## Steering Group Comments on LPR. Updated April2024

#### Chapter 6 - Spatial Strategy

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

Policy SP4 of the adopted Local Plan is applicable to all proposals for development on the edge of Bourne and indicates that such proposals require local support. However, as part of the review it is noted that the Policy is to be amended as part of the Local Plan Review to relate solely to new residential development.

The Examiner's report into the adopted Local Plan considered the need for local community support for all developments on the edge of settlements (not just residential development) 'to be an entirely appropriate provision for locations where, ordinarily, communities may reasonably expect development not to take place. I see nothing inherently unsound in community support being part of the basis for what are exceptional circumstances. The BPNP Steering Group therefore strongly objects to the proposed change as it would remove the need for other types of development on the edge of the settlement to have community support.

#### Chapter 9 – Employment and Economic Prosperity

#### Policy E<sub>4</sub> (Protection of Existing Employment sites)

The Policy lists 6 sites in Bourne for protection. However, there appears to be some discrepancy between this list and the Policies Map as follows:

- 1. The Lincolnshire Herbs site on Spalding Rd (E7) is referred to in the table but has been excluded from the Policies Map.
- 2. There is a site of 5.5ha located on land between South Fen Rd and Tunnel Bank which is identified on the Policies Map but which does not appear to be listed in the table.
- 3. Approximately 18ha of land is identified as 'east of Cherry Holt Rd' on the Policies Map. However, this site is not included in the table.
- 4. The table includes a site of 15ha at South Fen Rd which does not appear on the Policies Map.

#### Chapter 10 – Protecting and Enhancing the Natural and Built Environments.

#### New Policy 4: Biodiversity Opportunity and Delivering Measurable Net Gains

The introduction of a policy to assist in the delivery of Biodiversity Net Gain is warmly welcomed as is the Biodiversity Opportunity and Green Infrastructure Mapping which highlights the existing ecological network and indicates where the best opportunities lie for improvement in the extent, condition and overall connectivity of the network.

Appendix 1 of the Local Plan Review (Principles for Development within Biodiversity Opportunity Areas), to which Policy 4 refers, includes two distinct categories of

'opportunity for creation'. However, the associated mapping does not make any distinction between the two categories.

## Policy EN5: Water Environment and Flood Risk Management

Bourne and surrounding communities are included in the Project Groundwater initiative managed by the Environment Agency and funded by DEFRA. The project aims to develop a greater understanding of groundwater and how it can be managed both in terms of flood risk and as a resource. While the project is expected to take several years to complete, it could have implications for development and inform future thinking on how groundwater challenges are approached. Reference should therefore be made to Project Groundwater in the text associated with the policy.

#### Policy EN7: Protecting and Enhancing Grantham Canal

The Steering Group notes the inclusion of this policy. However, the Car Dyke is an ancient man-made water course which traverses South Kesteven and runs along the western fen edge from Peterborough to Lincoln. The Lincolnshire Heritage Explorer indicates that it is the largest of the known Romano-British canals, and it is an important feature of the Roman landscape in the fens. Relatively small sections of the Dyke are Scheduled including an area between Bourne and the village of Dyke. Consequently, as with the Grantham Canal, a policy should be introduced to safeguard the Car Dyke and support proposals designed to develop its recreational, nature conservation, heritage and tourism potential.

### Chapter 11 - The Built Environment

#### Policy DE1: Promoting Good Quality Design

Amendments to the policy to better reflect Government ambitions to achieve well designed places is supported. However, the BPNP Steering Group strongly objects to the statement that 'All major development (as defined in the Glossary) must demonstrate compliance with (and any subsequent versions) Neighbourhood Plans'. This infers that minor developments do not have to comply with Neighbourhood Plan policies. However, planning law requires all planning applications, irrespective of scale, to be determined in accordance with the development plan unless material considerations indicate otherwise. The sentence should therefore be deleted or amended to reflect planning law.

#### Design Code and Public Engagement

While Policy DE1 identifies an extensive raft of design principles, greater clarity is needed to understand how these will be applied. It is assumed that, this clarity is to be provided by the proposed preparation of a Design Code for the District. It is noted that the National Model Design Code sets out a coding process in which the overall area of a local authority is divided into a series of 'types' such as 'town centre', 'suburbs' and 'villages' etc. However, in preparing the SKDC Design Code it should be recognised that no two

areas of the same 'type' will be the same and may even have different character areas within them. A blunt approach runs the risk of replacing 'anywhere developer designs' with 'anywhere National Model Design Code designs'. The BPNP Steering Group has undertaken considerable work to identify local distinctiveness within the Parish including the preparation of a Character Assessment, a schedule of non-designated heritage assets and traditional design and materials which will provide the evidence base for design policies in the Neighbourhood Plan. It is therefore essential that the proposed SKDC Design Code recognises local distinctiveness, as detailed in any neighbourhood plan documents.

The BPNP Steering Group would welcome the opportunity to be involved in the preparation of the Design Code.

#### Policy OS1: Open Space and Recreation

The policy would benefit from further explanation of how it is to be applied in practice. For example, the policy sets a standard of 1.6ha of outdoor sports facilities within 1200m of a development. Where a site is not within 1200m it is unclear what scale of development would be expected to generate on-site provision rather than a financial contribution and how that contribution would be calculated.

## Chapter 12 – South Kesteven's Communities

# Housing allocations: Policy SKPR-53 Land at Mill Drove and Policy SKPR-83 – Land North of Mill Drove.

The Bourne Parish Neighbourhood Plan Steering Group supports the allocation of land to the north-east of the town as this accords with the locational growth strategy recommended to, and agreed by, the Town Council and set out in the <u>Housing Sites Assessment Background Paper</u> (October 2023). However, the Steering Group has several comments regarding the development principles, as follows:

- 1. **Preparation of a masterplan:** There would be some benefit in preparing a single masterplan for the whole of the development area rather than one for each of the allocated sites. However, poor design is a persistent issue within Bourne and there is a strong desire to raise the quality of design and move away from standard house types. The NPPF recognises that design guides and codes can provide an important opportunity to develop effective community engagement in the design process and to produce a framework for 'creating beautiful and distinctive places with a consistent and high- quality standard of design'. The Steering Group would urge SKDC to incorporate the requirement for a design code as part of the masterplan process.
- 2. *Car Dyke:* Dwellings should front onto the proposed open space alongside the dyke to provide an active frontage and create an attractive setting.
- 3. **School provision:** The LEA has confirmed that there are capacity issues at both primary and secondary school level in Bourne. Bourne Academy has indicated the need for additional land to enable further expansion. Given that the proposed

housing site is located adjacent to the Academy, part of the site should be reserved to facilitate this expansion which will, in part, be made necessary by the development. In conjunction with this, consideration should be given to the possible opportunity that development could provide to reduce the volume of traffic accessing the Academy along Edinburgh Crescent, particularly at the start and end of the school day.

- 4. *Connectivity:* The need for connections throughout the site to the wider town are noted and agreed. However, the Steering Group considers it essential that the development principles highlight the need for strong links across the Car Dyke not only for pedestrians but also for cyclists to deliver shorter routes towards Bourne Academy, the Leisure Centre, the town centre and other destinations west of Car Dyke.
- 5. *Green Infrastructure:* Criterion h of Policy SKPR-53 refers to the site as being within or including a Green Infrastructure Area. However, the Biodiversity and Green Infrastructure Mapping does not reflect this conclusion and therefore requires amendment.

#### Chapter 13 - Infrastructure and Developer Contributions

#### Policy ID1: Infrastructure for Growth

While the policy is related to the provision of infrastructure required as a result of new development, it should be recognised that there are significant existing infrastructure issues in Bourne. The BPNP Steering Group has outlined key issues in relation to transport infrastructure in its response to Policy ID2. Other issues include schools which are recognised as being at or close to capacity by the Local Education Authority and difficulties accessing healthcare and dentists. Further comment on the provision of school infrastructure has been made in response to the proposed housing allocations: Policy SKPR-53 Land at Mill Drove and Policy SKPR-83 – Land North of Mill Drove.

#### Policy ID2: Transport and Strategic Transport Infrastructure

The policy commitment of SKDC to work with delivery partners to support and promote an efficient and safe transport network which offers choice, reduces the need to travel by car and encourages the use of alternative modes of transport is strongly supported. However, while the policy is related to new development, it should be recognised that there are significant existing transport issues within the town of Bourne which need to be addressed, including the following,

**Town centre traffic:** Within Bourne town centre, the pavements are narrow in places and roads are dominated by traffic, including many heavy goods vehicles travelling through the town centre. This traffic creates a barrier for pedestrians and creates noise, pollution and safety issues which have a clear and negative impact on the public realm and shopping experience. There is also a desire to bring the market back into the Market Place and see public realm improvements undertaken to enhance the status of the town centre as a Conservation Area and enhance its vitality and viability.

There is a strong desire within the local community to see the construction of a relief road that would support the required town centre improvements. While this aspiration

is strongly supported by the Bourne Parish Neighbourhood Plan Steering Group, it would not favour the use of housing growth as a way of securing a town centre relief road but would fully support and welcome a commitment from the local authorities to begin the process of investigating route options and exploring funding mechanisms which are not dependent upon further housing growth.

Reducing the need to travel by car: Paragraph 12.37 of the Local Plan Review states that Bourne 'provides housing for large numbers of people who commute the 16 miles to Peterborough daily, and to those who commute the 21 miles to Grantham'. While there is a regular bus service connecting Bourne to Peterborough there isn't a service connecting the town with Grantham. The Local Plan Review does not appear to include a clear strategy to reduce existing levels of out-commuting. Consequently, without appropriate intervention measures, it would seem likely that housing growth will only increase outcommuting and that there will be no viable, alternative to the car for commuters travelling to Grantham.

**Promoting cycling:** The Local Transport Plan cycling strategy refers to the need for an evidence-based approach to developing cycling networks and improving infrastructure. Given the essentially flat topography of Bourne and the compact nature of the town, it represents an ideal settlement within which to develop a Local Cycling and Walking Infrastructure Plan (LCWIP) which can be used in responding to funding opportunities and to ensure that new developments, where proposed, provide links to the town-wide network, where possible. The Bourne Parish Neighbourhood Plan Steering Group considers the development of a LCWIP to be essential to SKDCs commitment to work with delivery partners to support and promote an efficient and safe transport network which offers choice. An efficient cycling network and other measures designed to reduce the need to travel/travel by car could also improve the flow of vehicular traffic during periods of the day when queuing occurs at a number of locations.