

South Kesteven Local Plan – Regulation 18 Consultation.

Representations (**OBJECTION - OMISSION SITE**) by **Aspbury Planning Limited** on behalf of **Habitat Homes Lincs: Land bounded Elms View and Belvoir Gardens, Great Gonerby, Grantham Lincolnshire.**

1.0 **THE REPRESENTATION**

- 1.1 The Representor, which has an interest in the land edged in red on the attached OS Plan (land bounded by Elms View and Belvoir Gardens, Great Gonerby) – ‘The Representation Site’ (RS), amounting to some 4.5 hectares, seeks allocation thereof for an integrated residential ‘retirement community’ (a housing complex designed specifically for older adults [age 55+] incorporating a range of independent [UCO Class C3], assisted living and care home [UCO Class C2] residential accommodation, with communal facilities and amenities).
- 1.2 As demonstrated in the attached *Illustrative* Masterplan, the Site can accommodate up to 80 independent and extra-/supported care residential units, a (70-bed) care home, and a community hub building. Vehicular access would be from Elms View and the Representor has control of the property through which the new access would be created.
- 1.3 The Local Planning Authority will be aware that the proposal has previously been the subject of a Pre-Application Enquiry and the Representor has noted the Authority’s response thereto. That response has informed this Representation and would similarly inform a future Planning Application, pursuant to a Local Plan Allocation.
- 1.4 In support and amplification of this Representation the Representor is preparing the following material, which it proposes to submit in the near future, so that the Authority will be able to make a fully informed decision on the proposed allocation ahead of the Regulation 19 stage of the Plan-making process, allowing it to include this allocation therein:
- A Preliminary Ecological Assessment;
 - A desktop Archaeological Assessment;
 - A Transport Assessment;
 - A Landscape and Visual Impact Assessment;
- 1.5 The proposed new allocation: SKPR-??? – ‘Land bounded by Elms View and Belvoir Gardens, Great Gonerby’ (Indicative number of units: 80 + [70-bed] Care Home) – would, it is suggested, be subject to the following ‘Development Principles’:
- High design quality including attention to the layout, height and scale of development reflecting particularly its location on the edge of the Village and incorporating sustainable/energy efficient design;
 - Measures to optimise/enhance pedestrian and cycle connections into the village and to the local network of footpaths and bridleways should be incorporated into the

development proposal via the propose access and the PRoWs running along the eastern boundary and on Church Lane to the south east of the Site;

- Appropriate formal and informal open space provision on site;
- Retention and incorporation of important on-site features, such as trees and hedgerows in the development, where possible;
- A landscaping/biodiversity buffer along the external (southern and western boundaries). (It is noted that This site is within a Green Infrastructure Area. Proposals on this site should incorporate the relevant principles for development within Green Infrastructure Areas set out in Policy EN3 Green Infrastructure);
- Comprehensive/integrated SUDS hierarchy-based surface water drainage scheme.

1.6 The Representor notes that the draft Local Plan includes another residential allocation - ***SKPR-241 – Land Off Church Lane – in Great Gonerby***. ***This*** proposal is without prejudice to that draft allocation and is promoted as additional/complementary to it and not as an alternative.

2.0 **SUPPORTING COMMENTARY**

2.1 The draft Local Plan Review recognizes the need for (more) housing/accommodation for the elderly. Thus. In the ‘District Profile’ (Page 12) it notes:

“23% of the population is aged over 65 years. The over 65 group is expected to increase by 7% to 2041”

In Table 1 – Economic, Social and Environmental Challenges (page 13) under ‘Social Challenges’ it is stated:

“A mix of housing types and tenures is required to meet local needs. There is a particular demand for two and three bed properties, arising from newly forming households and older households seeking to downsize.”

“The number of older people living in in the District is expected to increase significantly over the plan period - this has significant implications for meeting housing, health and care needs.”

“Increasing need for specialist or extra care housing –support this through targeted new build provision”

In Chapter 7 – Meeting Housing Needs – Paragraph 7.19 reads:

“The Local Housing Needs Assessment indicates a need of 3,923 - 4,053 specialist homes for older people over the plan period based on the age and likely health needs of the population....”

And Policy H4 - Meeting All Housing Needs – states inter alia:

“All major developments for residential development should provide appropriate type

and sized dwellings to meet the needs of current and future households in the District.

“New housing proposals shall also:

“Enable older people and the most vulnerable to promote, secure and sustain their independence in a home appropriate to their circumstances, including through the provision of specialist housing (as defined in the Glossary) across all tenures in sustainable locations. New housing proposals shall take account of the desirability of providing retirement accommodation, extra care and residential care housing and other forms of supported housing;....”

- 2.2 This reflects guidance in Paragraphs 8 (b) and 62 of the NPPF. Moreover, it is recorded at the national level, that by 2026, older people will account for almost half (48%) of the increase in the total number of households!
- 2.3 Provision of dedicated specialist accommodation such as this frees-up family accommodation, leading to a better fit between residential demand and supply and reducing housing pressure thereby.
- 2.4 Notwithstanding the above, the Plan merely states (at 7.19) that *“the need for these homes is incorporated into the overall need for housing and is not additional to the overall housing requirement up to 2041.”* Whilst the Representor accepts this as a simple statement of statistical methodology and determination of **overall** housing need, this approach implicitly downplays and conceals the significance of the clear and pressing need for housing to address the specific needs of the elderly.
- 2.5 Moreover, there is, no allocations in the emerging local plan specifically for housing for older adults. This is important because integrated retirement communities, such as is proposed on the RS cannot compete with land values generated by open market/family housing. This due, amongst other things, to the specialist nature and the inclusion of communal facilities and services in such developments. In practice, therefore, developers are outbid in competition for sites with ordinary housebuilders.

Intrinsic Characteristics/Benefits of Purpose-Designed Integrated Retirement Communities.

- 2.6 Consistent with other developments of this type, the proposal the subject of this Representation would incorporate:
- A **range** of residential accommodation types (and tenures) designed specifically for elderly people/retirees, which address the evolving needs of this population cohort through later life across the spectrum from the active elderly to those in need of varying degrees of support and care. The integrated approach recognizes, amongst other things, that members of the **same** household may experience different health levels at any one time and have different accommodation needs, therefore. However, **all** homes would be designed, as a minimum, to meet Part M of the Building Regulation in terms of accessibility;
 - Shared indoor and outdoor facilities, including, inter alia: manned reception/contact point/office; a communal meeting/activity room/lounge; a café/coffee shop (with IT

facilities); a gym; a medical consulting room; family guest suite; and outdoor activity areas. These communal facilities would also be made available to elderly people in Great Gonerby.

- Active 24/7 on-site management and supervision, including maintenance of the outdoor spaces;
- Because most residents will have typically relocated from existing (under-occupied) family accommodations (commonly called ‘downsizing’) in this same part of Lincolnshire, they will not impose an additional burden on local healthcare facilities. Indeed the availability of on-site care resources, able to deal with routine health issues is likely to reduce pressure on local primary healthcare facilities. The development would offer a prescription collection and drop-off service (again available to other elderly persons on Great Gonerby).
- Facilities such as this typically generate significantly lower vehicular traffic levels than conventional housing, with many residents choosing not/being unable to own and use a private motor car. Such motor car usage as there is, tends to be **outside peak hours** because there is no need for journey-to-work/school trips for residents, whilst staff work shifts that do not coincide with peak hours. The excellent local facilities in Great Gonerby are all within comfortable level walking/cycling distance of the RS and of scheduled bus service stops.
- Additionally, the facility could operate a dedicated **mini bus**, offering, amongst other things: daily scheduled trips to Grantham Town Centre (including the Bus- and Railway Stations); ‘on-demand’ trips to local Doctors’ Surgeries and to Grantham & District Hospital; and occasional trips to local and regional visitor attractions (e.g. Belton House, Belvoir Castle etc.). This will further reduce to propensity for travel by private motor car. Subject t to capacity, such trips can be made available to local non-resident elderly people.

Compliance with relevant provisions of the emerging Local Plan Review

2.7 The Representor contends that, in addition to the provisions recorded at 2.1 and 2.2 above, the proposed allocation would accord with the other provisions of the draft Plan as follows:

The Vision & Strategic Objectives: Village & Countryside:

“Outside the four main towns, new development will be focused primarily on those villages where there are good levels of services and facilities, having regard to the environmental and infrastructural capacity of those villages and the desire to safeguard existing services and employment.

The Strategic Objectives: Notably **Nos. 9, 10** and **11**.

Chapter 8:

“8.2 The settlement hierarchy ranks settlements based on various factors, such as the availability of local services and access to sustainable transport options. The settlement hierarchy aids decision making as it identifies those settlements most suitable for

accommodating new homes, new jobs and investment in services, facilities and infrastructure.”

“8.4 The Larger Villages are the most sustainable villages in the District and as such they will be the focus for development outside of Grantham, Stamford, Bourne and The Deepings. The assessment of the larger villages took the following into consideration: Primary schools, food shops, public transport, village halls, post offices, public houses, open space, play space, doctors, police / fire, secondary schools and other businesses. The sustainability of these settlements could be undermined if services are lost or facilities significantly reduced.

2.8 **Great Gonerby** is classified as a ‘Large Village’ (Policy SP2 – Settlement Hierarchy) in the Plan. The Representor supports this status as the Village clearly meets the relevant services and facilities criteria. Thus it benefits from the following:

- Parish Church,
- Primary School
- Public House
- Convenience Shop
- Post Office
- Village Hall
- Equipped sports/recreation ground

Significantly, the Village also enjoys good public transport connectivity as follows with ‘Kesteven Call Connect’ (on demand) and scheduled ‘Centrebus’ Service 24 to-and-from Grantham and Newark (via Gonerby Hill Foot).

2.9 The Representors consider the relevant Policies in the Draft Plan to be generally be sound.

- As regards **Policy SD1** – Principles of Sustainable Development in South Kesteven, it is submitted that the proposed allocation would intrinsically comply or is capable (through design etc.) of being rendered compliant, specifically with clauses a), b), c), d), e), f), h), i), j) and k).
- With respect to **Policy SP1** – Spatial Strategy, the Representors support the assessed housing requirement of 14,020 dwellings with a 21% additional buffer, which is considered to be prudent to ensure the delivery of the minimum requirement (Paragraph 6.6), subject to the reservations expressed at 2.4 above.
- As noted above, the Settlement Hierarchy at **Policy SP2** (including the classification of Great Gonerby in Clause 3 – ‘Larger Villages’ is supported and is considered justified on the basis of the infrastructure and facilities the Village possesses as listed above. Moreover, Great Gonerby is located adjacent to the Grantham built-up area.
- As regards **Policy H1** – Housing Allocations, the Representor contends that this Policy is presently **unsound**, because of the lack of explicit provision of housing

allocations for the elderly, but could be rendered sound by the allocation of the RS on the terms (Development Principles) suggested above.

- Given the willingness to provide for an appropriate level of affordable housing, the Representor contends that the proposed Allocation would with **Policy H2**.
- As already noted above, allocation of the RS would be fully compliant with **Policy H4**, notably Clauses a), c) and d) and, by freeing-up family housing, would facilitate the achievement of Clause b).

2.10 The Representors contend that this is an excellent prospective allocation for the following reasons:

- ❖ It is sustainably located close to the centre of the Village and to all the local amenities and bus routes (within comfortable walking distance);
- ❖ It is immediately adjacent to the existing pattern of development well-related to the existing built form of the Village;
- ❖ It 'hugs' the edge of the built-up area and is a visually well-contained space such that development on it would not extend obtrusively into the open countryside. Significantly the sharply falling topography beyond the southern and western boundaries, including a 'false crest' adjacent to these boundaries, screens the Site in external views in an arc from the west, south-west and south, including from the A1 and A52 and the Vale of Belvoir; whilst the built up area of the village contains it on the northern and eastern sides;
- ❖ On-site landscaping in accordance with the terms of the prospective allocation can reinforce this visual containment;
- ❖ The proposed size / scale, layout and character of the development is appropriate to the setting and proportionate to the size and character of the Village;
- ❖ The Representor has submitted an 'Illustrative' Layout Plan with these Representations that demonstrates how the terms of the draft can be met in full;
- ❖ The development would be capable of being well-designed (respecting the character of the area, incorporating good [locally- distinctive/sensitive] design and sustainability principles;
- ❖ The allocation does not involve the loss of best and most versatile (BMV) agricultural land, nor would its 'loss' to agriculture affect the viability of the holding of which it currently forms part;
- ❖ The development is capable of delivering at least the statutory minimum (10%) Biodiversity Net Gain;
- ❖ The Site lies in Flood Zone 1 and would not be at risk of flooding or cause flooding elsewhere;
- ❖ The development would deliver an appropriate level and tenure(s) of needed Affordable and/or Specialist Housing (in accordance with **Policies H2** and **H4** of the Draft Plan);
- ❖ The proposed Allocation Site is available and unencumbered (by any restrictive covenants/leases/tenancies etc.) and the Representors would look to bring it forward for development immediately upon conformation of the Allocation through the adoption of the Local Plan Review. In principle, the Site is capable of being delivered within the first 5-year Plan Period, therefore;

- ❖ The development of the RS specifically for retirement/late life housing and care can be secured through the terms of the proposed allocation and, in due course, through a Section 106 Obligation pursuant to a Planning Application.

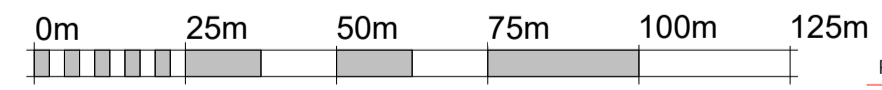
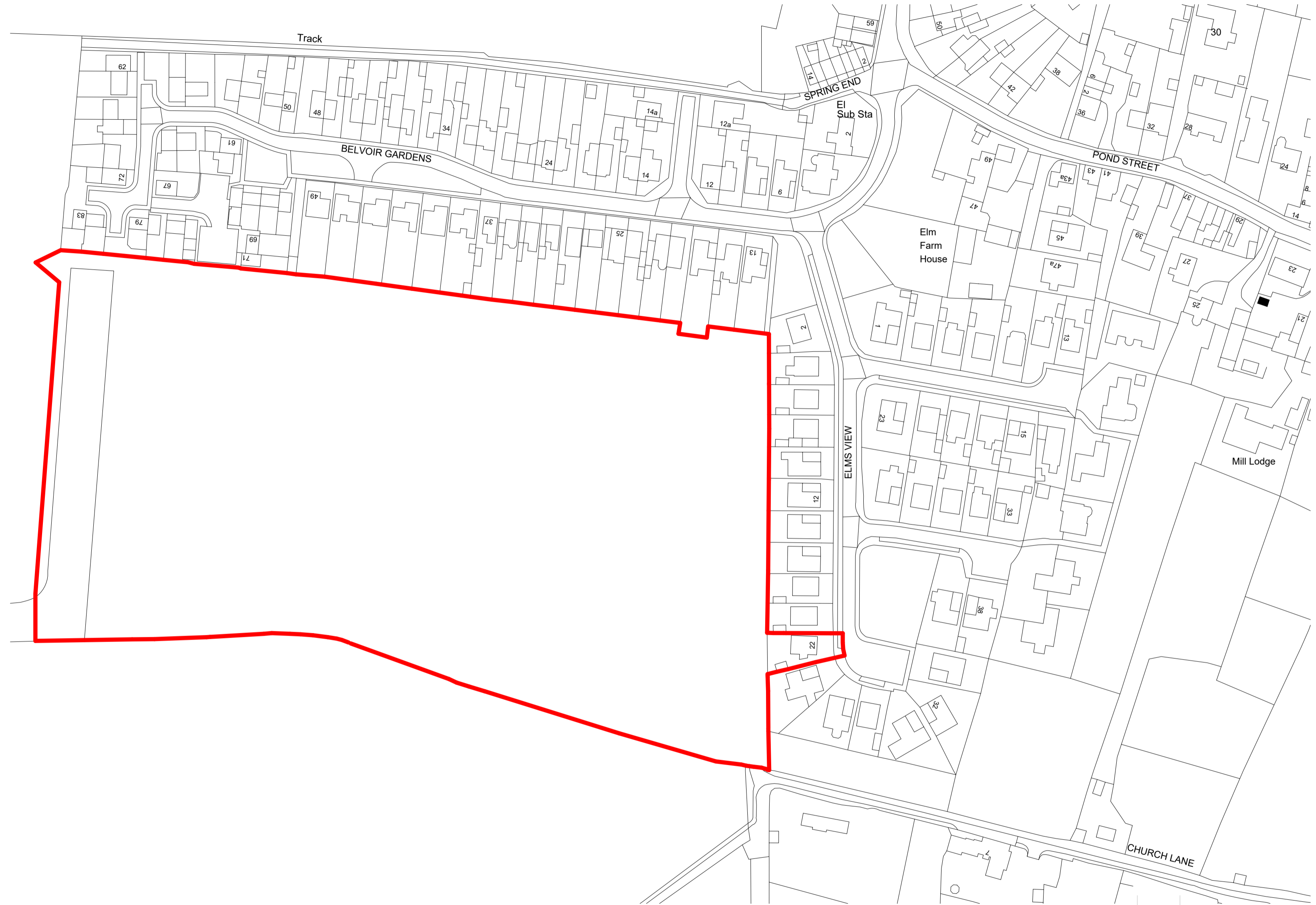
3.0 SUMMARY & CONCLUSION

- 3.1 In Summary, therefore, the Representor proposes the allocation of the RS in Draft Local Plan Review (LPR) specifically for dedicated housing and care facilities for the elderly, subject to the above-cited proposed Development Principles.
- 3.2 This is a demonstrably appropriate allocation complying with sound spatial planning principles, with the guidance in the NPPF and with all the other relevant policies in the emerging Local Plan.
- 3.3 It will address the current UNSOUNDNESS of the draft Local Plan Review by virtue of its failure to provide (an) allocation(s) explicitly for housing development for the elderly.
- 3.4 It will meet an recognised/acknowledged and pressing specialist housing need and is capable of being delivered *early* in the Plan Period.
- 3.5 Development of the Allocation on the terms proposed would clearly constitute **SUSTAINABLE DEVELOPMENT**.

Asbury Planning Limited

April 2024

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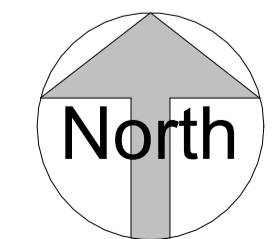
VISUAL SCALE 1:1250 @ A2

PI	18.04.24	First Issue	IRD	GF
rev	date	rev notes	drn	chk

PROJECT	ORIGINATOR	ZONE	LEVEL	TYPE DISCIPLINE	NUMBER	REV
619	SGA	XX	SL	DR	A	00001 PI

SCALE @ A2: 1:1250 DATE: Apr 24

DRAWN BY: IRD CHECKED BY: GF



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CLIENT **Zee Construction**
 PROJECT **South Kesteven Local Plan Review – Proposed allocation for a Integrated Retirement Village**
 TITLE **Land at Great Gonerby Existing Site Aerial Plan**

PROJECT	ORIGINATOR	ZONE	LEVEL	TYPE	DISCI	NUMB	REV
619	SGA	XX	SL	DR	A	00003	PI
SCALE @ A3	1:1250			DATE			Apr 24
DRAWN BY	IRD			CHECKED BY			GF



105m

100m

95m

90m

2 Storey block or 14No 1 Bed flats for care staff and close care residents connected to the care home

2 storey, 70 bedroom care home with enhanced communal facilities to form 'Village Hub' for the site and wider community. Positioned at the lowest point of the site to minimise visual impact

Landscaped amenity pond to aid Suds and bio-diversity

Schedule of Accomodation

- 66No Retirement and close-care 2 & 3 Bedroom Bungalows
- 14No 1 Bedroom Close-care Flats
- 70 Bedroom Care Home & Community Hub
- Public Open Space with pathways and buggy routes open to the wider community

With the exception of the two storey care home, and close care flats, all of the proposed development is single storey. So with well screened boundaries and a south facing slope across the site, the impact on the existing houses and long distance views will be minimal

North to South slope of the site makes it ideal for solar, low-carbon development

Footpath and buggy link to Elms view

Existing Public Right of Way through site from North to South. Path retained and enhanced with soft landscaping/hedgerow screens. Connection to Church Lane & Pathway system on site.

Primary Vehicle and Pedestrian Access from Elms View

Pedestrian/buggy link to Church lane

South Kesteven Local Plan Review
 Proposed Allocation for an Integrated Retirement Village, Land at Great Gonerby
 619-A-SK101, 1:1250
 Proposed Site Plan



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