

South Kesteven Local Plan Regulation 18 Representations

Proposed Housing and Mixed-Use Site Allocations

On behalf of Gleeson Homes

Date: August 2025 | Pegasus Ref: P25-1980

LPA Ref: SKPR-333

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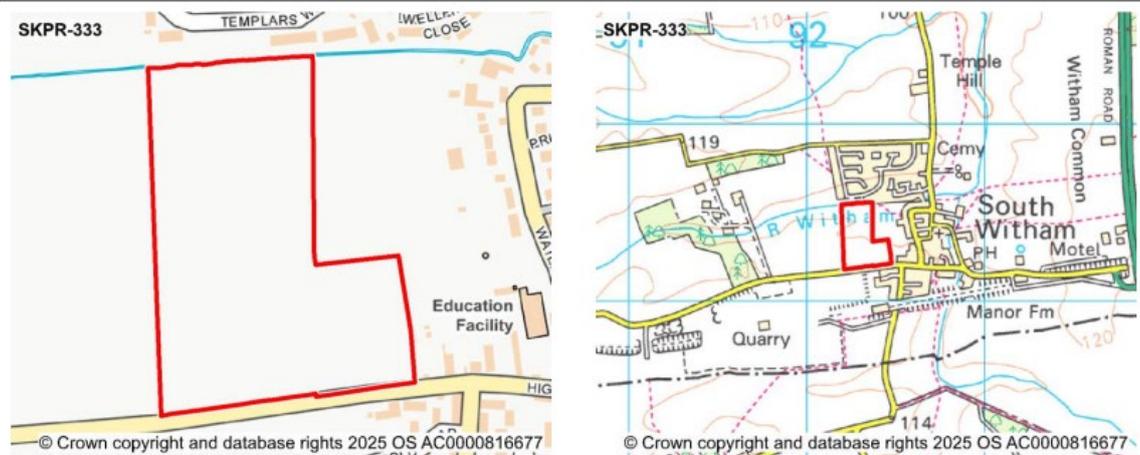
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Appendix A: Site Wide Concept Plan

1. Introduction

- 1.1. This representation is submitted by Pegasus Group on behalf of Gleeson Homes in response to the Draft South Kesteven Local Plan Regulation 18 Consultation July – August 2025.
- 1.2. The representation focuses upon the extra housing sites that are subject for consultation, together with the justification for the scale and distribution of development that is set out in the spatial strategy.
- 1.3. These representations relate to our client’s interests at Mill Lane, South Witham – Council reference is SKPR-333.
- 1.4. Gleeson Homes build high-quality affordable homes across the North of England and Midlands. Gleeson Homes seek to build safe, sustainable communities, improving the areas in which we build and the lives of the people who live there.
- 1.5. The site is proposed as an allocation in the Regulation 18 consultation document which sets out the area of the site as 7.4 hectares with a capacity of 138 dwellings. An extract of the Council’s site assessment is shown below:

Ref: SKPR-333	Parish: South Witham	Proposed Use: Residential	Preferred Site: Yes
Location: Land north of High Street, South Witham		Land Type: Greenfield	Site Size: 7.4



Major Constraints

- 1.6. This representation supports the allocation of the site within the emerging Local Plan, but provides evidence to indicate that the site can accommodate additional dwellings, approximately 200 dwellings, whilst delivering a high-quality development, including satisfying the draft policy requirements in terms of Biodiversity Net Gain, drainage, residential amenity and open space provision.
- 1.7. A concept plan is submitted with the representation, which shows that the site is deliverable and includes the following:
 - 200 dwellings with up to 30% affordable homes;
 - Density of 30 dwellings to assimilate into the character of the surrounding settlement;



- Safe vehicular access from Mill Lane;
- Significant amount of Green Infrastructure including:
 - Recreational routes within the site and pedestrian connectivity to the adjacent South Witham Play Park and playing fields and further afield to facilities and services on Water Lane;
 - Equipped areas of play and/or contribution to the South Witham Play Park;
 - Landscaped buffers and central green links to create a network of natural greenspaces and provide onsite BNG; and
 - Sustainable Drainage Systems to control surface water runoff, improve water quality, and enhance the environment.

2. Overall Scale and Distribution of Development

Plan Period

- 2.1. Paragraph 2.2 of the Local Plan consultation document states that the plan period has been amended and is to be extended to 2043. The paragraph states that this is *“to ensure that the plan looks forward for a minimum of 15 years from adoption which is expected in 2027 this is a requirement as set in the National Planning Policy Framework”*.
- 2.2. The Council has a significant amount of work to complete to produce a sound plan, including transport modelling, infrastructure planning, and the testing of options for the scale and distribution of development in the Plan. The Council has also significant work to do working with statutory consultees and infrastructure providers ensuring the plan and its policies are deliverable and meet other tests of soundness.
- 2.3. As we state later in this representation, the Plan needs to include significantly more housing provision to provide flexibility in supply so that there is a reasonable prospect that South Kesteven’s housing need can be met. Planning for this increased level of growth is likely to take more time than the Council allows, and this needs to be reflected in the timetable to prepare the Plan and to allow a 15 year timeframe from adoption.
- 2.4. We consider that the Plan period should be extended to at least 2045 in order that plan can be positively prepared and is supported by necessary evidence to justify the policies within the Plan.

Housing Supply Flexibility

- 2.5. It is noted that during the Regulation 18 consultation in 2024, the Council set out a provision of 16,975 homes against a then requirement of 14,020 homes over the plan period. This housing provision represented a level of flexibility of 21% over the requirement. Page 24 of the 2024 Regulation 18 consultation document specifically states that 20% flexibility was included in the adopted and in the emerging plan in order:

 “to provide developers with a greater choice of sites and to have a contingency in case sites are not delivered within the timeframes anticipated”.
- 2.6. The Local Plans Expert Group report (2016) set out recommendations for a 20% allowance of developable reserve sites to provide extra flexibility to respond to change.
- 2.7. It is noted that the current Local Plan proposes a housing provision of 19,672 homes against a stated need of 17,720 homes over plan period to 2043 which represents a flexibility of only 11%.
- 2.8. The housing trajectory in the plan does not provide a site-by-site breakdown of start dates and build out rates, and there is no corroborating evidence from strategic promoters and developers sites to support the anticipated delivery rates. For sites such as SKPR-65 Prince William of Gloucester Barracks and site SKPR-278 (GR3-H1): Spitalgate Heath – Garden Village, these sites are stated to be contributing 1890 and 1512, respectively, to the housing trajectory. These sites would only have to delay by a matter of months for any flexibility to be used.

- 2.9. We cannot see any reason why the Council should depart from the original approach to housing provision flexibility which has been set out in its adopted plan and within its previous Regulation 18 consultation on the Local Plan and as advised by The Local Plans Expert Group (2016) report. If the Local Plan includes an appropriate plan period to 2045 and includes 20% buffer then it should include housing provision of 23,390 homes. This means that the Council should be planning for a further 3,718 homes. This is a significant shortcoming which needs to be addressed in the next version of the Local Plan.

Testing Alternative Options

- 2.10. The consultation document notes the increase in the housing need from 701 to 886 dwellings per year as the main reason for the current consultation, and the document's focus on allocating additional housing and mixed-use sites to meet the increased housing requirement. It is also noted that this consultation is intended to build upon the consultation carried out in April 2024.
- 2.11. Given the increase in scale of development that needs to be planned for compared to the adopted Local Plan, it would be expected that the consultations in 2024 and this current one, would test reasonable alternatives for the overall scale and distribution of development across the district in line with the 'justified' test of soundness which requires a local plan to identify an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.
- 2.12. The consultation document is accompanied by a Sustainability Appraisal (SA) Scoping Report, however, it is also not accompanied by an SA Report which sets out reasonable alternatives for the scale and distribution of development. The thorough testing of reasonable alternatives is not only fundamental to the justification and the soundness of the Plan, but also required for legal compliance in line with the SEA Regulations¹

Settlement Hierarchy Update 2025

- 2.13. We have reviewed the Settlement Hierarchy Update May 2025 and support the designation of South Witham as a Larger Village, and therefore a sustainable location for housing development within the district.

¹ The Environmental Assessment of Plans and Programmes Regulations 2004

3. Proposed Site Allocation SKPR- 333

3.1. Site SKPR 333 is proposed as an allocation in the Regulation 18 consultation document with a capacity of 138 dwellings with an approximate density of 30 dwellings per hectare.

3.2. The Policy for the site states that the following development principles apply:

a. A comprehensive masterplan is required for the site.

b. On the western edge of the site a suitable and sensitive boundary treatment will be provided to screen views of the development from the adjacent open countryside.

c. Pedestrian links, such as footway and cycleway connections into the village from the site should be incorporated in the development proposal to link to existing footway on High Street.

d. Footway connections should be made into the existing play space to the northeast of the site from the development.

e. A buffer should be provided along the southern and western edges of the site. This buffer should screen future residential occupiers of the site from the noise and nuisances of the adjacent quarry. The provision of the buffer will ensure the redevelopment of this site does not impact on the continued operations at the quarry.

f. This site is situated within a Minerals Safeguarding Area and Limestone Minerals Safeguarding Area. Before considering a planning application for this site, a Minerals Assessment will be required.

g. This site is within or includes an area of Biodiversity Opportunity. Proposals on this site should incorporate the relevant principles for development within Biodiversity Opportunity Areas set out in New Policy 4: Biodiversity Opportunity and Delivering Measurable Net Gains.

h. This site is within or includes a Green Infrastructure Area. Proposals on this site should incorporate the relevant principles for development within Green Infrastructure Areas set out in Policy EN3 Green Infrastructure.

3.3. With regard to site density, we note the Local Plan Regulation 18 consultation document states at paragraph 2.6 that:

“The Housing Density Study (2025) recommends, to accurately represent the current landscape of house building within the district, that density in the four main towns should be increased from 30 to 35 dwellings per hectare, and that the village densities remain at 30 dwellings per hectare.” The sketch layout shows that with 200 dwellings, the density of the proposal is 27 dwellings per hectare and therefore would not exceed the suggested densities”.

3.4. The consultation document goes on to state at paragraphs 2.8 and 2.9:

“The dwelling potential of sites included in the Local Plan is indicative only; the true potential of any site will be assessed by more detailed study, having regard to many



factors which are outside the scope of the Local Plan, and which need to be considered as part of the planning application process.

Some sites have been considered to have a lower density, due to their sensitive location and this is reflected in the indicative density. Again, this is not a rigid number, but it would not normally be considered that a much higher density would be appropriate in this location."

- 3.5. Our consultant team has had regard to the previous 2024 Regulation 18 consultation which proposed topic-based policies including, Policy DE1: Promoting Good Quality Design, and the newly proposed Policy 4: Biodiversity Opportunity and Delivering Measurable Net Gains.
- 3.6. Attached at Appendix A is an emerging Concept Masterplan, which shows a layout that would deliver approximately 200 dwellings on the site. This would optimise the use of the land and provide a more efficient use of the land while also creating beautiful and sustainable places in line with paragraphs 129 and 130 of the NPPF. The masterplan shows a layout that is also consistent with emerging policies, notably:
- A landscaped buffer along the western edge to limit effects of the proposed development on the surrounding countryside;
 - Proposed pedestrian links and recreational routes within the site and to connect to the existing public open space and into the village via the existing Public Rights of Way to Water Lane and/or via a proposed new footway on High Street;
 - New equipped areas of play including potential trim trail and/or contributions to existing area of play such as the adjacent South Witham Play Park;
 - An appropriate buffer and additional mitigation along the southern and western edges of the site to ensure there are no significant effects to the amenity of future residents of the site and the operations of the quarry are not impacted.
 - Proposed green infrastructure/ecological buffers to the north, west and east with a proposed central green link from east to west providing connectivity between existing areas of habitat to the east to the creation of a significant amount of habitat as part of the landscaped buffers to the north, west and south. This green infrastructure provision will be consistent with the Council's emerging principles in Policy EN3 and New Policy 4. The aim is to achieve a minimum of 10% BNG onsite. However, if this is not achievable, adjacent land to the west is available to provide additional BNG provision.
- 3.7. In the coming months, our consultant team are continuing to prepare a package of technical reports, which will inform refinements to our masterplan for the site. This package will include technical evidence, in terms of landscape, ecology/Biodiversity Net Gain, highways, drainage, noise, vibration and air quality.
- 3.8. As this package of technical evidence is developed, we would look to work with the Council to define a more evidence based, bespoke understanding of the capacity of the site and which can then be reflected in the final policy for site SKPR- 333.
- 3.9. As noted elsewhere in our representation, the Council needs to include more housing provision within its emerging Local Plan to ensure it plans for an appropriate plan period and



includes sufficient flexibility. One means of achieving this objective is to work with site promoters to ensure that site capacities make effective use of land whilst also responding appropriately to the constraints and opportunities of their surroundings.



Appendix A: Site Wide Concept Plan

Schedule of Accommodation									
Block/Type	Units	Single	Two	Three	Four	Five	Six	Seven	Eight
100	100	100	100	100	100	100	100	100	100
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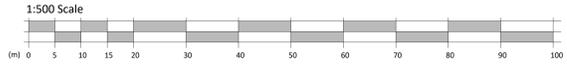
SKETCH FEASIBILITY

Legend:

- Proposed Dwellings
- Proposed Affordable Housing
- Proposed Focal Building/Elevation
- Primary Tree Lined Avenue: 6m wide
- Secondary Roads: 5.5m wide
- Tertiary Roads: 5.5m wide Shared Surface Streets
- Tertiary Lanes: 4.8m wide Lanes Fronting Green Space
- Private Driveways: 4.8m wide
- Potential for a Central Play Space
- Perimeter Linear green Space
- Perimeter Pedestrian Footpath Route
- Potential for Trim Trail Locations along the Pedestrian Footpath Route
- Community Orchard Planting of Native Fruit Trees
- Attenuation Basin/Ecological Habitat Area
- Landscape Buffers
- Pump Station Location



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URBANAPEX
DESIGN AND PLANNING CONSULTANTS

Client: Gleeson Midlands

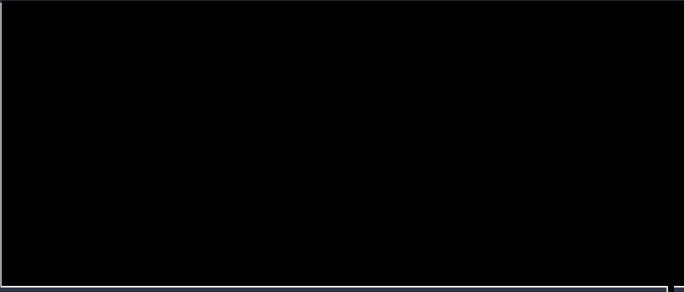
Site: Mill Lane, South Witham

Drawn: Sketch Layout

Project: UA25-031/P/SK01

Preliminary Issue P2-3

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004



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