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18 April 2024

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

*By email only*

Dear Sir / Madam,

Representations to the South Kesteven District Council Regulation 18 Consultation on the Draft Local Plan (February 2024)

I write on behalf of my clients, the landowners of Land to the South of Mill Drove and West of Meadow Drove, to submit representations to the above referenced consultation on the Regulation 18 Draft Local Plan (hereafter 'emerging Local Plan'). The site has the individual reference SKPR-99, and also forms the northern parcel of the larger site Land at Mill Drove, which has the reference SKPR-53. The emerging Local Plan and the draft policies contained therein are broadly supported as being in accordance with the National Planning Policy Framework (NPPF, December 2023) and the soundness tests.

Policy SP1: Spatial Strategy

The proposed spatial strategy is supported as being in accordance with the requirement in national policy for new development plans to meet local housing needs as a minimum. The spatial strategy is also supported by appropriate evidence, with the Local Housing Needs Assessment (September 2023) clearly setting out that the minimum housing requirement for South Kesteven ('the District') across the local plan period is 14,020 dwellings, calculated in accordance with the standard method. Not only will this meet housing needs, but will also play an important part in supporting the ambitious vision for sustainable economic growth in the District.

The proposed strategy of directing the majority of new growth towards Grantham and the market towns (which includes Bourne) is supported as being in accordance with the aim stated in the NPPF for new development plans to achieve sustainable development. Taking this approach will ensure new homes are delivered on sites that have good connectivity, sustainability and access to existing services and facilities to meet day to day needs. This is based on the findings of the Interim Sustainability Appraisal (October 2020) undertaken at the Issues and Options stage which appraised various options for growth and demonstrated that focusing growth in existing key settlements was most sustainable.

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In terms of establishing what the key settlements are. The settlement hierarchy in the adopted Local Plan (January 2020) confirms that Grantham is the most sustainable location for development, followed by the market towns of Bourne, Stamford, and The Deepings. No change is proposed to this element of the settlement hierarchy. The Settlement Hierarchy Review (February 2024) thus takes the correct approach in not re-appraising the market towns. It is noted that Table 2 of the Review places Grantham in the market town category, whilst elsewhere including in Policy SP2 Grantham is designated as a Sub-Regional Centre. This should be corrected for consistency.

#### Policy SP4: New Residential Development on the Edge of Settlements

This policy should be amended to clarify that the criteria set out in this policy are only required to be met by sites that are not allocated in the Local Plan and are therefore coming forward outside of the plan-making process. This will ensure the policy meets the soundness test set out at paragraph 16 c) of the NPPF.

The final paragraph of Policy SP4 contains a typographical error, stating 'application' rather than 'applicant'.

#### Policy H2: Affordable Housing Contributions

The aim in Policy H2 for the affordable housing figure to be informed by the outcome of the Whole Plan Viability Assessment is supported, although it is disappointing that the Council have not taken a view in this consultation given the Viability Assessment was completed in January 2024. Nonetheless, the Council is encouraged to have due regard to representations from the developer industry on the Viability Assessment, to ensure an accurate view is taken on matters that are likely to affect viability, such as the mandatory Biodiversity Net Gain requirement and future Building Regulation Standards.

The discussion in Policy H2 as to when site specific viability assessments will be considered is confusing. The policy begins with an explicit statement that such assessments will only be considered for brownfield sites and allocations in Grantham, but the policy then goes on to state when viability assessments will be considered on other sites. This matter should be clarified, and the policy amended to accept viability assessments on all development sites. The Whole Plan Viability Assessment, while a useful strategic tool, cannot be expected to consider all site-specific constraints that may arise and it is therefore important to allow for certain flexibility to ensure delivery of sustainable development is not unduly constrained.

The policy title is incongruous, 'Contributions' should be deleted or replaced with a more consistent term such as 'Provision'.



#### Policy 4: Biodiversity Opportunity and Delivering Measurable Net Gain

The policy as drafted is supported, with it being consistent with the legislative requirement for all eligible development sites to deliver at least 10% Biodiversity Net Gain. It is noted that the Whole Plan Viability Assessment has tested the viability of increasing the requirement above 10%. Although commentary is not provided on whether a higher requirement is likely to be set out in policy, the Council is cautioned that such an increase will not only have viability implications but also other impacts which will need to be carefully considered. This includes impacts on the number of homes that sites are able to deliver, which would mean additional allocations may be needed to deliver the target growth requirement.

#### Policy SB1: Sustainable Building

This policy requires further clarification. The policy should only encourage the inclusion of energy efficiency measures and use of renewable energy sources which go beyond Building Regulation requirements. Regard needs to be had of the Housing Minister's Written Ministerial Statement of January 2024 which clearly set out that the Government does 'not expect plan makers to set local energy efficiency standards that go beyond current or planned building regulations'.

In accordance with the Planning Practice Guidance, the Council will also be expected to provide evidence supporting the inclusion of optional water efficiency target of 110 litres per house per day.

#### SKPR-53 – Land at Mill Drove

The inclusion of this site as an allocation for residential development is fully supported by our clients, who are the landowners for the northern field parcel adjacent to Mill Drove. Our clients have already commenced engagement with other relevant landowners, and are therefore confident that a comprehensive development can be delivered on this site in accordance with criterion a of the allocation.

Bourne is one of the main settlements in the District, and has strong sustainability credentials as already established above with local services, amenities and facilities that are capable of supporting the needs of existing and new residents in a sustainable manner. It is therefore logical for new growth to be directed towards Bourne. The conclusions drawn in the Points of the Compass Appraisal Annex to the Sustainability Appraisal (February 2024) are supported, as the assessment recognises the ecology and green infrastructure constraints associated with development to the west of Bourne and correctly concludes that growth on the eastern boundary of the settlement would be more appropriate. This also aligns with the conclusions of the Housing Sites Assessment undertaken by the emerging Bourne Neighbourhood Plan. The eastern boundary is also better related to existing services and facilities in Bourne. The allocation is directly adjacent to Bourne Academy and Bourne Leisure Centre, with other facilities in the town centre being readily accessible from the site.



The allocation has been assessed in detail through the evidence base supporting this Local Plan consultation. While the overall conclusions of the assessment process which have found the site as being suitable for development is agreed with, there are some minor clarifications to be made. The Sustainability Appraisal Technical Annex: Site Assessments (February 2024) scores the site as 'amber' or 'light red' on matters such as Biodiversity and Historic Environment despite there being no risk of direct impact on any ecology sites or designated heritage assets. It is understood that these scores are given based on a standard criteria, but it is important to ensure these are not misinterpreted as indicating there will be impacts purely because a 'dark green' score has not been achieved. The Site Assessment Report (February 2024) states there is contaminated land present on the site. The evidence supporting this has not been provided; as an agricultural site, the risk of contamination is low. Again, an amber score is given for proximity to Heritage and Ancient Woodland, despite the site location mean there will be no potential for direct impact on either woodland or any designated heritage assets. The site is also stated as being one for delivery in 10+ years. This is disagreed with – the landowners are committed to delivering the site and can confirm that early delivery of homes within the first five years of the plan period is achievable.

The clients are pleased to note that their specific landownership, appraised in both assessments under the reference SKPR-99, is also considered as being a suitable site and therefore preferred for development. The comments made in relation to the wider site SKPR-53 are also relevant to SKPR-99.

The development principles set out in SKPR-53 are considered to be appropriately specific and relevant to this site, and have been well-informed by the supporting site assessments. In respect of criterion d, it should be recognised that direct improvements to Carr Dyke itself may not be possible, but appropriate integration as a landscape feature as suggested by the policy is a positive development principle. Criterion f relating to the area of flood risk within the site is supported, as this will ensure efficient use of the site is made while mitigating any potential for flood risk. It should be noted this area falls within Flood Zone 2, and is therefore an area of 'medium flood risk' rather than 'high flood risk' as stated in the draft policy. This should be corrected.

Our clients fully support that the allocation currently states 285 units as being an 'indicative' capacity for the site. Further masterplanning work will confirm a site capacity that is appropriate to the site and its constraints, and it maybe that additional homes can be provided. The allocation should allow for sufficient flexibility to make efficient use of the site and accommodate a different number of homes, where supported by design and masterplanning work that demonstrates a well-designed and policy compliant development can be achieved.

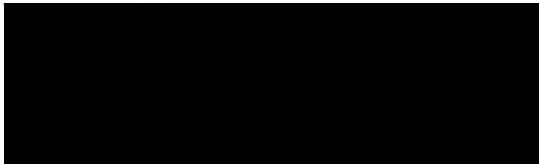
While the above matters will be considered in further detail through masterplanning informed by relevant technical assessments. It is clear at this stage that the site is located in a sustainable location and represents a deliverable proposition (suitable, available and achievable), capable of introducing appropriate mitigation measures through sensitive masterplanning to address site constraints. The site can make an important contribution towards local housing need, the



continued growth of Bourne and its development as a market town, and the District's wider sustainable development objectives.

Our clients remain keen to work collaboratively with both the Council and other landowners in the preparation of the new Local Plan, to ensure a positive policy position for SKPR-53 is taken forward that can deliver tangible benefits for the local community and the District as a whole. Accordingly, the allocation of the site for residential development is fully supported. Our clients will also continue to engage positively in further consultation with the Steering Group as preparation of the Neighbourhood Plan progresses.

Yours faithfully,



Andrew Hodgson  
**Senior Director**

