Land Fronting Deeping Road, Baston

South Kesteven Local Plan Regulation 18 Representations



Prepared on behalf of Wates Developments | April 24



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TABLE OF CONTENTS

1.	Introduction	3
2.	Land Fronting Deeping Road, Baston	7
3.	Sustainability Appraisal	11
4.	Vision and Development Management policies	16
5.	Spatial Strategy and Meeting Housing Needs	24
6.	Conclusions	29

Appendix 1. Baston Green - Vision Document

1. INTRODUCTION

- 1.1 These representations have been prepared on behalf of Wates Developments in response to the SKDC Regulation 18 Local Plan Consultation.
- 1.2 Wates are promoting Land Fronting Deeping Road, Baston, part of which is identified as an allocation for 86 homes. These representations and accompanying Vision Document support the proposed allocation, whilst highlighting the whole sites suitability for up to 250 dwellings, and rationale for these being allocated as a whole now to bring forward homes quickly alongside significant benefits on this unconstrained site.
- 1.3 Based on the whole site, the proposals will be able to provide the following benefits to the Council:
 - Up to 250 (75 affordable) sustainable homes contributing towards supplying for South Kesteven's housing need.
 - Comprehensive landscaping strategy, helping to disguise the development and deliver up to 40% Biodiversity Net Gain
 - Up to 7.53 acres (47.96% of whole site) Open Space for future and existing residents to use, in addition to community space in the form of play spaces for all ages including sports provision, LEAPS/ LAPS, allotments or community orchards
 - Enhancements to the existing Public Right of Way as well as new walkable and cycle friendly routes
 - Improvements to the local highway infrastructure and sustainability measures
 - Greater contributions/ provision of community benefits
- 1.4 The following technical assessments have been carried out in detail and are summarised within these representations demonstrating that the sites fronting Greatford Road and Deeping Road comprise a singular field with similar characteristics, and would have limited impact to the area, which justifies the delivery of the site as a whole.
 - highways,
 - ecology
 - trees
 - landscape
 - drainage

Wates Developments

- 1.5 Wates is an expert in land, planning, and residential development with a proven track record of delivering high quality homes and places. Wates Developments are committed to sustainable development with a group-wide strategy focussing on climate change, biodiversity, and waste, being a signatory of the Terra Carta founded by King Charles III
- 1.6 Our core metric of planning success now stands at 98% on applications made since the business was first established in 2005. 39 joint ventures with housebuilders on sites across the country, which together have delivered more than 7,000 homes over 18 years.



- 1.7 Wates Developments have provided key infrastructure to South Kesteven in the form of the following:
 - Poplar Farm School, Grantham Constructed in May 2019, the school provides much needed primary education places for children, with 14 classrooms, a school hall, kitchen, library, toilets and a new grass sports pitch provided with the ability to be extended to a three-form entry school if required. School staff were able to contribute towards the design of the school, and so additional roof lights for more natural light and additional storage into teaching walls were incorporated. The projected was shortlisted in the Value and Project of the Year Award category at the East Midlands Celebrating Construction Awards.

Rover

The Beacon Children's Home, Grantham – Wates Developments completed the first phase of the £3.8 million redevelopment of The Beacon Children's Home in Grantham in October 2017. The development provided significantly improved facilities for home care staff and children with disabilities in Grantham and Lincolnshire. Redeveloping from the 1960s built home, ensuring that spacious bedrooms, superior communal space and extensive outdoor space were provided. Throughout the development, Wates utilised a range of local businesses to deliver the project, in addition to employing apprentices from Grantham College.

Scope and Structure of these Representations

- 1.8 These representations are made with respect to the ongoing promotion of the Land fronting Deeping Road, Baston ('the site'), for residential-led development, over which Wates Developments holds a specific land interest. These representations address topics within the South Kesteven District Council (SKDC) Local Plan Regulation 18 consultation, and its supporting evidence base, accordingly.
- 1.9 The purpose of these representations is to assist SKDC ('the Council') in formulating an approach within the emerging Local Plan that is both consistent with national planning policy and the tests of soundness. In this regard, our representations are mindful of the tests of soundness set out at paragraph 35 of the National Planning Policy Framework ('NPPF') (December 2023) which a future Regulation 19 document and Examination in Public will be judged against; namely, whether the emerging Local Plan is:

Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

Justified – representing an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

Effective – deliverable over the plan period, and based on effective joint working on crossboundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

1.10 At this early stage of plan-making, it is important that the Council pursues an approach that is consistent with national policy, effective, justified, and positively prepared, in order for the Local Plan to be found sound at examination. These representations comprise our recommendations to assist the Council in achieving such an approach as emerging plan progresses toward adoption, such as ensuring the Council has a suitable Plan Period to provide for the housing needs of the district.



Policy Context

- 1.11 South Kesteven District Council (SKDC) adopted its 'Local Plan 2011-2036' in January 2020. The Plan sets out the spatial strategy to meet development needs across the District up to 2036.
- 1.12 The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) requires local planning authorities to review local plans at least once every 5 years from their adoption date. This is intended to ensure that planning policies remain relevant and able to effectively meet the needs of the local community.
- 1.13 The Inspector's final report on the current Local Plan committed the Council to undertake an early review of the Local Plan from April 2020. The Local Plan, which is the subject of this Regulation 18 Consultation, represents the progression of this review process and enables necessary updates of evidence including housing and employment need.
- 1.14 In this regard, Wates Developments supports the Council's commitment to the preparation of a new local plan to cover the South Kesteven administrative area.

Structure of Representations

- 1.15 Our representations are set within the context in which we seek to highlight, where relevant, the opportunities that are presented for the emerging Local Plan to continue to allocate the Land fronting Deeping Road, Baston ('the site') for development.
- 1.16 Accordingly, the following sections of these representations are set out as follows:

Section 2: Land fronting Deeping Road, Baston

Section 3: Review of Local Plan Evidence Base (Sustainability Appraisal)

Section 4: Comments On Vision, Objectives and Policies

Section 5: Comments on Spatial Strategy and Housing

Section 6: Summary and Conclusions

1.17 We trust that our comments are of assistance to the Councils in formulating an approach that is positively prepared, effective, justified, and consistent with national policy, as the emerging Local Plan progresses toward adoption.

2. LAND FRONTING DEEPING ROAD, BASTON

2.1 Land fronting Deeping Road, Baston has currently received a draft allocation within the Regulation 18 Draft Local Plan for the residential development of 86 dwellings.

Site Characteristics and Context

- 2.2 Baston is located within the southern area of the South Kesteven District and is currently identified as a large village in the adopted SKDC Local Plan, however it did not receive any allocations for growth within the adopted Local Plan. The village of Baston is within proximity of three of the four key market towns of the district, with Bourne to the north, Market Deeping to the south, and Stamford to the west of the village. Additionally, Baston benefits from the key north-south route A15 passing through the village, providing direct access from Market Deeping to Bourne, and continues to the city of Lincoln to the north and Peterborough to the south. Baston is able to provide several services and facilities to locals, including primary and secondary education, local shop, two public houses and more.
- 2.3 The site being promoted and discussed throughout these Representations is located within the western end of the village adjoining the current built up part of the village, with the eastern boundary of the site adjacent to the A15. The site is a suitable and sustainable location for future growth which has received some recognition by South Kesteven District Council. These Representations are supported by a Vision Document prepared by Boyer Design (Appendix 1), which provides a technically informed masterplan for the future delivery of this site, as summarised below.

Highways.

2.4 Firstly, Bancroft have assessed the proposed access to the site from the A15. Their work concluded that the proposed development would not have any adverse impacts or cause additional stress on the local road network. Additionally, as demonstrated within the Vision Document, the Public Right of Way will be retained and improved to improve the connectivity of the site with the settlement of Baston, as well as to provide safe and sustainable access and connectivity for residents to the local amenities that Baston is able to offer.

Landscape

2.5 SLR have prepared work which demonstrates that the site at Baston will not have an adverse impact against the views of the landscape of Baston. The development will not extend any further south than the boundary of the existing built up area of Baston. This will assist in preserving the views of the village and preventing the merging of settlements between Baston and Langtoft to the south. To further ease the impact of the development on the views, additional planting will be provided along the boundaries of the site which will also assist the landscape led approach by helping to screen the development whilst providing additional biodiversity.

Ecology

2.6 FPCR have prepared a Preliminary Ecological Appraisal (PEA) to identify any potential constraints and opportunities. The PEA found that the site largely consists of arable grassland



with small areas of dense scrub, poor semi-improved grassland, and ruderal habitats. These were found to be of no more than local importance. The PEA recommends the inclusion of buffer zones along the retained tree lines, ditches, and hedgerows to minimise any impacts, in addition to the introduction of bird and bat boxes, hedgehog highways, and planting of native species.

2.7 In addition to this, FPCR have carried out assessments of the site and provision of biodiversity. The site has the potential to meet and exceed local and national biodiversity requirements. The prepared works show that the site has the potential to achieve a net change across the site in both habitats and hedgerows which will deliver over and above the national policy requirements

Trees

2.8 An Arboricultural Constraints Report has been prepared by SJA Trees which confirms there are no trees within the centre of the site and are restricted to only along the boundary to the north of the allocated parcel. These trees are large mature trees that have the ability to provide ecological and landscape contributions, in addition to contributing towards the green infrastructure of the local area. These trees to be retained and protected throughout the development.

Drainage

2.9 In regard to drainage, the site is wholly within Flood Zone 1 and is not subject to flood risk. RSK have provided a drainage strategy which is achievable in ensuring that the site continues to present little to no flood risk for all current and future residents and will use modern sustainable drainage methods that meet the requirements of the LLFA. Based on the site levels, the surface water drainage strategy is likely to require pumping, which helps to justify the inclusion of the land fronting Greatford Road.

Commitment to Sustainability & Climate Change

- 2.10 Wates Development are committed to providing sustainable development and contributing towards the fight against climate change. Wates have a group target to becoming a net zero company by 2045, which is to be achieved through:
 - a. Optimising the use of materials and avoiding waste through resource efficiency.
 - b. Reducing their Greenhouse Gas emissions in all products and processes.
 - c. Driving positive outcomes for the natural environment.
- 2.11 Further to this, Wates have an Environmental Strategic Plan, setting out their short term and long term targets, which are in line with the Sustainable Development Goals set by the United Nations. Through their commitments to the environment, Wates build award winning zero carbon homes across the UK.
- 2.12 Wates currently have a group-wide strategy which focuses on combating climate change, providing biodiversity, and minimising waste. To further demonstrate their commitment to the environment, Wates are a signatory of the Terra Carta founded by King Charles III and



launched in 2021. The Terra Carta gives fundamental rights and value to the environment, allowing the private market to assist in achieving the Sustainable Development Goals.

Summary

2.13 The Council are seeking to provide development within the sustainable, large villages of the district, of which Baston is able to demonstrate this position. Wates are passionate about tackling climate change and welcome this opportunity to work with South Kesteven District Council and the Parish Council of Baston to assist in improving the sustainability of housing across the district. This allocation and wider site is readily available for development as a whole and is deliverable and has the ability to come forward in a timely manner early within plan period.

Land Fronting Greatford Road, Baston

2.14 Further to the allocated site fronting Deeping Road for 86 dwellings, the allocation has the ability to be expanded to include the land adjacent to the west to provide a total of up to 250 dwellings in addition to further landscaping, open space, drainage and associated infrastructure.

Highways

- 2.15 As discussed, the main point of access to the site will be off the A15, which will also serve as the main access point for the land fronting Greatford Road. Hub Transport have carried out assessments of the impact of the additional site on this access point and concluded that there would not be any adverse impact on the road network. In addition to this, Hub Transport have liaised with Lincolnshire County Council as the Highway Authority to discuss whether the proposed access for up to 250 dwellings would initially be acceptable. Lincolnshire County Council confirmed that the provided information provided was acceptable and should accompany future applications.
- 2.16 Further to the above, the Public Right of Way will be retained and enhanced to create an enjoyable footpath for residents to enjoy in a pleasing environment that is not overbearing. This will in turn maintain the connectivity between the site, the centre of the village and the wider countryside beyond.

Landscape

2.17 If this additional land were to be allocated for housing, this would in turn allow for a better landscape strategy through greater landscaping and connectivity corridors through the scheme along key desire lines, whilst helping to disguise the proposal.. To further ensure there is minimal impact, the site as a whole will continue to develop the built form as far south as the current built up area of the village extends. Additionally, within the southern area of the site, open space will be provided with LEAP, community space, and planting to provide a landscaping buffer.

Drainage

The lowest point of the site is located in the western field where a detention basin is proposed to facilitate a gravity led strategy. This is the most sustainable approach as required by policy, which helps to justify the whole sites allocation.

2.18 In regard to drainage, the effects of 250 dwellings have been assessed by RSK, and any impacts are able to be mitigated against through the use of SUDS within the site. This will ensure that future residents and existing neighbouring residents are provided with a safe environment that is not subject to flooding.

Trees

2.19 The tree survey also confirms that the whole-site proposal can be accommodated off Greatford Road without significant impact to the trees, whilst providing the opportunity to further planting to support the landscape led approach and biodiversity net gain.

Ecology

- 2.20 FPCR have carried out work to understand the potential of Biodiversity Net Gain across the two land parcels. Similarly to the allocated area of the site, the development of the site with the additional land parcel will be able to provide a net gain in habitat creation and hedgerow creation.
- 2.21 Taking the above into consideration, this site being brought forward by Wates Development has the potential to bring forward up to 250 dwellings in a suitable and sustainable environment. The technical work to date highlights the logical inclusion of the whole site for a number of reason, which will help facilitate a more sustainable and attractive development proposal, with no additional impact. Accordingly, The site is deliverable and developable in the same manner as Deeping Road, and should be assessed in combination to highlight its suitability, especially where it is concluded that the Council require additional housing to provide for the needs of the district, the site is readily available to come forward.



3. SUSTAINABILITY APPRAISAL

3.1 In this section the Sustainability Appraisal carried out to support the development of the draft Local Plan will be discussed.

Sustainability Appraisal

- 3.2 AECOM have carried out an Interim Sustainability Appraisal ('SA') on behalf of South Kesteven District Council. The SA sets out the Scope and Framework for undertaking the assessment and provides next steps of the further detail on the various topic areas to be assessed prior to the Regulation 19 consultation where appropriate.
- 3.3 The Interim SA assesses the following of each site and locations for growth:
 - The environmental constraints of the main settlements in the District
 - The environmental constraints of the available site options for a potential allocation in this Local Plan Review.
 - Potential site options for the Local Plan Review
 - The proposed updates to the Local Plan Review policies
- 3.4 A SA Scoping Report was produced which identified a range of sustainability issues to be focused on, which were translated into the SA Framework. The Framework identified 9 key areas for focus: Biodiversity and Geodiversity, Landscape, Historic Environment, Air, Land, Water and Soils Resources, Climate Change, Population and Community, Health and Wellbeing, Transport, and Economic Viability. To further support the identified areas of focus, a Points of the Compass exercise was carried out, assessing the 20 main settlements of the District, to identify the most appropriate locations for growth. Further information regarding the Points of the Compass exercise is discussed within this Section of the Representations, but we agree that the Sustainability Appraisal and Points of the Compass exercise are necessary to find the most sustainable locations for growth.
- 3.5 The SA recommends 2 alterations to be considered in the Regulation 18 Local Plan for the following identified key areas:
 - a. Air, Land, Soil, and Water Resources policies should be strengthened to require development above 1ha to be accompanied by an Agricultural Land Classification report
 - b. Transport policies could be strengthened to improve connectivity within more rural locations
- 3.6 We agree that these proposed recommendations are appropriate and will assist in ensuring that the most appropriate land is identified for future growth.
- 3.7 The Appraisal scores the individual sites through 5 Red Amber Green (RAG) Rules which provides the benefit of clearly showing which sites are most appropriate with a rating from dark green to dark red, depending on the extent of the constraint that faces the site:



Dark Red: Least well-performing sites
Light Red: Less well-performing sites
Yellow: Middle ranking sites
Light Green: better performing sites
Dark Green: Best performing sites

3.8 The RAG Rules are outlined within Table 3.1 of the SA Technical Annex, which demonstrates the criteria which is used to evaluate the constraints and opportunities. However, after reviewing the scores of the sites at Baston, some data of the assessment require reviewing, as some data sources being referenced were last updated knowingly in 2006.

SKPR-109: Land Fronting Deeping Road, Baston

3.9 Following a review of the RAG Assessment of the land fronting Deeping Road in Baston, we largely agree with the positive scoring that has been provided of the site. Although, one area that needs to be reviewed is the distance from the site to a Public Right of Way. The RAG Assessment by AECOM identifies the distance from the site to a Public Right of Way to be 117m, however, there is a Right of Way immediately adjacent of the site, to the north between the allocated site and the existing built up area of Baston and is therefore not 117m away. This factor should be amended to dark green as per table 3.1 of the SA Technical Annex, and thus demonstrates that the site continues to be a suitable option for growth.

SKPR-110: Land Fronting Greatford Road, Baston

- 3.10 The results of the assessment of the land fronting Greatford Road, Baston has also been reviewed. This review provided several items which require amending due to inaccurate measurements and data.
- 3.11 Firstly, under Community Wellbeing, it states that the distance to an Employment Site is 3.3km from the site. However, 2.3km from the site is the Kings Street Industrial Estate, therefore this would amend the scoring from yellow to light green. Following on from this, it is stated that the Primary Service Shop is located 671m from the site, which following a review, the site is located 500m from the local shop, seeing this factor change from yellow to light green. Furthermore, the distance to the Kirkstone House School Open Space is stated to be 388m, but following a review, it is shown to be a distance of 290m. Although it does not change the score of the RAG Assessment, the Open Space is almost 100m nearer than currently stated.
- 3.12 Within the Transport section of the RAG Assessment, it found that the bus stop is approximately 511m from the site, however, there is a bus stop located on Main Street which is 300m from the site. Therefore, the scoring should be amended from yellow to light green for this factor. Lastly, the assessment has identified that the Public Right of Way is 117m from the site. There is a Public Right of Way that goes directly across the site (east to west) and is therefore not 117m away. This factor should be amended from light green to dark green. The amended scores are shown within the table below:



Constraint	Council RAG Assessment	Boyer RAG Assessment
Air Quality		
Air Quality Management Area (AQMA)		
Biodiversity and Geodiversity		
Internationally Protected Sites		
Site of Specific Scientific Interest		
Local Geological Site		
Regionally Important Geological Site		
Local Wildlife Site		
Local Nature Reserve		
Ancient Woodland		
Priority Habitat		
Historic Environment		
Grade I Listed Building		
Grade II* Listed Building		
Grade II Listed Building		
Scheduled Monument		
Conservation Area		
Registered Park and Garden		
Landscape Tree Preservation Order (TPO)		
Flood Zone 2		
Flood Zone 3		
Land, Soil, and Water Resources		
Agricultural Land Classification – Grade I		
Agricultural Land Classification – Grade II		
Agricultural Land Classification – Grade III		
Mineral Safeguarding Area		
Mineral Consultation Area		
River		
Source Protection Zone		
Community Wellbeing		
Employment Site		
Primary Service – Shop		
Primary Service – Primary School		
Primary Service – Secondary School/College		
Primary Service – Surgery		
Town Centre		

Open Space	
Transportation	
Bus Route	
Bus Stop	
Train Station	
Public Right of Way	

- 3.13 These amendments show that the site is more sustainable than it was originally scored, as some of these criterion are being based off data from 2006 (Bus Stops) and 2008 (Open Space), but since then there have been changes in the settlement. This revised scoring shows that the site is suitable for development and should be included as an allocation within the emerging Local Plan in combination with the land fronting Deeping Road, Baston.
- 3.14 Although we agree with the approach taken in scoring the sites, the assessment should be informed by more recent data, rather than data which was last updated 18 years previously, as this may create gaps in accurate data and show sites which are suitable as being not suitable for development. For example, the land fronting Deeping Road, which has seen four constraints improve from yellow to light green or dark green showing that the site is suitable for future growth in Baston.
- 3.15 The Sustainability Appraisal outlines the next steps for the progression of the Local Plan. It is expected when responses to the Regulation 18 consultation are received, further work will be carried out to consider in greater detail development strategy options for the review. This will include the considerations of suitable alternatives for housing, employment opportunities, and spatial strategies. Once this has been completed, the Council is currently anticipating the Regulation 19 consultation to take place later 2024 and to submit the sound plan to the Secretary of State in Winter 2024/25.
- 3.16 Although we agree that the refinement of the Local Plan and alternative options should be carried out to ensure soundness of the Plan, we consider these timescales proposed for the Regulation 19 consultation and submission to the Secretary of State to be ambitious and should be considered to become more realistic.

Points of the Compass

- 3.17 To support the Sustainability Appraisal, a Points of the Compass Assessment has been prepared (SA Technical Annex), which assesses the four Market Towns and Larger Villages across the district.
- 3.18 The assessment appraises the 20 settlements against the following criteria:
 - a. Built environment designations; scheduled monuments, conservation areas, registered parks and gardens, and listed buildings.
 - b. Biodiversity designations; SSSIs, Priority Habitats, and RIGS.
 - c. Soil and water designations; SPZs, ALC, and Flood Zones



3.19 The Baston Broad Area has been divided into 2 segments: Ba1 and Ba2. The site being brought forward by Wates Developments is located within the western area of Ba2 and is the only housing allocation within the Baston Broad Area.

Ba1

3.20 The broad area Ba1 faces several constraints that prevents this area being suitable for development. Firstly the northern boundary of the area is approximately 2km from the Baston Fen SAC in addition to the northern area of Ba1 being within the Impact Risk Zone of the Baston and Thurlby Fen SSSI. Also identified are two small patches of Deciduous Woodland BAP Priority Habitat at the northeastern boundary as well as the eastern corner of the broad area. Furthermore, all land which is not within the built-up area of the settlement has been identified as Grade 2 Agricultural Land (classed as Best and Most Versatile Land). In regard to the flood risk of the broad area, the built-up area is within Flood Zone 2 and the west is within Flood Zone 3.

Ba2

- 3.21 Within Ba2, it is identified that there are 16 listed buildings which are along the northern boundary within 100m of Main Street, and thus, the site at the land fronting Deeping Road, in combination with the additional land being promoted at the land fronting Greatford Road, would have minimal impact on the built environment.
- 3.22 In regard to landscaping, the broad area as a whole lies within the Fens Landscape Character Area (as per the Landscape Character Assessment carried out in 2007), which has been identified as a character area of low-medium sensitivity for residential development. Additionally, to the east of Ba2 lies Manor Farm which hosts a singular patch of Traditional Orchards BAP Priority Habitat (approximately 0.6ha). To the east of the settlement is also identified for Grade 2 and Grade 3a agricultural land, which is considered the best and most versatile land classification. This further demonstrates that the west of the village is the ideal place for development to take place, as there will be no impact on the Priority Habitat, and the area has been identified as low-medium sensitivity to residential development, which is not constrained by high quality agricultural land.
- 3.23 The natural topography of the Fens gives way to potential flooding issues, and the Points of the Compass identifies that approximately 50% of Ba2 is within Flood Zone 2, particularly along the northern boundary and to the east, with limited areas of Flood Zone 3 along the western boundary. The Land fronting Deeping Road benefits from less constraints to flooding, with the key areas of Flood Zone 3 being predominately to the east of the broad area.
- 3.24 The Point of the Compass exercise demonstrates that the western area of Ba2 is most suitable for growth in Baston. This is due to the presence of less constraints in this area of Baston that would compromise the development of dwellings in addition to it having been identified at being of low-medium sensitivity to residential development. Therefore, Baston should be an ideal location for future growth, and within Baston our site is the most appropriate to be allocated, in combination with the land fronting Greatford Road.

4. VISION AND DEVELOPMENT MANAGEMENT POLICIES

4.1 This section makes comments on the duration of the Plan Period alongside the Vision of the Draft Local Plan as well as other policies including in the Local Plan Review.

Chapter 2 - South Kesteven District - Plan Period

- 4.2 The Regulation 18 consultation document highlights in paragraph 2.1 that the plan period for the emerging Local Plan will run from 1st April 2021 through to 1st April 2041. It is positive to see that the Council are seeking to plan for the longer period and preparing a document which covers 20 years. We are however concerned that upon anticipated adoption the Council may feel to meet the minimum requirements as outlined in para 22 of the NPPF (2023).
- 4.3 Paragraph 22 of the NPPF requires "strategic policies should look ahead over a minimum 15 year period from adoption" and in our view the emerging SKDC Local Plan will not meet this clearly set Government target, despite the plan looking at a 20 year time period. In order to provide a minimum 15 year period from adoption the plan which is looking to 1st April 2041 will need to be adopted by 31st March 2026 at the very latest in order to provide the required time period.
- 4.4 The Council's Local Development Scheme (May 2023) shows that the plan is due to be adopted in Spring 2026 which does not provide comfort a clarity for local communities, service providers or the development industry that the minimum 15 year plan period will be achieved. The Local Plan has already experienced some delays and it is reasonable to assume that further delays in timescales will be encountered and therefore the Council should seek to extend the plan period in the Regulation 19 submission document.
- 4.5 By taking a positive and proactive approach to delivering to the plan period, the Council is able to ensure that the plan is robust, credible, and fit for purpose and has the opportunity to deliver more housing and growth opportunities across South Kesteven to meet local identified needs. Seeking to adopt a plan which fails to meet the minimum 15 year requirement will result in growth and investment being limited unnecessarily in South Kesteven which is detrimental to the local communities in the area.
- 4.6 Paragraph 2.2 of the Regulation 18 consultation documents states that the plan "provides an additional five years beyond the current plan period of the adopted Local Plan which runs to 2036". Although this is correct in terms of headline years, the actual effect is that the time is being "lost" at this stage because to provide an additional five years, the plan would need to be adopted in 2025 to reflect the five years since the plan was adopted in 2020. By the Council's own Local Development Scheme which shows adoption in 2026 the Council is not providing for an additional five years because of delays experienced already in the plan preparation stages.
- 4.7 We encourage the Council to extend the plan period by at least another two years to a time horizon of 2043 which will allow for any further delays in plan making whilst still ensuring that

the minimum time period can be achieved. Extending the plan period, also allows further years of development and growth to take place and therefore provides a greater buffer in terms of housing numbers (potentially an additional 1,402 units when using the housing target of 701 dwellings per annum as found in the plan) thus giving the local communities greater choice and flexibility for housing and employment options.

Chapter 3 - Vision and Strategic Objectives

- 4.8 Chapter 3 of the Regulation 18 Consultation sets out the Vision and the Objectives the Plan seeks to meet and provide.
- 4.9 The Vision provided has been updated to reflect the Council's commitment to fight climate change, and create a successful and strong economy, whilst building sustainable communities that provide a high quality of life. The suggested Vision is realistic in it's ability to be delivered through the provision of high quality housing in addition to the provision of employment types for a strong economy.
- 4.10 The Vision also considers the villages and countryside of the district. The Vision directs new development outside of the main towns towards the villages with a good level of services and facilities with regard to environmental and infrastructure capacity of the villages. We agree with this view of the Council directing growth outside of the main towns towards the villages with a good level of services such as the village of Baston, which has a primary school, local shops, bus services and more.
- 4.11 Chapter 3 states that the Vision will be achieved through providing appropriate development to meet the local needs for both sustainable housing through the provision of 16,975 dwellings throughout the Plan period, as well as for the employment needs of the district through the provision of employment land.
- 4.12 We are in support of the overall Vision in increasing the importance of tackling Climate Change as well as creating sustainable, diverse, and safe communities across the district. To strengthen the Vision to further ensure it is considered as sound, as discussed, the Plan period should be increased, and the Vision should be amended accordingly to account for the additional years.
- 4.13 The draft Plan also provides the strategic Objectives for the Local Plan moving forwards. The Objectives have been amended to emphasise the approach towards Biodiversity and Climate Change. There are 2 Objectives identified within the Social Objectives (Housing, Health, Social and Community Needs), Objective 10 and Objective 11. However, there are additional Objectives that relate to housing provided within the Economic Objectives (Objectives 5 and 9) and the Environmental Objectives (Objectives 12 and 13).
- 4.14 We consider that Objective 9 should be amended to take into the consideration in the extension of the Plan period, and thus the increased need for housing across the district.
- 4.15 However, we are pleased to see that the Council have provided an approach and set Objectives which are largely pro-growth whilst requiring the provision of diverse and



sustainable communities, that are well-designed to create safe communities which are energy efficient, assisting in combating Climate Change.

Chapter 4 - Sustainable Development in South Kesteven

Policy SD1 – The Principles of Sustainable Development in South Kesteven

- 4.16 Policy SD 1 seeks to deliver sustainable development in South Kesteven which reflects the overarching principles found in the National Planning Policy Framework that the Local Plan will be judged against when it reaches the Examination stages. It is essential that the Local Plan policy does not repeat national policy requirements but has a specific focus on South Kesteven.
- 4.17 Changes to the policy to incorporate the Council's commitment to reaching net zero carbon by 2050 is supported as this then provides strong links between the policy and the objectives of the emerging plan. We are broadly supportive of this approach as development proposals which come forward over the plan period will need to meet building regulations as a minimum and often standards can be exceeded (subject to viability and technical considerations).
- 4.18 It is also noted that the policy "may be updated further once the Climate Change Study has been completed" before the Regulation 19 document is published. We acknowledge that the Council's evidence base supporting the plan is evolving and comes into existence at different times but consider the Climate Change Study to be a fundamental piece of evidence to guide the ambitions of the Council in respect of climate. As a fundamental piece of evidence that is central to the ambition to be net zero carbon by 2050 as outlined in the emerging plan we would suggest that it is published in draft format for comment and review by local communities, service providers, stakeholders and the development industry to ensure that its conclusions are fully understood by all parties. Publishing this evidence when it is prepared will be of significant benefit to the Council and those engaging in the Local Plan as this will enable considerations to take place in a positive and meaningful manner to accord with the Council's Statement of Community Involvement. If this emerging evidence is not published until the Regulation 19 stage, we are concerned that its findings may result in policy amendments/revisions that have not been fully tested alongside other evidence base documents or considered by the range of interested parties engaging in the plan preparation stages.
- 4.19 Although we are broadly supportive of the approach set out in Policy SD1, we would suggest that any further revisions to the policy provide greater clarity as to the expectations of how development proposals are to meet criteria a-m within the policy. At the moment, it is unclear as to whether each of these 13 requirements has to be met and the relationship between them and a future iteration of the policy should better reflect this to ensure the policy is effective and justified and therefore capable of being found "sound" when subject to Examination in the future.

Chapter 5 - Climate Change and Energy

4.20 South Kesteven has quite rightly identified the impact of climate change on the country and sought to tackle this issue directly through clear ambitions to be net zero carbon by 2050 and



other related objectives embedded into the Vision and the Regulation 18 document as a whole. The Council should be supported in this approach and have clearly set out the issues specific to their administrative area.

- 4.21 It is acknowledged that the policy area is ever changing, and a balance needs to be found between the national policies and requirements (for example the Written Ministerial Statement published on 13 December 2023) and those within Local Plans (both existing and emerging). But we are concerned that by not including policies on Climate Change in the Regulation 18 Draft the Council are losing the opportunity to gain valuable consultation responses from a range of stakeholders to inform this emerging and very important area of policy.
- 4.22 Paragraph 5.16 of the Regulation 18 draft outlines the scope of the policy recommendations, but these do not provide the local communities in South Kesteven or the development industry with specific details or direction to prepare detailed consultation responses on. Any emerging policy requirements will need to be subject to public consultation and engagement and be embedded into the wider evidence bases (such as Viability Appraisal) and Sustainability Appraisal considerations to ensure that an effective and justified policy is prepared.
- 4.23 The Council is rightly taking a positive and ambitions approach to addressing Climate Change and has put this topic central to their actions as a local planning authority but has missed the opportunity to seek meaningful and collaborative public engagement by not including any draft policies within the Regulation 18 document. The development industry benefits from experience of current developments and up to date technologies and solutions to reduce the impact of climate change and are therefore well placed to engage positively and constructively with the Council on this important policy area.

Chapter 10 - Protecting and Enhancing the Natural and Built Environments

New Policy 4 – Biodiversity Opportunity and Delivering Measurable Net Gains

- 4.24 The emerging Local Plan includes a new policy which relates to biodiversity net gain which has now become mandatory for all developments following Government amendments to legislation and the 2021 Environment Act. New Policy 4 enables the Council to continue its commitment to addressing Climate Change, Climate Resilience and mitigating the impacts of developments across South Kesteven. We are concerned that the policy simply repeats national policy and therefore is potentially not required, however it is positive to see the Council being proactive in ensuring that Biodiversity is achieved through developments. The site for 250 dwellings at Baston will be able to achieve the national requirements and the requirements of New Policy 4 as demonstrated within Section 2 of these Representations.
- 4.25 Reference is made to development proposals being in line with other documents that are prepared outside of the Local Plan process which is a concern and needs to be addressed more accurately within the Regulation 19 document. We are also concerned that the Local Nature Recovery Strategy is embedded into the policy wording even though this is not yet completed and question whether this would be an effective policy when considered against the test of soundness in the NPPF.

- 4.26 It is positive to see that the Council seek on-site net gain where possible, but the policy has flexibility to allow for off-site measures to be considered in specific circumstances. It is important that any Local Plan policy incorporates flexibility and how this might be achieved through a combination of on-site and off-site measures where appropriate.
- 4.27 The policy also references the ongoing management, monitoring and reporting of BNG for 30 years after completion of a development. Clearly this can take place in many different ways but the supporting text of the policy should be amended to provide greater clarity and certainty as to the local authority expectations of the ongoing management of the site and BNG. The summary box found on page 98 of the Local Plan also references that biodiversity requirements have been tested in the Whole Plan Viability Assessment which is welcomed. However we are concerned that the costs used in Table 8.3 of the January 2024 Viability Assessment by HDH Planning and Development Ltd are from 2017 which is now becoming rather dated and should be refreshed ahead of the Regulation 19 document.
- 4.28 The Viability Assessment also appears silent on BNG costs for the 30 year post completion or how this is being factored into the financial modelling. We assume that the costs are factored into the combined figures for developer contributions but this is unclear and should be clarified through further revisions to the evidence base to provide certainty to the development industry as well as organisations such as the Greater Lincolnshire Nature Partnership and the Greater Lincolnshire BNG Task Group as referenced in paragraphs 10.11 and 10.12 of the Regulation 18 document.

Chapter 11 - The Built Environment

4.29 The importance of development proposals being able to mitigate against and adapt to climate change is supported and the Council is rightly seeking to take a positive and proactive approach to that through the emerging Local Plan.

Policy SB1 – Sustainable Building

- 4.30 Over the plan period the requirements, standards and targets are likely to change as best practice and modern technologies change and evolve and bring about greater efficiencies and outcomes for both the residents of new residential dwellings, the local community and the development industry. As such we are concerned that policy SB1 as currently written will not be flexible and effective over the plan period and greater focus should be given to development proposals needing to meet the mandatory building regulations and where possible exceeding these standards.
- 4.31 As the Council is aware, the building regulations are constantly being updated and revised to reflect more standards and legislation covering all aspects such as energy consumption, water use and requirements such as EV charging. Therefore policy SB1 is at risk of becoming redundant in the short term as building regulations will require greater standards than those outlined in the emerging policy.

Chapter 12 - South Kesteven Communities – Baston

- 4.32 The Regulation 18 document includes a site specific allocation for Land Fronting Deeping Road in Baston. The identification of this site as a residential allocation which will contribute towards the overall housing delivery and growth in South Kesteven is welcomed and supported.
- 4.33 The map extract showing the residential site allocation is accompanied by a table which details development principles (a-f) that will accompany the allocation. It is anticipated that these principles will be the basis on which a site specific policy will emerge against which future proposals in the form of an outline or detailed planning application will be judged.
- 4.34 We acknowledge that the site represents a gateway location for Baston and as outlined in the Vision Document supporting these representations this can be recognised through appropriate design and layout and supported by landscaping and boundary treatments to respect the site location and surrounds.
- 4.35 Future development on this site will be able to connect in a positive and meaningful manner with the existing parts of Baston and improvements to these connections will ensure integrated communities to aid the delivery of sustainable development in the area.
- 4.36 Development principles relating to archaeology, Green Infrastructure and Minerals Safeguarding are all important policy considerations but it will be essential that the Regulation 19 document includes detailed policy requirements to aid applicants but also guide decision makers considering proposals.
- 4.37 The site identified in Baston is capable of delivering sustainable development and Wates are committed to bringing this site forward in a timely manner. The emerging allocation provides confidence that Baston is suitable for additional growth over the plan period.
- 4.38 Within these representations, we have been able to show that Baston is a sustainable location and in our view scores higher than the Council have concluded. As a result of that and to provide greater choice of housing opportunities over the plan period the allocation is capable of being increased to include land adjacent which is identified as SKPR-110. We have outlined reasons why the number of units to be planned for should be increased across all levels of the Settlement Hierarchy due to an extended plan period and an increased buffer in accordance with best practice.
- 4.39 Both sites (SKPR-109 and SKPR-110) are in the same land ownership and control and should come forward comprehensively to provide greater benefits for the local community and the District as a whole.

Chapter 13 - Infrastructure and Developer Contributions

4.40 The need for infrastructure to be provided in a timely manner alongside growth and development is fundamental to achieving sustainable development and the Regulation 18 document correctly identifies that. Paragraph 13.1 of the Regulation 18 document provides examples of relevant infrastructure and we are broadly supportive of the types outlined but

also acknowledge that each community across South Kesteven is unique and will require different provision at different times over the plan period.

- 4.41 The summary box on page 235 of the Regulation 18 document details that "An Infrastructure Delivery Plan, including an Infrastructure Delivery Schedule, is being prepared and will inform the policy once finalised." We are concerned that the details of these important evidence base documents is not provided at this stage of the plan making process to allow for engagement and representations to be made on approach, requirements and timescales envisaged.
- 4.42 The existing Local Plan was found "sound" and includes similar policies in relation to Infrastructure and it is therefore questionable as to why the evidence to support these policies is still being prepared by the Council and not available as part of this consultation.
- 4.43 In order to judge the effectiveness of policies in a Local Plan, the requirements of service providers such as education, transport, health, leisure and utilities need to be understood in order to make a balanced judgement as to what will be required alongside the growth opportunities identified.
- 4.44 Paragraph 13.16 of the Regulation 18 document confirms that the Council will continue to seek developer contributions through Section 106 and may consider the introduction of a Community Infrastructure Levy or a replacement tariff following the Governments national review. Although we broadly support this approach, the Local Plan needs to provide an indication as to the level of Section 106 that may be requested for different types of development in different parts of the plan area. Without this clarification, the Council's Viability Appraisal is flawed because assumptions used in relation to Section 106 may not be accurate and therefore could be under or over stating requirements that need to meet the tests for planning obligations.

Policy ID1 – Infrastructure for Growth

4.45 Policy ID1: Infrastructure for Growth outlines the Council expectations for ensuring that the necessary infrastructure provision is provided at the appropriate time and in a suitable location. It is important that the policy and supporting text recognise that as part of development opportunities the provision of infrastructure is not solely within the "gift" of the developer/applicant. In most instances, the Section 106 obligation can provide the land and/or funds to aid the provision of infrastructure but often the service provider (such as education, utilities) is responsible for the delivery of the infrastructure. As a result, it is unreasonable to expect that development proposals provide the necessary infrastructure at an appropriate time as this fails to acknowledge the range of parties that need to align and be involved with bringing forward the infrastructure.

Policy ID3 – Broadband and Communications Infrastructure

4.46 Policy ID3: Broadband and Communications Infrastructure is intended to ensure that broadband connectivity in South Kesteven can meet the vital needs of all over the plan period. It is reasonable to identify this as a key policy consideration as all sectors of the community, both residents and businesses rely more than ever on access to broadband and communications networks. We are concerned however, that the policy and supporting text



only focuses on what a developer is required to integrate into their development and fails to hold the communications providers to account for the overall network. The requirement to "future proof" is understood but this needs to be considered further to reflect that across South Kesteven the overall network will be mixed with some locations benefiting from greater connections than others, reflecting the urban and rural communities.

5. SPATIAL STRATEGY AND MEETING HOUSING NEEDS

5.1 In this section the spatial strategy and housing need of the draft Local Plan will be discussed.

Chapter 6 - Spatial Strategy

5.2 Chapter 6 of the Regulation 18 consultation looks into the Spatial Strategy that has been taken that has informed the Local Plan.

Policy SP1 – Spatial Strategy

- 5.3 Policy SP1 and the supporting text outline that the Local Plan is to deliver sustainable growth across the District during the plan period. We are broadly supportive of the approach to propose development across the District in locations which are suitable and sustainable but also provide a variety of opportunities across the plan area. This approach will allow for greater certainty that the needs of the District can be met in a positive and robust manner that takes into account any unforeseen changes over the plan period.
- 5.4 Policy SP1 is clear that the Council is using the Standard Method for identifying housing need as the starting point for the plan which we support and are not aware of any justified and objective evidence which suggests a lower figure should be used.
- 5.5 We are also pleased to see that Policy SP1 identifies the role of Grantham as a sub-regional centre, three market towns and larger villages as all being capable of supporting growth and development over the plan period to meet the identified needs. Identifying and then implementing a strategy which spreads the growth around the higher order settlements across the District is positive and will enable local communities, service providers and the development industry to work together in a collaborative manner to bring forward the right sites at the right times in the right locations.

Settlement Hierarchy Assessment

- 5.6 The Council has undertaken a Settlement Hierarchy Assessment looking at all the villages in the district which has seen Baston be ranked 13th out of over 120 villages across the district, in terms of the facilities and services which are available, and thus showing that Baston is considered as one of the most sustainable villages in South Kesteven.
- 5.7 The review begun with a Village Services and Facilities Survey in August 2021 for each parish council to complete. As the survey initiated almost 3 years prior to the Regulation 18 consultation, the Council acknowledge that there may have been updates in facilities since.
- 5.8 Within Appendix 2 of the Settlement Hierarchy Assessment, Baston receives a total of 39 points, resulting in being 13th out of over 120 settlements which were being scored across the district. Following our assessment of Baston, this score should be increased to 48 through an additional 3 points for the place of worship (St John Church), a further 3 points for a second primary education facility (Kirkstone House School) as well as an additional 3 points for the

presence of secondary education in the village (Kirkstone House School). This would raise the position of Baston to being ranked 5th of the villages within the district.

5.9 We agree with the overall methodology taken towards the large villages in South Kesteven, and the identification of Baston as a larger village in the district that is sustainable for future growth. However, the assessment should be updated to incorporate the additional facilities and services in Baston, which will see the village rank 5th in regard to services and sustainability of the settlements in the district. Where this is recognised, it would further justify the whole sites allocation, whilst bringing forward further benefits.

Chapter 7 - Housing Need

- 5.10 It is pleasing to see the Council have used the Government's Standard Method in calculating the need for housing from 2021 to 2041. Using the Standard Method, this results in a need for 14,020 dwellings within the current Plan Period (2021-2041) and 701 dwellings per annum. The adopted Local Plan also contains a buffer to the supply close to 20% to provide a greater choice of sites, as well as to provide a contingency in case of a lack of delivery. It is positive that it is proposed for the buffer to be continued within the emerging Local Plan, which will see a total housing supply of 16,975 dwellings. To meet this supply, the Council allocated an additional 2,901 dwellings across 23 sites, which is a buffer 21% above the housing requirement.
- 5.11 Within the adopted Local Plan, it sort to direct approximately 1,872 dwellings (10%) of the total housing supply of 18,846 dwellings to large villages. However from 2021-2023, large villages have provided 210 dwellings of the required 1,127 dwellings, approximately 19% of delivery. The Regulation 18 Local Plan has a total supply of 16,975 dwellings, 2,503 dwellings are to be provided in large villages, seeing approximately 15% of growth being directed to these settlements. This is an increase of 5% from the adopted Local Plan.
- 5.12 It is pleasing to see that the Council have taken the successful delivery of dwellings in large villages into consideration in the preparation of the Regulation 18 Local Plan. With the increase in housing need following the extension of the Plan period, this demonstrates that the large villages have the ability to provide a meaningful proportion of the required housing which will also create a wider choice of housing for future residents.
- 5.13 Within Chapter 7, figure 6 provides the indicative housing trajectory 2021-2041. The trajectory shows the completions from 2021/22 and 2022/23, and minimal provision coming forward from the existing and proposed allocations but is severely lacking in detail to justify the overall trajectory. A majority of the allocations are proposed to come forward in 2028/29 where it is indicated where over 1,400 dwellings will be provided. Despite this high figure, from 2036/37 onwards until the end of the Plan period, the provision of housing will fail to meet the required 701 dwellings per annum. Additionally, of the information provided within the trajectory, there is limited details of the number of units to be brought forward by each individual site per year. This makes it difficult to assess the and agree to the accuracy of the level of housing that is being brought forward and the Council expectations in terms of delivery over the plan period.

- 5.14 Without the detail to enable local communities, service providers and the development industry the opportunity to fully interrogate the assumptions and calculations within the trajectory, it is not possible to provide assurances on the accuracy of the information.
- 5.15 South Kesteven submitted the Annual Position Statement on Housing to the Planning Inspectorate in July 2023 and received notification to confirm the 5 year housing supply position in September 2023. The Planning Inspectorate confirmed the Council has a 5.01 years supply which could be relied upon until October 2024.
- 5.16 Despite the confirmation from the Planning Inspectorate and the changes to the NPPF following the revisions in December 2023, it is essential that the Council provide the detailed evidence to support their position on housing land supply and the calculations which make up the housing trajectory. Without this detail, the Council will miss the opportunity to test their evidence through the Local Plan consultation and preparation stages which is procedurally flawed and should be rectified.
- 5.17 Further to the above, it is therefore unknown if the lack of previous delivery has been taken into consideration in preparation of the trajectory, or if constraints to development have been accounted for. For example, the delays in progress of the Grantham Southern Relief Road (GSRR) have meant that development reliant on this relief road such as the Spitalgate Heath allocation and Prince William of Gloucester Barracks allocation have been continuously pushed back. With little certainty of when the GSRR will be completed, the housing trajectory should take this into consideration.

Policy H2 – Affordable Housing

- 5.18 We acknowledge the importance of providing affordable housing options on a site of 10 or more dwellings as this ensures a range of accommodation to come forward which will promote mixed and balanced communities across South Kesteven.
- 5.19 The policy as presented in the Regulation 18 document includes a wide ranging percentage requirement which we understand will be refined as a result of the Whole Plan Viability Assessment. Alongside the Regulation 18 Local Plan, the Council have published a Whole Plan Viability Assessments prepared dated January 2024 on their website which has been prepared by HDH Planning & Development Ltd. Throughout this document, the residential site appraisals have assumed a consistent 30% level of affordable housing for testing purposes along with a consistent and defined mix of tenure type including affordable rent, social rent, shared ownership and first homes. We are therefore unsure why the emerging policy has not reflected this evidence base at this stage.
- 5.20 Appendix 16 and Appendix 17 of the HDH Planning & Development Ltd evidence published in January 2024 does show that a variation of affordable housing percentages and different mix of tenure types has been tested by the consultant team, with the results being show in coloured table to reflect the viability of the percentages tested. The approach to testing a variety of requirements is to be commended and in our view, exactly what the Local Plan evidence base should be seeking to explore and consider through specialist and professional support.



- 5.21 However, we are concerned that policy H2 does not accurately reflect the evidence that has been prepared. With an up to date evidence base document, the Council have not taken the opportunity to engage constructively through this consultation. It is unclear how the standards included within the policy, such as "make provision for 27-57%" have been reached when the viability evidence has tested 30% provision predominately but also tested a range from 0% to 40% as seen in Appendix 16.
- 5.22 We are also unclear as to how the Council has identified the range (27-57%) in the first part of the policy but then have fixed requirements in relation to the mix of affordable housing provided on site with reference in criteria a to 25% as First Homes and in criteria b including 60% as rent and 40% as affordable ownership.
- 5.23 Ahead of the Regulation 19 document, it will be essential that the Council provide clarity for local communities, applicants and decision makers as to the level of affordable housing and the mix of tenures that are required to meet needs in South Kesteven but also be aligned with the viability evidence available. As currently presented, the policy does not provide the clarity and certainty that is required of a fundamental planning policy which is linked to the overall aims and objectives of the Council's plan.

South Kesteven District Council's Site Assessment

5.24 A Site Assessment has been carried out by the Council to demonstrate where there is suitable land for development. The assessment has used the Red Amber Green (RAG) method which we agree is appropriate in finding the most suitable land for development. It is pleasing to note that the that the site has largely been positively scored by the RAG assessment prepared by the Council, however there are some constraints which require to be reviewed.

SKPR-109: Land Fronting Deeping Road, Baston

- 5.25 Whilst we largely agree with the scoring of the RAG assessment and conclusion of the site as an appropriate location for development, after a review there are some constraints that are required to be rescored.
- 5.26 Firstly, the bus stop located on the High Street in Baston is located 240m from the site, and therefore should be scored in green. Secondly, technical work has been prepared by Bancroft Consulting, which demonstrates that the site would not propose any adverse impacts on the highway network. Although Lincolnshire County Council commented there were concerns of visibility due to boundary treatments, the access to the site will be designed in a manner that is safe for all users of the road and highway network.

SKPR-110: Land Fronting Greatford Road, Baston

- 5.27 In addition to the land fronting Deeping Road, Baston, we have reviewed the RAG scoring of the adjacent land being promoted by Wates Developments to assess the constraints and the scoring they have currently been given.
- 5.28 The Site is located 0.5km from the local shop in the village. Due to this proximity, the site is only just qualifying for the amber scoring, but this close proximity should be taken into consideration in deciding on suitable land for housing. Similarly, the primary school is located



1.1km from the site, and the nearest bus stop is 300m from the site (50m above the green threshold) and thus the same consideration and weight should be given to these factors.

- 5.29 Additionally, the Site Assessment currently states that the nearest Employment Site is 3-10km from the site. As identified by the Policy Map, the nearest Employment Site is the King Street Industrial Estate which is 2.3km from the site and therefore should be amended to green.
- 5.30 Within the 'Main Findings' section of the Site Assessment, it is commented that mitigation measures are needed for the area as it is covered by the Minerals and Waste Policy in the LCC Minerals and Waste Plan 2016. As part of the development, mitigation measures will be provided which will in turn remove this barrier to development.
- 5.31 Lincolnshire County Council have correctly identified that there would be minor impact on the Local Highway Network as well as the Local Road Network. This is further supported by work carried out by Bancroft Consulting, which demonstrates that the trips generated in combination with those of the allocated site, would result in no adverse impacts. In addition to this, previous discussions with Lincolnshire County Council and Bancroft Consulting were held discussing the access of the site for up to 250 dwellings, which saw County Council confirm the scoping notes were acceptable to accompany future applications.
- 5.32 Therefore, this site should be allocated in combination with the land fronting Deeping Gate, in order to provide the additional required housing the District will require, as this is shown to be a suitable and deliverable option for future residential development through the Points of the Compass Assessment, the revision of the Settlement Hierarchy Assessment, and through the revisions made to the Site Assessment. This site is deliverable and available to come forward in the early years following the adoption of this emerging Local Plan, to ensure that the needed housing is brought forward.
- 5.33 As previously discussed with Section 4 of these Representations, the Plan period should be extended to the year 2043 which would result in an additional 1,400 dwellings being required. Following our reassessment of Baston being a large village, and the review undertaken of the RAG Site Assessments, the additional growth directed towards large villages should be allocated to the land fronting Greatford Road, Baston, as in addition to being a sustainable settlement, this land is readily available that is deliverable and developable to provide sustainable housing.
- 5.34 Furthermore, prior to the Regulation 19 consultation, a detailed Housing Trajectory should be provided to show how much housing the allocated sites are due to bring forward and when, and if their proposed timescales are realistic and achievable. This is also of greater importance due to the lack of delivery of housing from the previous plan, and constraints to delivery that may impact sites.

6. CONCLUSIONS

- 6.1 Boyer has prepared these representations on behalf of Wates Developments in response to the Local Plan Review undertaken by South Kesteven District Council ('SKDC').
- 6.2 These representations are made in support of the Regulation 18 Plan and with respect to the ongoing promotion of the Land fronting Deeping Road, Baston ('the site'), for residential-led development of up to 250 dwellings with open space, landscaping, drainage, and associated infrastructure. This site is a suitable option that is available and deliverable for providing the required growth in the district within the early years post adoption of the emerging Local Plan. The representations draw the detailed technical assessments which has been carried out in relation to highways, ecology, trees, landscape and drainage, which identify no additional harm through the allocation of the whole site, but deliver additional benefits.
- 6.3 The purpose of these representations has been to assist SKDC ('the Council') in formulating an approach within the emerging Local Plan that is both consistent with national planning policy and the tests of soundness.
- 6.4 In this regard, our representations relate to the tests of soundness set out at paragraph 35 of the National Planning Policy Framework ('NPPF') (December 2023); namely, whether the emerging Local Plan is: *Positively prepared; Justified; Effective; and Consistent with national policy.*
- 6.5 Wates Developments considers that, at this stage, the approach set out in the Local Plan Consultation Document is capable to be found sound. The approach currently being undertaken with regard to the Housing Requirement, and the associated Spatial Strategy, is consistent with national policy, effective, justified, and positively prepared.
- 6.6 These representations have set out our recommendations to assist the Councils in continuing to achieve an approach that is capable to be found sound as the emerging plan progresses toward examination and ensuring that the housing needs of the district are met in a sustainable manner.
- 6.7 Wates Developments would welcome the opportunity to meet with the Council to continue to discuss the opportunity that the Land fronting Deeping Road, Baston provides to deliver much needed housing, affordable housing, and improved sustainable transport connections whilst meeting the objectives of the Local Plan.



APPENDIX 1. BASTON GREEN - VISION DOCUMENT



Baston Green Land West of A15, Baston

Vision Document April 2024





Contents

1. Our Commitment	5
1.1. Commitment to the Community	6
1.2. Commitment to Climate Change & Sustainability	7
1.3 What Baston Green will bring to the Community	9

2. About the Site	11
2.1 Site Location	12
2.2 Planning Policy	14
2.3 Wider Facilities	15
2.4 Understanding the Site	16
2.5 Landscape Character	18
2.6 Summary of Site Characteristics	20

3. The Proposal	23
3.1 Our Vision for Baston Green	24
3.2 Design Principles	25
3.3 Design Framework	26
3.4 Illustrative Masterplan	28
3.5 Phasing Approach to Development	30

4. Conclusion 32



Project Team

Boyer



Planning & Masterplanning

SLR[©] Landscape

fpcr Ecology

rps Heritage



C BANCROFT CONSULTING

Transport



Drainage & Utilities

Summary

Wates Development is pleased to present this Vision Document to support its landscape led vision for a sustainable extension to the village of Baston.

In recognition of its sustainability, the site has recently been allocated in the South Kesteven Regulation 18 Plan for 86 homes (SKPR-109). This Vision Document demonstrates how the requirements of the allocation could be met, whilst also highlighting the unconstrained nature and benefits of the whole site to the local community.

The proposals for this site are informed by robust technical assessments including:

- Transport
- Landscape
- Heritage
- Ecology
- Drainage
- Utilities

The development will provide:

- Much needed new family and affordable homes
- Community infrastructure benefits,
- Biodiversity net gain
- Public open spaces and play space

The site is available, viable and deliverable and we would like to work together with you in delivering much needed homes for the local community and meet the housing needs of South Kesteven District Council.



Market Deeping





1. Our Commitment

1.1. Commitment to the Community1.2. Commitment to Climate Change & Sustainability1.3 What Baston Green will bring to the <u>Community</u>

1.1. Commitment to the Community

At Wates, everything we do is guided by our purpose of working together to inspire better ways of creating places, communities and businesses of tomorrow. Now in its fourth generation of family ownership, the Wates Group is committed to the long-term sustainability of the built environment, working collectively with the local planning authority and other key stakeholders.

We are committed to leaving a positive legacy for the local community by targeting local procurement, the creation of local training and employment opportunities and investing in local charitable organisations and community groups.

We believe this site is in a highly sustainable location and presents an excellent opportunity to create a landscape led vision for a high quality new neighbourhood which would support the continued growth of the District in order to meet identified housing need.

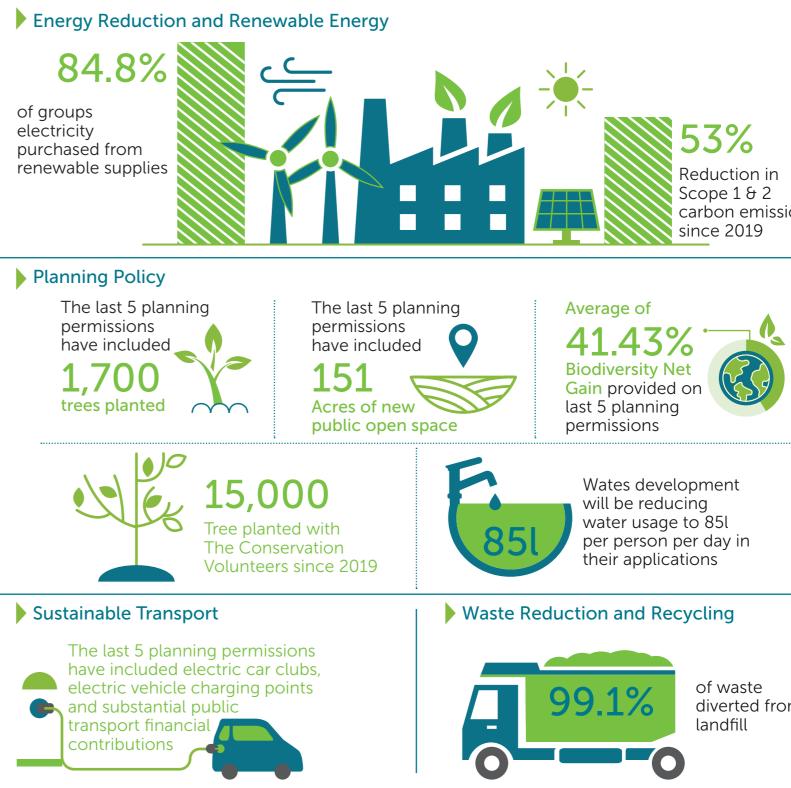


1.2. Commitment to Climate Change & Sustainability

Our commitment to climate change and sustainability align with South Kesteven District Council Climate Pledge target to become carbon neutral by 2030.

The proposal involves taking a holistic approach towards designing, constructing, and managing sustainable neighbourhoods. This includes using energy-efficient building materials and systems, incorporating renewable energy sources, and designing buildings to maximise natural light and ventilation.

We are keen to actively engage with the Council and other stakeholders to ensure that new developments meet or exceed the latest sustainability standards and guidelines. Furthermore, we are committed to integrating green spaces and promoting sustainable transportation options such as cycling and walking to encourage healthy and sustainable lifestyles. We are also committed to working with local businesses and organizations to achieve their sustainability goals, and to support the local economy while addressing climate change.



Baston Green Land West of A15, Baston

carbon emissions

diverted from

7



1.3. What Baston Green will bring to the Community



Sports Hub

New Walkable & Cycle Friendly Routes

Community Green





Biodiversity & Climate Responsive Design



Community Contribution





2. About the Site

2.1 Site Location 2.2 Planning Policy 2.3 Wider Facilities 2.4 Understanding the Site 2.5 Landscape Character 2.6 Summary of Site Characteristics

2.1. Site Location

The village of Baston is located in South Kesteven, in the proximity of market towns - Bourne (North), Stamford (West) and Market Deeping (South). Baston is defined as a "Larger Village" in the adopted South Kesteven Local Plan, well located to key north-south route - A15, which runs along the eastern boundary of the site.

The Local Plan identifies that Larger Villages are considered to be capable of delivering an appropriate scale of growth which reflects the range of services and facilities available in that settlement. In the Issues and Options document published in October 2020 the Council are seeking to maintain the existing settlement hierarchy and continue to focus development at locations with good levels of services and facilities to provide clarity for investment throughout South Kesteven.

In the Regulation 18 document published in February 2024, Baston is a suitable location for a residential development with a site specific residential allocation for 86 dwellings identified. The site will come forward as an allocation and there is opportunity to increase this allocation to provide up to 250 new homes on the edge of Baston. The proposals will promote the role and function of a Larger Village and deliver sustainable development. The new homes proposed are appropriate in scale for the settlement and will enhancing and maintain the services and facilities for the Baston community.

This site relates well to the existing settlement, in that it does not extend any further west or south than the existing extent of the village and fits nicely into the general character of the village. The access directly to the A15 would not impact the capacity of existing junctions or add any pressure to the existing centre.

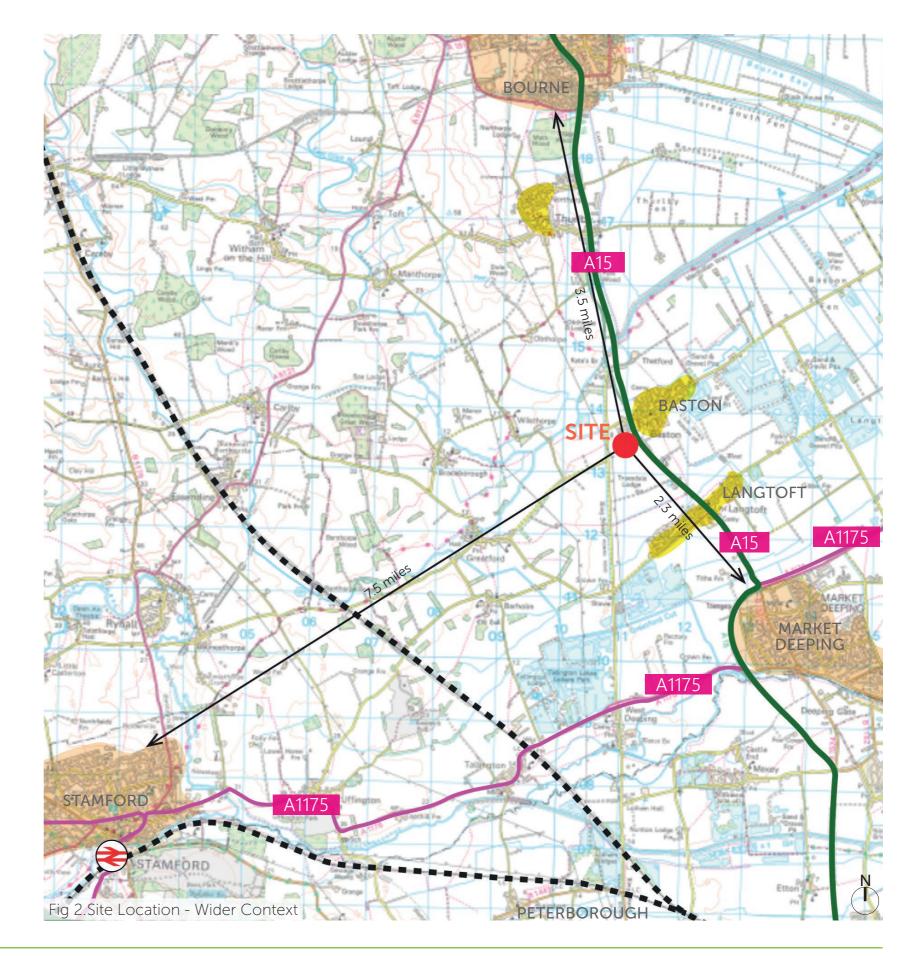


Fig 3. Aerial photograph of the site, looking south

NYDA

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2.2. Planning Policy

In February 2024 South Kesteven published their Regulation 18 Local Plan for consultation, providing the Council's vision for the future growth of the district and where this growth will be located.

The Vision of the Regulation 18 Plan outlines that South Kesteven District Council wish to continue to be a vibrant asset of Lincolnshire and have strong links with economies such as Peterborough and London. The Vision wishes to achieve sustainable developments which are inclusive and of high quality that protect the districts character and biodiversity. There is an emphasis on tackling climate change and lowering the amount of carbon emissions through supporting infrastructure that allows for low carbon lifestyles.

Growth is proposed for settlements across the district which have been identified as being suitable for future growth. This growth of settlements will not create adverse impacts and allow villages to maintain their diversity and vitality.

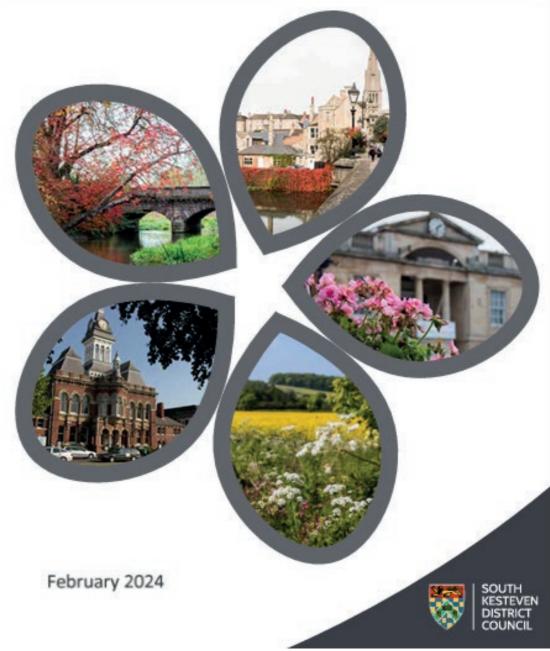
South Kesteven have identified Baston as a Large Village within the Settlement Hierarchy Assessment which demonstrates its suitability in providing future sustainable growth. Growth in Large Villages is further supported by Policy SP1: Spatial Strategy of the Regulation 18 Plan.

Baston is a suitable place to accommodate growth due to the number of services it can demonstrate such as education provision, local shops, public houses and more. This village was previously identified as a sustainable settlement within the adopted Local Plan and continues to be an ideal location for future growth within the emerging Local Plan

Regulation 18 Local Plan proposes to allocate the land fronting Deeping Road, Baston residential development of up to 86 dwellings, with an assumed density of 30 dwellings per hectare. We agree that this site is a suitable option for the growth of Baston. We are also promoting as part of this Vision Document the adjacent land fronting Greatford Road in Baston.

In combination of these two sites, a high quality addition to Baston can be provided that will bring benefits to not only the future residents of the site, but to the whole community of Baston. These sites are suitable for growth and are available as well as deliverable to provide the housing needs of the district early within the plan period post adoption of the emerging Plan.

South Kesteven District Council **Regulation 18 - Draft Local Plan** 2021 - 2041



2.3. Wider Facilities

The site is located to the west of Deeping Road (A15), and east of Baston Road and King Street. Baston along with Langtoft has schools and healthcare facilities. Bus stops are located along Deeping Road, Main Street and Langtoft Outgang Road with services to Bourne/Morton (north), Market Deeping/ Peterborough (south), Stamford (west) and Spalding (east).

To the south of the Baston is the settlement of Market Deeping. Market Deeping offers a variety of different leisure, amenity and shopping facilities and employment.

The site has a huge advantage of being next to a routes of Public Rights of Way that provide opportunities for walking and cycling and making the village facilities reachable to future residents.



Kirkstone House School



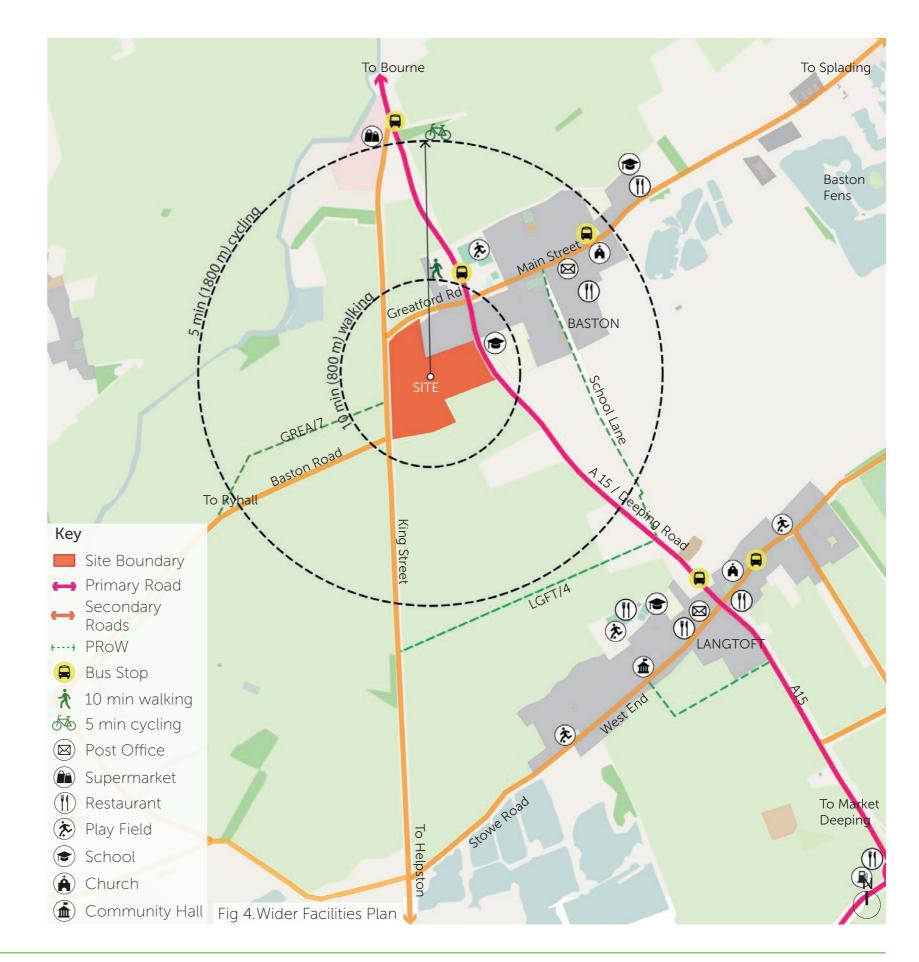
High Street Bus Stop



Black Horse Pub on the Main Street



Greatford Road & Deeping Rd Junction



Baston Green Land West of A15, Baston

2.4. Understanding the Site

The site is located to the south west of the village of Baston. The site measures approximately 15.7 hectares / 38.8 acres and comprises of two compartments of cultivated arable land with small areas of poor semi-improved grassland, ruderal and dense scrub are also present.

The site is bounded by hedgerows and tree lines along the northern, western and eastern boundaries and by a wet ditch in the south. The boundary in the northeast is demarcated by the off-site grassland associated with the Public Rights of Way.

The site abuts King Street to the west and the A15 to the east. Arable land is present to the south and west, while residential development is along the north eastern edge of the site.

The wider landscape surrounding the site and Baston is dominated by arable and with more limited pastoral land.





1- Looking South across the site from Public Rights of Way (PRoW)BAST/2

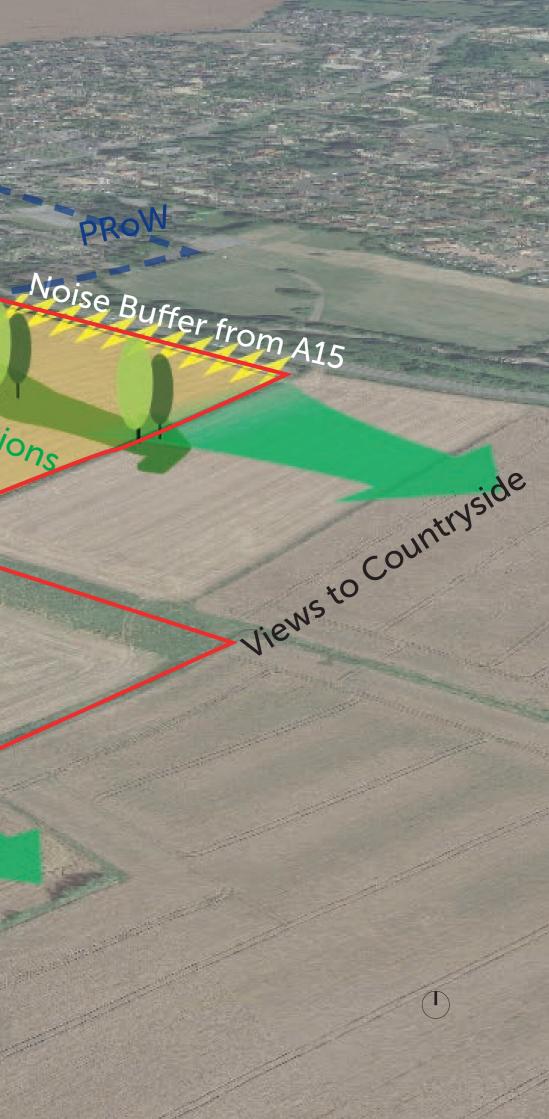


2- Looking North towards the site from King Street Drain



3: Looking North-East towards the site from where PRoW GREA/7 intersects King Street Drain

PROW Green Connections Trees to be retained PROW Green Connections Potential for multifunctional green space Views to Countryside Fig 6.Understating the site - Opportunities



2.5. Landscape Character

Designations

- The site is not within a landscape or landscape-related designation
- The site benefits from PRoWS which connect Baston with other neighbouring settlements (Bast/2)
- Two Local Wildlife Sites are located 760m to the south west, and 1.6km to the east.
- The closest listed building is located in Baston 220m away.

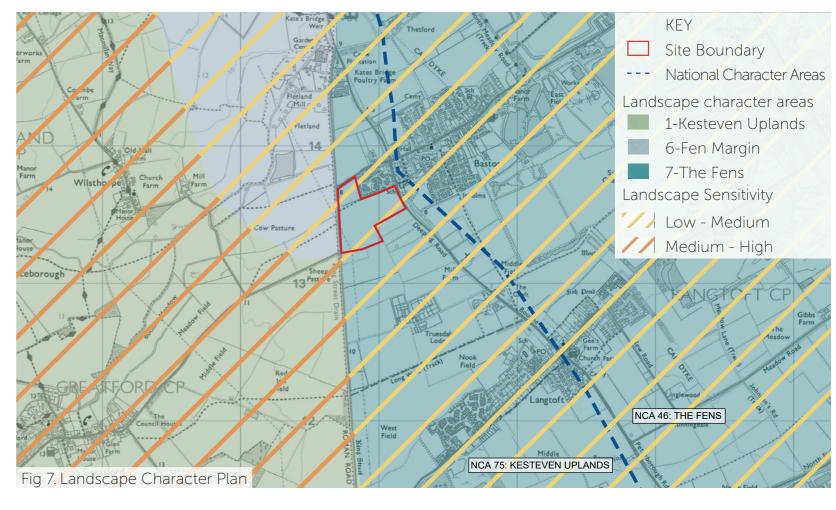
Existing Landscape Character Assessments

The site is on the eastern edge of National Character Area 64, Kesteven Uplands. However the site and immediate context is more reflective of the adjacent National Character Area 46 the Fens, described as "expansive flat, open, low-lying wetland influenced by the Wash Estuary, and offering extensive vistas to level horizons".

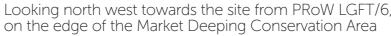
In the South Kesteven Landscape Character Assessment (2007), the site is on the western edge of Character Area 7. However, the site reflects some adjacent character areas, Fen Margin characteristics such as "higher degree enclosure with more hedgerow and tree cover than the typical Fen", "the settlement also influences include landscape character, and in places some have stark edges against the open agricultural land" and the "high proportion of settlement and the A15 and B1177 roads provides a higher level of activity in the landscape than exists either to the east or west".

Therefore the site and it's immediate context is a hybrid of these character areas which together comprises a flat, settlement edge, agricultural land generally, open, bound by vegetation, ditches and influenced by some urban features.

The site has a low-medium sensitivity landscape towards residential development. In respect to Fen Margins the assessment states "opportunities could exist in certain location around the edge of existing settlement for limited new development".

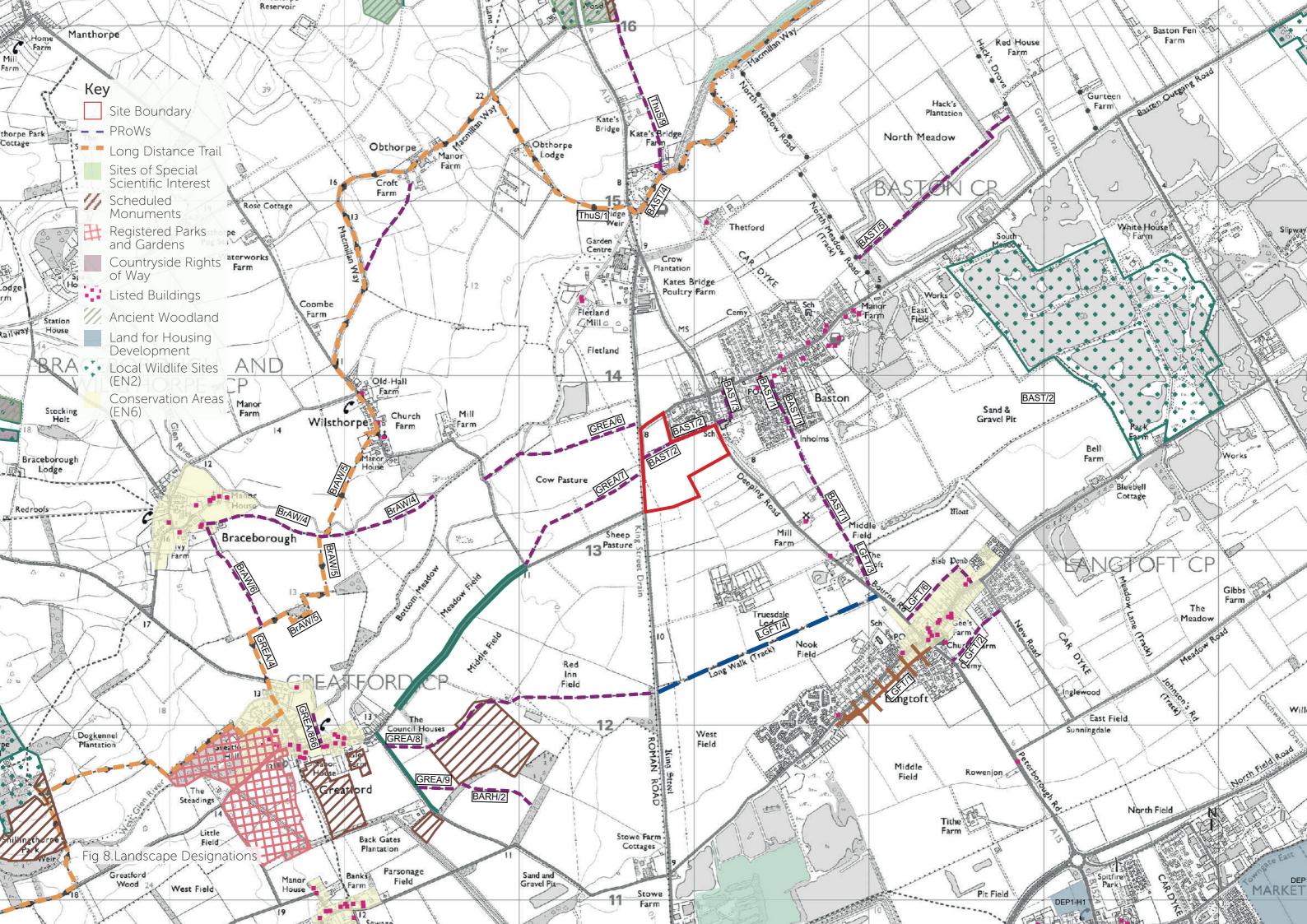








GREA/7 intersects King Street Drain



2.6. Summary of Site Characteristics

The site is currently private land and includes a Public Rights of Way skirting the northern boundary of the site.

Landscape, highways, utility assessment and preliminary ecology work have informed the design proposals. The site is dominated by arable grassland with small areas of dense scrub, poor semi-improved grassland and ruderal habitats.

Other boundary habitats include hedgerows which are all comprised of at least 80% native woody species and tree lines. Appropriate buffer zones will be adopted along the retained treelines. Work around ditches and hedgerows will follow best practice measures to minimise impacts associated with dust deposition or any accidental damage to retained habitats.

All hedgerows, tree lines and ditches will be retained and any treeline losses anticipated will be compensated for through appropriate new planting, ensuring habitat corridors are maintained and enhanced.

Vehicular access will be provided via a new junction on the A15/Deeping Road and Greatford Road creating a north east connection. The site has no overriding barriers to development and is therefore identified as a suitable location for housing.



Access

A15/ Deeping Road and Greatford Road will provide the all modes access point into the site. Additional pedestrian and cycling access will be proposed to integrate the scheme into the wider pedestrian and cycle network, connecting to the Public Rights of Way running along the northern edge of the site and onto Baston Road.



A high voltage 33kV overhead powerline cuts across the south western corner of the site. An additional 11kV overhead power line runs along the eastern side of the site, from north to south which will be grounded.

All other utility connections are achievable due to close proximity to existing supply.



Edge Conditions

The site abuts existing settlement edge on the north and has farmlands to the south. A15/ Deeping Road runs along the eastern edge of the site and Kings Street on the west.





The site is dominated by arable grassland with small areas of dense scrub, poor semiimproved grassland and ruderal habitats. Other boundary habitats included hedgerows which are all comprised of at least 80% native woody species and were therefore considered habitats or principal importance (NERC S.41) and treelines.

Existing site levels fall from a high point of around 9.75m AOD in the western part of the site to a low point of around 6.55m AOD in the south eastern part of the site near Deeping Road.

The natural slope of the site allows for the attenuation basins within the site towards the southern boundary as well as along the north eastern edge of the site. The attenuation basins will be complimented with the provision of swales and SuDS.

Utilities

Drainage







3. The Proposal

- 3.1 Our Vision for Baston Green 3.2 Design Principles 3.3 Design Framework 3.4 Illustrative Masterplan
- 3.5 Phasing Approach to Development

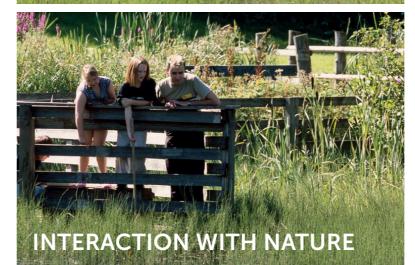
3.1. Our Vision for Baston Green

The site will deliver an attractive, and sustainable net zero neighbourhood that is well integrated into Baston village where people will aspire to live.

Baston Green will deliver a range of new homes of outstanding architectural quality which respects the natural surrounding. The neighbourhood will be set within a landscape of interconnected multifunctional green spaces which will promote well being and an active lifestyle.

Baston Green will create an enjoyable and inclusive environment, one which fosters a sense of community.







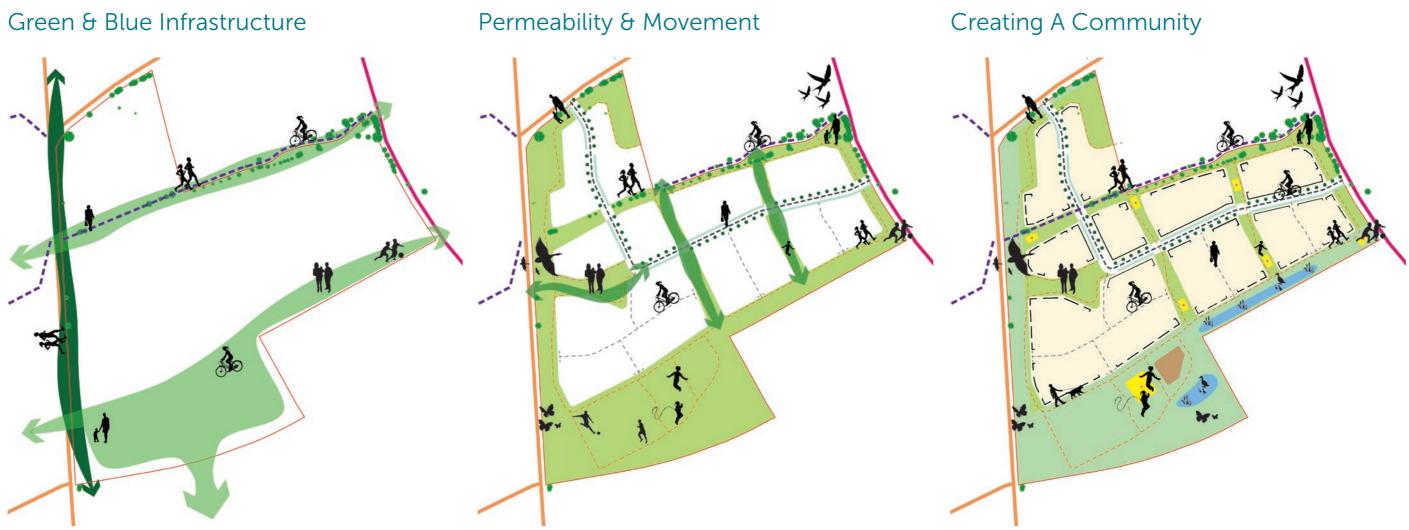






COMMUNITY OPEN SPACE

3.2. Design Principles



- The southern green space acting as a multifunctional green space and opens up to the countryside
- The northern Public Rights of Way is retained and enhanced as an east west green lung linked to wider Baston.
- The north south corridor on western edge acts as a buffer to the road and provides for biodiversity enhancement.
- Every home has access to open space allowing community and nature to come together
- A connected network of tree lined streets, green routes, informal walking, cycling leisure routes and public transport
- existing settlement
- neighbourhood.
- the background

Baston Green Land West of A15, Baston

• Designed to be a natural extension of the

• Offers a variety of built form, character areas, routes and spaces to create a beautiful

• Designed to have a green network at forefront, with homes and permeable built form set in

3.3. Design Framework

The proposed development framework plan allows for the site to deliver upto 250 units. The evolving design framework seeks to achieve the following principles -



Landscape led design

- Creating integrated green and blue infrastructure network which will include a mosaic of habitats, trees, hedges, meadows and wildlife shelter.
- This will be comprised within extensive area of POS, totalling 18.61 acres (48%) of the whole site.



Character and Identity

- Respond to the surrounding context and local landscape character.
- Create a series of linked areas of formal and informal open space, together with distinctive spaces.
- Ensure the most effective use of land through appropriate scaling and massing.



Permeability and Access

- Promote accessibility and enhance public transport opportunities to ensure a variety of forms of sustainable travel.
- Provision of recognisable routes and recreation routes to community features and amenities
- Provide traffic calming measures within the scheme ensuring pedestrian safety.
- Achieve a hierarchy of space and routes.



Supportive Infrastructure

- Ensure appropriate flood mitigation is incorporated.
- Provide proportionate and appropriate S106 and relevant contributions.



High Quality Design

- Ensure that public spaces are overlooked by buildings to provide a safe and secure environment.
- Provide accessible play spaces (LEAPs and LAPs) which will be well overlooked.
- Areas of public open space, formal and informal open space will be appropriately landscaped to ensure a sense of well-being.
- Through the detailed design process ensure materials are carefully considered and reflective of the local context.
- Ensure homes that are adaptable to the changing requirements of the population, including all ages.
- Ensure a climate resilient development.
- Provide a wide variety of dwellings types, including a range of tenures to provide a mixed and balanced community.

Кеу

_	Site Boundary
	Proposed development area [250 Units]
	Multifunctional green space
	Allotments/Community Orchards
	Play provision
۲	Indicative location of attenuation basins and swales
	Indicative location of pumping station
	Indicative location of substation station
	Proposed pedestrian and vehicular access
	Existing pedestrian/cycle link to Public Rights of Way (PRoW)
	Existing Public Rights of Way
	Indicative primary street
	Indicative secondary street
••••	Proposed indicative footpath
	Proposed 3m wide swales along primary street
•••	Proposed 3m wide green verge with tree planting along primary corridor
ш	Frontages
*	Key Buildings





Кеу

Site Boundary

Existing trees and

- hedges New areas of woodland planting
- New areas of native tree and buffer planting Green corridors
- 6 improving permeability across the site Multi-functional
 - drainage basins and swales
- Areas for biodiversity X enhancement
- Potential community
- orchard and allotments Local equipped area of
- play (LEAP) Local area of play (LAP)/
 - Trim trail

Parking for allotments

Fig 12. Illustrative Masterplan

3.4. Illustrative Masterplan

The Illustrative Masterplan delivers up to 250 new homes which is informed by exemplar design principles for high quality place making. We've applied a landscape led approach, ensuring the proposal sensitively integrates into Baston, whilst at the same time enhances the wider landscape and provides a beautiful sustainable neighbourhood for both families and individuals.

- All modes access from A15, Deeping Road All modes access from Greatford road Existing Public Rights of Way (PRoW) access Southern open green providing for kick about space and potential for biodiversity enhancements New north south buffer with walking routes and potential for 5 biodiversity enhancements Green fingers increasing permeability of the site and linking the 6 existing settlements
 - Main street with tree verge and swales

SuDS and attenuation ponds

www.wates.co.uk

Baston Green Land West of A15, Baston



3.5. Phasing Approach to Development

Кеу

Site Boundary

Existing trees and

- hedges New areas of woodland planting
- New areas of native tree and buffer planting
- Green corridors 6 improving permeability across the site Multi-functional
- drainage basins and swales
- Areas for biodiversity X enhancement
- Potential community
- R orchard and allotments Local equipped area of
- play (LEAP)
- Local area of play (LAP)/ Trim trail

Parking for allotments

Fig 13. Illustrative Masterplan

Significant landscape buffer and planning along western boundary to accommodate circular walking route and screen the development.

Retention and enhancement of existing green infrastructure providing extensive and varied areas of public open space to support health and well-being.

Transformation from an arable field into green and blue infrastructure will allow significant biodiversity net gain (up to 40%)

Landscape buffer to south will limit the growth of Baston's built up area boundary and accommodate play spaces and landscaping opportunities.

Provision of a large detention basin in the lowest point of the site will allow for a gravity-led drainage strategy supporting the whole site.

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3

Access via Greatford Road discussed with Lincolnshire CC who are happy in principle. This requires the removal of one tree.

4. Conclusion

This document sets out our vision and concepts for the delivery of a sustainable village extension to Baston.

Wates Development has an enviable track record of creating thriving new communities and is committed to working closely with stakeholders and the local community to create a beautiful, resilient sustainable neighbourhood reflecting the highest in design standards.

The landscape led vision will be a key design driver to create a high quality new community that is well integrated with the urban fabric of Baston, significantly enhance biodiversity value of the local area and promotes a 'truly' sustainable development in the context of climate change. A sustainable travel plan and a range of on-site and offsite highways improvements will further enhance the sites sustainability.

The proposal addresses local unmet housing need and will deliver up to 250 new family homes of varying mix and tenure as well other community infrastructure.

The site is free from major constraints, is in a sustainable location and is available, viable and deliverable.



Provides a wide range of new homes within a beautiful setting



Enhances links, providing footpaths and creating a sustainable and integrated community





The potential of a development with everyday life nestled in nature with enhanced visual links



Provides biodiversity net gain through sensitive landscaping and ecological enhancement



Provides 18.61 acres (48%) of publicly accessible amenity open space and recreation facilities which will benefit the existing village

> Low impact - zero carbon - ready development sustainable homes for all



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