

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

Ref:

Date: 25/04/2024

Planning Policy Team

**South Kesteven District Council Regulation 18 Draft Local Plan consultation.**

Please find attached the formal comments of Lincolnshire County Council (LCC) in response to the South Kesteven District Council Regulation 18 Draft Local Plan consultation.

Notwithstanding specific points raised in the response, LCC supports the vision, objectives, and overall approach to delivering sustainable growth across South Kesteven. Our county's land is under unprecedented pressure from development, and while we recognise the benefits it can bring, it must be the right growth in the right place. Matters such as: the value of food production for the nation, the needs of our communities and business as well, as the Infrastructure needs of the county must be balanced. Where the impacts of growth are not appropriately mitigated, Lincolnshire County Council will object to development.

Please also accept the Councillor comments attached in Appendix A and give them full consideration when reviewing all of the consultation responses received.

Yours sincerely

Cllr Colin Davie

Executive Councillor: Economic Development, Environment and Planning

## **South Kesteven Local Plan Review Consultation April 2024**

### **Introduction**

The Local Plan is a statutory planning document prepared by South Kesteven District Council. The Local Plan, together with adopted neighbourhood plans and supplementary planning documents (SPD), will make up the "statutory development plan" for the District.

Please find below the comments of Lincolnshire County Council in response to the Draft Local Plan consultation.

Where policies in the Draft Local Plan remain unchanged from the 2020 Adopted Local Plan, comments have largely not been made on those policies.

### **Proposed Allocations**

LCC as Highways Authority and Lead Local Flood Authority commented in the preparation of the South Kesteven Site Assessment Report (February 2024). Officers have made a technical assessment of each of the sites based on the information available to date. Any sites classed as minor, moderate or major impact on roads, highways and/or surface water will require mitigation as specified in LCC's earlier comments. For example: LCC has seen no plans for mitigation for two sites in Great Gonerby or for the Prince William of Gloucester Barracks site and therefore objects to these. Our comments must continue to be taken forward in future drafts of the Local Plan. Unless appropriate and sufficient mitigation is in place, LCC will object to the planning applications.

Learning the lessons from Storms Henk and Babet, surface water management is of paramount importance. Water management needs to be appropriately considered on all allocated sites before they come forward as an application. Unless appropriate and sufficient mitigation is in place, LCC will object to the planning applications.

Members have made specific comments on some of the site allocations based on their local knowledge. All of these comments have been copied in the appendix to this response and should be taken into consideration as part of the consultation responses received.

### **LCC Minerals and Waste Position**

We are currently preparing a new minerals and waste local plan for Lincolnshire. The new plan will replace both parts of the adopted plan which covers the period to the end of 2031. It is proposed that the updated plan will extend this period until the end of 2040.

We are currently at an early stage of plan preparation. A consultation on the issues and options for updating the plan took place from 28 June 2022 to 12 August 2022. The issues and options consultation and the accompanying call for sites was supported by a sustainability appraisal (SA) scoping report.

A large number of comments and site nominations were received and as a result, we anticipate that public consultation on the draft plan (preferred approach) will take place in 2024.

We will be able to comment further on how the SKDC draft plan aligns with the LCC document once the consultation is complete.

#### Comments on specific Policies:

##### Agricultural Housing

There does not appear to be a policy addressing agricultural housing either under the essential need for a rural worker (the approach of paragraph 84 of the NPPF) or more significant agricultural workers dwellings. The situation in the Draft Local Plan appears to be that proposals away from the towns and villages would be judged against Policy SP5 which is unlikely to support such development. LCC would support the inclusion of such more permissive policy for rural housing, where there is a demonstrated rural business need.

##### Biodiversity and Geodiversity

LCC welcomes the policy approach in EN2 and elsewhere in the plan to promote biodiversity and geodiversity net gain. Such policies will make a positive contribution to the District's future.

##### DE1: Promoting Good Quality Design

LCC welcomes the Policy DE1 approach to car parking that is 'sufficient for the location and type of development', and that 'spaces should be easy to use, fit for purpose and large enough to cater for a wide range of users'. Specifically, it is supported that each development is considered on its merits, particularly with relation to location and public transport provision. Where insufficient car parking is proposed, LCC as Highways Authority will object to the relevant planning application.

##### ID1: Infrastructure for Growth

Policy ID1, and particularly its final paragraph, is not strong enough within the context of the national Planning Practice Guidance on viability, specifically this paragraph:

*Policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage. (emphasis added)*

Moreover, national guidance puts responsibility on site promoters to engage in plan making to ensure that proposals can be policy compliant, accounting for development costs.

LCC suggests the final paragraph of ID1 is strengthened to advise that only 'particular circumstances justify the need for a viability assessment at the application stage'. In making this change, SKDC should consider the Planning Practice Guidance wording and the associated list of 'particular circumstances'.

It is appreciated that it is not possible to identify the precise infrastructure requirements for the whole plan period but LCC welcomes the early consideration of the infrastructure requirements, specifically of the site allocations. This should be considered beyond Highway infrastructure and look at the land holistically in terms of all requirements on the land such as drainage, sewerage, energy and clean water. The IDS will be integral to ensuring the long term sustainability of the plan.

Appendix A Councillor Comments:

The attached letters are comments from individual local councillors representing the South Kesteven area who know the area well and have commented on specific sites. These comments should be fully considered as part of the consultation exercise and their local knowledge taken onboard when taking sites forward to the next stage of the local plan.

1. Cllr Stokes
2. Cllr Hill
3. Cllr Wootten
4. Cllr Martin