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Dear Sirs

**Representations to the South Kesteven Regulation 18 Draft Local Plan Consultation
Land to the West of Swinehill, Harlaxton
David Wilson Homes East Midlands**

On behalf of David Wilson Homes East Midlands ('DWH'), we have prepared the following submission to the South Kesteven District Council ('SKDC') Regulation 18 Draft Local Plan Document in relation to their land interests at land to the west of Swinehill, Harlaxton ('the Site').

Site Overview

DWH is promoting land to the west of Swinehill, Harlaxton for residential development. A larger site (c44.3 hectares and 109.6 acres) was previously submitted by DWH in 2020 and was subsequently assessed in the Site Assessment Document 2024 (reference SKPR-198). In response to the Draft Plan consultation and evidence base, DWH are now promoting a smaller development opportunity.

DWH has submitted an updated Promotion Document in support of these representations which sets out a summary of the technical work undertaken to date and includes a Concept Masterplan for the Site (Appendix 2). The Promotion Document (Version 3) submitted alongside these representations has been updated from the versions submitted to SKDC in December 2020 and more recently in March 2023.

The revised site area is 18.40 hectares (45.46 acres) which could deliver around 200 market and a policy compliant level of affordable dwellings alongside safeguarded land for a community facility and a drop off / pick up parking for Harlaxton Primary School. The Site offers an immediate development opportunity which could be delivered within the next 5 years.

The Site is within a highly sustainable location immediately adjacent to the settlement boundary of Harlaxton (a 'Larger Village') and in close proximity to the range of shops, services and facilities provided within Harlaxton and Grantham. It is therefore considered that it offers a great opportunity to deliver much needed housing with community and environmental benefits in a highly sustainable and accessible location.

Regulation 18 Issues and Options Consultation Document Response

SD1: The Principles of Sustainable Development in South Kesteven

DWH support draft Policy SD1 which states that *'development proposals in South Kesteven will be expected to mitigate against the impacts of climate change and contribute towards creating a strong, stable and more diverse economy'* and includes various criteria that *'development proposals shall consider how they can proactively minimise'*. It is considered that policy wording used is reasonably flexible and accords with paragraph 35 (d) of the NPPF which states that *'plans are 'sound' if they are: Consistent with national policy –*



enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant’.

This policy does not set standards beyond adopted policy and is therefore considered in line with the ministerial statement that was issued in December 2023¹ which states that *‘a further change to energy efficiency building regulations is planned for 2025 meaning that homes built to that standard will be net zero ready and should need no significant work to ensure that they have zero carbon emissions as the grid continue to decarbonise. Compared to varied local standards, these nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes’.* It goes on to state that *‘the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations’* [Savills Emphasis]. Therefore, it is considered that the plan should only require development to comply with current or planned building regulations.

This response is also relevant to any to any future policy which may be drafted in response to Chapter 5 – Climate Change and Energy.

SP1: Spatial Strategy

DWH object to draft Policy SP1: Spatial Strategy. The policy states that *‘the housing need for South Kesteven, using the standard method, is 14,020 new dwellings. To ensure the need is met in full, the minimum Local Plan requirement for South Kesteven is 14,020 dwellings across the period 2021 to 2041’* [Savills Emphasis].

The Planning Practice Guidance (‘PPG’) reference 2a-002-20190220) states *‘the standard method uses a formula to identify the minimum number of homes expected to be planned for...[it] identifies a minimum annual housing need figure. It does not produce a housing requirement figure’* [Savills Emphasis]. The Government’s standard methodology identifies the minimum annual housing need which should be used as a starting point. In SKDC’s Local Housing Needs Assessment (February 2024) it suggests that the Council may need to consider increasing the housing need from the standard method figure due to the affordable housing need. Paragraph 8.65 of the draft plan states that *‘the estimated need for affordable housing equates to 57% of the Standard Method Figure’.* Paragraph 8.68 goes on to state *‘a consideration emerging from this analysis is whether the estimate of the need for affordable housing should affect the District’s housing requirement’.* Policy H2 provides a requirement for sites 10 dwellings or more (or an area of 0.5 hectares or more) to make a provision for 27-57% affordable housing. 57% is significant and therefore, it is considered that South Kesteven should be planning for more than the minimum level of housing.

Furthermore, DWH object to the plan period currently being used (2021 to 2041). SKDC are already 3 years into the plan period and it is likely that the plan will not be adopted until 2026 at the earliest which leaves just 15 years of the plan period remaining. The PPG states (Paragraph: 064 Reference ID: 61-064-20190315) *‘strategic polices should be prepared over a minimum 15 year period and a local planning authority should be planning for the full plan period’.* To allow for the timing of the plan adoption being delayed we consider that the plan period should be extended and if the plan period is extended they will need to find more sites. If more sites are required it is considered that more development should be directed towards the Larger Villages such as Harlaxton. DWH’s Site land to the West of Swinehill, Harlaxton offers a sustainable residential development opportunity that should be considered. The proposals include land safeguarded for community use to limit the impact of any future growth on existing infrastructure in the settlement.

The policy also states that *‘Larger Villages will provide a supporting role in meeting the development needs of the District’.* Table 3 of the draft plan provides the current percentage distribution of development across the settlements. This shows that 15% of all development in the plan is proposed to be focused in the Larger Villages compared to 49% in Grantham and 31% across the three market towns. This is considered to be a small percentage and therefore provides a ‘limited role’ rather than a ‘supporting role’ as stated in the policy. Paragraph 11 (a) of the National Planning Policy Framework (NPPF) states that *‘all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area’.* It is considered

¹ <https://questions-statements.parliament.uk/written-statements/detail/2023-12-13/hcws123>

development should be spread further across the identified sustainable settlements and not just be concentrated in Grantham and the market towns. Harlaxton is classified a Larger Village in the draft Policy SP2 Settlement Hierarchy and is suitable for further growth. The draft policy also states that the proposed allocations should “provide for a variety of site types and sizes to ensure choice is offered to the market and delivery is achievable”. Currently, the draft plan has only allocated one small site in Harlaxton which does not offer much variety in what is offered. Therefore, it is considered further sites should be allocated in Harlaxton, not least sites which have the potential to enhance the sustainability credentials of Larger Villages such as the proposed site.

Furthermore, DWH do not support the policy requirement that ‘development should provide the scale and mix of housing types that will meet the identified need for South Kesteven (as informed by the Local Housing Needs Assessment)’. The proposed housing mix should be determined on a site by site basis at the time of an application and be informed by market demand. This is considered to be the true measure of housing need within the locality and in accordance with paragraph 31 of the NPPF which states ‘the preparation and review of all policies should be underpinned by relevant and up to date evidence...and take into account relevant market signals’.

SP2: Settlement Hierarchy

DWH support Harlaxton being identified as a Larger Village. Paragraph 8.4 of the draft plan states that ‘the Larger Villages are the most sustainable villages in the District and as such they will be the focus for development outside of Grantham, Stamford, Bourne and the Deepings’ [Savills Emphasis]. However, despite Harlaxton being one of the most sustainable Larger Villages and having not been the subject of any growth in the adopted Local Plan, only a single small scale allocation is proposed in the settlement (draft allocation SKPR-74 for 24 dwellings). Additionally, Harlaxton is in a unique position compared to the majority of Larger Villages due to its close proximity to the range of shops, services and facilities offered in Grantham (the largest and most sustainable settlement in the District)

Harlaxton is 1 of 16 settlements classified as a ‘Larger Village’ in the settlement hierarchy. Despite being one of the higher scoring Larger Villages in the Settlement Hierarchy Review, 4 Larger villages (Barkston, Barrowby, Baston and Morton) which are classified as less sustainable than Harlaxton, are proposed to deliver more growth over the plan period in the draft local plan (see table in Policy H1: Housing Allocations). Paragraph 82 of the NPPF states ‘in rural areas, planning policies and decisions should be responsive to local circumstances’.

Furthermore, in the Council’s Settlement Hierarchy Study 2017 Harlaxton was classified as the 4th most sustainable Larger Village, however, in the Council’s most recent Settlement Hierarchy Review document (February 2024), Harlaxton is classified as the 10th most sustainable out of the 16 settlements regarded as a ‘Larger Village’. It is not clear why there has been such a significant change in how sustainable the settlement is in just 7 years even if other Larger Villages have new facilities.

Additionally, Table 3 of the Draft Local Plan states that 14% (1,002 dwellings) of the development distribution in the District will be focused towards the ‘Larger villages’. However, despite Harlaxton offering a range of services and facilities, only one site has been allocated (SKPR-74) for 24 dwellings. Considering how sustainable Harlaxton is it is considered that further sites should be allocated within the settlement in order to ensure that the settlement is providing a supporting role in meeting the development needs of the district (Policy SP1).

Furthermore, paragraph 6.3 of the Sustainability Appraisal (February 2024) states that ‘development should create strong, sustainable, cohesive, and inclusive communities’, it is considered that for this to be achieved development should be more evenly distributed across the settlements and therefore further development should be directed towards the Larger villages.

If further growth is directed to Harlaxton then it is considered that DWH’s Site land to the West of Swinehill, offers a sustainable residential development opportunity that should be considered. The proposals include land safeguarded for community use to limit the impact of any future growth on existing infrastructure in the settlement.

SP3 : Residential Development within Settlements

DWH do not support draft policy SP3 as clarity is needed on whether this policy is just for sites not allocated. Paragraph 16 (d) of the NPPF states that *'plans should contain policies that are clearly written and unambiguous, so it is evident how the decision maker should react to development proposals'* [Savills Emphasis].

SP4: New Residential Development on the Edge of Settlements

DWH object to the criteria included in policy SP4 which states that *'proposals for new residential development... will be supported provided that the essential criteria a-d below are met. The proposal must a. demonstrate clear evidence of substantial support from the local community'* [Savills Emphasis]. This is considered to be a very onerous requirement and it is unclear on what clear local support means, for example, does it mean that as long as the majority (e.g. 51%) support the proposals than that would be 'clear support'? Does this need to be clear support for the principle of development or the whole proposal (e.g. design). The National Planning Policy Framework ('NPPF') outlines the importance of pre-application and engagement with the community (paragraphs 39-46) however does not state that residential developments adjacent to existing settlements are required to have substantial support from the community for them to be acceptable.

The Policy should be amended in order to only refer to 'greenfield' sites on the edge of settlements and not brownfield schemes. The Government recently consulted on proposals to strengthen planning policy and give significant weight to the benefits of delivering homes on brownfield land². The criteria set out in Policy SP4 should therefore only be applicable to greenfield edge of settlement sites and development of any windfall brownfield sites should be encouraged in the draft plan.

It is considered that the policy should also be amended to be more flexible recognising that sometimes residential development beyond the settlement boundaries in the event that SKDC are not able to demonstrate a Five Year Housing Land Supply and that the need for substantial community support should be removed. Often land outside or adjacent to the limits to development may be the most suitable location for new development and that existing sites within the development limits may not be the most appropriate land to deliver the development required (nor the most sustainable option). Paragraph 7 of the NPPF recognises that *'the purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner'*. Paragraph 69 of the NPPF also states that *'planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability'*.

SP5: Development Outside the Settlement Boundary

DWH object to Policy SP5 and that *'development outside the settlements will be limited to that which has an essential need to be located outside the existing built form of a settlement'*. The policy defines the types of development which would be supported (a-d). This criteria for countryside exemption development is stricter than the exemptions listed under in the NPPF for Green Belt development (paragraph 154). There is also no reference in the draft policy to other national exemptions for isolated homes in the countryside (e.g. exceptional design quality) (NPPF paragraph 84). Draft Policy SP5 goes above and beyond the NPPF and is therefore not consistent with national policy (paragraph 35).

New Policy 2: BMV Agricultural Land

DWH object to draft new Policy 2: BMV Agricultural land which states that development affecting the best and most versatile agricultural land will only be permitted if criteria a-d as outlined is met. It is considered that the criteria included is stricter than what is required in NPPF paragraph 180 and is therefore not consistent with national policy (paragraph 35).

² <https://www.gov.uk/government/consultations/strengthening-planning-policy-for-brownfield-development/strengthening-planning-policy-for-brownfield-development>

Criteria a) states that development will only be permitted if *'there is insufficient lower grade land available at that settlement (unless development of such lower grade would be inconsistent with other sustainability considerations)'*. This suggests a sequential test will be required. If this is to be included within the policy more information on what alternative sites need to be assessed should be included. It is also not clear whether the availability of other similar best and versatile land is taken into account. The criteria goes beyond the NPPF which states that planning policies should *'recognise the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland'* and footnote 62 states *'where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality'*.

This Policy should only be relevant to sites not allocated within the plan and the key item which should be required in this policy is for windfall proposals to demonstrate that the benefits of the scheme outweigh the loss of the agricultural land. A review of other agricultural land should not be required.

H1: Housing Allocations

DWH object to Policy H1: Housing Allocations. As stated in our responses to Policy SP1 and SP2, it is considered that SKDC should be planning for more growth than the minimum housing need. Page 43 of the plan states that *'to maintain flexibility in supply it is proposed to retain the 20% buffer above the minimum housing requirement...this equates to a total housing supply of 16,975'*. However, also makes clear that *'existing adopted Local Plan allocations have been retained, where they have been reassessed as developable, unless the whole site has been completed or has planning permission'*. Subsequently, there are a number of historic strategic sites allocated within Grantham (all for 1,100+ dwellings). Page 18 of the Lichfield Start to Finish Report (February 2020) states that *'a number of local plans have hit troubles because they overestimated the yield for some of their proposed allocations...[and] for local authorities to deliver housing in a manner which is truly plan-led, this is likely to mean allocating more sites rather than less, with a good mix of types and sizes, and being realistic about how fast they will deliver so supply is maintained throughout the plan period'*. It is therefore considered that there should be further smaller sites identified within the plan, like DWH's site adjacent to the sustainable settlement of Harlaxton.

Furthermore, SKPR-272 Barrowby is not considered to be capable of delivering the 270 units as identified in the table in Policy H1. Part of this site has already been delivered and the rest of the site has planning applications already submitted. Paragraph 12.62 of the draft plan states *'the allocation at Barrowby will deliver up to 270 new dwellings'* and acknowledges that *'part of the site has been completed with 49 new homes delivered in 2021/2022 as part of an affordable housing scheme'*. As such, part of the site has already been delivered and subsequently it is considered further dwellings will need to be found to replace the allocation.

Paragraph 126 of the NPPF states that *'planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability'* [Savills Emphasis]. As part of the Local Plan review SKDC should undertake a detailed assessment of the progress of historic allocations and if these have been partly delivered or have applications submitted they should not be carried forward as the housing the site will deliver should be for the housing requirement from the previous plan.

We object to only one site being allocated in Harlaxton (SKPR – 74) for 24 dwellings (please refer to our response to Policy SP2). As identified in the draft Policy SP2, Harlaxton is a sustainable Larger Village and paragraph 12.83 of the draft plan outlines the range of facilities Harlaxton has and states *'facilities include a Public House, Post Office within the local store, Primary School, a Doctor's Surgery and a Village Hall. There are also local sports clubs, alongside the open space provision'*. Harlaxton is therefore considered to have capacity to accommodate more housing than currently allocated. DWH's Site land to the West of Swinehill, Harlaxton, for residential development (SHLAA reference SKPR-198) is considered suitable for a residential allocation.

H2: Affordable Housing Contributions

DWH object to Policy H2: Affordable Housing Contributions which states *that 'all development comprising 10 or more dwellings (or an area of 0.5ha or more) should make provision for 27-57% depending on the outcome of the Whole Plan Viability Assessment'*. It is considered that although the policy is written flexibly and suggests any requirements will be based on evidence (a viability assessment) which is in accordance with paragraph 35 (b) of the NPPF which states that *'plans are 'sound' if they are justified and are based on proportionate evidence'*, 57% affordable is considered significant and the evidence has not been taken into consideration. The SKDC Viability Report (2023) initial appraisals are based on the assumption sites would be 30% affordable. Paragraph 12.68 of the Viability Report also recommends that greenfield sites should be subject to 20% affordable housing and strategic sites 30%. The policy is therefore considered to be at odds to the evidence and should be amended to state that *'all development comprising 10 or more dwellings (or an area of 0.5ha or more) should make provision for 20-30% affordable'*. This, by virtue, implies that the proposed allocations are not sufficient to meet the District's affordable housing need.

Paragraph 7.18 of the supporting text (and table 4) provides the affordable housing mix that the Local Housing Needs Assessment (2023) recommends, however, the mix is not included in the policy and table 4 provides a percentage range, acknowledging that the range will depend on the site specifics and market. This is welcomed as the policy provides guidance but is flexible which is in accordance with paragraph 16 (b) of the NPPF which states *'plans should be prepared positively, in a way that is aspirational but deliverable'*.

H4: Meeting all Housing Needs

DWH do not support Policy H4 and the requirement for residential development of over 10 dwellings to target the provision of at least 10% M4(2) dwellings. Requirements for M4(2) standard dwellings should only be included when justified by evidence (PPG Paragraph: 009 Reference ID: 63-009-20190626) and should be done on a site by site basis. The Planning Practice Guidance (PPG) states that Councils have the option to *'set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of access'* where there is a justified need (PPG Paragraph: 002 Reference ID: 56-002-20160519). The PPG states *'local plan policies should also take into account site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2)... compliant dwellings, particularly where step free access cannot be achieved or is not viable. Where step-free access is not viable, neither of the Optional Requirements in Part M should be applied'* (PPG: Paragraph: 008 Reference ID: 56-008-20160519).

We therefore consider that the requirement for 10% M4(2) properties should be properly evidenced and balanced against the need to make the most efficient use of land available and site viability.

DWH welcome that the housing mix is included within Table 4 and provides an 'indictive' mix of homes and ranges. This provides welcome flexibility as its not within the policy (the policy just says 'provide appropriate type and size of dwellings'). However it is considered that draft plan should still refer to market considerations being key. This is referred to in our response to policy SP1 and explained in more detail.

New Policy 3: New Community Services and Facilities

DWH support New Policy 3 which requires proposals for new community facilities to *'wherever feasible'* be in accordance with criteria a-f. The inclusion of the wording *'wherever feasible'* is welcomed as this provides flexibility which is in accordance with paragraph 16 (b) of the NPPF which states *'plans should be prepared positively, in a way that is aspirational but deliverable'*.

DWH's Site land to the West of Swinehill, Harlaxton is proposing to provide facility land for a community use. It is considered that the location of the facility will be in accordance with criteria a-f. It will be well located to serve the community, prioritise and promote access by walking, cycling and public transport, the facility is accessible to a wider catchment, be physically accessible to all members of society. It is expected to be designed to be adaptable to future demands and will be operated without detriment to local residents. The provision of the

facility land will be a benefit to local residents and there is an opportunity for it to provide land for the doctor's surgery which is considered to be currently oversubscribed.

EN2: Protecting Biodiversity and Geodiversity

DWH do not support policy EN2. The policy states that *'the Council...will facilitate...the...enhancement of the District's Biodiversity...this includes seeking to enhance ecological networks and seeking to deliver a net gain on all proposals'* [Savills Emphasis]. It is considered that the policy should define the exact net gain expected (10%) to be delivered so it is in line with the requirements as defined in New Policy 4 and most importantly so the policy is consistent with national policy so it is in accordance with NPPF paragraph 35 (d) which states *'plans are 'sound' of they are consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant'*. The policy should also make clear that exempt development should not be required to deliver net gain.

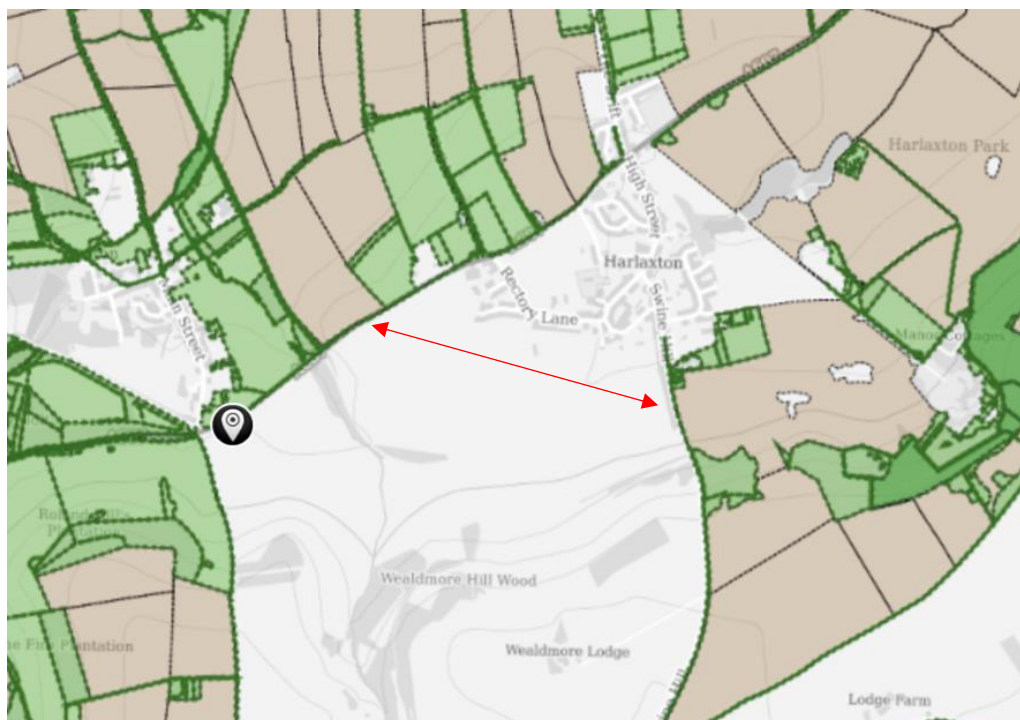
New Policy 4: Biodiversity Opportunity and Delivering Measurable Net Gains

DWH do not support New Policy 4 which states: *'proposals for major development should seek to deliver wider environmental net gains where feasible'* [Savills Emphasis]. The policy does not explain what the 'wider environmental gains' should be and therefore this wording is not in accordance with paragraph 16(d) of the NPPF which requires policies to be clearly written. Additionally, it should be clarified in the policy that this is not in addition to the 10% Biodiversity Net Gain requirement.

DWH are unclear on how the mapping / identification of sites for the Biodiversity and Green Infrastructure Areas Opportunity Areas have been decided. Paragraph 16 (d) of the NPPF states that *'plans should contain policies that are clearly written and unambiguous, so it is evident how the decision maker should react to development proposals'* [Savills Emphasis] and therefore it is considered this should be clearly set out in the policy or within the appendix.

DWH's Site at Harlaxton is not identified as an opportunity area for either biodiversity or green infrastructure improvements. DWH are however keen to provide biodiversity enhancements on their Site. The landowner for DWH's Harlaxton site owns a larger landholding than what is being promoted by DWH. Therefore, as part of any development on the Site, wider biodiversity and green infrastructure improvements could potentially be made to connect the biodiversity and green infrastructure opportunity areas identified east of Swinehill Lane and north of the A607 (shown by the red arrow on the extract from the Biodiversity and Green Infrastructure Policy Map 2024 below).

Extract - Biodiversity and Green Infrastructure Policy Map 2024



Furthermore, DWH consider that the policy stating that *'all qualifying development proposals...must deliver at least 10% measurable biodiversity net gain'* is appropriate and in accordance with paragraph 35 (d) of the NPPF which states that *'plans are 'sound' if they are: d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant'*.

EN3: Green Infrastructure

Please refer to our response to New Policy 4 specifically in relation to Green Infrastructure Opportunity Areas.

EN4: Pollution Control

DWH object to policy EN4 and consider it be rephrased to state: *'Where practical and viable development should seek to minimise pollution...'* This amending wording is in accordance with the NPPF paragraph 16 (b) which states *'plans should be prepared positively, in a way that is aspirational but deliverable'*.

EN5: Water Environment and Flood Risk Management

DWH object to policy EN5. The policy should ensure it makes it clear that the sequential test is only required for sites not allocated. Paragraph 16 (d) of the NPPF states that *'plans should contain policies that are clearly written and unambiguous, so it is evident how the decision maker should react to development proposals'* [Savills Emphasis].

EN6: The Historic Environment

DWH support Policy EN6 and the wording which states *'development that is likely to cause harm to the significance of a heritage asset or its setting will only be granted permission where the public benefits of the proposal outweigh the potential harm'* and consider it to be in accordance with paragraphs 208 of the NPPF which states *'where a development proposal will lead to less than substantial harm to the significance of a*

designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use'.

The rest of the policy is written using wording such as *'development proposals should aim to'* [Savills Emphasis] which is in a way that is in accordance with paragraph 16 (b) of the NPPF which states *'plans should be prepared positively, in a way that is aspirational but deliverable'*.

A very small part of DWH's Site at the northern edge (land to the West of Swinehill, Harlaxton (SHLAA reference SKPR-198)) falls within the Harlaxton Conservation Area. It is considered that any impact can be mitigated against and the Concept Masterplan produced (see Appendix 2 of the submitted promotion document) demonstrates this. Public open space is proposed in the part of the Site that falls within the conservation area and key views to the spires and Registered Park and Garden have been incorporated into the layout. The DWH Site is also proposing to provide facility land which is a community benefit.

DE1: Promoting Good Quality Design

DWH do not support policy DE1. The policy states: *'applications for Planning Permission that are not well designed will be refused'* [Savills Emphasis]. The wording is not clear as 'well designed' is subjective. Further to this, the language used is not flexible and words such as 'must' and 'should' are used throughout the policy. Words used should be more flexible such as 'where practicable' or 'could' or 'where feasible' rather than applying unrealistic blanket restrictions to all development. This is in accordance with paragraph 16 (b) of the NPPF which states: *'plans should be prepared positively in a way that it is aspirational but deliverable'*. DWH also consider that bullet 3 (c) should be reworded to align with the NPPF and footnote 53 *'unless, in specific cases, there are clear, justifiable and compelling reasons why this would be inappropriate layouts should be designed to ensure that sufficient space is given for the creation of tree lined streets and trees within other public spaces'* [Savills Emphasis].

SB1: Sustainable Building

DWH object to draft Policy SB1 which states that *'all development proposals will be expected to mitigate against and adapt to climate change, to comply with national and contribute to local targets on reducing carbon emissions and energy uses...'* [Savills Emphasis]. The policy as stated in the Ministerial Statement that was issued in December 2023³ should not go beyond national standards. The Ministerial Statement states *'a further change to energy efficiency building regulations is planned for 2025 meaning that homes built to that standard will be net zero ready and should need no significant work to ensure that they have zero carbon emissions as the grid continue to decarbonise. Compared to varied local standards, these nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes'*. It goes on to state that *'the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations'* [Savills Emphasis]. Therefore, it is considered that the plan should only require development to comply with current or planned building regulations and not ask developers to meet local needs which go beyond these.

IDI: Infrastructure for Growth

DWH are generally supportive of this policy. However, it is important that all statutory consultees provide realistic assumptions on contributions that will be sought for proposed allocations in order to avoid the need for further viability assessment at the decision making stage (PPG Reference ID: 10-002-20190509). Currently the Viability Assessment just notes an assumption of S106 Agreement costs of £20,000 per unit. It is unclear from the Assessment whether this is based on what has been requested by consultees or just experience by the Consultants elsewhere.

³ <https://questions-statements.parliament.uk/written-statements/detail/2023-12-13/hcws123>

ID2: Transport and Strategic Transport Infrastructure

DWH generally supports this policy and that the viability assessment referred to includes infrastructure improvement costs in the assessment. This is in accordance with the PPG Paragraph: 001 Reference ID: 10-001-20190509 '*plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure)*'. However, the specifics on what the infrastructure requirements are have not been set out as such therefore it is not clear what the figures are based on.

ID3: Broadband and Communications Infrastructure

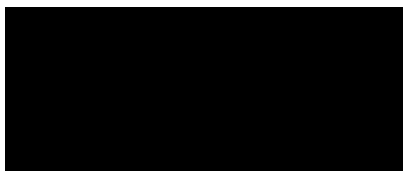
DWH object to Policy ID3. It is considered that 'where possible' should be added so the policy states 'where possible new developments must be served by either: Fibre to the Premises...or Fibre to the Cabinet technology'. This is accordance with NPPF paragraph 16 (b) which states that '*plans should be prepared positively, in a way that is aspirational but deliverable*'.

Policy M1: Early Local Plan Review

DWH object to the complete policy removal of Policy M1. Although it is considered that SKDC do not need to commit to an early review of their plan they should keep a review policy in as in accordance with paragraph 33 of the NPPF they will need to review the plan after 5 years.

I trust the above is helpful. I look forward to receiving confirmation of receipt of these representations.

Yours sincerely



Jessica Graham
Associate Director

Enc

Updated Promotion Document (Version 3)

Land to the West of Swinehill, Harlaxton



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Appendix 2 – Concept Masterplan Option

1. Introduction

- 1.1.1. On behalf of our client, David Wilson Homes East Midlands ('DWH'), Savills (UK) Limited has prepared this updated Promotion Document to support the submission of land to the west of Swinehill, Harlaxton (the 'Site') for residential development. This document is an updated version of the Promotion Document previously submitted to the Call for Sites process in 2020 ('Version 1') and in April 2023 ('Version 2'). This document ('Version 3') considers the Draft Regulation 18 Local Plan proposals and includes analysis of additional technical work that has been instructed since 2023 which included a Transport Appraisal which was undertaken by ADC Infrastructure.
- 1.1.2. South Kesteven District Council ('SKDC') is undertaking a Local Plan Review which is currently proposed to cover the plan period up to 2041. The Local Plan Review will update the vision, objectives, spatial strategy and policies for the future development of the District, taking account of the latest National Planning Policy Framework ('NPPF') updates, particularly in relation to the assessment of housing needs and future requirement for employment land in order to plan for future growth. DWH has responded to the findings of the Regulation 18 version of the Local Plan Review and the proposed level of growth being directed to Harlaxton by reducing the area of land being promoted for development. An amended Concept Masterplan is shown at Appendix 2.
- 1.1.3. The Site is immediately adjacent to the settlement of Harlaxton. Harlaxton is identified as a Larger Village in the adopted and emerging Local Plan. Harlaxton Parish Council has not yet produced a Neighbourhood Plan for the settlement.
- 1.1.4. This document has been prepared to provide an updated position for the Site and sets out further details in relation to the Site's context and the opportunities that it presents.

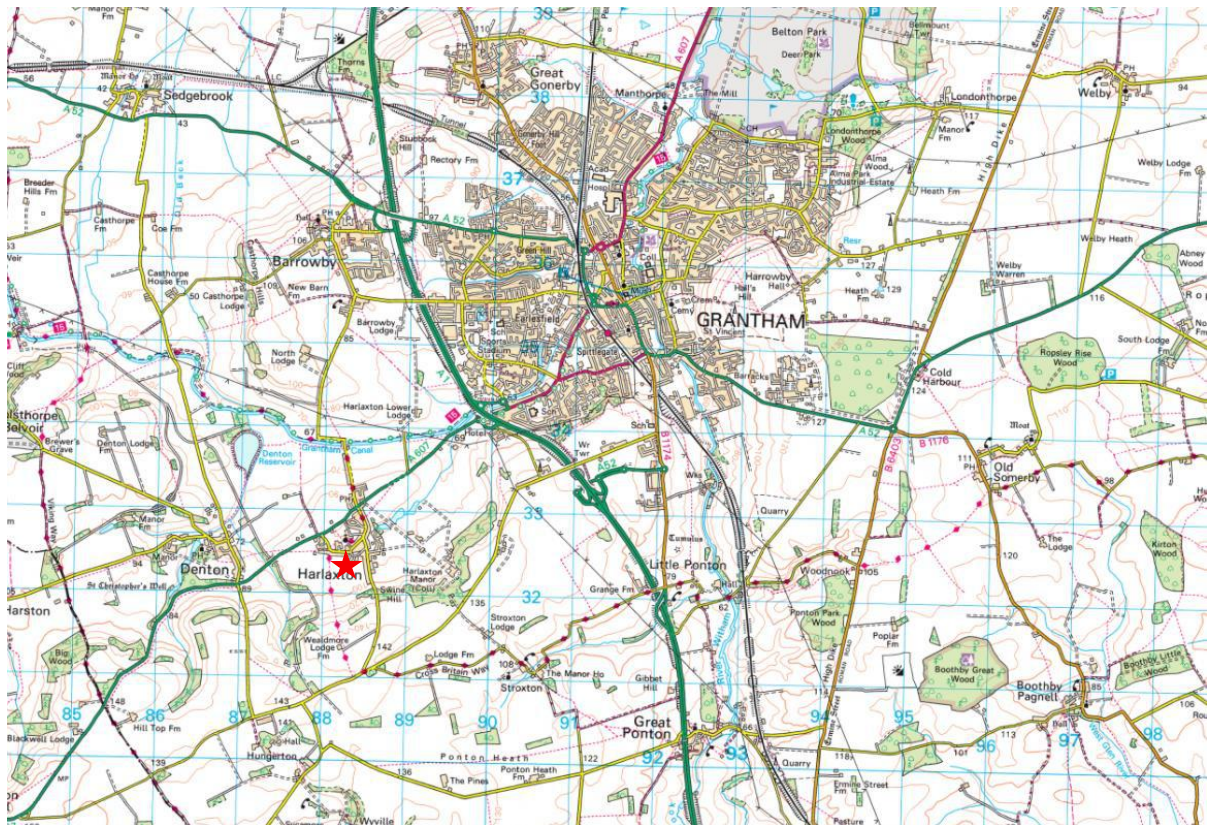
2. Site Context

2.1. Site Location

2.1.1. The Site is located the west of Swinehill, Harlaxton, immediately adjacent to the settlement boundary of Harlaxton. The settlement is approximately 2.7 miles from Grantham and 1.5 miles from the village of Denton. Grantham is the largest settlement within South Kesteven District.

2.1.2. Plan 1 shows the location of the Site in the context of Grantham and the wide range of shops, services and facilities it provides.

Plan 1: Site Context Plan



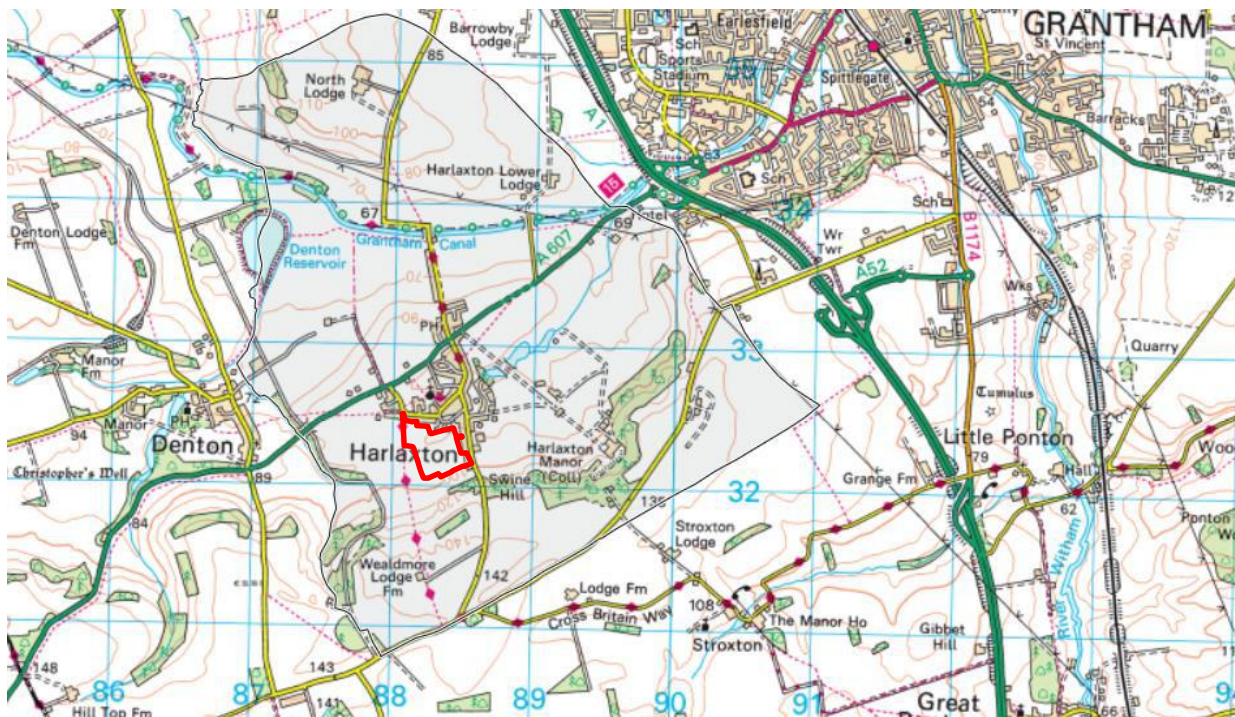
Land to the West of Swinehill, Harlaxton

Updated Promotion Document (Version 3)



2.1.3. The Site is immediately adjacent to the settlement of Harlaxton. Harlaxton is categorised as a ‘Larger Village’ in SKDC’s adopted and emerging Local Plan’s settlement hierarchy which is just below Grantham and the three market towns of Stamford, Bourne and The Deepings. Plan 2 shows the Site’s approximate location to the south west of Harlaxton and Grantham to the north east of the settlement.

Plan 2: Site Location adjacent to Harlaxton



Land to the West of Swinehill, Harlaxton

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- 2.1.4. The Site is approximately 18.40 hectares (45.46 acres) and is currently in agricultural use.
- 2.1.5. As shown on Plan 3, the Site is immediately adjacent to Harlaxton and is bound by the by residential properties to the north, Swinehill Lane and residential properties to the east and agricultural fields to the south and west.

Plan 3: Site Plan



2.2. Adjacent Uses

- 2.2.1. There is no defined settlement boundary for Harlaxton in the adopted Local Plan. However, the Site is immediately adjacent to the settlement edge. Along the northern and eastern boundaries of the site are residential properties and the southern and western parts of the site are adjacent to agricultural land. As shown in the Concept Masterplan (Appendix 2), any built development proposed on the Site will be focused within the northern and eastern part of the site adjacent to the existing residential properties. We therefore consider that residential use on the Site would be in keeping with the existing adjacent uses and should be considered a suitable use for this location. Appropriate landscape buffering and separation distances between the proposed development and the existing properties have been considered and can be agreed at planning application stage.

2.3. Proximity to Shop, Services and Facilities

2.3.1. Appendix 1 demonstrates the close proximity of the Site to the shops, services and facilities provided within Harlaxton. The primary school and doctor's surgery are located adjacent to the Site's eastern boundary. The Site is also within approximately 500 meters (5-minute walk) of Harlaxton Village Centre. The services and facilities highlighted on the plan are as follows:

- Existing Primary School;
- Doctor's Surgery;
- Sports & Social Club;
- Recreation Ground;
- Village Hall;
- Harlaxton Business Park;
- Public House;
- Post Office;
- Play area;
- Place of Worship; and,
- Bus Stops.

2.3.2. In addition to the shops and services in Harlaxton, the Site is approximately 1.5 miles from the village of Denton which has: a primary school, a public house, 2 bed and breakfasts and a church. The Site is also approximately 2.7 miles from Grantham which is the largest and most sustainable settlement in the District. It offers a wide range of services and facilities and direct access to London via train. Grantham can be accessed by public transport from Harlaxton.

3. Planning Policy, Environmental, Heritage and Technical Opportunities

3.1.1. We have set out below the key planning policy, landscape, transport, ecological, heritage and other opportunities of the Site that we consider makes it suitable for residential development.

3.2. Sustainable Location

3.2.1. To accord with the NPPF, a presumption in favour of sustainable development should be at the heart of plan-making and decision-taking (Paragraph 10). As set out in Section 2, the Site is in a sustainable location. The Site is adjacent to Harlaxton which is identified within the adopted South Kesteven Local Plan (January 2020) as a 'Larger Village' which have been subject to growth (circa 10% of the overall housing requirement) in the adopted plan. In the emerging Regulation 18 Draft Plan (February 2024), Harlaxton is still identified as a 'Larger Village'.

3.2.2. In the emerging Plan, Larger Villages are proposed to be subject to circa 15% of the overall housing requirement. Despite being one of the highest scoring Larger Villages in the Council's Settlement Hierarchy Study 2017 (4th most sustainable), Harlaxton is one of the few larger Villages not to have any strategic residential allocations within the adopted Local Plan and only has one small allocation for 24 dwellings in the emerging plan. Harlaxton is in the unique position compared to other Larger Villages due to its close proximity to Grantham (the largest and most sustainable settlement in the District) and the wide range of shops, services and facilities it offers. It is therefore considered that further housing growth should be directed to Harlaxton.

3.2.3. Draft Policy SP1 (Spatial Strategy) of the emerging plan states that '*larger villages will provide a supporting role in the development needs of the District. Development should create strong, sustainable, cohesive and inclusive communities, making the most effective use of appropriate previously developed land (where possible) and enabling a larger number of people to access jobs, services and facilities locally*'. The Site is in very close proximity to existing shops, services and facilities located within Harlaxton as well as being in walking distance to bus stops on A607 and Church Street which connect the Site to Grantham. The Site is therefore in a highly sustainable and accessible location and should be considered for an allocation within the emerging plan.

3.3. The Council's Assessment of the Site

3.3.1. The eastern part of the Site (circa 2.7 hectares) is included in SKDC's Strategic Housing Land Availability Assessment ('SHLAA') (2017) as site reference HAR14-147 and the previous promoted larger Site, as submitted to the 2020 Call for Sites (circa 43 hectares), is included in the Site Assessment Document (February 2024) (SKPR-198). Limited constraints were identified within the 2017 SHLAA and 2024 Site Assessment Document and the constraints listed included the Site being adjacent to a Conservation Area, being Grade 3 agricultural land and having views over the countryside.

- 3.3.2. The SHLAA concluded that the Site was available but not suitable or achievable because it was not compliant with Policy SAP H1 of the now superseded Site Allocation and Development Policies Development Plan document (April 2014).
- 3.3.3. Superseded Policy SAP H1 'Other Housing Development' stated that new housing development will be provided in the market towns and 16 Local Services Centres, of which Harlaxton was one, through the development of suitable brownfield redevelopment and small infill sites. The Policy went on to state that *"other than those sites which are allocated, new greenfield sites on the edges of the towns and villages will not be considered acceptable for housing development"*. As stated above, this policy has now been superseded by the adopted Local Plan which now states that in the Larger Villages, *"in addition to allocations, development proposals which promote the role and function of the Larger Villages, and will not compromise the settlement's nature and character, will be supported"* (Policy SP2). Additionally, these policies are considered to be more relevant to development management and should not be a factor considered when determining whether a site is suitable for development or not. Nevertheless, we therefore consider that proposals to release some land for residential growth in Harlaxton are supported by Policy SP2.
- 3.3.4. As explained above, the Site was submitted to the Council as part of the 2020 Call for Site process albeit a larger site area than that which is now being promoted by DWH. The main findings from the 2024 Site Assessment are that the Site is a *'large strategic site that has naturally generated multiple constraints which would need to be addressed. Site of this scale could significantly alter character and setting of the settlement. Site not proposed for allocation at this time as other more suitable sites are available to meet required need across the plan period'*. DWH have considered this Assessment and have subsequently reduced the size of the Site being promoted for development (see Concept Masterplan at Appendix 2).
- 3.3.5. Given the Site's proximity to one of the most sustainable settlements in the District and the limited constraints identified in the 2024 Site Assessment, DWH consider that the Site should be considered for a residential allocation within the emerging plan. Allocating this Site will ensure that Harlaxton is the subject of growth that is relative to it being one of the most sustainable Larger Villages in the District.

3.4. Housing Need

- 3.4.1. In the emerging plan, draft Policy SP1 Spatial Strategy states that *'the housing need for South Kesteven, using the standard method is 14,020 new dwellings'*. However, the Planning Practice Guidance ('PPG') reference 2a-002-20190220) states *'the standard method uses a formula to identify the minimum number of homes expected to be planned for...[it] identifies a minimum annual housing need figure. It does not produce a housing requirement figure'* [Savills Emphasis]. The Government's standard methodology identifies the minimum annual housing need which should be used as a starting point. The final housing requirement in the plan should consider other matters, such as affordable housing needs or economic ambitions.

3.4.2. In SKDC's Local Housing Needs Assessment (February 2024) it suggests that the Council may need to consider increasing the housing need from the standard method figure due to the affordable housing need. Paragraph 8.65 states that *'the estimated need for affordable housing equates to 57% of the Standard Method Figure'*. Paragraph 8.68 goes on to state *'a consideration emerging from this analysis is whether the estimate of the need for affordable housing should affect the District's housing requirement'*. Policy H2 provides a requirement of sites of 10 dwellings or more (or an area of 0.5 hectares or more) should make a provision for 27-57% affordable housing. Given the significant affordable housing need, it is considered that South Kesteven should be planning for more than the minimum level of housing. Further growth should be concentrated in the larger villages as identified in draft policy SP2: Settlement Hierarchy.

3.5. Education Infrastructure

3.5.1. EFM has undertaken a review of education provision in the vicinity of the Site and future capacity / requirements should the Site be developed.

3.5.2. A development of 200 dwellings will generate 40 primary school aged children and 44 secondary and sixth form aged children. Based on the most recently published data, Harlaxton Primary School is operating with 37 spare spaces and Denton Church of England Primary School has 10 spare spaces. EFM therefore consider that there is sufficient primary school capacity to accommodate the proposed development.

3.5.3. The closest secondary schools to the Site are Walton Academy and West Grantham Church of England Secondary Academy in Grantham. Walton Academy is currently at capacity but West Grantham is only operating at 50% capacity with 315 spare places.

3.5.4. In light of the above, it is considered that there is existing primary and secondary infrastructure capacity to accommodate the proposed development. However, should additional education infrastructure be required, then circa 1 ha of land within the Site is proposed to be safeguarded for potential community use (see Appendix 2).

3.6. Health Infrastructure

3.6.1. EFM has undertaken a review of health provision in the vicinity of the Site and future capacity / requirements should the Site be developed for around 200 dwellings.

3.6.2. The nearest GP surgery to the Site is Harlaxton Surgery: the Welby Practice. The surgery is not at capacity and is currently accepting new patients. There are 2,272 patients registered to the practice. The national approach to assessing existing health care capacity is to use a standard per-sqm formula for GP provision per person, which is 0.08571sqm per person. On that basis, a facility that accommodates 2,272 patients should be a minimum of 195sqm in size. The Welby practice is at least 260sqm so EFM consider that it should be able to accommodate additional patients.

3.6.3. It is therefore considered that there is existing healthcare capacity to accommodate the proposed development. However, should additional health infrastructure be required, then circa 1 ha of land within the Site is proposed to be safeguarded for potential community use (see Appendix 2).

3.7. Highways / Access

- 3.7.1. There are 3 existing agricultural access points into the Site: two off Swinehill to the east of the Site and one north of the Site onto West End / Rectory Lane. Additionally, there is one Public Rights of Way ('PRoW') through the site 'Harl/4/2' which is along the western boundary of the Site from West End to the agricultural fields to the south. As part of the proposed development of the Site, these PRoW will be retained and realigned where required, and new public footpaths will be provided throughout the Site and in the proposed open space areas (see Concept Masterplan at Appendix 2).
- 3.7.2. A Transport Appraisal has been prepared by ADC Infrastructure ('ADC'). The Appraisal concludes that the Site is close to local services and amenities and to the local footway network. It also confirms that access from Swinehill on the southern edge of the Harlaxton would be acceptable and suitable junctions can be provided. ADC states that whilst most of the traffic is expected to route north through Harlaxton to reach the A607, there is nothing to suggest that traffic routing through the settlement would create an unacceptable impact on the local network. ADC confirmed that the local network can accommodate the number of dwellings proposed.
- 3.7.3. ADC also confirmed that the Site is accessible to sustainable modes of transport. There are existing bus stops within close proximity to the site on the A607 and High Street. The High Street bus stops are served by Bus 9 which is a reduced service between Monday to Friday between Sunningdale, Grantham, Harlaxton and Woolsthorpe. The A607 bus stops are served by Bus 9 as well as Buses 8, 56 and 55 with frequent services between Melton Mowbray and Grantham (every 30 minutes – 1 hour). As part of any future development of the Site, DWH would seek to improve the existing service. This will be discussed with the Local Highway Authority and bus providers at the planning application stage.
- 3.7.4. ADC concluded that there are no known local highway network capacity issues or other highways issues that would negatively affect the Site coming forward for residential development. Any future development proposals on the Site would be accompanied by a Transport Assessment that would assess the network at the time of submission. As stated in the NPPF (paragraph 115), development should only be prevented on highways grounds "*if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe*".

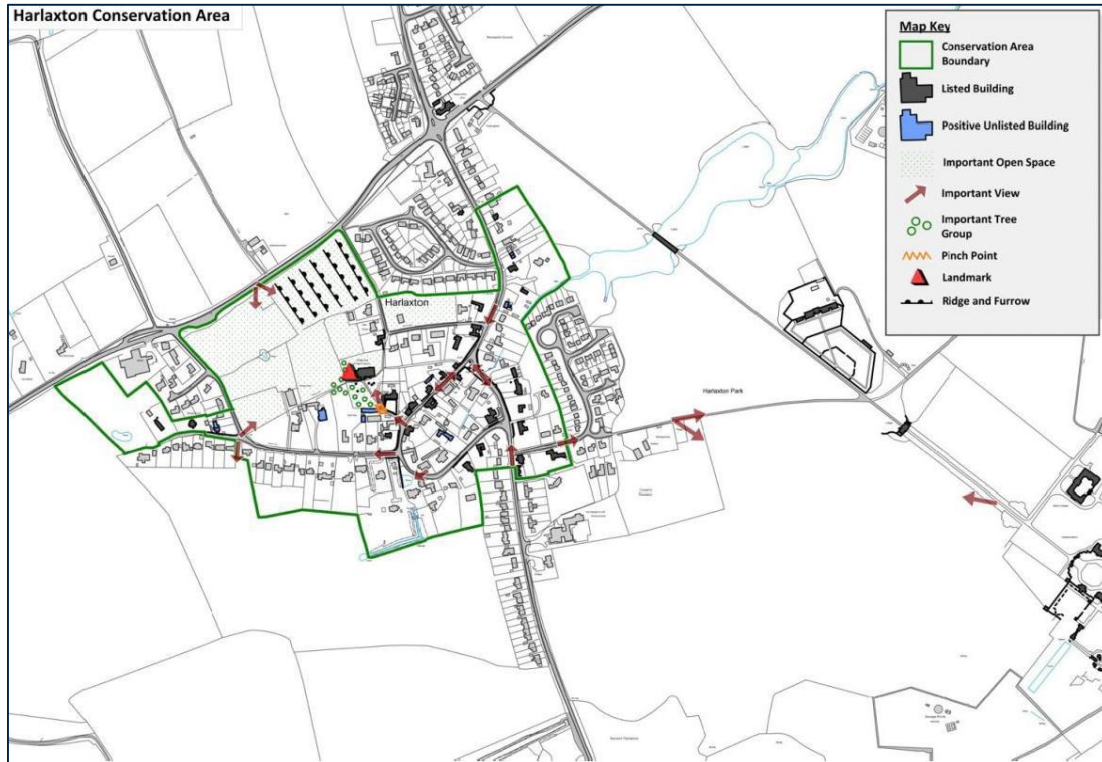
3.8. Heritage

- 3.8.1. A Heritage Note has been produced by the Savills Heritage team. The note highlights the initial heritage considerations for the Site and the potential visual changes to the wider setting of adjacent heritage assets arising from the proposed built form and associated landscaping. There are no known listed heritage assets within or immediately adjacent to the Site. However, a very small part of the site at the northern edge falls within the Harlaxton Conservation Area ('CA'). There are also a number of listed heritage assets within Harlaxton including the Grade I listed Church of St Mary and St Peter within the CA and Grade II* listed Harlaxton Manor Park and Garden to the east of Harlaxton.
- 3.8.2. The Heritage Note also states that the Site may contain below ground non-designated heritage assets (archaeological remains) associated with the development of the surrounding area. The archaeological potential within the Site relates to the possibility of buried remains (non-designated heritage assets) to be present dating from the post-medieval period. Through assessment of previous archaeological investigations in the vicinity of the Site, the Savills Heritage team deemed that there is a moderate potential for agricultural features (such as ridge and furrow), which would be of low to moderate significance (depending on nature and extent). Further investigation will be required at the planning application stage but is not currently expected to impact on the development potential of the Site.
- 3.8.3. The Heritage Note states that the potential change to the setting of the Harlaxton CA arising from the proposed development would need to be considered in the concept masterplan and the CA management plan which has been produced by SKDC should be complied with. The Heritage Note also states that key views from the Site to the spire of the Grade I listed Church of St Mary and St Peter and Harlaxton Manor should be incorporated into the masterplan where possible. The Heritage Note also recommends that appropriate landscaping is incorporated around and throughout the Site in order to avoid or minimise any potential impact on the historic environment. The Concept Masterplan (Appendix 2) have taken these recommendations into consideration. Public open space is proposed in the part of the Site that falls within the CA and key views to the spires and Registered Park and Garden have been incorporated into the layout.

3.9. Landscape

- 3.9.1. A Landscape Appraisal has been produced by Pegasus. The Appraisal assesses the suitability of the Site to accommodate residential development from a landscape and visual perspective and provides recommendations for the proposed layout.
- 3.9.2. The Landscape Appraisal confirms that the Site and its surroundings are not subject to any statutory or non-statutory landscape designations.
- 3.9.3. As stated in the heritage section above, part of the Site is located within the Harlaxton CA. Pegasus has reviewed the Harlaxton CA Appraisal and Management Plan. Trees are noted as being a significant feature within the CA, framing key views within and outside the boundary. The Harlaxton CA map within the Appraisal identifies 'Important Views' within and out of the CA (see Extract 1 below). The map shows an 'important view' extending south into the central part of the Site.

Extract 1: Harlaxton Conservation Area Map



3.9.4. Proposed Measure 16 in the CA Management Plan states that “any proposals for development will have consideration to the setting of Harlaxton Manor and the registered park and garden” and that “Consideration will be given to the contribution that Harlaxton Manor (Grade I) and the registered park and garden (Grade II*) make to the character and appearance of the conservation area when dealing with development proposals.”

3.9.5. Pegasus has also reviewed the Harlaxton Village Statement (2004). The Village Statement sets out guidelines for new developments. The guidelines that Pegasus consider are of most relevance to the Site, the potential development and landscape are included below:

- “The network of footpaths is retained and improved where possible;
- The existing approaches and views of the village are protected;
- The destruction of existing trees is avoided and new ones are planted wherever possible;
- New Developments, infilling and changes to existing buildings should have regard to the general village style and in particular to the building style in the immediate area;
- New buildings should acknowledge their Harlaxton context, avoiding pattern-book designs and reflect the following specific requirements;

- *Refer to local settlement patterns;*
 - *Do not alter existing building lines without considering the resulting effect;*
 - *Respect the local characteristics and context of the particular site;*
 - *Construction materials and building size should blend in with surrounding properties as closely as possible;*
 - *Respond to typical settings and garden forms;*
 - *avoid large areas of hard surfacing; and*
 - *Houses should be no higher than two storeys, with Drawings, computer images and artists impressions to justify how the proposed developments or alterations would blend with the surrounding buildings should be provided.”*
- 3.9.6. The majority of the above are considered to be matters that will be agreed at the detailed design stage but where relevant the Concept Masterplan has sought to accommodate the above.
- 3.9.7. In relation to landscape character, the Site is in the central southern part of the Harlaxton Denton Bowl Landscape Character Area (LCA), as identified in the 2007 South Kesteven District Landscape Character Assessment. The Assessment states that the Harlaxton Denton Bowl Character Area is a small to medium-scale landscape with a varied topography and landcover. The Assessment also notes that the landscape has high scenic value with important views to Belvoir Castle which lies outside the District.
- 3.9.8. The Character Area has been assessed as having high landscape sensitivity to new residential proposals and “*the scale of the landscape and range of landscape elements would make it difficult to assimilate major development within most of the character area*”.
- 3.9.9. Pegasus’ Landscape Appraisal confirms that the Site is undulating. The highest ground in the Site comprises land in the most south-eastern part reaching approximately 110m AOD; and includes grassland and arable farmland in the northern and western parts of the Site, where the land reaches approximately 90m AOD and 95m AOD. From the highest ground in the north and west of the site, the land falls south and southwest to approximately 85m AOD on the Site’s western boundary. Land across the field in the south-eastern part of the site rises gradually and then steeply to the southern site boundary. Land south of the site rises steeply, reaching 145m AOD at Wealdmore Lodge Farm. The land southwest of the site rises steeply, reaching 145m AOD southwest of the site.

- 3.9.10. Pegasus make recommendations within the Landscape Appraisal to mitigate landscape harm should the Site be developed. Their recommendations are as follows:
- Retaining and enhancing the existing boundary hedgerow and mature trees; creating new landscape buffers (a minimum of 15m); and, providing open spaces along the boundaries will assist with assimilating the proposed development into the settlement edge context and transition between the settlement edge and countryside.
 - New tree planting should be provided within areas of open space across the Site to soften the appearance of the proposed development.
 - The existing PRoW should be retained on their current alignment if possible.
 - Design should respect the 'important view' south from Harlaxton CA and identified key views towards Harlaxton Manor Registered Park and Garden and longer distant view towards Belvoir Castle.

3.9.11. The above proposed recommendations have informed the production of the Concept Masterplan (Appendix 2).

3.10. Trees

3.10.1. FPCR has undertaken a tree survey of the Site. Individual trees were assessed (these were category B, C and U) in addition to the tree groups and hedgerows (there is 1 Category A tree group, and a number of Category B and C tree and hedges groups). As required in national and local policy, as part of any future redevelopment of the Site, existing trees and hedges will be retained where possible. Tree and hedgerow planting will be proposed to replace any loss that is unavoidable. The woodland to the south east and south west of the Site will be retained and protected as part of any future development proposals

3.11. Ecology

3.11.1. FPCR has produced a preliminary Ecological Appraisal for the Site.

3.11.2. The Appraisal confirms that there are no sites of international importance within 15km, no sites of national or regional importance within 2km and no local statutory or non-statutory sites within 1km of the Site.

3.11.3. The majority of the Site is cultivated arable farmland which FPCR consider to have limited ecological value but there are areas of improved grassland and ruderal and scrub vegetation within the northern part of the Site. The woodland in the south eastern corner of the Site is semi-natural broadleaved woodland.

3.11.4. FPCR conclude that the loss of low distinctiveness habitats like arable land and small areas of semi-improved and improved grassland can be mitigated within the proposed development through the creation of species rich grassland within on-site public open space and flood mitigation. The loss of scrub and ruderal habitats can be mitigated through new tree planting and enhancement of the woodland parcel in the south of the Site. The hedgerows should be retained where possible and managed. Where they are removed, replacement native species planting should be provided.

- 3.11.5. FPCR consider that foraging habitat on site is of limited value for badgers. FPCR recommend that during construction best working practices should be implemented to reduce any impact on the off-site sett.
- 3.11.6. There are no ponds on Site and FPCR consider that site habitats were generally of poor stability to support Great Crested Newts. However, FPCR note that there are some suitable habitats for foraging and shelter within the hedgerows, woodland and mixed scrub and ruderal vegetation within the Site. Detailed GCN surveys will be undertaken at the planning application stage. The Appraisal states that the Site is generally of poor suitability to support reptiles.
- 3.11.7. FPCR consider that the majority of the Site comprises sub-optimal habitats for bats but the hedgerows and woodland within and bordering the Site provide moderate/high value foraging habitat. Detailed surveys will be undertaken at the application stage. However, FPCR recommend that the woodland and site boundaries are suitably buffered from development with a lighting strategy suitable to prevent excessive light spill into the woodland. New woodland planting could also be provided to benefit bat foraging and commuting. Bat boxes could also be proposed to provide new opportunities for roosting bats.
- 3.11.8. In regards to nesting and foraging birds, FPCR concluded that the mature trees, the woodland, hedgerows, scrub and areas of open grassland provided features suitable for use. No notable bird species were recorded by FPCR on Site during the habitat survey. Detailed surveys will be undertaken at the application stage and any tree removal required should be undertaken outside of the bird breeding season where possible.
- 3.11.9. The Site's hedgerows and woodland are considered by FPCR to provide suitable commuting and foraging habitat for hedgehogs. FPCR recommend that hedgehog holes are included in plot fencing.
- 3.11.10. An initial biodiversity impact assessment was also undertaken by FPCR. The final calculation will be determined at the detail design stage but FPCR consider that the Site can easily deliver at least 10% net biodiversity gain.

3.12. Utilities

- 3.12.1. MEC has produced a Utilities Report in order to establish how the proposed development will be serviced with key utility supplies, whether diversion or protection of existing apparatus may be required and estimated costs for service connection and diversion works, where available. The responses MEC received from key providers is summarised below:
- Foul Water – Anglian Water (AW) confirmed that there is capacity at the Harlaxton Water Recycling Centre. AW confirmed that a proposed gravity flow to the public foul sewerage network is acceptable as the foul sewerage system, at present, has available capacity for the proposed development. AW has also confirmed that there are no public surface water sewers within the vicinity of the proposed development therefore alternative methods would be required. There is an existing main along the A607 which requires diversion to serve the proposed development and a 2.5m (5m in total) easement.

- Clean Water – AW confirmed that there is insufficient capacity to supply the proposed development with clean water, therefore reinforcement works will be required. AW has provided a cost for the off-site works which can be funded by DWH at the planning application stage. There is an existing clean water main along the A607 which requires diversion to serve the proposed development and a 3m (6m in total) easement.
- Gas – Cadent has confirmed that there is insufficient capacity in the local low pressure gas network to supply the Site and therefore reinforcements are required and can be funded by DWH at the planning application stage. It is noted that Building Regulations now require the use of heat pumps, in any event.
- Electricity – National Grid Electricity Distribution (NGED) have provided an estimated quote to connect the proposed development to their high voltage network. NGED have advised that reinforcement at Grantham South Primary Station in Barkestone Lane and the extension of the 11kV boards will be required. From this point, high voltage and low voltage infrastructure will be laid to 2 to 4 substations located within the development (numbers are subject to site layout plans) to supply the development. DWH consider that there is sufficient flexibility in the Concept Masterplan (Appendix 2) for substation(s) to be provided.
- Telecommunications – Openreach will deploy Fibre to the Premises (FTTP) free of charge to all new housing developments of 20+ dwellings. Diversion of the underground apparatus within the A607 may be required to facilitate a site entrance.

3.13. Drainage

- 3.13.1. The Site is located within Flood Zone 1 and is at low risk from surface water flooding (Environment Agency Flood Risk Map). Therefore, DWH do not foresee any issues with drainage on this Site and consider that Sustainable Drainage Systems could be delivered as part of any future development on this Site (this will be subject to further technical work).

3.14. Contamination

- 3.14.1. The Site is a greenfield site and there are no known contamination or land stability issues (this will be subject to further technical work).

3.15. Ownership

- 3.15.1. The Site is in single ownership and is being promoted by DWH. This avoids potential complications that can arise when there is more than one landowner involved which is often the case when land assembly is required to promote strategic sites, and should result in the Site being able to be delivered quickly following allocation.

4. Potential Development Opportunity

4.1.1. Savills Urban Design has produced a landscape-led Concept Masterplan which demonstrates the proposed landscape buffers and potential development zones within the Site. The proposed residential zones and landscape buffers have been developed to retain key views, limit the development's encroachment to the south and provide a transition between the settlement edge and countryside. The high level plans maintain a strong rural aspect from the south and include a robust landscape buffer along the western, southern and eastern edge in order to minimise views and reduce the prominence of the proposed development in any views.

4.2. Concept Masterplan

4.2.1. The site area being promoted for built development and public open space totals circa 18.40 hectares with a net development area of around 6.65 hectares. The proposals could deliver around 200 dwellings (at circa 30 dwellings per hectare) with c.9.40 hectares of public open space, c.1 hectare of land for a community facility and a potential area for a school drop off car park adjacent to the proposed pedestrian/cycle access in the north-east of the Site.

4.2.2. The public open space could include two potential children's play areas (one to the north and one to the south) and significant biodiversity net gain improvements. New pedestrian connections will be provided across the Site and will connect users of the retained PRoW (Harl/4/2) with Swinehill to the east.

4.3. Deliverability

4.3.1. If allocated, the Site could start delivering development within the next 5 years. There are currently no identified significant environmental, heritage, transport, drainage, flood risk, access, contamination or ownership constraints which would affect the delivery of the Site.

4.4. Community Benefits

4.4.1. As well as providing much needed market and affordable homes, as part of the proposed development, land is being safeguarded for community use / facility. The end use for this land can be agreed at a later stage with the Council and local community. DWH is also proposing to provide drop off/pick up parking for Harlaxton Primary School which is located to the north east of the Site. We are aware that during school drop off/ pick up times, Swinehill is used for parking which can cause backlog along the road. The provision of a small parking area within the Site could reduce the number of vehicles being parked on Swinehill and offer a safe parking option within close proximity to the school for parents.

4.4.2. The development of the Site could also potentially contribute to and / or provide the following:

- Funding options are being explored by the Parish Council to improve the existing children's play area in the village. Contributions towards the provision of new play area(s) either in terms of land / facilities or financial contributions could be provided.
- When developed, the Site will deliver Biodiversity Net Gain which will be an improvement from the existing position of ploughed agricultural and grazing land which has limited ecological value.

Land to the West of Swinehill, Harlaxton

Updated Promotion Document (Version 3)



- Significant areas of public open space are proposed to be provided which will provide biodiversity benefits as well as health and wellbeing benefits for future and existing residents. Contributions could also be provided to the existing public footpath network for improvements which could be agreed with the community.

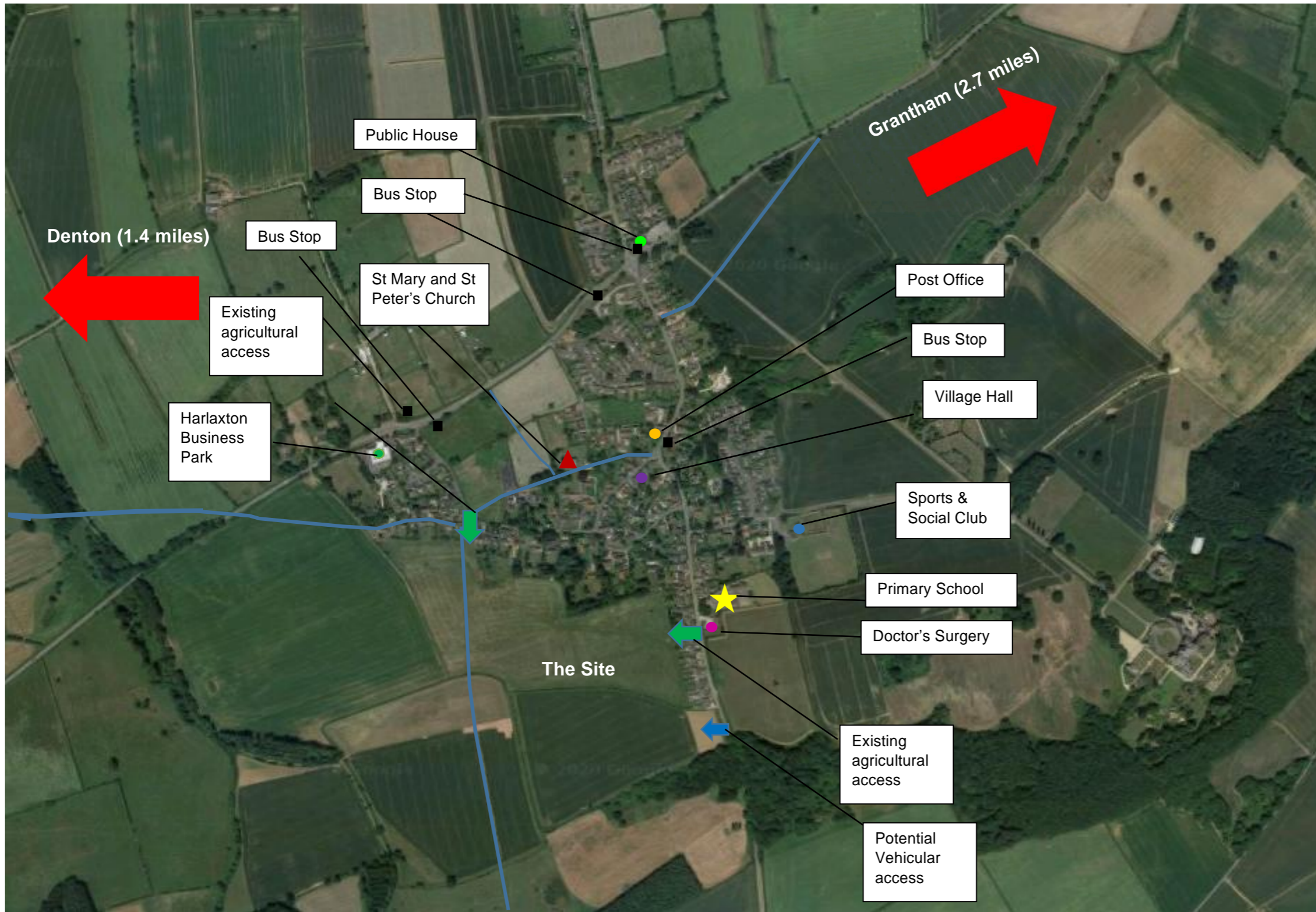
5. Conclusions

- 5.1.1. DWH is promoting land to the west of Swinehill, Harlaxton to SKDC to be considered for a residential allocation within the Local Plan Review. In response to the Draft Regulation 18 version of the Local Plan Review and its evidence base, the scale of development on the Site has been reduced to that which was previously submitted to SKDC and land safeguarded for a community facility and school drop off/pick up parking has been added.
- 5.1.2. As set out in our response to the Local Plan Review, it is considered that the housing requirement should be increased for the District to plan for more than the minimum number of houses calculated through the Standard Method. Given its identification as a sustainable Larger Village within both the adopted and emerging plans, it is considered that Harlaxton should be the subject of more growth than is currently proposed in the emerging Local Plan. Harlaxton provides a range of services and facilities as well as public transport links to Grantham which is the largest settlement in the District.
- 5.1.3. DWH's Site is located immediately adjacent to Harlaxton in walking distances of the services it provides and is therefore within an sustainable and accessible location. In addition to the Site providing much needed market and affordable homes for the District and potential community benefits, there are limited environmental constraints on the Site and the design of any development that is delivered could be heritage and landscape-led to ensure that the development is appropriately absorbed into the landscape and the impacts arising on any designated heritage assets are considered to be less than substantial. Therefore, it is considered that the development of the Site could accord with the NPPF's requirements that a Plan should be accord with (Paragraph 16).
- 5.1.4. In light of the above, we consider that the Site offers an opportunity to deliver a sustainable development opportunity with community benefits and we would welcome the Council's consideration for this land coming forward as a housing allocation in the emerging plan.



6. Appendices

Appendix 1 – Services and Facilities Plan



Legend


















- ★ Primary School
- Doctor's Surgery
- Sports & Social Club
- Village Hall
- Harlaxton Business Park
- Public House
- Post Office
- Place of Worship
- Bus Stop
- ← Potential Vehicular access
- ← Existing agricultural access
- Public Right of Way
- Site Boundary

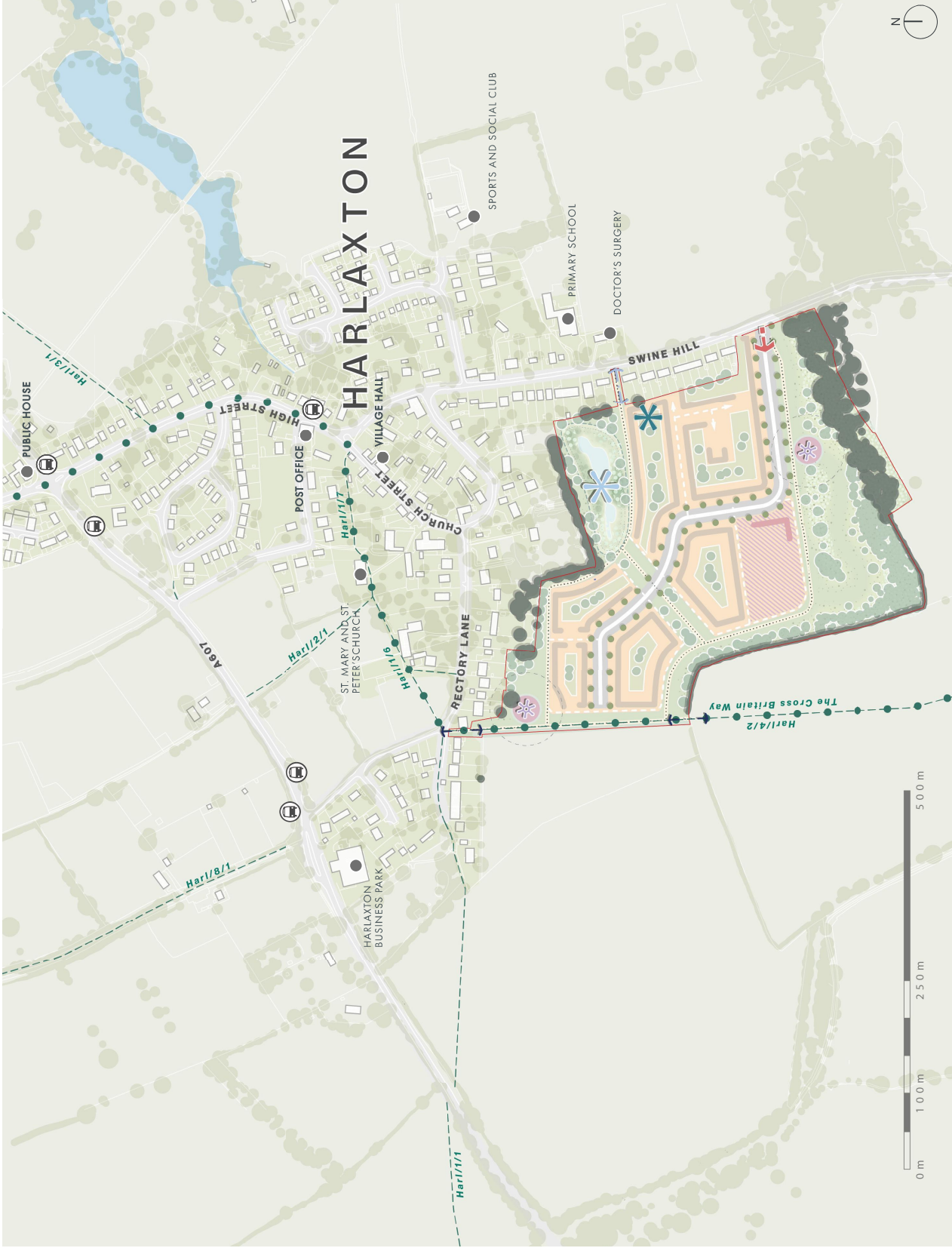
Land to the West of Swinehill, Harlaxton

Updated Promotion Document (Version 3)



Appendix 2 – Concept Masterplan

-  Site Boundary **Har/4/1a**
-  Potential Developable Area & Indicative Frontages **0.65ha**
-  Potential Community Facility & Indicative Frontages **1.00ha**
-  Potential location of primary school drop off/pick up parking
-  Indicative Public Open Space/ Rear Gardens
-  Potential Primary Vehicular Access
-  Retained Existing Vegetation
-  Potential Primary Road Alignment
-  Potential Secondary Road Alignment
-  Existing Public Rights of Way (PROW)
-  National Walking Trail
-  Retained PROW Access Points
-  Illustrative Recreational Footpath Network & Cycleway
-  Potential Recreational / Cycle Connections
-  Potential Locations of Children's Play Space (LEAP and NEAP)
-  Proposed Attenuation Basins
-  Bus Stops



Land South of Harlaxton, Lincolnshire
on behalf of David Wilson Homes

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