meaning of ‘positive overall support’. We also suggest that additional wording is added which makes clear that the Town Council will take a positive approach to sustainable development proposals on the edge of Stamford, particularly where it will meet identified needs of the local population.

Summary

Having reviewed the Consultation Document we are generally supportive of the objectives and policies of the Plan. However, we respectfully request that the following changes are made:

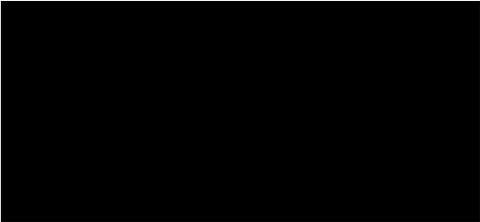
Policy/ Text	Suggested changes
Map of Neighbourhood Plan Area	- The eastern boundary of Plan Area should be amended to follow the line of Newstead Lane to the east.
Policy 1	- Reference to ‘Stamford East’ should be included in the policy title. - Reference to ‘up to two and half storeys’ should be removed from criteria i).
Policy 2	- Clarity is required regarding sites outside, but adjacent to, the Plan Area boundary. - The wording of criteria 2.1 should be amended to better reflect wording of SKDC Policy SP4
Policy 3	- Clarity is required as to whether the policy applies to allocated residential sites. - Additional wording should be added to state ‘subject to viability’ to allow sufficient flexibility.
Policy 4	- Criteria relating to the redevelopment of allocated employment sites for non-employment uses should be included within the Policy.
Appendix 1	- Clarity required regarding green links proposed in Stamford Character Study.
Appendix 2	- Clarity required regarding how applicant can demonstrate

	"positive overall support".
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I trust you will consider these comments in taking the Neighbourhood Plan forward.

Should you require any further information, please don't hesitate to get in touch.

Yours faithfully



James Cullingford
Associate Director

