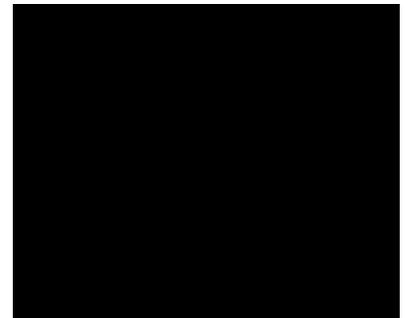


24 April 2024

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



Sent via email: planningpolicy@southkesteven.gov.uk



Dear Sir / Madam

South Kesteven Draft Regulation 18 Local Plan response on Behalf of Bettinson Trust

This letter provides a response to the Regulation 18 Local Plan currently being consulted upon for 8 weeks from 29 February to 25 April 2024.

We are instructed by the Bettinson Trust to submit representations to the draft Local Plan and evidence base documents.

For your reference, SKPR-53 (shown below), within the Draft Regulation 18 South Kesteven Local Plan, includes land owned by the Bettinson Trust as well as four additional landowners (Bradshaw, Jones, Lees and Lincolnshire County Council). The Bettinson Trust land totals c.2.9ha (7.1 acres) part of the SKPR-53 wider c.20ha (49 acres) draft allocated site.

SKPR-53 Land at Mill Drove (indicative 285 dwellings)

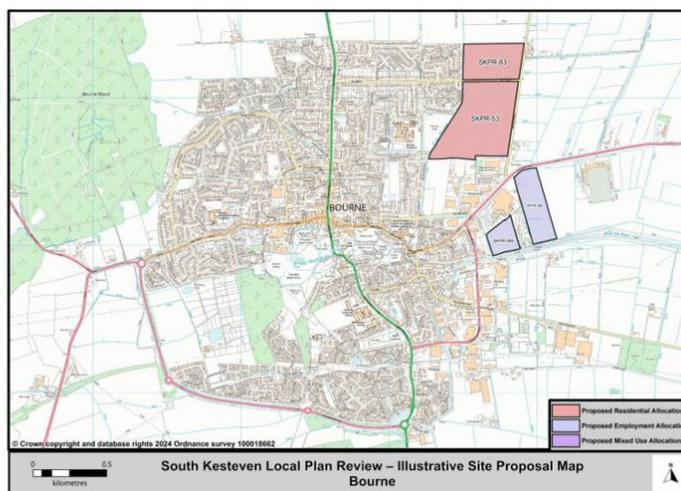


Figure 22: Bourne Illustrative Map

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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Bettinson Trust Ownership Red Line – ‘the Site’



Savills previously provided an initial response to Bourne Town Council (12th December 2023) to the three evidence base documents which were being consulted upon by the Steering Group who are responsible for preparing the Bourne Parish Neighbourhood Plan (‘the Plan’) on behalf of Bourne Town Council, which included:

- Bourne Character Assessment (November 2023);
- Local (non-designated) heritage assets (November 2023); and
- Green Infrastructure (November 2023).

Bourne Neighbourhood Plan included the Bettinson Trust land and land owned by four additional landowners in their Housing Sites Assessment updated October 2023, (reference Site 6).

Following initial meetings that have taken place between most of the landowners with an interest in the draft SKR-53 allocation, we understand that three additional landowners (Bradshaw, Jones and LCC), alongside the Bettinson Trust, will be seeking the support of a promotor going forward in the next stages of the Local Plan. The collective landowner group is interested in producing a comprehensive masterplan to support the proposed allocation SKPR-53 for 285 dwellings in Bourne (Land at Mill Drove).

The landowners that Savills have commenced engagement with include Bradshaw, Jones, LCC and, Lees. The Lees family, who own the at the northern end of the draft allocation, have not yet been engaged but will have the opportunity to be part of a comprehensive development and to feed into the proposals for the SKPR-53 proposed allocation.

Site Context

The Bettinson Trust land totals c.2.9ha (7.1 acres) and forms part of the SKPR-53 wider c.20ha (49 acres) draft allocation for 285 dwellings. The land immediately south of the Bettinson Trust red line was allocated BRN1-H1: Manning Road for 107 dwellings in the adopted South Kesteven Local Plan (2020) and received planning permission for 121 dwellings in April 2022 (S18/0904), this was previously under Bettinson Trust ownership.

The SKPR-53 Site is located to north east of Bourne Centre. Bourne is a 'market town' north west of Peterborough (c.16 miles) and south east of Grantham (c.22 miles). The Site is bound by Manning road (south), Meadow drive (east) and Mill Drove (north). The site lies adjacent to Pinfold Industrial Estate and there are residential properties and Bourne Academy to the west of the Site. North Road which runs through the centre of Bourne links Bourne to surrounding towns via the A15. Bourne is the third largest settlement in South Kesteven with regular bus services to Peterborough and Market Deeping, Stamford and Spalding.

We understand that Bourne Town Council is keen for the existing public right of way running north along the Car Dyke to be upgraded and the potential for bridge access to be provided to link Bourne Academy. Bourne Town Council updated Site assessment (October 2023) prepared by the Steering Group for the progression of the Neighbourhood Plan has identified the opportunity to improve green infrastructure links, enhance biodiversity and ensure the integration of the Car Dyke as a possible landscape feature. There is also a requirement for playing field space in this north section of the land closest to Bourne Academy and west of the Lincolnshire County Council land. It is understood that Lincolnshire Council also form the education authority and demands for this land to support Bourne Academy will be important in the stages towards land promotion or a planning application.

The Site is not located within the Green Belt and there are no known heritage assets within the Site. The Site is mainly within flood zone 1 (low-risk), however, the Car Dyke is identified as a 'main river' by Environment Agency.

Below, we set out representations that we wish to make to the draft local plan on behalf of Bettinson Trust.

Regulation 18 Issues and Options Consultation Document Responses

SP1 Spatial Strategy

We support draft Policy SP1 and the proposed allocation SKPR-53 (Land at Mill Dove). Bettinson Trust, who own part of the site, fully support the inclusion of its land in a wider allocation. Following the release of the draft plan, a meeting between many of the other land owners was convened and all were in agreement that a joint approach to a comprehensive site promotion should be taken forward. However, due to the time allowed it has not been possible to prepare joint evidence and a combined masterplan for the Reg18 stage. However, it is proposed that technical work and a concept plan will be provided to the Council going forward.

SP2 Settlement hierarchy

We support draft policy SP2 and the recognition that in order to address the District's housing growth needs the majority of new development will be focused in Grantham and that development which supports the role of the three market towns, including Bourne, will be allowed, provided that it does not compromise its nature and character. Bettinson Trust and the other landowners of allocation SKPR-53 propose to undertake a raft of technical work to support the draft allocation and comprehensive masterplan and this will include landscape and master planning inputs which will seek to assimilate a scheme that is appropriate to its context.

H2 Affordable housing contribution

As currently drafted, Bettinson Trust object to the proposed affordable housing contributions policy H2 which requires *'all development comprising 10 or more dwellings (or an area of 0.5ha or more) should make provision for 27-57% depending on the outcome of the Whole Plan Viability Assessment'*. Para 8.7 of the viability assessment states *'it is informed by the Local Housing Needs Assessment (LHNA)'*. The LHNA confirms the policy AH range and Para 8.65 also says *'it is not the housing requirements for the district.'* However, Para 10.33 Whole Plan Viability assessment proposes the requirement of *10% AH for brownfield sites, 20% for greenfield and 30% for strategic sites*. H2 policy should align with the Whole Plan Viability Assessment and each site should be considered on its own merits where an affordable housing target cannot be met.

A further concern we have, and we wish to object to, is the assumption regarding the split of social rented and affordable ownership which is assumed to be 60%:40%. We consider that the plan should first factor in the 25% First Homes, as required under Annex 2 of the NPPF which would then leave the remaining 75% affordable homes to be split between social rented and affordable ownership.

H4 Meeting all housing needs

We support the 'indicative mix' of housing and that a standard or fixed housing on all sites is not required. This allows for residential schemes to adapt to changing market conditions throughout the plan period. We do however suggest there should be clarity on the mix of affordable housing sought.

We are not are not objecting to the proposed requirement for at least 10% of dwellings on schemes of over 10 dwellings to be M4(2) compliant, requirements for M4(2) standard dwellings should only be included when justified by evidence (PPG Paragraph: 009 Reference ID: 63-009-20190626) and should be agreed on a site by site basis. The PPG states *'local plan policies should also take into account site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2)... compliant dwellings, particularly where step free access cannot be achieved or is not viable. Where step-free access is not viable, neither of the Optional Requirements in Part M should be applied'* (PPG: Paragraph: 008 Reference ID: 56-008-20160519).

We suggest the requirement for 10% M4(2) properties needs to be evidenced and balance to make use of the land and viability.

EN1 Landscape character

We support this policy as written, a review of the Points of Compass Assessment (Bou2) states the site sits within the Fen Margin and the edge of the Fens Landscape character area and this is also supported by Bourne Character assessment (November 2023). The Points of Compass Assessment considers the Fen Margin and Fens Landscape as low-medium sensitivity residential developments. Bettinson Trust are working up proposals for draft allocation SKPR-53, which will sensitively address existing green infrastructure (Car Dyke) and introduce landscape and biodiversity enhancements as part of the proposed development in accordance with paragraph 180 of the NPPF.

EN3 Green infrastructure

We support draft policy EN3 as proposed. Bettinson Trust are working up proposals for draft allocation SKPR-53, which will sensitively address existing green infrastructure (Carr Dyke) and introduce landscape and biodiversity enhancements as part of the proposed development. A range of technical work is to be undertaken including landscape, drainage, ecology and masterplanning which will take account of the Green Infrastructure Mapping prepared by the GLNP.

EN5 Water environment and flood risk management

We support draft policy EN5 as written.

SB1 Sustainable building

We object to Policy SB1 Sustainable Building, the Council should provide a suitable evidence base to ensure it is justified in line with paragraph 35 of the NPPF, and include suitably detailed guidance of how it expects such requirements to be complied with by applicants.

Any requirements related to local energy efficiency standards for residential uses, should consider the recent (13 December 2023) statement by the minister for Minister of State for Housing which states that: *"...the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond*

current or planned buildings regulations.” Significantly, the Statement goes on to state “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”.

SKPR – 53 – Land at Mill Drove

We support draft allocation SKPR-53 for 285 dwellings. The landowners are in agreement to work together to prepare joint technical work and a comprehensive concept masterplan and this will be prepared for the Regulation 19 stage of the plan. Given that the site appears to have relatively few constraints, it is anticipated that the level of housing that could be achieved on the site may be slightly higher than 285 dwellings. We support the site assessment undertaken by Bourne Town Council for the Neighborhood Plan which has estimated a site capacity of 300-350 dwellings to be closer to the likely yield. However, we will seek to clarify this through the undertaking of further technical work and a concept masterplan for the site.

We understand that the Regulation 19 Local Plan is due to be consulted on in Summer 2024, based on the Local Development Scheme (LDS) released in May 2023, which the Bettinson Trust, alongside a landowner group, intend to make representations to the SKPR-53 draft allocation. Over the coming months a range of technical work will need to be undertaken to support the preparation of a concept plan which will provide further support to the draft allocation.

We look forward to engaging with South Kesteven District Council on the draft local plan in due course.

Yours faithfully



Michael Davies
Director