




25th April 2024

**South Kesteven District Council (SKDC) Regulation 18 Draft Local Plan. 2021 – 2041**  
**Representations on behalf of the Developers of Poplar Farm Grantham (S08/1231/EIAOL).**

<p>Buckminster Trust Estate.</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>  <p><b>BUCKMINSTER</b></p>	<p>Norwich Hub Ltd.</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>  <p><b>Poplar Farm</b> Grantham</p>
<p>Representations by:</p> <p>Andrew Russell-Wilks BSc FRICS MRTPI</p> <p>Godfrey-Payton</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> 	

**Representations on behalf of the developers of Poplar Farm Grantham: Buckminster (Buckminster) and Norwich Hub (NH) on SKDC's Regulation 18 Draft Local Plan. 2021 – 2041.**

**Consultation from Thursday 29th February to 11:59pm Thursday 25th April 2024.**

1. It is noted that on the SKDC Local Plan website it sets out that: *Until the review has been undertaken and a new Local Plan is found sound and adopted by the Council, the current Local Plan (2011 - 2036) will continue to be the development plan for the District and used in determining planning applications.*

These representations deal mostly with Poplar Farm's neighbouring site Rectory Farm being developed by Jelson and Vistry Homes. Buckminster and NH support the adjacent development and are working together on utilities including electrical supplies, drainage for foul and storm water across Poplar Farm, and connecting up roads, cycleways and footpaths between Rectory Farm and Poplar Farm.

2. Climate Change. Points 2.4-2.6. Buckminster and NH are both pleased to see that Climate Change is acknowledged in the Reg 18 Local Plan.
3. Para 2.25 reads as follows: *2.25 The Local plan .....a new district wide Design Code is currently being prepared in accordance with the National Design Guide.* Buckminster and NH and NH look forward to seeing the draft district wide Design Code when it is formally consulted on.
4. Challenges for the Local Plan to Address. Paras 2.30-2.34 including Table 1. It is good to see that the major challenges facing district are all acknowledged and to be planned for.
5. Chapter 3 - Vision and Strategic Objectives. Buckminster and NH very much support the ambitious vision for the district and Grantham town centre in particular where the Buckminster is a longstanding investor.
6. The Table following para 3.3 sets out the Strategic Objectives of the Local Plan. The emphasis on sustainable growth and diversification of the local economy is particularly welcomed as is the emphasis on diversification, additional growth, diversifying the employment base of the local economy, stimulating tourism, focus on the vitality of town centres, need for new residential development to have a mix and range of house types and tenures, need to move to a low carbon economy, and bio-diversity net gain.

7. Chapter 4 – Sustainable Development in South Kesteven. Paras 4.1 -4.3.

SD1: The Principles of Sustainable Development in South Kesteven

Development proposals in South Kesteven will be expected to ~~minimise the impact~~ **mitigate against the impacts of** climate change and contribute towards creating a strong, stable and more diverse economy.

Development proposals shall consider how they can proactively minimise:

- a. **the use of resources, and meet high environmental standards in terms of design and construction with particular regard to energy and water efficiency;**
- b. the effects of climate change and include measures to take account of future ~~changes~~ **projected scenarios** in the climate **locally**;
- c. the need to travel, and wherever possible be located where services and facilities can be accessed more easily through walking, cycling or public transport; **and** ~~the use of resources, and meet high environmental standards in terms of design and construction with particular regard to energy and water efficiency; and~~
- d. the production of waste both during construction and occupation.

Development proposals shall consider how they can proactively avoid:

- e. developing land at risk of flooding or where development would exacerbate the risk of flooding elsewhere.
- f. the pollution of air, land, water, noise and light

Some comments on these individual points:

- a. Noted and agreed. Initially the costs of complying and delivering the higher environmental standards of energy use and water efficiency may need to be taken into account in any scheme viability exercise.
- b. Noted and agreed. If for example PV panels are proposed on new homes then the extra costs of those panels may need to be addressed in any scheme viability exercise.
- c. Noted and agreed that development should be located where people have a clear choice of cycling or walking to local facilities as opposed to their cars.

See over.

8. Specialist Housing Provision. Table 4: Indicative mix of homes to be delivered up to 2041:

*Table 4: Indicative mix of homes to be delivered up to 2041*

Number of bedrooms	Market	Affordable Ownership	Affordable Rent
<b>1 bedroom</b>	1% – 5%	10% - 15%	30% to 35%
<b>2 bedrooms</b>	30% – 35%	40% - 45%	45% to 50%
<b>3 bedrooms</b>	45% - 50%	30% - 35%	20% to 25%
<b>4 bedrooms</b>	10% - 15%	5% - 10%	1% to 5%
<b>5+ bedrooms</b>	1% - 5%	1 to 5%	

*Source: AECOM modelling using Census 2011 and ONS 2018 based household projections. Note 'market' includes owner occupied and private rented tenures.*

Noted that the 2011 Census was used for modelling. We suggest it would be better to use 2021 Census data which is now available.

It may be helpful to clarify the above table is mandatory in terms of setting the mix of homes to be delivered on schemes generally, or if it is advisory.

9. Chapter 8 – Protecting Existing Community Facilities and Providing New Facilities..

Buckminster and NH supports in principle policy SP6

10. Chapter 11 – The Built Environment and DE1: Promoting Good Quality Design pages 119-124.

The policy is supported but

Buckminster and NH support the policy DE1 and looks forward to commenting upon any Design Guides and Codes the council consult on in the normal way. If a particularly expensive design solution is required by the council then it would be reasonable for that related costs to be taken into account in any viability assessment.

Following points relate to the DE1: Promoting Good Quality Design boxes on pages 120, 121, 122, and 123.

Para b reads as: *Development proposals should be visually attractive and make a positive contribution to the local distinctiveness, vernacular, townscape, streetscape and landscape character of the area. Proposals should use typical characteristic and positive local examples as design cues to create places with a clear a coherent identity;* In order to achieve modern sustainability standards including building airtightness. Modern Methods of Construction (MMC) may need to be increasingly employed to achieve Zero Carbon buildings. It could be that there is not a neat fit with point b and it could be the same for points 1. a and c. MMC may be a better fit with point 6 a-c.

11. Sustainable Building and Construction 11.6 to 11.9. 11.9 text reads as: *11.9 The South Kesteven District Water Cycle Study was updated in October 2016. This recommended that, in order to move towards a more 'water neutral position' and to enhance sustainability of development coming forward, a policy should be developed that ensures all housing is as water efficient as possible, and that new housing development should go beyond mandatory Building Regulations requirements.*

*It recommended a policy of setting the Building Regulations optional requirement target of 110 l/h/d.*

It would be reasonable that any costs related to *going beyond mandatory Building Regulations requirements* be taken account of in the Whole Plan Viability Assessment.

It is noted and welcomed that under *Summary of Proposed Changes* it is set out that : *The final policy, will be informed by a Whole Plan Viability Assessment which will accompany the plan. The Whole Plan Viability Assessment assesses a range of developer contributions for different site typologies and locations across the district.*

12. OS1: Open Space and Recreation. The new and revised standards of open space (compared to the adopted Local Plan Jan 2020) are all noted. We assume that the Whole Plan Viability Assessment will allow for those costs of creating the open space and recreation facilities as part of its normal analysis.

13. SKPR-279 (GR3-H2): Rectory Farm (Phase 2) 1150 units, and SKPR-280 (GR3-H3): Land adjacent to Rectory Farm (Phase 3) 404 units.

We comment on these two allocations because Buckminster and NH are the co-developer of the land to the east of the two Rectory Farm Phases known as Poplar Farm which is an ongoing development with a common boundary to Rectory Farm.

14. The text on page 146 sets out: *Any application must accord with the Rectory Farm Supplementary Planning Document adopted November 2021.* That SPD covers similar topics to the joint working as between the Rectory Farm and Poplar Farm owners/developers. i.e. the need to connect up the roads, cycleways and footpaths between the two developments. Similar objectives are achieved in the following quotes from the Regulation 18 Draft Local Plan consultation. Our emphasis :

*a. Development should provide a strategic access solution which limits the number of new access points onto the A52 Barrowby Road. The strategic access solution should include details on vehicular, pedestrian and cycleway connections to the adjacent Poplar Farm.*

*b. Provide for safe and convenient highway, footway, and cycleway connections throughout the site connecting residents to local schools, including the new Poplar Farm Primary School, community facilities and into the town centre.*

*d. The development will make suitable open space provision including providing an additional playing field or land for such use, adjacent to the boundary of Poplar Farm School.*

And SKPR-280.

*a. Provide safe and convenient highway, footway, and cycleway connections throughout the site connecting it to local schools, community facilities and into the wider town.*

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15. **EN3: Green Infrastructure and NEW POLICY 4: Biodiversity Opportunity and Delivering Measurable Net Gains.** These new policies and Appendices are supported.



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