

28 August 2025

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



Michael Davies



Dear Sir / Madam

**South Kesteven District Council Local Plan (2023 – 2043)
Regulation 18 Proposed Housing and Mixed-Use Site Allocations Consultation**

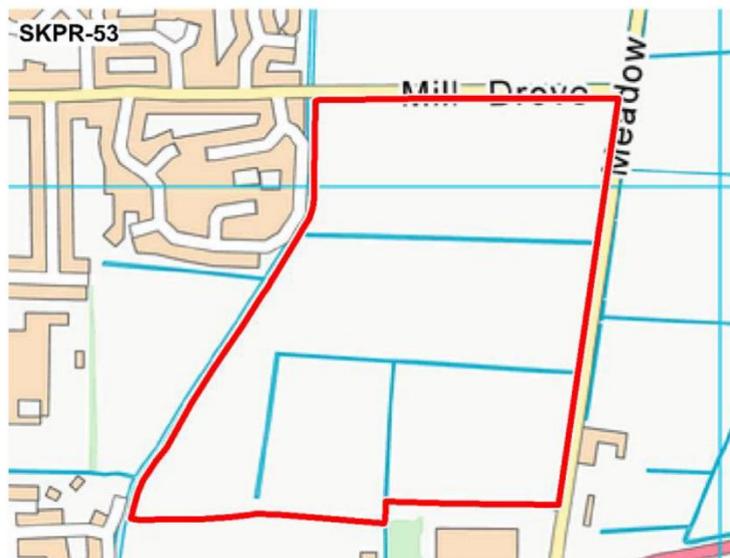
Bettinson Trust – Land at Mill Drove SKPR-53

Overview

This letter provides a response to the Regulation 18 Proposed Housing and Mixed-Use Site Allocations Consultation currently being consulted upon for 8 weeks from 3rd July to 28th August 2025. We are instructed by the Bettinson Trust to submit representations to the consultation 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.22ha (54 acres) draft allocated site.

SKPR-53 Land at Mill Drove (indicative 441 dwellings)



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

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS.

A subsidiary of Savills plc. Registered in England No. 2605138. Registered office: 33 Margaret Street, London, W1G 0JD



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). We understand the Steering Group are looking to continue progressing the Neighbourhood Plan and consultation on the draft Neighbourhood Plan is expected in Autumn 2025. The conclusion of the South Kesteven Draft Site Assessment report July 2025, states ‘a portion of the site (SKPR-53) is proposed to be allocated through the Neighbourhood Plan’.

In addition, Savills responded to the Regulation 18 Local Plan which was consulted on between February-April 2024, the Bettinson Trust land and land owned by the four additional landowners was included, This is the same site (SKPR-53) that remains in the Proposed Housing and Mixed-Use Site Allocations document (July 2025), currently being consulted upon.

Following initial meetings that have taken place between landowners with an interest in the draft SKPR-53 allocation, we understand that the four additional landowners (Bradshaw, Jones, LCC and Lees), alongside the Bettinson Trust, are 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 441 dwellings in Bourne (Land at Mill Drove).

Site Context

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 north of Pinfold Industrial Estate, Bourne Academy and existing residential properties are located 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 district with regular bus services to Peterborough and Market Deeping, Stamford and Spalding.

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) which is currently under construction, This land was previously under Bettinson Trust ownership.

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, there are some areas of Flood Zone 2 across the middle of the Site, which could affect the net developable area.

Regulation 18 Proposed Housing and Mixed-Use Site Allocations Consultation Document Response

Below, we set out representations that we wish to make to the Regulation 18 Proposed Housing and Mixed-Use Site Allocations Consultation on behalf of Bettinson Trust.

2. Meeting Identified Need

Local Housing Need

Following the revised standard method publication in December 2024, South Kesteven District Council's housing need has increased, The Regulation 18 consultation document states in paragraph 2.2 that the need has increased from 701dpa – 886dpa resulting in 185dpa uplift per year over the plan period. This equates to a minimum housing need of 17,720 dwellings (2023-2043), which reflects the need for an additional Regulation 18 to identify and consult on additional sites. However, South Kesteven's 5yhls statement published (March 2025) states at paragraph 1.5 that the requirement is 895dpa, This is the same number that is included in the

Government's revised local housing need, December 2024. Therefore, whilst we support South Kesteven's consultation on additional sites we believe the need is a minimum of 895dpa. National policy makes it clear that the standard method is a 'starting point' to determine the minimum housing need, It does not produce a housing requirement figure.¹ Therefore, the total need of the plan period should be at least 17,900 dwellings (2023-2043), when taking the above into account. In addition, the consultation document does not seem to have taken account of any affordable housing uplift, economic uplift or any cross-boundary requirement when calculating the housing requirement.

We understand a number of evidence base documents are expected to be published with the Regulation 19 consultation in early 2026. A Housing Density Study has been produced to increase the density of existing draft allocations and whilst a higher number of dwellings is likely to be achievable on draft allocation SKPR-53, other sites will require more detailed assessments to understand onsite constraints and the developable area. The draft site assessments document 2025 is a useful tool, however this lacks evidence to justify the conclusions in line with paragraph 36 of the NPPF.

Table 1 (page 3/4)

Table 1 of the Proposed Housing and Mixed-Use Site Allocations sets out the Local Plan Timetable derived from the Local Development Scheme (LDS) published February 2025. The plan is expected to be adopted in November 2027; this is subject to SKDC keeping to all key milestones which would result in a 16-year plan period from adoption. Paragraph 22 of the NPPF 2024 makes it clear that Strategic policies should look ahead over a minimum 15-year period from adoption. The Regulation 19 had previously been expected to take place in Winter 2024/early 2025 but this was delayed due to the need to conduct an additional Regulation 18 consultation to take account of new sites. Any additional delays that are required as a result of national policy change or for any other reason does not allow room for slippage.

Furthermore, the PPG (Paragraph: 083 Reference ID: 61-083-20211004) states that '*where the proposed local plan strategy incorporates larger scale developments such as new settlements or significant extensions to existing villages and towns, policies should be set within a vision that looks further ahead (at least 30 years) to take into account the likely timescale for delivery*'. The Regulation 18 proposes to allocate SKPR-65 (Prince William of Gloucester Barracks) for 2080 dwellings 2041+ dwellings and SKPR-278 (Spitalgate Heath) for 235 dwellings 2041+. For the reasons set out above we believe SKDC should be revise the plan period to 2045 or beyond.

¹ Planning Practice Guidance ('PPG') Paragraph: 001 Reference ID: 68-002-20241212

SKPR – 53 – Land at Mill Drove

The table below sets out the previous Regulation 18 policy (2024), Savills comments made on behalf of the Bettinson Trust in comparison to the additional Regulation 18 currently subject to consultation:

Regulation 18 (Spring 2024)	Savills Comments made in Reg 18 Reps 2024	Regulation 18 Proposed Housing and Mixed-Use Site Allocations (July 2025)	Savills Response to Reg 18 (August 2025)
Indicative Unit Numbers: 285 (site numbers reduced due to high-risk flood areas). Assumed Density: 30 Dwellings per hectare.	<i>'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.'</i>	Indicative Unit Numbers: 441 Assumed Density: 35 Dwellings per hectare	We support draft allocation SKPR-53 for 441 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.
The following development principles accompany this allocation: a. A comprehensive masterplan is required for the site. All parties shall work together to bring forward a comprehensive plan for the site, including the phasing of development.	<i>'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.'</i>	The following development principles accompany this allocation: a. A comprehensive masterplan is required for the site. All parties shall work together to bring forward a comprehensive plan for the site, including the phasing of development.	The site is currently being marketed, and 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.
		b. A maximum of 3ha of land, adjacent to Bourne Academy to be as playing field provision for the school.	We query the addition of criterion (b.). Whilst the landowners are keen to contribute towards new infrastructure provisions arising from the proposed development, it should not be required to rectify existing deficiencies or shortages in playing pitch provision without evidence being provided first. Consideration also needs to be given to the other site constraints which may affect the net developable area (e.g. Flood Zone 2) Should additional land be required for playing pitches then this may reduce the ability to deliver 441 dwellings on the site We note a Playing Pitch Strategy is currently being prepared and should this identify a specific requirement for playing pitches in this area this can be taken into account in the application proposals. Any contributions requested as part of the application proposals must be CIL Regulation 122 compliant and accord with paragraph 56 of the NPPF. It is also noted that Land at Manning Road, has already reserved c.1.1ha for Abbey School Planning Field.
b. Highway, footway, cycleway connections should be provided throughout the site to the wider town.	No specific comment made but generic request	c. Highway, footway, cycleway connections should be provided throughout the site to the wider town and	Connections between SKPR-53 and the wider area will be addressed as part of any comprehensive masterplan proposals and seek to connect proposed footpaths with the existing and proposal network.

		SKPR-83 – Land North of Mill Drove.	
c. Development should integrate the public right of way along the Carr Dyke into the pedestrian movements throughout and into the site.	No specific comment made	d. Development should integrate the public right of way along the Carr Dyke into the pedestrian movements throughout and into the site.	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.
d. The development proposal should ensure the integration of Carr Dyke as a positive landscape feature and provision of open space and ensure that the requisite easement of the Carr Dyke is provided to allow maintenance of the water feature.	<i>'will sensitively address existing green infrastructure (Carr Dyke) and introduce landscape and biodiversity enhancements as part of the proposed development.'</i>	e. The development proposal should ensure the integration of Carr Dyke as a positive landscape feature and provision of open space and ensure that the requisite easement of the Carr Dyke is provided to allow maintenance of the water feature.	As iterated in previous Regulation 18 representations as part of 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.
e. Landscape screening to the eastern edge of the site will be required to reduce the impact on views into the site from the open countryside.	No specific comment but mentioned landscaping and how any proposes will aim to introduce enhancements	f. Landscape screening to the eastern edge of the site will be required to reduce the impact on views into the site from the open countryside.	Proposals for SKPR-53 will seek to introduce landscape and biodiversity enhancements in accordance with paragraph 187 of the NPPF. We note paragraph 1.20 of the proposed housing and mixed-use allocations document states that further evidence, including a Landscape Assessment, is expected to be published as the local plan preparation progresses and we will review and provide comments on this when it is produced and available.
f. The high flood risk area within the centre of the site should not be developed but utilised for open space provision, landscaping and sustainable urban drainage (SUDS), as necessary.	<i>'The Site is mainly within flood zone 1 (low-risk), however, the Carr Dyke is identified as a 'main river' by Environment Agency.'</i>	g. The high flood risk area within the centre of the site should not be developed but utilised for open space provision, landscaping and sustainable urban drainage (SUDS), as necessary.	The flood mapping has recently been updated (March 2025), the Bettinson Trust land remains wholly within Flood Zone 1 (low risk) and low risk surface water flooding. Whilst there are some areas within the middle part of the SKPR-53 which are located within Flood Zone 2 (medium risk), the Sustainability Appraisal Addendum July 2025 states at paragraph 5.44 that <i>'the overlap with flood zone 2 is relatively small and therefore there is potential for these areas to be avoided during development.'</i> In addition, the NPPF paragraph 174 directs new development away from areas which have a risk of flooding and therefore this will inform the masterplan proposals for the site which will seek to develop in areas at the lowest risk of flooding. Furthermore, paragraph 1.20 of the proposed housing and mixed-use allocations document states that further evidence, including an SFRA, is expected to be published as the plan progresses and we will review and provide comments on this when it is produced and available.
g. Screening to the south of the development will be required to minimise conflict with the existing industrial development.	No specific comment made	h. Screening to the south of the development will be required to minimise conflict with the existing industrial development.	As iterated above, any proposals for the site will seek to introduce landscape screening and a suite of technical work including relevant noise and odour assessments will be undertaken as part of the application proposals to integrate development of the site with surrounding area.
h. This site is within or includes a Green Infrastructure Area. Proposals on this site should incorporate the relevant principles for	Site is not within a Green Infrastructure Area		We support the removal of criterion, as the site is not located within a Green Infrastructure Area.

development within Green Infrastructure Areas set out in Policy EN3 Green Infrastructure.			
		i. There is the potential for archaeological remains on this site and the appropriate pre-commencement investigations should be carried out.	As iterated, technical work will be prepared to support the Regulation 19 and future masterplan proposals. We do, however, note that the Sustainability Appraisal Addendum 2025 published with this consultation does not reassess existing draft allocations carried from the Regulation 18 despite significant changes to the policy wording. The PPG states that SA should be updated to reflect significant changes to policy and reassess the site in line with the PPG. ²

Evidence

We understand a number of evidence base documents are yet to be published and work is currently underway.

Importantly these include:

- Strategic Flood Risk Assessment
- Landscape Assessment
- Strategic Highways Assessment
- Playing Pitch Strategy

A number of evidence base documents have been published with the additional Regulation 18 which we wish to respond to:

Housing Density Study

We understand that the Housing Density Study has informed the increase in indicative numbers for draft allocated sites with Bourne from 30dph – 35dph. Whilst we support the change in indicative numbers for SKPR-53 from 285 to 441 dwellings, we do however wish to clarify whether the site densities included in the Figures 1-21 are net of the net developable area as oppose to net of the gross development area as it is currently unclear. For example, Land at Manning Road, achieved 26.6ha directly south of SKPR-53, Therefore if you are achieving 35dph is being sought from the net of the net developable area then we consider that this is unlikely to be achievable with the constraints and requirement to provide 3Ha of playing fields.

² Planning Practice Guidance | Paragraph: 021 Reference ID: 11-021-20140306

**S18/0904 Land at Manning Road,
Bourne**

Approved Houses: 121

Site Size: 4.55ha

Overall Density: 26.6

Developable Area Density: 44.3



Draft Local Plan Site Assessment Report July 2025

We note 44 additional sites were put forward to the previous Regulation 18 undertaken in Spring 2025 and we support draft allocation SKPR-53 continued inclusion in the Regulation 18 Proposed Housing and Mixed-Use Allocations document. We support the overall assessment of the site (pg.102/102), which states that ‘the site offers a suitable and sustainable location for housing within the market town of Bourne’. Bourne is one of three market towns in Tier 2 of the settlement hierarchy (Settlement Hierarchy Report 2025). However, we question the site deliverability timetable which states the site will take 10+ years to come forward. An application is expected to be submitted on the site in 2026. Therefore we believe a 5–10-year delivery time is more appropriate. We ask that Appendix B Development Trajectory within the IDP and Project Schedule (2025) is updated to reflect the change.

We understand from the assessment that the Steering Group, who are managing the preparation of the Bourne Neighbourhood Plan, expected to be consulted on in Autumn 2025, are supportive of growth in this location and a portion of the site is proposed to be allocated in the Neighbourhood Plan. Whilst we are not aware of what are the Steering Group propose we also support growth in this location.

The main findings of the assessment seek for development to be avoid identified flood risk within the centre of the site. Technical work will be undertaken, and landowners are in agreement to work together to inform a masterplan for the site which will take account of the criterion set out in policy SKPR-53.

In terms of specific constraints identified in the site assessment, The table below shows the constraints which have been RAG assessed as ‘RED’ and our query with these assessments:

Category (Constraints RAG assessed RED for SKPR-53)	Query Regarding Assessment
Located/Overlap with Flood Zone 2/3	<p>The Sustainability Appraisal Addendum 2025 states at paragraph 5.44 that ‘the overlap with flood zone 2 is relatively small and therefore there is potential for these areas to be avoided during development.’</p> <p>In addition, the NPPF paragraph 174 directs new development away from areas which have a risk of flooding and therefore this will inform the masterplan proposals for the site which will seek to develop in areas at the lowest risk of flooding.</p>
Surface Water Flood Risk	<p>Whilst we accept that the site will be subject to some pluvial flooding, this is not across the whole site and large areas SKPR-53 are not at risk of surface water flooding. Technical assessments will be undertaken to understand appropriate mitigation.</p> <p>Furthermore, the RAG assessment methodology does not include an ‘amber’ assessment for pluvial flooding and the majority of sites in the Draft Sites Assessment are scored RED. It is likely that most sites across South Kesteven and beyond will be subject to a degree of surface water therefore the relevance of the methodology is questionable. A more refined methodology which differentiates between different types and levels of flood risk would be more appropriate in accordance with the New national flood and coastal erosion risk information (25th March 2025)</p>
Proximity to closes Designated Site	<p>The methodology states on pg. 23 (Table 15), that if a site is located with 0-5km from a SAC/SPA or SSSI the site is assessed as RED. SKPR-53 is located 4.7km from Baston Fen SAC and also with 5km of Math and Elsea Wood SSSI. Natural England did not make a comment on this in the assessment.</p>
Overlap with Grade 2 Agricultural Land	<p>SKPR-53 is understood to be Grade 2 (very good) agricultural land, however the eastern edge of Bourne is also mainly Grade 2 agricultural land.</p>
Contaminated Land on Site	<p>We understand the Site is located within close proximity to the Pinfold Industrial Estate, relevant technical work to assess ground conditions and odour will form part of any proposals for the site.</p>

The Draft Sites Assessment 2025 is a baseline review of constraints, more detailed evidence including the SFRA, Landscape Assessment and Strategic Highways Assessment is required to justify the conclusions in accordance with NPPF paragraph 36.³

Sustainability Appraisal Addendum 2025

As mentioned in earlier, comments the Sustainability Appraisal Addendum 2025 published with this consultation does not re-assess existing draft allocations carried from the Regulation 18, despite significant changes to the policy wording. In line with the PPG (*Paragraph: 021 Reference ID: 11-021-20140306*) the SA should be updated to reflect significant changes to policy and reassess the sites, not just the additional sites that have been added as part of this consultation which are represented in Appendix 1 of the SA.

³ National Planning Policy Framework December 2024 | Paragraph 36



We understand that the Regulation 19 Local Plan is due to be consulted on in January-February 2026, based on the LDS published in February 2025. 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