



For and of behalf of

Ashwood Homes

Objection to South Kesteven Local Plan Reg 18 consultation –SKPR-257 Omission
Site Land at 22 East End, PE6 9LP allocation for residential development and the
allocation of SKPR 71 as the sole allocation in Langtoft

Sites

Site References – SKPR-257, SKPR 71, SKPR 278, SKPR 65, SKPR 279, SKPR 281,
SKPR-37, SKPR-330, SKPR-71, SKPR-333, SKPR-275, SKPR-277, SKPR-309, and
SKPR-7.

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1.0 INTRODUCTION

a. Ashwood Homes

- 1.1 Ashwood Homes are a well-established, locally based developer operating in South Lincolnshire for over 25 years, recognized for building high-spec, traditionally styled homes with strong customer support and community focus.
- 1.2 Ashwood Homes' are currently operating 7 live residential developments across Lincolnshire, offering a range of homes:
 - a) Holbeach Meadows – 1 to 5-bedroom homes, as part of a 900-home development
 - b) The Brambles (Holbeach) – 1 to 4-bedroom homes, part of a second development phase
 - c) The Spires (Kirkton, near Boston) – 1 to 4-bedroom homes, as part of a multi-phase development of over 400 homes
 - d) Cowley Park (Donington) – 1 to 4-bedroom homes, as part of a second phase development
 - e) Elderwood (Crowland) - 2 to 5-bedroom homes, as part of a 52 homes development
 - f) Yews Farm (Pinchbeck) - 1 to 4 bedroom homes as part of a 400-home development
 - g) Riverside Walk (Surfleet) – 2 to 4-bedroom homes as part of a 48 home development
- 1.3 Ashwood homes have also recently completed a successful and popular 41 home development in Langtoft itself, providing a range of executive homes and including 12 affordable homes.
- 1.4 Ashwood Homes offers a blend of exclusive small-to-medium developments in towns, alongside their large-scale, phased developments.
- 1.5 Their long-standing reputation is built on high-quality homes, on sites of all sizes, from small executive sites of 5 homes or more, to multi-phase developments totalling over 1,000 homes.
- 1.6 Ashwood Homes has carved out a strong reputation in South Lincolnshire as a specialist in new-build residential developments:
 - a) Over 25 years of presence in the local market, building quality, traditional-style homes for a wide range of buyers—from first-time purchasers to growing families and underway executives Ashwood Homes.
 - b) Offers 1-bedroom through to 5-bedroom homes, all carefully designed with attention to detail ensuring high specifications, energy efficiency, and customer-focused services that often include integrated appliances and finish options Ashwood Homes.
 - c) Provides buyer assistance schemes, such as Help to Buy and Part Exchange, to help various buyer segments step onto the property ladder Ashwood Homes.
 - d) Promotes a full-service approach: from reservation to legal completion, backed by strong after-sales customer care Ashwood Homes.

- 1.7 Ashwood Homes are a Small to Medium sized house builder (SME) with a small but skilled internal team covering site management, construction, and sales but are responsible for a larger number of local sub-contractors.
- 1.8 Since their founding their developments have created hundreds of local jobs, contributing to the local Lincolnshire economy.
- 1.9 The Photographs below show the recent development of 41 homes at Langtoft including 12 affordable homes demonstrating the quality of the development.

Photograph 1: Woodland Rise Langtoft



Photograph 2: The Thames



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b. Outline of the objection to the Reg 18 Local Plan.

- 1.10 It is considered that the plan should be more cautious with regard to the likely level of completions to be delivered on its strategic sites and that up to 1,000 additional allocations be made to insulate the plan from the possibility of all these sites failing to deliver at levels above the average.
- 1.11 The distribution of site by location and site should be wider including more allocations in the rural areas (and the larger villages in particular) and the number of small and medium size sites should be increased to support the local SME home builders as encouraged by government guidance.
- 1.12 In line with these objections, it is proposed that a further allocation is made in Langtoft and that site SKPR 257 is also allocated as this is a sustainable site in the heart of the village.
- 1.13 If only one allocation is to be made in Langtoft (contrary to the above) then the proposed allocation SKPR 71 should be replaced by SKPR 257 as the latter is clearly a more sustainable location.



2.0 THE PROPOSED ALLOCATION SKPR 257

a. The site

- 2.1 The Draft Local Plan Site Assessment Report accepts that this site has merit but is not proposed for allocation at this time as it considers that there are other more suitable sites available to meet required need across the plan period. This is challenged as it is considered the sustainability credentials of this site have been underplayed.
- 2.2 The above report also highlights some concerns over the sites impact on the historical environment due to proximity with Langtoft Conservation Area although we consider that these concerns can be easily addressed by the sensitive development of the site.
- 2.3 The proposed site is 2.8 ha of agricultural land located to the south of East End, Langtoft.
- 2.4 The site is enclosed on its north and southwest boundaries by the existing settlement and by the cemetery. Its northeastern boundary is partially enclosed by existing development and domestic (non-agricultural) uses.
- 2.5 Presently access to the site is via a gravel drive off East End but a new access can be provided across the site of the previously demolished 22 East End. This was a 2-storey, detached dwelling.
- 2.6 While the front part of the site is within the Langtoft Conservation Area the remainder of the site is outside of the conservation area, and the proposed development of the site would retain the area within the conservation as open space to provide a setting for the conservation area and listed buildings.
- 2.7 To the west of the site is a pumping station and cemetery, beyond which is the A15. The site is flat and only partially visible to the rear of the cemetery from the A15.
- 2.8 The edge of the village conservation area runs along the north-west edge of the site where there are several listed buildings including Gee's Farmhouse and associated outbuildings, Church Farmhouse and dovecote and the Waggon and Horses public house.
- 2.9 To the south-west of the site on the opposite side of the A15 is 'The Rides' - a 1990s residential development.
- 2.10 Langtoft Public Footpath no. 2 runs through the site from the rear of the existing cemetery and joins with New Road to the north-east of the site.

b. The proposed allocation

- 2.11 It is proposed that the whole of site SKPR 257 be allocated but that like other proposed draft allocations there should be criteria within the allocation guiding its development. In the case of this proposal the following area suggested:
 - a) Possible impact on the Conservation Area and adjacent Listed Buildings shall be considered through scheme design to mitigate potential harm.
 - b) Landscape screening to the southern edge of the site will be required to reduce the impact on views into the site from the open countryside.
 - c) The landscaping scheme will also deliver an appropriate boundary to the existing cemetery.
 - D)** Development should integrate the existing public right of way crossing the site into the pedestrian movements throughout and into the site.



3.0 THE NEED FOR ADDITIONAL ALLOCATIONS

- 3.1 It is acknowledged that the Reg 18 plan has an 11% additional flexibility in its allocation of 19,672 homes by 2043.
- 3.2 There are two issues, however, firstly will the plan be adopted by 2028 and second will all the sites deliver in the time frame.
- 3.3 In considering the timeframes for the delivery of the sites below reference is made to the research by Lichfields “Start to finish” Edition 3 and in particular Figure 3.1 “Median average timeframes from validation of the first application to completion of the first dwelling”. This suggests the following lead in times between validation of first outline application to first completions for the following size of site:
 - a) 500 – 999 dwellings 4.9 years
 - b) 1000 - 1499 dwellings 6.2 years
 - c) 1500 - 1999 dwellings 6.6 years
 - d) 2000 + dwellings 6.7 years
- 3.4 The same research is relied upon to provide the following median rates of annual delivery¹:
 - a) 500 – 999 dwellings 68 dpa
 - b) 1000 - 1499 dwellings 87 dpa
 - c) 1500 - 1999 dwellings 104 dpa
 - d) 2000 + dwellings 138 dpa
- 3.5 This research has been used to test the delivery assumptions in the Reg 18 Local Plan for the following large sites.
- 3.6 This is not an objection to the allocation of these sites but an objection to the assumed level of delivery the implications of which we argue is that additional smaller sites should be allocated to accommodate the slower delivery rates suggested by the above research.

a. SKPR-278 (GR3-H1): Spitalgate Heath

- 3.7 SKPR-278 (GR3-H1): Spitalgate Heath is a proposed Garden Village (Mixed Use Allocation). Its indicative total number of homes is 3700 with some 1,512 anticipated to be constructed by 2043.
- 3.8 While this site has been subject to a planning application since 2014 (S14/2169) but has undergone changes requiring further work to the Environmental Statement that has not been completed. There remain outstanding objections as well including from Anglian Water (25 March 2025).

“This site is located within the catchment of the Marston Water Recycling Centre (WRC), which currently lacks the capacity to accommodate the additional flows that would be generated by the proposed development as a whole.

Anglian Water has determined that the site is unsustainable due to the associated environmental risk and the increased discharge rates, which could lead to a deterioration in water quality and an unacceptable risk of breaching environmental legislation at

¹ Lichfields “Start to finish” Edition 3 table 4.2.



Marston WRC. Considering these concerns, we recommend that planning permission be refused on the grounds of insufficient infrastructure capacity and to prevent environmental harm.”

- 3.9 This is a serious constraint which will require considerable investment in infrastructure to overcome. Until funding and a timescale for the necessary infrastructure to be delivered is clearly set out this cannot be considered to be a sound allocation in terms of being sustainable and deliverable.²
- 3.10 At this stage the lack of evidence as to how and when infrastructure constraints are to be overcome the whole of the allocation should be discounted from contributing to the housing needs of the area in the plan period.
- 3.11 Remove **1,512 homes** from the total deliverable in the plan period

b. SKPR-65 (GR3-H4): Prince William of Gloucester Barracks

- 3.12 SKPR-65 (GR3-H4): Prince William of Gloucester Barracks is a Mixed Use Allocation) delivering an indicative total of approximately 3,000 homes with an estimated 1,890 anticipated to be constructed by 2043.
- 3.13 This proposal also including employment generating area of 8ha.
- 3.14 This allocation is dependent upon the MoD closing the site this is now scheduled to close in 2029.³
- 3.15 The requirement for planning permission to be granted is that it will create a new settlement based on garden village principles, with a minimum of 3,000 dwellings on the site of the Prince William of Gloucester Barracks. There is potentially the scope to increase site capacity beyond 4,000 dwellings would need to be subject to more detailed evidence and design work being undertaken.
- 3.16 This adjoins proposed allocation SKPR-278 (GR3-H1) Spitalgate Heath which may have an impact on delivery both in terms of infrastructure delivery and market absorption.
- 3.17 Taking account of the time to prepare an outline application once the plan is proposed to be adopted in November 2027 and the fact that the site is not to be disposed of until at least 2029 will delay the submission of any application until a developer is selected. This process of disposal as well as the cost of such an application means that earlier speculative work is unlikely to be undertaken at this stage except that required to support the proposed allocation. The earliest likely submission of an outline would be 2 years after the disposal date in 2029 and this would mean (according to the above timings and build out rates) first completions in 2038 leaving a 4 year build out at 138 dwellings delivering some 552 homes completed suggesting a potential **shortfall of 1,338 homes**.

c. SKPR-279 (GR3-H2): Rectory Farm (Phase 2 and 3)

- 3.18 SKPR-279 (GR3-H2): Rectory Farm (Phase 2) is anticipated to deliver some 1150 homes by 2043 and phase 3 an additional 404 dwellings making some 1,554 homes in total.
- 3.19 Both Phase 2) and 3 are required to be planned for in a comprehensive manner such that each of the three phases (and corresponding landowners /developers /site promoter(s)) work together to provide a single urban extension. The co-ordination of a number of

² NPPF para 16 parts a and b.

³ DEO Disposal Timeline 2024



different parties is potential fraught with difficulty.

- 3.20 While the Council state it will work with the site promoter(s) / landowners / developers to ensure that a planning application / master planning strategy is developed that enables planning applications for the site to be progressed without compromising the delivery of the whole site comprehensively there appear to be no agreements currently in place.
- 3.21 Part of site under development and there are full applications for a total of 448 homes (S16/2819 for 220 dwellings and S16/2816 for 228 both approved in 2023).
- 3.22 It is noted that the upgrade to the A1 / A52 junction has been identified as being necessary mitigation for a number of developments within the Grantham area, including the Grantham Designer Outlet Village and Spitalgate Heath Garden Village. These works are required to be provided “upfront” for these developments, and the permissions previously issued for these developments have been subject to Grampian conditions preventing occupation until the upgrade works have been completed.
- 3.23 The original condition 25 on the latest permission states:
“25 No more than 448 dwellings within the development hereby approved, either alone or in combination with planning permissions (S16/2818, S16/2819 or S16/2816) shall be occupied, until the scheme shown on drawing no. 106648-SK006 Rev A (the Western junction GDOV scheme) has been completed.”
- 3.24 Two further section 73 application have been made to vary Condition 24 (Off-site highways works) of planning permission S16/2816. The first S24/0140 to allow the occupation of 150 homes prior to completion of works was refused the second to allow 50 dwellings to be occupied was approved.
- 3.25 A similar position has been arrived at with a Section 73 application to vary Condition 24 (Off-site highways works) of planning permission S16/2819 to allow for 20 dwellings to be occupied prior to the completion of works
- 3.26 While parts of phase 2 are under construction under two consents for a total of 448 homes there remains the limit on the number of homes that maybe occupied until the improvements to the A1 are completed. There is also the need for the coordination of landowners and developers. At an average build rate of 104 dpa this site could build out in the next 15 years i.e. by 2040 however the majority of the site 1,106 does not have planning consent and this together with the restriction on occupation will delay delivery. There is no indication of additional applications being made and so taking account of the time to prepare and coordinate outline application once the plan is proposed to be adopted in November 2027 suggests the likely submission of outline applications would be 2 years after adoption in November 2029 and this would mean (according to the above timings and build out rates) first completions in 2036 leaving a 6 ½ year build out at 108 dwellings (for both phases) delivering some 648 homes completed suggesting a potential **shortfall of 458 homes.**

d. SKPR-281 (STM1-H1): Stamford North

- 3.27 SKPR-281 (STM1-H1): Stamford North is anticipated to deliver some 1,350 homes by 2043.
- 3.28 The allocation requires that a high level masterplan, supported by a detailed development brief, appropriate full transport assessment and phasing plan, is required for the entire site (to include for the land extending into Quarry Farm, Rutland with an



additional capacity of 650 dwellings).

- 3.29 Planning permission has been granted subject to a s106 which has been drafted but not yet signed.
- 3.30 Taking account of the time to prepare an detailed applications once the S106 is signed then the earliest likely submission of an detailed applications would be in about 2 years in 2029 and a further 1 to 2 years before first completions in 2031.⁴ This would mean a 12year build out at 87 dwellings (based on a single developer) on the South Kesteven part of the allocation) delivering some 1,044 homes completed suggesting a potential **shortfall of 306 homes**.
- 3.31 This calculation is based on the size of the site allocated within the district and that none of the completions will take place on part of the district that is in Rutland.

e. SKPR-37 Deeping

- 3.32 The Site Assessment report (page 648) indicates that this site will not deliver for 10 years (i.e. 2035).
- 3.33 The report states that a Transport Assessment is required to demonstrate what additional highway works are required.
- 3.34 This allocation cannot be considered a developable allocation until the cumulative impact of both this allocation (from the 2020 adopted plan) and the proposed allocation SKPR 330 has been undertaken. This is likely to find that highway improvements are necessary and that they require third party land.
- 3.35 Remove **680 homes** from the supply.

f. SKPR-330 Land east of Linchfield Road, Market Deeping (880 homes)

- 3.36 The Site Assessment report (page 648) indicates that this site will not deliver for 10 years (i.e. 2035).

“The site is not in close proximity to the SRN; however, due to its size it is likely to generate some cumulative impacts on the SRN. Subject to further traffic and capacity assessments.

Likely to require a Transport Assessment and Travel Plan. Cumulative Impact Assessments may be required in conjunction with other policies in the area (SKPR-328, SKPR-330, SKPR-331).”

- 3.37 This allocation cannot be considered a developable allocation until the cumulative impact of both this allocation (from the 2020 adopted plan) and the proposed allocation SKPR 37 has been undertaken. This is likely to find that highway improvements are necessary and that they require third party land.
- 3.38 Remove **880 homes** from the supply.

g. SKPR-71, Langtoft

- 3.39 The owners of the proposed allocation (SKPR-71) are the same as allocation SKPR 277 which was allocated in the adopted plan and as owners of that earlier allocation they have not shown an interest in bringing the land forward for development site has not been marketed and there have been no applications since its identification for development.

⁴ Lichfields “Start to finish” Edition 3 figure 3.2.



3.40 There is clearly an ownership constraint on the development of this site and as such it cannot be considered to be developable.

3.41 Remove **55 homes** from the supply.

h. SKPR-333, South Witham

3.42 Anglian Water have no capacity and objected to the outline application that has been made for part of this allocation as follows:

“Considering these concerns, we recommend that planning permission be refused on the grounds of insufficient infrastructure capacity and to prevent environmental harm. Anglian Water collaborates with local planning authorities across the region to identify sustainable locations for future development, taking into account infrastructure capacity as part of the development plan processes.”

3.43 This is a serious constraint which will require considerable investment in infrastructure to overcome. Until funding and a timescale for the necessary infrastructure to be delivered is clearly set out this cannot be considered to be a sound allocation in terms of being sustainable and deliverable.⁵

3.44 At this stage the lack of evidence as to how and when infrastructure constraints are to be overcome the whole of the allocation should be discounted from contributing to the housing needs of the area in the plan period.

3.45 Remove **133 homes** from the supply.

i. SKPR-275, South Witham

3.46 This is also subject to the same constraint as outlined by the Anglian Water Objection above .

3.47 Until funding and a timescale for the necessary infrastructure to be delivered is clearly set out this cannot be considered to be a sound allocation in terms of being sustainable and deliverable.⁶

3.48 At this stage the lack of evidence as to how and when infrastructure constraints are to be overcome the whole of the allocation should be discounted from contributing to the housing needs of the area in the plan period.

3.49 Remove **34 homes** from the supply.

j. SKPR-277, Thurlby

3.50 This is a historic allocation with owners showing no interest in developing the land. There have been no applications since its earlier identification for development.

3.51 There is clearly an ownership constraint on the development of this site and as such it cannot be considered to be developable.

3.52 Remove **50 homes** from the supply.

k. SKPR-309, Colsterworth

3.53 The Site Assessment report (page 206) indicates that this site will deliver within 5 years,

⁵ NPPF para 16 parts a and b.

⁶ NPPF para 16 parts a and b.



but this appears extremely unlikely.

- 3.54 The report states that a Transport Assessment is required to demonstrate what additional highway works are required as follows:

“The site is immediately adjacent to the SRN. The development is likely to produce significant impacts on the SRN. Subject to further traffic and capacity assessments. Likely to require a Transport Assessment, Travel Plan and CTMP. Boundary related matters likely to be required.”

- 3.55 This allocation cannot be considered a developable allocation until the required traffic and capacity assessments have been undertaken. This is likely to find that highway improvements are necessary and that they require third party land.

- 3.56 Until this is resolved then the site cannot be considered developable and should be discounts from the plans future supply.

- 3.57 Remove **310 homes** from the supply.

L. SKPR-7, Bourne (Raymond Mears)

- 3.58 The Site Assessment report (page 98) indicates that this site will not deliver within 5 to 10 years, but this appears extremely unlikely given the issue with accessing the site.

- 3.59 The report also states:

“Access only appears possible from existing roundabout near Coop, northern roundabout cannot accommodate 5th arm. This would be too many houses off one access.

Insufficient connectivity to town centre for sustainable modes.”

- 3.60 This allocation cannot be considered a developable allocation until the required traffic and capacity assessments have been undertaken. This is likely to find that highway improvements are necessary and that they require third party land.

- 3.61 Until this is resolved then the site cannot be considered developable and should be discounts from the plans future supply.

- 3.62 Remove **270 homes** from the supply.

m. Conclusion on potential shortfall based on alternative delivery assumptions.

- 3.63 The timings of the delivery of individual allocations in local plans is always subject to a number of different influences however to avoid prolonging the housing crises and to build in flexibility and robustness to the emerging plan the above analysis provides a sobering alternative to the forecast completions assumed in the Reg18 Local Plan.

- 3.64 The potential under delivery calculated above is 6,062 homes.

- 3.65 While the Reg 18 plan states that the Local Plan trajectory contains a buffer of around 11% above the minimum requirement of 17,720 dwellings, equating to a housing supply of 19,672 dwellings across the plan period the above would suggest that the overall deliver could be as low as 13,646 (19,672 – 6,026) an undersupply of some 4,074 homes.

- 3.66 In light of this evidence the council should consider the allocation of additional small and medium sites that do not have the complexity of the larger strategic sites in order to ensure that the minimum requirement is delivered especially in the early part of the plan period if these larger strategic sites do not start delivering in accordance with the

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councils forecast trajectory.



4.0 NATIONAL POLICY ON THE DISTRIBUTION OF GROWTH AND THE NEEDS OF SMALL AND MEDIUM ENTERPRISES

a. Distribution of growth should meet the needs of the rural area.

- 4.1 Planning policies should be responsive to local circumstances and support housing developments that reflect local needs⁷ and housing provided to enhance or maintain the vitality of rural communities.⁸ Planning policies should identify opportunities for villages to grow and thrive.⁹
- 4.2 The table 6 on page 13 of the Reg 18 Local Plan suggest that some 23% of the future housing provision will be made in the larger rural settlements and other rural settlements.
- 4.3 The larger villages, including Langtoft have some 3,689 homes allocated, an average of 246 homes in each. Langtoft has the second smallest proposed allocation, a single site for 55 homes with only Long Bennington with a single proposed allocation of 50 homes having a lower level of proposed provision.
- 4.4 There is little to justify this low level of allocation given that the settlement performs well in terms of the scores in the council's assessment of settlements ranking midway as 7th out of 15 of the larger villages.¹⁰

i). Allocations should support Small and Medium Sized Housebuilders

- 4.5 The NPPF highlights that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and that they **are essential** for Small and Medium Enterprise housebuilders to deliver new homes and are often built out relatively quickly.¹¹
- 4.6 Ashwood Homes are an SME builder, and they specialise in the provision of homes on small and medium sized sites. A continuous supply of such sites is important to their longevity and maintaining their workforce. Ashwood Homes has approached the owners/ agents of some of the larger draft site allocations and has been advised that they are not a big enough organisation for them to be considered for the development of the sites, despite the scale of projects delivered to date.
- 4.7 In this context a review of the proposed allocations suggests that there are just five sites under 50 dwellings proposed to be allocated.

⁷ NPPF para 82

⁸ NPPF para 83

⁹ Obit

¹⁰ Settlement Hierarchy Review May 2025 Appendix 3

¹¹ NPPF para 73



5.0 ADDRESSING THE REASON FOR NOT ALLOCATING SITE FOR RESIDENTIAL DEVELOPMENT

a. The Draft Local Plan Site Assessment Report

5.1 This simply states:

5.2 “Main Findings

The site has merit but is not proposed for allocation at this time as other more suitable sites are available to meet required need across the plan period. Some concerns over the sites impact on the historical environment due to proximity with Langtoft Conservation Area which would need to be addressed.”

b. The site

5.3 The proposed site is 2.8 ha of agricultural land located to the south of East End, Langtoft.

5.4 The site is enclosed on its north and southwest boundaries by the existing settlement and by the cemetery. Its northeastern boundary is partially enclosed by existing development and domestic (non-agricultural) uses.

5.5 Presently access to the site is via a gravel drive off East End but a new access can be provided across the site of the previously demolished 22 East End. This was a 2-storey, detached dwelling.

5.6 While the front part of the site is within the Langtoft Conservation Area the remainder of the site is outside of the conservation area, and the proposed development of the site would retain the area within the conservation as open space to provide a setting for the conservation area and listed buildings.

5.7 To the west of the site is a pumping station and cemetery, beyond which is the A15. The site is flat and only partially visible to the rear of the cemetery from the A15.

5.8 The edge of the village conservation area runs along the north-west edge of the site where there are several listed buildings including Gee's Farmhouse and associated outbuildings, Church Farmhouse and dovecote and the Waggon and Horses public house.

5.9 To the south-west of the site on the opposite side of the A15 is 'The Rides' - a 1990s residential development.

5.10 Langtoft Public Footpath no. 2 runs through the site from the rear of the existing cemetery and joins with New Road to the north-east of the site.

c. The proposed allocation

5.11 It is proposed that the whole of site SKPR 257 be allocated but that like other proposed draft allocations there should be criteria within the allocation guiding its development. In the case of this proposal the following area suggested:

- a) Possible impact on the Conservation Area and adjacent Listed Buildings shall be considered through scheme design to mitigate potential harm.
- b) Landscape screening to the southern edge of the site will be required to reduce the impact on views into the site from the open countryside.
- c) The landscaping scheme will also deliver an appropriate boundary to the existing cemetery.



Development should integrate the existing public right of way crossing the site into the pedestrian movements throughout and into the site.

d. The impact on the historic environment

- 5.12 The site proposed for allocation was subject to an appeal¹² over 5 years ago in which the inspector concluded that the development would result in a less than substantial harm to the designated heritage assets.¹³
- 5.13 A more recent appeal¹⁴ last year granted permission for erection of replacement dwelling with garage following the demolition of the existing building at 22 East End.
- 5.14 The inspector found that the appeal site sat within the Langtoft CA which is a relatively small CA and that the East End comprised predominantly detached and semi-detached properties with a variety of scale, form and architectural detailing. The character of the CA was considered to derived from the group value of 18th century rubble houses, some of which have 19th century brick facades, rather than individual buildings of merit.¹⁵
- 5.15 The Inspector found the proposed building to be in keeping with the conservation area¹⁶ and in respect of alterations required to the front wall the inspector commented:
- “Walls contribute positively to the character and appearance of the CA. The Council’s Conservation Officer has raised no objection to the relocation of a small section of the north-east wall as it is in a poor state of repair. Given its limited height, set back from the highway, this small section of wall is not highly prominent, and its re-alignment would not detract from the character and appearance of the streetscene. The extent of removal of the frontage wall to facilitate the new access would be modest in the context of the overall length of wall. Furthermore, the majority of this wall would be retained, thus maintaining the enclosure of the private front garden space. In response to third party concerns the appellant has confirmed that the proposal does not include the widening of the existing gated access to the adjacent farm and the existing north-west boundary wall is to remain as currently in situ. Overall, the limited changes to the walls would preserve the character and appearance of the CA.”¹⁷*
- 5.16 In respect to the allocation of the larger site behind 22 East End access can be secured with a similar alteration to the front wall.
- 5.17 In respect of the adjacent Grade II listed Gee’s Farmhouse and two stable blocks (both of which are Grade II listed). The inspector noted that Gee’s Farmhouse is a mid-18th century farmhouse, now a house with 19th and 20th century alterations and that the listed buildings derive their significance from their group value of architectural merit and historical association with agriculture.¹⁸
- 5.18 The inspector noted that the wall running to the north-east boundary of the appeal site, allowed the adjacent listed building to retained in an area of enclosed space, which

¹² Appeal Ref: APP/E2530/W/20/3251992 27 November 2020

¹³ Ibid para 22

¹⁴ Appeal Ref: APP/E2530/W/23/3329420 8 March 2024

¹⁵ Appeal Ref: APP/E2530/W/23/3329420 8 March 2024 para 6.

¹⁶ Ibid para 8

¹⁷ Ibid para 10

¹⁸ Ibid para 12



contributes to its setting.¹⁹

- 5.19 The inspector found that the setting of the identified listed buildings was diminished due to the presence of modern built development in the locality and that the then existing dwelling, No. 22, contributed little to their significance.
- 5.20 The commented that the realignment of the boundary wall further away from the adjacent listed buildings and would maintain the scale and sense of enclosure without harming the setting of the listed building. Furthermore, that the visual appearance of the wall would be similar to the existing wall in terms of design, scale and materials. The inspector concluded that the relationship of the appeal site in respect of the adjacent listed buildings, the proposal replacement dwelling would not harm the setting or any special features of special architectural or historic interests which the listed buildings possess. It was noted that this is a view shared by the Council.²⁰
- 5.21 The inspector in allowing the appeal stated that the proposed dwelling would preserve the setting, and thereby the significance, of the nearby listed buildings.²¹
- 5.22 A further Archaeological Desk Based Assessment and Heritage Statement have been commissioned and these are attached to this objection.
- 5.23 The Archaeological Desk Based Assessment²² conclusions on the likelihood and probable nature of archaeological remains on the Site was that these are of relatively low sensitivity, they should not in principle prevent development of the site. It concluded that the harm caused to the historic environment will not be significant but that mitigation measures are likely to be necessary to evaluate and record the deposits that the development will disturb. It is suggested that while this could be done prior to development, or as a condition of, full planning permission being granted. It is suggested that mitigation could commence with a geophysical survey which will inform a phase of trial trenching. The results of these investigations will determine if an open area excavation is then required.
- 5.24 The Heritage Statement²³ comment that the proposal for the access road and footpath through the plot rather than a new house retains the former farmyard as effectively open space and thus represents an improvement for the historic environment by keeping the united identity of the three buildings, which has otherwise been compromised by division of the plot into separate domestic areas. Such a change would also open up public access to, and appreciation of, the buildings. This represents a moderate positive impact.
- 5.25 The Heritage Statement states that the enclosure of the southern boundary of Gee's Farm separates it from its traditional rural setting but that the setting has already been compromised by the splitting of farmyard plot and accretion of domestic attributes. Therefore, this represents a minor adverse impact on the setting.²⁴
- 5.26 A potential viewing position from East End could be affected by the presence of distant and deep housing beyond the historical farm, which would also represent a minor

¹⁹ Ibid para 12

²⁰ Appeal Ref: APP/E2530/W/23/3329420 8 March 2024 para 16

²¹ Appeal Ref: APP/E2530/W/23/3329420 8 March 2024 para 17

²² Archaeological Project Services: Archaeological Desk Based Assessment page 13

²³ Archaeological Project Services: Heritage Statement para 7.2

²⁴ Archaeological Project Services: Heritage Statement para 7.3



adverse impact on the setting.²⁵

- 5.27 The Heritage Statement concludes that overall, the proposed development would have a neutral impact on the setting of Gee's Farm, with both positive and negative aspects.²⁶
- 5.28 The view of tower of St Michael's Church and roof of the Dovecote from the public right of way across the Site would be interrupted but these are distant views are not the primary way in which either monument is appreciated, so the proposals represent a minor adverse effect on the historic environment.²⁷
- 5.29 In respect of the Conservation Area the Statement considers this will be affected by similar issues to Gee's Farm in that views of Gee's farm will become more open, but from certain positions marred by distant views of modern housing beyond. The changes to walls at the front and side of no.22 would effectively be neutral, resulting in alterations, but restoration of otherwise decaying elements.²⁸
- 5.30 The Heritage Statement highlights that mitigation can be employed to further reduce any harmful impacts and develop upon the positive aspects of the development. Such measures could include:
- a) The boundary between the new access road and listed buildings should be kept at approximately the height of the current wall to maximise the visibility of the Listed stable blocks²⁹
 - b) The buildings closest to Gee's Farm should be influenced by the historic buildings' design to reinforce local distinctiveness. This could include pantile/slate roofs, limestone quoins and raised coped gables.³⁰
 - c) The visibility of the new housing from East End may be reduced by a meandering access road, with mature vegetation in key positions.³¹
 - d) The walls should have coping in keeping with the styles used within the conservation area. The rebuilt wall between 22 and 26 should keep pantile coping, while it might be beneficial to replace the 20th century cement coping on the boundary with East End in a material more typical of the conservation area.³²
 - e) It may be possible to provide meaningful views of the church tower from within the development which adds to the residents' sense of place.³³
- 5.31 The Heritage Statement comments that with these mitigation measures in place, it is considered that the harms caused to the setting of heritage assets will be minimal and not significant, balanced out by the positive improvements for Gee's Farm, to produce an overall neutral effect on the historic environment.³⁴

²⁵ Archaeological Project Services: Heritage Statement para 7.4

²⁶ Archaeological Project Services: Heritage Statement para 7.5

²⁷ Archaeological Project Services: Heritage Statement para 7.6

²⁸ Archaeological Project Services: Heritage Statement para 7.7

²⁹ Archaeological Project Services: Heritage Statement para 7.11

³⁰ Archaeological Project Services: Heritage Statement para 7.12

³¹ Archaeological Project Services: Heritage Statement para 7.13

³² Archaeological Project Services: Heritage Statement para 7.14

³³ Archaeological Project Services: Heritage Statement para 7.15

³⁴ Archaeological Project Services: Heritage Statement para 7.16



5.32 The Heritage Statement concludes that the changes to the historic environment suggested by the proposals are not significant and are on the lowest end of the scale harm³⁵ and that mitigation will minimise the negative impacts and maximise the positive, resulting in a neutral effect on the historic environment.³⁶

e. Summary of proposed allocation

5.33 The reasoning provided by the plan and the supporting evidence for not allocating this highly sustainable site is not considered to be sufficient to justify its non-allocation for residential given both the district wide and local needs for sustainably located residential developments that can be delivered quickly without the requirement for major infrastructure.

5.34 The site SKPR 257 is the most suitable allocation for Langtoft for the following reasons:

- a) It is an appropriate size for the settlement fitting well with the overall form of the settlement.
- B)** It has the best relationship with the settlement form being located in heart of the village.
- C)** It is closer to the facilities like the school, the village hall, convenience store and café.³⁷
- D)** It is close ()within 250 m of public transport.

5.35 The assessment for SKPR 257 is simply on the grounds that it is not considered necessary to meet needs. In these circumstances the significant sustainability benefits of the site need to be weighed against the impact on the listed building which for the reasons set out in this objection we consider can be suitably mitigated resulting in SKPR 257 being a better location for development in the settlement if only one site is considered to be required.

ACTION

IF ONLY ONE ALLOCATION IS REQUIRED IN LANGTOFT THEN SITE SKPR 712 SHOULD BE DELETED AND REPLACED WITH SITE SKPR 257

³⁵ Archaeological Project Services: Heritage Statement para 8.4

³⁶ Archaeological Project Services: Heritage Statement para 8.5

³⁷ Draft Local Plan Site Assessment Report Final comparison of SKPR 71 to SKPR 257



6.0 OBJECTION TO ALLOCATION SITE SPKR-71

- 6.1** As set out elsewhere in this objection there is no objection to further development in Langtoft in fact we consider that the settlement should have a higher level of allocation because of its relative sustainability serving not only its own needs but that of its rural hinterland. Additional development is considered important to support the existing level of facilities and services within the settlement.
- 6.2** This objection however is made on the basis that if the council decide not to make further allocations In Langtoft then there is a better more sustainable site in the form of SKPR 257 that should be allocated instead of the proposed site.
- 6.3** The reasons why SKPR 257 is a more preferable site is as follows:
- A)** It has a better relationship with the settlement form being located in heart of the village.
 - B)** It is much closer to the facilities like the school, the village hall, convenience store and café.³⁸
 - C)** It is within 250 m of public transport compared to over 1 km.
- 6.4** The assessment for SKPR 257 is simply on the grounds that it is not considered necessary to meet needs. In these circumstances the significant sustainability benefits of the site need to be weighted against the impact on the listed building which for the reasons set out in this objection we consider can be suitably mitigated resulting in SKPR 257 being a better location for development in the settlement if only one site is considered to be required.

ACTION

IF ONLY ONE ALLOCATION IS REQUIRED IN LANGTOFT THEN SITE SKPR 712 SHOULD BE DELETED AND REPLACED WITH SITE SKPR 257

³⁸ Draft Local Plan Site Assessment Report Final comparison of SKPR 71 to SKPR 257



7.0 PROPOSED ALLOCATION OF SKPR 257

- 7.1 In light of these objections, it is requested that this omission site is allocated in the Reg19 version of the local plan.