For and on behalf of
Stamford Property Co Ltd

South Kesteven Site Allocations and Policies DPD
Examination in Public

Supplementary Submissions
Thursday 8th November

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Agenda

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General Issues

Core Strategy housing requirements for Stamford

• Progress in complying with Core Strategy housing trajectory for Stamford
  o SAPMM010 updates current position.
  o Is this in line with Core Strategy trajectory?
  o Up-dating of requirements
  o **Does the Council’s position reflect actual needs?**
  o Is the Council’s approach sufficiently flexible?
  o Does the Plan make provision for an additional 5/20% allocation in Stamford in-line with the National Planning Policy Framework?

• Site Selection Process
  o Principles behind choice of sites

• Stamford Traffic Model
  o Should the Plan show the results of the Stamford Traffic Model?

• Impact of constraints in the sewerage network
  o Have any issues with infrastructure to serve development in
  o Stamford been overcome? 196
  o Are the changes to paragraph 3.1.14 (SAPMM012) sufficient
  o to address concerns about drainage matters?

• Landscape Sensitivity and Capacity Study
  o Is it necessary for the text to refer to the Landscape Sensitivity and Capacity Study?

Policy Sites

• STM1a
  o Should the site be increased in size by including adjacent land?
  o Would the allocation lead to unacceptable traffic issues?

• STM1d – Stamford Football Club
  o Is the allocation realistic given the need to re-locate the football club?

• STM2a
  o Would the allocation for employment use lead to
  o unacceptable traffic congestion? 32
The Core Strategy

The CS sets out its strategy at Objective 2 – to ensure that each town fulfils its role as defined in the Regional Spatial Strategy 2009. RD1 paragraph 2.4.6 defines Stamford and Bourne as third tier settlements providing a range of higher order district-wide services and facilities – and so distinguishes them from The Deepings.

NPPF paragraph 47 requires Authorities to boost significantly the supply of housing, and to meet the full, objectively assessed needs for market and affordable housing.

SK12 Table 10 indicates completions in Stamford – in the range between 46-101 and averaging 76 over the longer term. This average has been maintained post recession, the decline in production in the past monitoring year – SK12 page 19 refers - not a sign of a downward trend for the reasons set out following. SK12 also states that:

The number of completions overall has continued to show the fall demonstrated in recent AMRs compared to the high levels experienced in the preceding years: this is in line with the national slow down in the housing market.

This is demonstrably not the case in Stamford.

SK24 indicates 189 dwellings under construction or with permission in Stamford (all sites) – little more than 2 years supply at the present average. Indeed the fact that there were 84 dwellings under construction suggests that completions in the current year will approach the historic peak rate, notwithstanding the constrained supply of sites.

SK12 Table 9 anticipates 90 completions in the current year falling to 70 or thereabouts and further to 40 post 2017. This is very significantly below what would be needed to boost significantly the supply of housing, and to meet the full market need for housing in Stamford. It can only be seen as highly constraining of supply. This may have, overall a knock on effect on the ability of the district to achieve and maintain a five year supply.

Five year supply

There is a persistent shortfall in land supply. SK15 admits a figure of 4.0 years assuming that all commitments deliver completions including brownfield SHLAA sites without consent. They may or may not make a contribution. SK15 also reflects the substantial reliance on small sites. Apart from the argument that a plan led planning system should principally deliver planned growth rather than rely on supply of essentially windfalls, there is no guarantee that all extant consents will be implemented. 4.0 years is inevitably an optimistic figure.

The figure in SK11 was 4.8 years. That relied on potentially deliverable sites without permission – amounting to almost exactly an extra year’s supply.

Prior to that the AMRs reflected the full contents of the original SHLAA or were based on the previous Structure Plan figure. SK6 noted that completions better equated with ONS projections of housing need than the then Structure Plan annual requirements, the former being some 25% higher than the latter – paragraph 3.16-3.17 refer. In relation to current strategic requirements the shortfall in supply is persistent – ND3 paragraph 47.2 should prevail.
It would appear that in the part of the district that is capable of sustaining the delivery of housing land, the Plan intends to pursue constraint in two forms: a limitation on the overall numbers and a lack of flexibility.

The level of growth proposed for Stamford is greater than The Deepings but less than half that ascribed to Bourne which is acknowledged to be the hierarchical equivalent albeit it does not benefit from, for example, a rail connection and further education college. The delivery of homes at Bourne arises from a long term commitment to planned urban expansion commensurate with the role of the town and providing a long term resource of land which will be brought forward to reflect levels of market demand.

SK1 allows for 160 dwellings on 4 sites plus 400 at Empingham Rd. Site STM1b is allocated for 30 but will not yield more than 23 (figure agreed through pre-application consultation with SKDC 12/10/12). Other sites may be subject to similar considerations. The yield may not equal the expectation, thereby further exacerbating a constraint on the housing market. None of the sites can be considered to provide an enduring resource capable of sustaining housing demand especially in the latter part of the plan period.

Whilst considering the CS, the Inspector chose not to remedy imbalance by a specific strategic allocation at Stamford she certainly did not preclude significant scales of development. Indeed she required SKDC to strengthen their commitments to ensuring that the spatial strategy (derived from RSS8) could be delivered – SK15 paragraphs 3.8-3.9 refers. The framework provided by the CS does not preclude enabling Stamford to deliver the homes needed, and provide the flexibility to allow overall housing objectives for the district to be secured.

SK15 paragraph 3.13 presents the critical conclusion: that the spatial distribution of development needs to be capable of accommodating changes in overall targets and adaptable to circumstances such as a shortfall in delivery in a particular sub-area without undermining the spatial objectives. However, the premise of the CS was expressed at SK15 3.38 to the effect that there was no reason to believe that the given target would fail to consolidate the role of Stamford in line with the RSS and would allow past development rates to be broadly maintained - which Policy H1 expected would meet need and support the provision of additional community infrastructure.

Demonstrably, as shown by SK12 Table 9, that is not the case on any count and merits review even at this relatively short interval.

Moreover, the allocations at Stamford are not adaptable, rather they are finite. They do not support the CS objectives for the continuing role of Stamford, they do not provide a flexible resource of housing land and patently, they do not meet demand or contribute to boosting the overall supply.

**Conclusion**

We do not consider that the proposed allocations at Stamford will be effective.
They will individually and cumulatively not:

- ensure that there is a sufficient, continuing, supply of housing land in the town
- provide a flexible resource of land that could if needed address an under provision of supply elsewhere in the District
- recognise the capacity of the town to accommodate growth based upon the level of local services and facilities in accord with the Core Strategy (and derived from RSS8)
- promote a significant boost in housing supply
- promote the provision of new social and community infrastructure
- contribute to the resolution of acknowledged traffic issues

Consequently we invite consideration that the plan as published is unsound.

In order to address the matters that render the current proposals for Stamford ineffective an alternative mixed use development allocation at Newstead should be allocated to:

- enable the projected annual delivery of new homes to be sustained at the historic average of 75 dwellings per annum over the whole plan period (an additional allocation of a minimum 250 dwellings)
- to provide an on-going resource of housing land capable of delivery beyond the plan period
- to deliver constructive benefits towards improving the town’s infrastructure, likely to be secured only over the longer term.