

Your ref:
Our ref: 480 39 MB

19 April 2024

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

Dear Sirs

**SOUTH KESTEVEN LOCAL PLAN
REGULATION 18 CONSULTATION 2024
FORMER AVELAND SCHOOL, BILLINGBOROUGH (SKPR-61)**

Thank you for the opportunity to provide representations on the Regulation 18 Draft version of the Local Plan for South Kesteven.

We represent Lincolnshire County Council, the owner of the former Aveland School on Birthorpe Road in Billingborough, which is allocated, together with neighbouring land (SKPR-103) for residential development under policy H1. In total the sites are expected to deliver 140 dwellings at a density of 30 dwellings per hectare. The two sites are expected to be delivered together, provide pedestrian links to the village core as well as the allotments that are described as being to the north of the site, although the allotments are in fact to the south, and are to be developed in a coordinated fashion.

We confirm the landowner supports the principle of development and will make the site available for development.

There are, however, comments on both the Site Assessment/Sustainability Appraisal process and the Billingborough Residential Allocations development principles on page 195 of the Local Plan.

On the site assessment, a few areas of concerns are raised, which in reality should be discounted. These are:

- Agricultural Land Classification – both assessments consider the site to be grade three agricultural land. In reality, and as acknowledged in the site appraisal, SKPR – 61 occupies the site of the demolished Aveland Secondary School. The Agricultural Land Classification Map for the East Midlands region, however, does not recognise settlements of the size of Billingborough. In reality, the site should be classified as "Land Predominantly in Urban Use". New Policy 2 appears to require a soil survey to be undertaken for sites involving 1ha of Best and Most Versatile Agricultural Land. No such requirement should be applied to the redevelopment of a former school site.



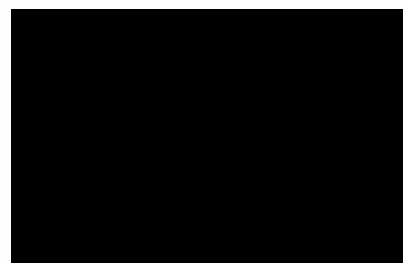
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- Surface Water Drainage – The site appears to be subject to surface water flooding from puddling within the site. The lapsed planning consent (S14/1316) and subsequent (withdrawn) Reserve Matters Application (S19/0084) demonstrated how surface water drainage could be delivered appropriately for a development of 40 dwellings within the confines of that application site.
- Source Protection Zone – the site is considered to be within a Source Protection Zone. This can be an important issue, however, the detailed planning consents for SKPR-61 did not demonstrate that ground water is a concern. The former use of the site as a school had already established the principle of development on the site.

There were a few other more minor concerns relating to distance to Nature Conservation sites, listed buildings, protected trees, bus routes, railway stations and secondary school. In reality the development is unlikely have an impact on any heritage or ecological assets (certainly no concerns were raised during consideration of the lapsed outline consent or the subsequent withdrawn Reserve Matters application for 40 dwellings). The proximity to railway stations and schools is similar to most sites in South Kesteven outside Grantham and should not weigh against this site. The bus stop is just over 400m away, with 400m being the normal upper limit walking distance to bus stops in urban areas. Billingborough, however, is a village and as such the extra distance should not be an issue.

The Local Plan Billingborough Residential Allocations on page 195 includes a number of development principles which need to be carefully considered.

Principle A requires the preparation of a comprehensive masterplan and joint working between (all parties). It is not clear why a comprehensive masterplan is required. The previous planning consent showed how a site could be developed independently without prejudicing development of SKPR-103, which can be accessed from Pointon Road to the east as well as on to other neighbouring roads.

It is also unclear who “all parties” may be.

Such a requirement may be appropriate where there has been discussion with the LPA and the site proponents, but we are unaware of any such discussions taking place. Our clients are certainly not averse to the potential of a joint development, or to allow pedestrian, or possibly vehicular, links through their site. There is no evidence, however, to justify a joint scheme. The site assessment and SA exercises have not identified any factor that would indicate the development of one site is dependent on



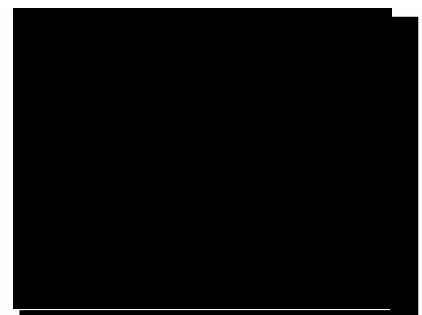
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the other, but an absolute requirement will do nothing to maximise delivery and may only serve to sterilise both parts of the allocation.

Unless there is evidence of an absolute need for a joint development, Principle A should be deleted or amended to allow a more flexible approach to development.

Principle C requires connections to the allotments to the north of the site (they are actually to the south – this should be corrected). The allotments were provided as part of the Outline application that included the residential development of 40 dwellings on SKPR-61 – (reference S14/1316 and S16/0747). The allotments, together with the recreation field, car park and access were provided as part of the proposed redevelopment of the school site under the otherwise lapsed outline consent for 40 dwellings. We note the allotments seem to be at capacity and there are clear signs the recreation field is regularly used for informal recreation. As such, it appears the facilities are used by the wider population and are not simply meeting a need created by the proposed development. The Reserved Matter submission for the residential development (S19/0084) also incorporated a pedestrian link to the allotment area, which demonstrated how this requirement could be delivered as part of a future development.

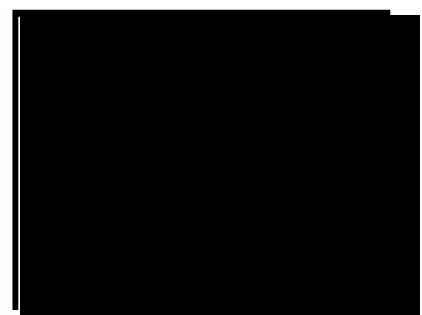
P C should confirm the allotments, including the access from Birthorpe Road, were provided under the outline consent for the redevelopment of SKPR- 61.

Principle D requires development to make “good use” of the two potential access points from Pointon Road and Birthorpe Road. It is not clear what “Good Use” means – but SKPR-61 can access Birthorpe Road as demonstrated by the lapsed outline planning consent. SKPR-103 would appear to have access to both Pointon Road and Birthorpe Road, whether or not the sites are developed as a single entity.

Please provide clarity on the term “good use” and confirm SKPR-61 is only dependent on access to Birthorpe Road.

Principle F requires development to be set back from the historic hedgerows to the south of the site. The hedgerows do not affect SKPR-61. The hedgerows to Birthorpe Road appear to have been planted as part of landscaping for the school and incorporate decorative fruit trees. These would normally be retained as part of a development. We note the school had two access points which could form the basis of a future vehicular access for future development without impacting significantly on the existing hedgerows.

Principle F should be amended to confirm the hedgerows do not impact on SKPR-61.



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Principle G indicates the site is within an area of "Biodiversity Opportunity", despite being a cleared site of a former school, and a site with a recently lapsed planning consent for 40 dwellings.

It is not clear how such areas have been defined. A Biodiversity Opportunity Map has been published with the plan, the derivation of the plan has not been provided, nor has any consultation taken place with the landowners. It appears by investigating the map that areas of Biodiversity Opportunity do not include developed areas and, as such, SKPR-61 should not be designated in this way. The site also benefits from allocation in the adopted local plan, an allocation which predated the BOM exercise.

It is not reasonable to overlay an existing allocation with a restrictive designation without providing a robust justification.

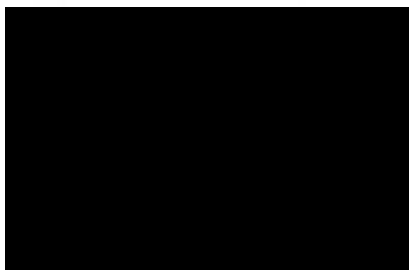
Principle G should be removed as it is redundant after the Biodiversity Net Gain Regulations came into force in February 2024.

Principle H indicates the site is a Green Infrastructure Area – as a derelict school site subject to an existing local plan allocation this does not apply to SKPR-61. As stated above, the map of Green Infrastructure Areas has not been justified. Principle H should be deleted or confirmation given that it does not apply to the allocation SKPR-61.

We **Support** the allocation of SKPR-61 but **Object** to the detailed comments set out above until and unless they can be properly justified and consulted on publicly. The landowner would welcome the opportunity to discuss any of these matters in more detail, to allow for a mutual understanding of the issues involved.

Please contact the office should you have any questions.

Yours faithfully



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