

## **South Kesteven Local Plan**

### **Draft Reg.18 Consultation (February 2024)**

#### **Draft Representations**

#### **Lindum Group Ltd – 22/04/2024**

### **Introduction**

This note sets out the representations of the Lindum Group to the Draft Reg.18 Consultation of the South Kesteven Local Plan. These representations should be read in conjunction with separate representations submitted on behalf of the Lindum Group by Carter Jonas which focus specifically on the proposed allocation of Land off Ermine Street in Ancaster in Policy H1.

### **Strategic Objectives**

#### **SUPPORT**

The Lindum Group support the proposed change to Objective 6 of the strategic objectives. Enhancing the role and function of the Larger Villages has been introduced to objective 6, which we consider to be an appropriate and sustainable amendment. The Lindum Group have land interests in Ancaster and Claypole, both of which are included as Larger Villages in the Settlement Hierarchy (see below). We consider both settlements to be sustainable locations suitable for residential development as detailed further in our below representations.

Whilst the Lindum Group acknowledge and support the need for planning policy to consider and address the impacts of climate change, we suggest a balance is required to ensure that the delivery of development opportunities is not overly constrained and that a suitable balance is achieved. Therefore, whilst we support the proposed changes to Objective 13, we urge caution in detailed policy to ensure a balance is met between ensuring development can come forward and ensuring such development considers the impacts in terms of Climate Change. Further comment is provided to this on Chapter 5 of the Draft Local Plan (see below).

### **Chapter 5 – Climate Change**

#### **NEUTRAL**

The Lindum Group welcome the Council's acknowledgment of the Written Ministerial Statement of December 2023 and its importance in considering Climate Change policy. The statement entitled 'Planning – Local Energy Efficiency Standards Update' is very clear that Local Plan Policies should not go beyond current or future planned building regulations. For the benefit of the doubt, the relevant section of the ministerial statement is repeated below:

*The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government's commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale.*

It is the view of the Lindum Group that current and emerging building regulations are sufficiently robust in considering climate change impacts and that Local Planning Policies do not need to push beyond building regulations. As detailed in the ministerial statement, should Local Authorities look to go beyond building regulations then such policies will need to be well-reasoned and robustly costed. This is an important point when considering the need for balance when considering climate change policy and ensuring such policy does not overly constrain development.

### **Spatial Strategy**

#### **SP2: Settlement Hierarchy**

##### **SUPPORT**

The Lindum Group support the proposed change to the Settlement Hierarchy in Policy SP2 and the inclusion of Claypole as Larger Village. The Settlement Hierarchy Review of February 2024 is a well-structured document which includes a logical and thorough analysis of the settlements including accessibility to services, facilities and employment opportunities. Claypole has a good range of facilities, including a primary school, village shop, village hall, church and public house alongside good recreation facilities. The settlement is therefore a sustainable one, as highlighted by the score of 40 in the village survey scoring.

In addition to this, Claypole is identified as having 696 residential addresses, a figure that is on par with many of the other larger villages and is significantly larger than the majority of the small villages in which it was previously grouped. For Claypole to continue to be a sustainable village that sustains its important facilities then further growth is required and this growth will be aided by its identification as a large village. The Lindum Group have land interest in Claypole which we consider suitable for development going forward in line with its identification as a Large Village.

#### **New Policy 1: Rural Exception Schemes**

##### **SUPPORT**

The Lindum Group support the proposal to create a new policy for Rural Exception Schemes. We agree with the Council's summary of the proposed change that separating rural exception scheme policy from Policy SP4 provides better clarity in relation to this policy. This is an important policy in terms of delivering affordable housing in South Kesteven and is one we support.

### **Delivering New Homes**

##### **OBJECT**

As indicated in the introduction to this note, these representations should be read in conjunction with the representations submitted by Carter Jonas on behalf of the Lindum Group in support of the allocation of the site East of Ermine Street in Ancaster.

We do however object to the omission of land owned by the Lindum Group in Claypole. The Lindum Group own land to the north of our previous development on land to the north of Doddington Lane in Claypole (S21/0415), see attached location plan. We consider the site to be suitable for residential development and its development would conform with Claypole being upgraded to a Large Village in the Settlement Hierarchy.

The Draft Site Assessment Report of February 2024 includes consideration of our site but includes an error in relation to its analysis. The most fundamental of these errors is the

conclusion in the main findings of the report which indicates that the site has planning permission and therefore the principle of development is established, and allocation is not required. This is not the case for the whole site, and whilst the southern half of the site has now been built out (Claystone Meadows, St Peters Meadow) the northern half was not part of that permission and remains undeveloped.

The undeveloped half of the site makes for a logical, sustainable and deliverable housing development and in our view should be included as an allocation in Claypole. As highlighted by the other elements of the Site Assessment, the site has little to no constraint and can be suitably accessed through the new development to the south. The attached plan shows that a development of 16 dwellings can be delivered on site using a design approach led by the permitted scheme to the south.

The current draft document includes for no allocations within Claypole, despite its promotion in the Settlement Hierarchy to a larger village. The allocation of our site to the north of the St Peters Meadow would conform with the settlements revised status as a large village.

### **Sustainable Building and Construction**

#### **SB1: Sustainable Building**

NEUTRAL

We have concerns that this policy is broadly similar to the conditions proposed within Chapter 5 which deals with climate change. We suggest this policy should be incorporated within that chapter and reiterate our view that any such policy should bear in mind the ministerial statement of December 2023. We do however welcome the acknowledgement that any sustainable building policy takes into account the planned Whole Plan Viability Assessment. We frequently work in the Central Lincolnshire Plan Area in which extensive Climate Change and Sustainable Building policies were introduced. The result of which is viability of development in the area is under extreme pressure, with application numbers falling. Any viability assessment needs to be robust and include consultation with developers and construction companies who have experience of this issue. Lindum would be happy to participate in such discussions.

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Rev	Description	Date



PHASE 1  
(COMPLETED)

	House Type A - 2 Bed Bungalow (3 Person)	58m <sup>2</sup>	3 Properties
	House Type B - 2 Bed House (4 Person)	67m <sup>2</sup>	2 Properties
	House Type C - 3 Bed House (5 Person)	80m <sup>2</sup>	6 Properties
	House Type D - 2 Bed Bungalow (3 Person)	58m <sup>2</sup>	2 Properties
	House Type F - 2 Bed House (4 Person)	67m <sup>2</sup>	4 Properties



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Client  
**Lindum Developments**

Project  
**Claypole Ph2  
 Doddington Lane, Claypole**

Drawing  
 Proposed Site Plan

Scale  
 1:750@A3

Drawn by \_\_\_\_\_ Checked by  
 S.J.P.

Drawing Number \_\_\_\_\_ Revision \_\_\_\_\_