



# Land off Church Lane, Great Gonerby

South Kesteven Local Plan Regulation 18  
Representations

**Boyer**

Prepared on behalf of Allison Homes | April 24

---

**REPORT CONTROL**

<b>Project:</b>	Land off Church Lane, Great Gonerby
<b>Client:</b>	Allison Homes
<b>Reference:</b>	24.3009
<b>Document and revision number</b>	Document No. IMS-F-18, Revision 2
<b>File Origin:</b>	Click to add file location.
<b>Primary Author</b>	AH
<b>Checked By:</b>	SA

<b>Issue</b>	<b>Date</b>	<b>Status</b>	<b>Checked by</b>
1	18.04.24	Draft	SA

## **TABLE OF CONTENTS**

<b>1. Introduction</b>	<b>3</b>
<b>2. Land off Church Lane, Great Gonerby</b>	<b>5</b>
<b>3. Sustainability Appraisal</b>	<b>7</b>
<b>4. Vision and Development Management policies</b>	<b>8</b>
<b>5. Conclusions</b>	<b>11</b>

## 1. INTRODUCTION

- 1.1 These representations have been prepared on behalf of Allison Homes in response to the SKDC Regulation 18 Local Plan Consultation.
- 1.2 Allison Homes are promoting Land off Church Lane, Great Gonerby for the residential development of around 86 dwellings.

### Scope and Structure of these Representations

- 1.3 These representations are made in relation to the promotion of the land off Church Lane, Great Gonerby ('the site'), for residential-led development. These representations address topics within the South Kesteven District Council (SKDC) Local Plan Regulation 18 consultation.
- 1.4 The purpose of these representations is to assist SKDC ('the Council') in formulating an approach within the emerging Local Plan that is both consistent with national planning policy and the tests of soundness. In this regard, our representations are mindful of the tests of soundness set out at paragraph 35 of the National Planning Policy Framework ('NPPF') (December 2023).
- 1.5 At this early stage of plan-making, it is important that the Council pursues an approach that is consistent with national policy, effective, justified, and positively prepared, in order for the Local Plan to be found sound at examination. These representations comprise our recommendations to assist the Council in achieving such an approach as emerging plan progresses toward adoption.

### Policy Context

- 1.6 South Kesteven District Council (SKDC) adopted its 'Local Plan 2011-2036' in January 2020. The Plan sets out the spatial strategy to meet development needs.
- 1.7 The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) requires local planning authorities to review local plans at least once every 5 years from their adoption date. This is intended to ensure that planning policies remain relevant and effective.
- 1.8 The Inspector's final report on the current Local Plan committed the Council to undertake an early review of the Local Plan from April 2020. The Local Plan, which is the subject of this Regulation 18 Consultation, represents the progression of this review process and enables necessary updates of evidence including housing and employment need.
- 1.9 In this regard, Allison Homes supports the Council's commitment to the preparation of a new Local Plan to cover the South Kesteven administrative area.

### Structure of Representations

- 1.10 Our representations are set within the context in which we seek to highlight, where relevant, the opportunities that are presented for the emerging Local Plan to continue to allocate the Land Off Church Lane, Great Gonerby for development.
- 1.11 Accordingly, the following sections of these representations are set out as follows:

**Section 2:** Land off Church Lane, Great Gonerby

**Section 3:** Review of Local Plan Evidence Base (Sustainability Appraisal)

**Section 4:** Comments On Vision, Objectives and Policies

**Section 5:** Summary and Conclusions

- 1.12 We trust that our comments are of assistance to the Council in formulating an approach that is positively prepared, effective, justified, and consistent with national policy, as the emerging Local Plan progresses toward adoption.

## 2. LAND OFF CHURCH LANE, GREAT GONERBY

- 2.1 Land off Church Lane, Great Gonerby is proposed as a draft allocation within the Regulation 18 Draft Local Plan for the residential development of around 86 dwellings. The site reference is SKPR-241.

### Site Characteristics and Context

- 2.2 The site immediately adjoins the built-up area of Great Gonerby to the south of the settlement. Great Gonerby has been identified as a large village in the adopted Local Plan under Policy SP2. The village provides key services and facilities to local residents including a primary school, local store, post office, public house, and church. There is frequent public transport from Great Gonerby to the town of Grantham and to the north to Newark where further facilities are available, such as supermarkets and hospitals.
- 2.3 Technical work has been carried out by the Developer to support this site coming forward as a housing allocation, to demonstrate that the site is suitable and deliverable.
- 2.4 BWB Consulting Ltd have undertaken a Highways Appraisal to assess the site access and highway impact. This process included engagement with Lincolnshire County Council Highways who have provided guidance in support of the principle of access to the site from Church Lane including a number of improvements to the access arrangements, which would benefit existing local residents.
- 2.5 Lockhart Garrat have undertaken a Preliminary Ecological Appraisal (PEA) to give an understanding into the ecological context of the site. The report concluded that the site is not located within a designated conservation area and does not fall within an Impact Risk Zone for a SSSI. The site is approximately 0.42km North of a local priority habitat, but the likely impact has been concluded as 'negative (non-significant)'. The site has a low biodiversity baseline and there are opportunities for biodiversity enhancements to deliver net-gains.
- 2.6 AWA Tree Consultants prepared an Arboricultural Report which concluded that the sites central area comprised of no significant trees. There are a small number of trees that have been categorised as 'B', meaning that 'retention is desirable' along the edge of the site which can be incorporated into the design. There are opportunities within the site to enhance landscaping and tree cover as part of the development proposals.
- 2.7 A built heritage statement was prepared by RPS which identifies that the site has little to no effect on the historical landscape.

### Summary

- 2.8 The Council have made a suitable choice in proposing the site as a draft housing allocation. We are fully supportive of the proposed allocation of the site as the settlement of Great Gonerby is an ideal location for future growth due to the presence of several facilities and services that are available, in addition to the accessible, frequent public transport that is available for transport to the wider Grantham area.

- 2.9 The site is under the control of a housebuilder with a strong track record of delivery across the District and surrounding area and the site would be delivered early on in the plan period.

### 3. SUSTAINABILITY APPRAISAL

- 3.1 AECOM have carried out an Interim Sustainability Appraisal ('SA') on behalf of South Kesteven District Council.
- 3.2 The SA Framework was informed by an initial scoping report which was carried out identifying a range of sustainability issues to focus on. To further support the Sustainability Appraisal, a Points of the Compass exercise was carried out, which assessed the key settlements, to identify the most appropriate locations for growth within each settlement. We agree that the Sustainability Appraisal and Points of the Compass exercise are necessary to find the most sustainable locations for growth.
- 3.3 The Appraisal scores the individual sites through 5 Red Amber Green (RAG) Rules which provides the benefit of clearly showing which sites are most appropriate to be allocated.
- 3.4 The assessment that has been carried out for Land off Church Lane, Great Gonerby (assessment reference: SKPR-241) provides largely positive results, particularly under community wellbeing where scores were largely light green or better. Additionally, it is recognised that there is good access to public transport opportunities within proximity of the site. The assessment raises awareness to the proximity to the Church of St Sebastian Grade I listed building and the Grade II listed building located on pond street. The Heritage Assessment carried out by RPS on behalf of Allison Homes does not consider these to be constraints to this site coming forward.
- 3.5 We are pleased to see the benefits of the site have been recognised through the assessment which is largely positive, taking into consideration the opportunities the site benefits from, in particular the access to local shops, transport and other services and facilities.



## 4. VISION AND DEVELOPMENT MANAGEMENT POLICIES

- 4.1 This section makes comments on the duration of the Plan Period alongside the Vision of the Draft Local Plan as well as other policies including in the Local Plan Review.

### Chapter 2 - South Kesteven District - Plan Period

- 4.2 The Regulation 18 consultation document highlights in paragraph 2.1 that the plan period for the emerging Local Plan will run from 1st April 2021 through to 1st April 2041. It is positive to see that the Council are seeking to plan for the longer period and preparing a document which covers 20 years. We are however concerned that upon adoption the Council may feel to meet the minimum requirements as outlined in paragraph 22 of the NPPF (2023).
- 4.3 Paragraph 22 of the NPPF requires “strategic policies should look ahead over a minimum 15 year period from adoption” and in our view the emerging SKDC Local Plan will not meet this. In order to provide a minimum 15 year period from adoption the plan will need to be adopted by 31st March 2026 at the very latest in order to provide the required time period. However, as the Local Plan has already experienced delays, it is reasonable to assume that further delays in timescales will be encountered.
- 4.4 By taking a positive and proactive approach to delivering to the plan period, the Council is able to ensure that the plan is robust and credible with the opportunity to deliver more housing across South Kesteven to meet local needs. We encourage the Council to extend the plan period by at least another two years to a time horizon of 2043 which will allow for any further delays in plan making whilst still ensuring that the minimum time period can be achieved.

### Chapter 3 - Vision and Strategic Objectives

- 4.5 Chapter 3 of the Regulation 18 Consultation sets out the Vision and the Objectives the Plan seeks to meet and provide.
- 4.6 The Vision provided has been updated to reflect the Council’s commitment to fight climate change, and create a successful and strong economy, whilst building sustainable communities that provide a high quality of life. The suggested Vision is realistic in its ability to be delivered through the provision of high quality housing and creating a strong economy.
- 4.7 We are support of the overall Vision in increasing the importance of tackling Climate Change as well as creating sustainable, diverse, and safe communities across the district. To strengthen the Vision to further ensure it is considered as sound, the Plan period should be increased, and the Vision should be amended accordingly to account for the additional years of the plan period.
- 4.8 The draft Plan also provides the strategic Objectives for the Local Plan moving forwards.
- 4.9 We consider that Objective 9 should be amended to take into the consideration in the extension of the Plan period, and increased need for housing across the district. However, we

are pleased to see that the Council have provided an approach and set Objectives which are largely pro-growth whilst requiring the provision of diverse and sustainable communities.

#### **Chapter 4 - Sustainable Development in South Kesteven**

##### **Policy SD1 – The Principles of Sustainable Development in South Kesteven**

- 4.10 Policy SD 1 seeks to deliver sustainable development in South Kesteven.
- 4.11 Although we are broadly supportive of the approach set out in Policy SD1, we would suggest that any further revisions to the policy provide greater clarity as to the expectations of how development proposals are to meet criteria within the policy. At the moment, it is unclear as to whether these requirements have to be met by development proposals and the relationship between them.

#### **Chapter 6 - Spatial Strategy**

##### **Policy SP1 – Spatial Strategy**

- 4.12 Policy SP1 outlines that the Local Plan is to deliver sustainable growth across the District. We are broadly supportive of the approach to propose development across the District in locations which are suitable and sustainable. This approach will allow for greater certainty that the needs of the District can be met in a positive and robust manner.
- 4.13 Policy SP1 is clear that the Council is using the Standard Method for identifying housing need as the starting point which we support and are not aware of any justified and objective evidence which suggests a lower figure should be used.

##### **Settlement Hierarchy Assessment**

- 4.14 Appendix 2 of the Settlement Hierarchy Assessment provides the individual scoring of each settlement within the district, with the settlements with the higher scores being the most sustainable and suitable for growth.
- 4.15 Great Gonerby received a total score of 36, resulting in the settlement being the 16<sup>th</sup> highest score out of the total 128 settlements which were assessed. The assessment of Great Gonerby correctly identifies the services and facilities that are present, such as the local shop, primary education, public house, village hall, and more. This assessment shows that Great Gonerby is a sustainable location to accommodate growth in the district as it is a local centre which provides access for local residents' needs without the need to travel further afield.
- 4.16 We agree with the overall methodology taken towards the large villages in South Kesteven, and the identification of Great Gonerby as a larger village in the district that is both suitable and sustainable for future growth.

#### **Chapter 7 - Housing Need**

- 4.17 It is pleasing to see the Council have used the Government's Standard Method in calculating the need for housing, in addition to the use of a 21% uplift, resulting in a total housing requirement of 16,975 dwellings. To meet this requirement, the Council propose to allocate an additional 2,901 dwellings across 23 sites. It is important that the Council are satisfied that all

sites put forward are suitable, available and deliverable, such as our Client's site at Great Gonerby to ensure that the housing requirement will be delivered over the plan period.

#### **Policy H2 – Affordable Housing**

- 4.18 We acknowledge the importance of providing affordable housing options on large sites as this ensures a range of accommodation to come forward across South Kesteven.
- 4.19 The policy as presented in the Regulation 18 document includes ranging percentage requirements which we understand will be refined as a result of the Whole Plan Viability Assessment. Alongside the Regulation 18 Local Plan, the Council have published a Whole Plan Viability Assessments prepared dated January 2024 which has been prepared by HDH Planning & Development Ltd and assumes a consistent 30% level of affordable housing for testing purposes along with a defined mix of tenure type. We are therefore unsure why the emerging policy has not reflected this evidence base at this stage.
- 4.20 Ahead of the Regulation 19 document, it will be essential that the Council provide clarity as to the level of affordable housing and the mix of tenures that are required to meet needs.

#### **Chapter 12 - South Kesteven Communities – Great Gonerby**

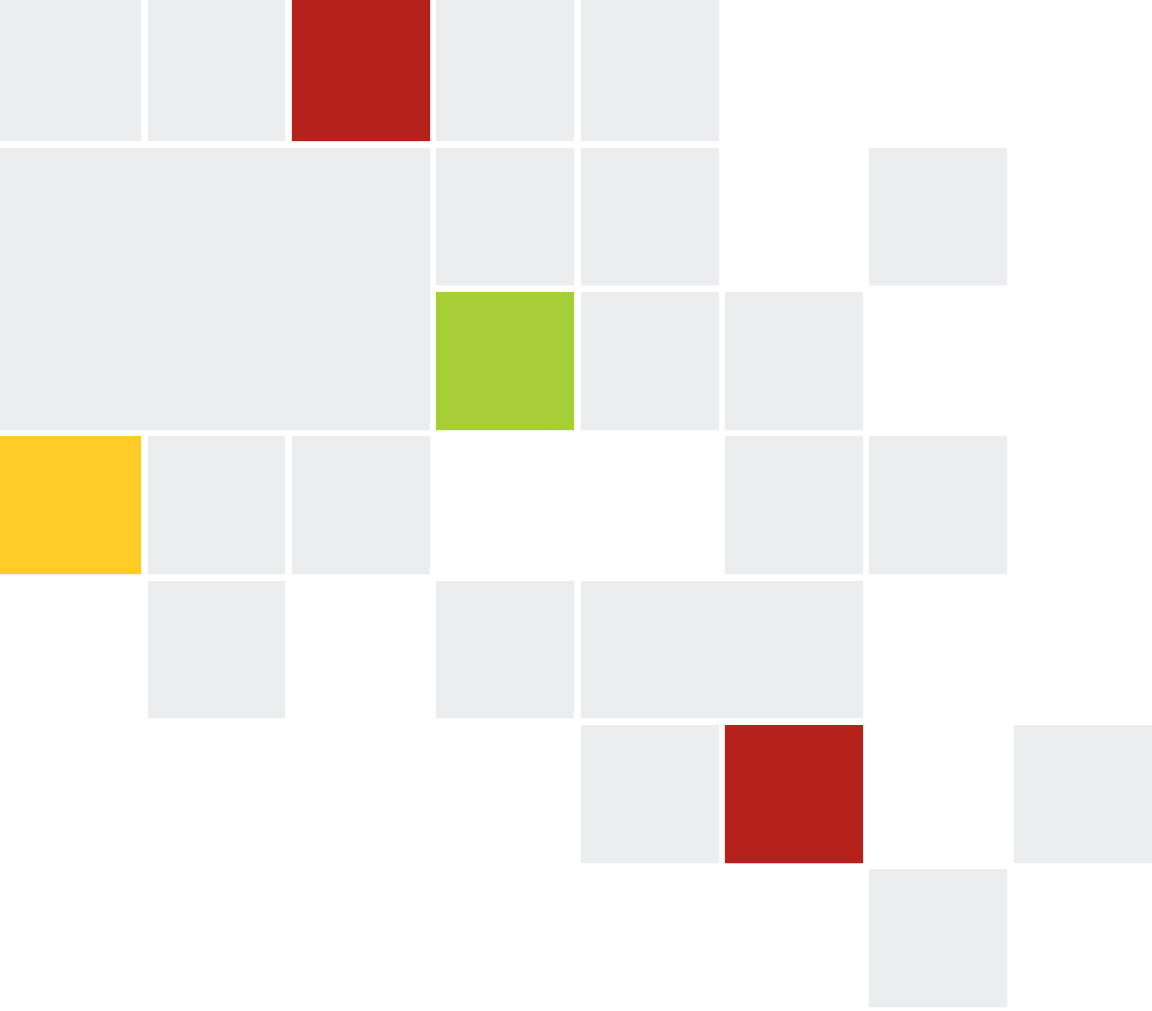
- 4.21 The Regulation 18 document includes a site specific allocation for Land off Church Lane in Great Gonerby to contribute towards the overall housing delivery and growth in South Kesteven which welcomed and supported.

#### **New Policy – SKPR-241: Land Off Church Lane**

- 4.22 The new policy includes specific criteria, and it is anticipated that these principles will be the basis for future decision.
- 4.23 Future development on this site will be able to provide necessary highway improvements to Church Lane in addition to providing connectivity for pedestrians and cyclists from the site to the centre of the settlement and surround public footpath network.
- 4.24 Land off Church Lane, Great Gonerby is capable of delivering sustainable development and Allison Homes are committed to bringing this site forward in a timely manner. There are no constraints or issues that would impact on the deliverability or suitability of the site.
- 4.25 Great Gonerby is a suitable location for growth and the allocation of sustainable housing growth within the settlement is supported.

## 5. CONCLUSIONS

- 5.1 Boyer has prepared these representations on behalf of Allison Homes in response to the Local Plan Review undertaken by South Kesteven District Council ('SKDC').
- 5.2 These representations are made with respect to the ongoing promotion of Land off Church Lane, Great Gonerby, for residential development of around 86 dwellings with open space, landscaping, drainage, and associated infrastructure. The site is being promoted by a housebuilder, is available, suitable and deliverable within an early part of the plan period. Allison Homes are supportive of the Council's approach to proposing the site as a draft housing allocation.
- 5.3 Allison Homes considers that the approach set out in the Local Plan Consultation Document is capable to be found sound. The approach undertaken with regard to the housing requirement, and the associated Spatial Strategy, is consistent with national policy, effective, justified, and positively prepared.



Boyer