



Land Fronting Deeping Road, Baston

Representations to South Kesteven Local Plan
Regulation 18 Housing and Mixed-Use Allocations
Consultation

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Prepared on behalf of Wates Developments | August 25

REPORT CONTROL

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1. INTRODUCTION

- 1.1 These representations have been prepared on behalf of Wates Developments in response to the South Kesteven Regulation 18 Proposed Housing and Mixed-Use Site Allocations Consultation.
- 1.2 Wates are promoting the land fronting Deeping Road, Baston ('the site') which has been proposed as a draft allocation within the further Regulation 18 document. These representations support the proposed allocation of the site for up to 283 dwellings and its availability to bring forward homes quickly, alongside the benefits of the delivery of this unconstrained site.
- 1.3 The land fronting Deeping Road, Baston will be able to provide the following benefits to South Kesteven:
- Up to 283 sustainable homes (including affordable housing) to contribute towards meeting South Kesteven's housing need.
 - Comprehensive landscaping strategy to assimilate the development to the village edge and to deliver biodiversity enhancements.
 - High quality open space for future and existing residents to use, in addition to community space in the form of play spaces for all ages, including sports provision, LEAPs/LAPs, allotments or community orchards.
 - Enhancements to the existing Public Rights of Way and the provision of new and improved walking and cycling routes to key destinations in the village and surrounding areas.
 - Improvements to the local highway infrastructure and sustainability measures.

Wates Developments

- 1.4 Wates is an expert in land, planning, and residential development with a proven track record of delivering high quality homes and places. Wates Developments are committed to sustainable development with a group-wide strategy focussing on climate change, biodiversity, and waste, being a signatory of the Terra Carta founded by King Charles III.
- 1.5 Wates core metric of planning success now stands at 98% on applications made since the business was first established in 2005 as well as agreeing 39 joint ventures with housebuilders on sites across the country, which together have delivered more than 7,000 homes over 18 years.
- 1.6 Wates Developments have delivered key infrastructure within South Kesteven in the form of the following:
- **Popular Farm School, Grantham:** Constructed in May 2019, the school provides much needed primary education places for children, with 14 classrooms, a school hall, kitchen, library, toilets and a new grass sports pitch provided with the ability to be extended to a three-form entry school if required. School staff were able to contribute towards the design

of the school, and additional roof lights for more natural light and additional storage into teaching walls were incorporated. The project was shortlisted in the Value and Project of the Year Award category at the East Midlands Celebrating Construction Awards.

- **The Beacon Children’s Home, Grantham:** Wates Developments completed the first phase of the £3.8 million redevelopment of The Beacon Children’s Home in Grantham in October 2017. The development provided significantly improved facilities for home care staff and children with disabilities in Grantham and Lincolnshire. Redeveloping the 1960s built home, ensured that spacious bedrooms, superior communal space and extensive outdoor space were provided. Throughout the development, Wates utilised a range of local businesses to deliver the project, in addition to employing apprentices from Grantham College.

Policy Context

- 1.7 South Kesteven District Council (SKDC) adopted its ‘Local Plan 2011-2036’ in January 2020. The Plan sets out the spatial strategy to meet development needs across South Kesteven up to 2036.
- 1.8 The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) requires local planning authorities to review local plans at least once every 5 years from their adoption date. This is intended to ensure that planning policies remain relevant and able to effectively meet the needs of the local community.
- 1.9 The Inspector’s final report on the current Local Plan committed the Council to undertake an early review of the Local Plan from April 2020. In April 2024, SKDC commenced preparations of their new Local Plan with the Regulation 18 consultation which included a review and updating of their evidence base documents, as well as reviewing housing and employment needs.
- 1.10 In December 2024, the Government published the new NPPF which updated the housing requirements for local authorities. Where an authority did not meet 80% of the new housing requirement figure in their Regulation 19 consultation on or before 12th March 2025, the authority is required to recommence plan making with new housing figure.
- 1.11 Following the publication of the new NPPF, SKDC have published their Proposed Housing and Mixed-Use Site Allocations document, which is the subject of this consultation, and seeks to demonstrate how the Council will meet the new housing requirements across South Kesteven.
- 1.12 In this regard, Wates Developments support the Council’s commitment to the preparation of the new Local Plan to provide direction for housing growth across the South Kesteven administrative area.

Structure of Representations

- 1.13 Our representations are made in addition to our previous comments submitted to the Regulation 18 consultation in April 2024. These representations are set within the context in which we seek to highlight, where relevant, the opportunities that are presented for the

emerging Local Plan to continue to allocate the land fronting Deeping Road, Baston for development.

1.14 Accordingly, the following sections of these representations are set out as follows:

- **Section 2:** Meeting Housing Needs
- **Section 3:** Review of Sustainability Appraisal
- **Section 4:** Land fronting Deeping Road, Baston
- **Section 5:** Summary and Conclusions

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

2. MEETING HOUSING NEEDS

2.1 The following section of these representations considers the changes to the housing needs of South Kesteven, and how the Council proposes to meet housing needs across the District. This section will also review the related topics, in addition to specific allocations proposed within the Regulation 18 consultation document.

South Kesteven Housing Needs

2.2 South Kesteven District Council published the Regulation 18 Draft Local Plan in April 2024 which sets out the policies and directions for growth across the District. This Draft Local Plan was consulted on, of which, Wates Developments responded with representations supporting the general approach made within the Draft Plan, with several recommendations on how the Plan should proceed.

2.3 Following the publication of the Draft Local Plan, the standard method for calculating housing need was changed through the publication of the new December 2024 NPPF. This has resulted in South Kesteven seeing an increased need for housing, rising from 701 dwellings per annum (as per the Draft Local Plan 2024) to 886 dwellings per annum (when taking into consideration the 2024 affordability ratio). This totals 17,720 dwellings across the 20-year plan period, 3,700 dwellings more than what was previously planned for in the Draft Local Plan (2024).

2.4 Within the transitional arrangements of the revised NPPF (December 2024) emerging Local Plans are required to meet at least 80% of the new standard method at the Regulation 19 stage of plan preparation in order to continue under the previous NPPF requirements by 12th March. As South Kesteven were not at Regulation 19 stage in March 2025, the Council are required to identify further housing sites beyond the previously identified allocations to meet the new standard method in full.

2.5 Within the Regulation 18 Proposed Housing & Mixed-Use Site Allocations Document, the Council have reviewed the housing provision to meet the new standard method requirement. With consideration of the 2024 affordability ratio, the Council have proposed to meet the housing requirement of 886 dwellings. Additionally, the Council have continued to provide a buffer of 11% to provide a total of 19,672 dwellings across the plan period.

2.6 Although the Council have removed sites which are now considered to not be appropriate, the increased housing is to be delivered through a mixture of increased densities in urban locations, and provision of 10 new draft allocations. For the sites in which the capacity was increased, this was informed by the Housing Density Study (July 2025). This study recommended that in order to accurately represent the current landscape of house building within the District, that density in the four main market towns should be increased from 30 to 35 dwellings per hectare, whilst density in all other settlement types remains 30 dwellings per hectare (dph).

2.7 The Planning Practice Guidance (PPG) considers effective use of land and outlines in relation to housing density that a range of tools and considerations can be utilised when establishing

appropriate densities for a particular area (PPG, Para 004). Previously the Council have used an indicative number of 30 dph in assessing capacity of proposed allocations and ensure that a controlled level of growth can be satisfied. However, analysis undertaken as part of the Housing Density Study shows that all four of the market towns have been exceeding the Local Plan 30 dph indicative figure since 2020. This therefore demonstrates the recommendations for the increased housing density figures applied to proposed allocations within the market towns are achievable as seen historically.

- 2.8 In total it is proposed from the increased site capacities and additional sites put forward this will provide around a further 4,500 new homes which will meet the shortfall caused by the new standard method as well as providing a buffer.
- 2.9 Wates Developments welcome the approach taken by the Council to meet the new housing needs which will assist the Plan in being compliant with the NPPF, it is positive the Council have removed the allocation of sites which are not well located or will have impacts of the surrounding networks. We also welcome the consideration of the 2024 affordability uplift to ensure that the housing needs are informed by the most up to date evidence.

Plan Buffer

- 2.10 As outlined above, the further Regulation 18 Proposed Housing & Mixed-Use Allocations consultation, the Council have proposed a housing buffer of 11%, which sees a total provision of 19,672 dwellings across the 20-year plan period. The provision of an 11% buffer is in accordance with Paragraph 78 of the NPPF (December 2024), however, the Council have not set out why the previous buffer of 21% set out within the Draft South Kesteven Local Plan (2024) has been reduced.
- 2.11 The Council previously stated within the Draft South Kesteven Local Plan (2024), that a buffer of 21% was retained to reflect the 20% buffer which is currently in place within the adopted Local Plan. This buffer allows for greater choice of sites, in addition to providing a contingency in case of the lack of delivery of housing. No justification has been provided by the Council for the decrease in the buffer and although the Council meet the 2023 Housing Delivery Test requirement by providing 95% of needed the previous housing needs, the figures from the last three years indicate delivery is below the new standard method requirement of 886 per annum. The results of the 2023 Housing Delivery Test in comparison to the results of the new standard method are shown in Table 2.1:

Table 2.1 Summary of HDT Results in comparison to the New Standard Method

	2020/21	2021/22	2022/23
2023 Housing Delivery Test: Number of Homes Delivered (Published Dec 2024)	525	485	642
Difference from new Standard Method Figure (886 dpa)	-361	-401	-244

- 2.12 When assessing the difference between the standard method requirement of 886 homes per annum and the number of homes delivered within the same period of 2020/21- 2022/23 this would result in only 62% of housing needs being met. Therefore the presumption in favour of sustainable development as per footnote 8 of the NPPF would apply alongside the requirement for an action plan and a 20% buffer.
- 2.13 Therefore, the Council should still ensure contingency is provided for to allow for choice in sites as well as in the event of under delivery which has been experienced in South Kesteven. A 20% buffer should be provided for as previously planned within the Draft South Kesteven Local Plan (2024) and to also take into account the implications of the increased standard method figure. Through providing a 20% buffer, this would result in supply of 21,264 dwellings across the plan period.

Plan Period

- 2.14 The Regulation 18 Proposed Housing Mixed Use Site Allocations document, states in paragraph 2.2 the plan period has been amended from 2021 – 2041, to cover the period from 1st April 2023 through to 1st April 2043. Although the overall plan period proposed accommodates for a 20-year plan period, following a review of the Local Plan Timetable within Table 1 of the consultation document, adoption is anticipated in November 2027, one year later than the previously anticipated March 2026. This would see only 16-year's prior to the end of the proposed plan period upon adoption, this is in accordance with paragraph 22 of the NPPF (December 2024), which requires a 15-year plan period to be available upon adoption of the Local Plan.
- 2.15 We support the approach which has been taken by the Council in providing a 16-year plan period. Moving forwards, the Council should give consideration towards extending the plan period. The anticipated adoption is in November 2027 and proposes the risk of not meeting a 15-year plan period should there be any further delays in addition to the delays which have been seen since the publication of the NPPF in December 2024. If further delays are experienced in the preparation of the Local Plan, the plan period should be extended to 2044 to ensure there is a 15-year plan period available upon adoption of the Local Plan

3. SUSTAINABILITY APPRAISAL

- 3.1 The following section of these representations reviews the Sustainability Appraisal Addendum Report (2025) which has been prepared supporting this consultation.

Sustainability Appraisal Report Addendum

- 3.2 The Regulation 18 Proposed Housing & Mixed-Use Site Allocations consultation is accompanied by a Report Addendum (2025) to the Sustainability Appraisal (SA). The Report Addendum is to be read in conjunction with the SA previously prepared for the Regulation 18 consultation in April 2024.
- 3.3 This Addendum provides a focus on the changes and amendments to proposed housing and mixed-use allocations within the Draft Local Plan including additional site options and key changes to allocations. The Addendum does not assess sites which have not been amended and previously assessed within the SA which accompanied the previous Regulation 18 Draft Local Plan consultation in April 2024.
- 3.4 As per the SA Report (2024) the Addendum reviews nine SA themes and the effects of development have been graded through a 5 Red Amber Green (RAG) assessment, with dark red having the greatest negative impacts, and dark green having the greatest positive effect.
- 3.5 As previously commented within Representations to the Regulation 18 Draft Local Plan Consultation in April 2024, following review of the scores provided to the land fronting Deeping Road, Baston being promoted by Wates Development (site reference: SKPR-319 Land South of Greatford Road and West of King Street), some data of the assessment requires to be reviewed. Some data being used within the RAG assessment is considered to be out of date with the last update to data being in 2006 such as information relating to location of bus stops, and areas of open space. With data being published 19 years ago, this does not fully reflect the realities of what is present on site or within the surrounding area.

SKPR-319 Land South of Greatford Road and West of King Street

- 3.6 Within the Sustainability Appraisal Report Addendum, the assessment has positively combined parcels of SKPR-109 (Land fronting Deeping Road, Baston) and SKPR-110 (Land Fronting Greatford Road, Baston) to form one singular parcel with an overall assessment. Table 3.1 provides the assessment provided by AECOM within the Addendum, with a reviewed assessment of the site with up-to-date information. This review resulted in several themes and items which require amending due to inaccurate measurements and data.

Table 3.1 Sustainability Appraisal of Land Fronting Deeping Road, Baston

Constraint	Council RAG Assessment	Boyer RAG Assessment
Air Quality		
Air Quality Management Area (AQMA)	Green	Green
Biodiversity and Geodiversity		
Internationally Protected Sites	Red	Red
Site of Special Scientific Interest (SSSI)	Yellow	Yellow
Local Geological Site	Yellow	Yellow
Regionally Important Geological Site	Yellow	Yellow
Local Wildlife Site	Yellow	Yellow
Local Nature Reserve	Red	Red
Ancient Woodland	Yellow	Yellow
Priority Habitat	Green	Green
Historic Environment		
Grade I Listed Building	Yellow	Yellow
Grade II* Listed Building	Green	Green
Grade II Listed Building	Yellow	Yellow
Scheduled Monument	Green	Green
Conservation Area	Green	Green
Registered Park and Garden	Yellow	Yellow
Landscape		
Tree Preservation Order (TPO)	Yellow	Yellow
Flood Risk		
Flood Zone 2	Red	Red
Flood Zone 2	Red	Red
Land, Soil, and Water Resources		
Agricultural Land Classification – Grade I	Yellow	Yellow
Agricultural Land Classification – Grade II	Red	Red
Agricultural Land Classification – Grade III	Yellow	Yellow
Mineral Safeguarding Area	Red	Red
Mineral Consultation Area	Yellow	Yellow
River	Red	Red

Source Protection Zone	Yellow	Yellow
Community Wellbeing		
Employment Site	Yellow	Light Green
Primary Service – Shop	Yellow	Light Green
Primary Service – Primary School	Yellow	Yellow
Primary Service – Secondary School/College	Red	Red
Primary Service – Surgery	Red	Yellow
Town Centre	Yellow	Yellow
Open Space	Yellow	Yellow
Transportation		
Bus Route	Yellow	Yellow
Bus Stop	Yellow	Light Green
Train Station	Red	Red
Public Right of Way	Light Green	Dark Green

- 3.7 Firstly, within the Community Wellbeing theme, it is stated that the distance from the site to an employment site is 3.3km, however, following review the site is approximately 2.3km from the Kings Street Industrial Estate. This will see that this factor be amended from yellow to light green.
- 3.8 Additionally, it is stated under primary service (shop), that the local shop is located 671m from the site. Upon review, it should be noted that the shop is approximately 500m from the site, and thus the RAG scoring should be amended from yellow to light green. To also note, the RAG scoring also states that the site is 388m from the Kirkstone House School Open Space, but following review, the site is a distance of 290m from the school. Although this does not change the RAG scoring, it does recognise that the area of open space is almost 100m closer to the site than as currently assessed, and thus is more accessible for residents.
- 3.9 Lastly, within the Transport theme of the RAG assessment, it is stated that the bus stop is approximately 511m from the site. This is incorrect as a bus stop is located on Main Street which is approximately 300m from the site. This therefore sees the assessment amended from yellow to light green. Additionally, within the Transport theme, the RAG assessment identifies the site to be 117m from a Public Right of Way (PROW). However, there is a PROW which directly crosses the site from east to west and connects to the wider PROW network, and is thus not 117m away from the site. Therefore, this criterion should be amended from light green to dark green.
- 3.10 These amendments demonstrate that the site provides greater positive impacts and is more sustainable than what the site was originally scored. This is due to several of the criterion being assessed using data which is out of date, such as data relating to bus stops being dated from 2006 and data relating to open space being dated from 2008. Since these data sets were published, there have been changes within the settlement which affect the scoring of the site.

- 3.11 As stated within our previous representations to the Regulation 18 Draft Local Plan consultation, we agree with the general approach of the Sustainability Appraisal and approach to scoring the sites. However, these assessments should be informed by up to date information.

4. LAND FRONTING DEEPING ROAD, BASTON

- 4.1 The land fronting Deeping Road, Baston has received a draft allocation within the Regulation 18 Proposed Housing and Mixed-Use Site Allocations document for the residential development of 283 dwellings.
- 4.2 This allocation extends the previous draft allocation of the land fronting Deeping Road, Baston (site reference: SKPR-109) which was made in April 2024 to include the land fronting Greatford Road, Baston (site reference: SKPR-110). This sees an increase in the anticipated capacity of housing on site from 86 dwellings to 283 dwellings across the two parcels of land.

Site Characteristics and Context

- 4.3 The land fronting Deeping Road, Baston that has been promoted and discussed throughout these representations is located at the western end of the village adjoining the current built up residential area, with the eastern boundary of the site adjacent to the A15.
- 4.4 Baston is located within the southern area of the South Kesteven District and is currently identified as a large village in the adopted SKDC Local Plan but did not previously receive any allocations for growth. The village of Baston is within proximity of three of the four key market towns of the district, with Bourne to the north, Market Deeping to the south, and Stamford to the west of the village.
- 4.5 Baston benefits from the key north-south route A15 passing through the village, providing direct access from Market Deeping to Bourne, and continues to the city of Lincoln to the north and Peterborough to the south. The settlement is able to provide several services and facilities to locals, including primary and secondary education, local shop, and two public houses.
- 4.6 The site is a suitable and sustainable location for future growth which has been recognised by South Kesteven District Council. Since the previous Regulation 18 Draft Local Plan consultation Wates Developments have met with Baston Parish Council to discuss the potential of the site and understand the thoughts and queries of the local community.
- 4.7 Following this meeting, further technical work has been prepared in addition to previous work undertaken in response to queries raised by the Parish Council, to demonstrate that the land is suitable for housing within the emerging Local Plan and any adverse impacts will be mitigated for. This information is summarised below:

Access & Highways

- 4.8 Bancroft Consulting have assessed the proposed access points to the site at the A15 as well as onto Greatford Road. In regard to the Phase 1 access onto the A15, this would be delivered through a new T-junction with a right turn lane to provide vehicles blocking movement on the A15. The access would also be able to achieve suitable visibility splays based on requirements for national speed limit restrictions.
- 4.9 In regard to the Phase 2 access onto Greatford Road from the site, this would be delivered through a new T-junction with suitable visibility splays. It is also confirmed by Bancroft

Consulting that Greatford Road is of a suitable width to accommodate two cars to pass in opposing direction without conflict.

- 4.10 Following discussions with Baston Parish Council, it is understood local residents wish to see improved pedestrian facilities connecting the western end of the village to the east crossing the A15. Through allocation and subsequent development of the whole site, this would allow for greater upgrades to the pedestrian network including extension of footpaths and new safe crossing points for residents.

Ecology

- 4.11 FPCR have prepared a Preliminary Ecological Appraisal (PEA) to understand habitats and species present within the site. The assessment confirms the site is not within any site of international, national, or regionally important nature conservation importance. Furthermore, the PEA found that there were no amphibians (including Great Crested Newts), reptiles or badgers found within the boundary of the site.
- 4.12 As part of any application on the site, hedgerows and mature trees will be retained where possible with new and enhanced landscaping to be provided to mitigate the loss of grassland. Additionally, mitigation measures would be provided to protect biodiversity on site and minimise any adverse impacts.

Drainage

- 4.13 In regard to drainage, RSK have reviewed the drainage strategy to ensure there will not be any adverse impacts for existing and future residents. The land benefits from the natural topography falling from north to south, away from the existing properties to the north of the site. Through the allocation of both parcels of land, the site would be able to provide sustainable drainage features which ensure runoff on site is captured and stored appropriately, which would then be released at no greater than greenfield runoff rates.

Commitment to Sustainability and Climate Change

- 4.14 Wates Development are committed to providing sustainable development and contributing towards the fight against climate change. Wates have a group target to becoming a net zero company by 2045, which is to be achieved through:
- a. Optimising the use of materials and avoiding waste through resource efficiency.
 - b. Reducing their Greenhouse Gas emissions in all products and processes.
 - c. Driving positive outcomes for the natural environment.
- 4.15 The Wates Environmental Strategic Plan sets out the short term and long term targets to support the environment and improve sustainability, which are in line with the Sustainable Development Goals set by the United Nations. Through their commitments to the environment, Wates build award winning zero carbon homes across the UK utilising new sustainable ways of construction.

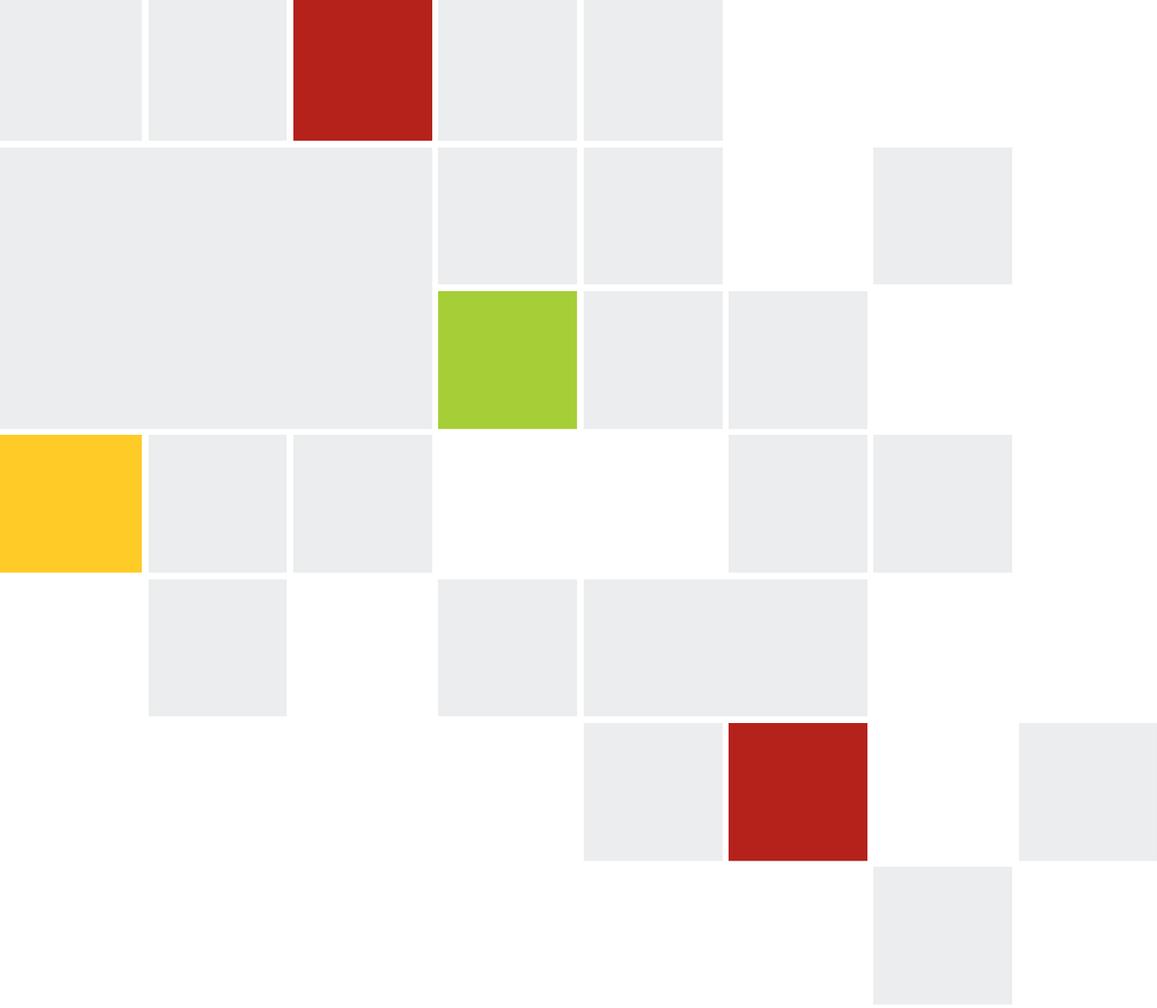
- 4.16 Wates currently have a group-wide strategy which focuses on combating climate change, providing biodiversity, and minimising waste. To further demonstrate their commitment to the environment, Wates are a signatory of the Terra Carta founded by King Charles III and launched in 2021. The Terra Carta gives fundamental rights and values to the environment, allowing the private market to assist in achieving the Sustainable Development Goals, further demonstrating Wates commitment to their short- and long-term targets set out within the Environmental Strategic Plan.
- 4.17 The Wates Developments Sustainability Strategy sets out their focus on creating vibrant and inclusive places for people to thrive. Wates Developments are committed to creating places which support the wellbeing of people as demonstrated by their commitment to the Healthy Homes Pledge, which prioritises the physical, mental, and social wellbeing of residents. Within placemaking, Wates incorporate nature into developments to support biodiversity across all of their projects through working closely with ecologists and landscape architects to understand opportunities to drive biodiversity.
- 4.18 Wates Developments are targeting to achieve 25% of all consented homes to be of higher energy performance than the building regulations by 2030. This will assist in meeting their goal of becoming Net Zero by 2045.
- 4.19 In regard to the land fronting Deeping Road, Baston, Wates Developments are committed to providing 15% BNG on site and utilising the core biodiversity principles for green and blue infrastructure to support the surrounding ecosystems. The design of the development will utilise the core placemaking principles and the principles of the 20 minute neighbourhood, to support sustainable development in Baston and South Kesteven.

Summary

- 4.20 Taking the above into consideration, this site being brought forward by Wates Development has the potential to deliver up to 283 dwellings in a suitable and sustainable environment. The technical work to date highlights the benefits of the site such as suitable access with improvements to the local highway network, provision of open space, and enhancements to biodiversity, which will help facilitate a more sustainable and attractive development proposal. Accordingly, the site is deliverable, suitable, and available to come forwards to meet the housing needs of South Kesteven.

5. SUMMARY & CONCLUSION

- 5.1 Boyer has prepared these representations on behalf of Wates Developments in response to the Regulation 18 Proposed Housing and Mixed-Use Site Allocations Consultation being undertaken by South Kesteven District Council ('SKDC').
- 5.2 These representations are made in support of the Regulation 18 Proposed Housing and Mixed-Use Site Allocations consultation document and emerging Local Plan with respect to the ongoing promotion of the land fronting Deeping Road, Baston ('the site'), for residential development of up to 283 dwellings with open space, landscaping, drainage, and associated infrastructure.
- 5.3 Wates Developments support the allocation of the land fronting Deeping Road to include the land fronting Greatford Road. The allocation of the wider site increases the housing capacity on site from 86 dwellings to 283 dwellings, whilst significantly increasing the open space provision, BNG and overall site benefits. This allocation and provision of 283 dwellings on this site is a positive step taken by SKDC in order to meet the increased housing requirement of 886 dwellings per annum.
- 5.4 The site is a suitable option that is available and deliverable for providing the required growth in the District within the early years post adoption of the emerging Local Plan. These representations draw on the additional technical assessments which build on previous technical work which has been carried out in relation to highways, ecology, and drainage, and how these respond to the Parish Councils comments following engagement with them. The further assessment identify no harm which cannot be mitigated for to the site or surrounding area through the allocation of both parcels of land whilst delivering additional benefits and improvements to Baston and South Kesteven.
- 5.5 The purpose of these representations has been to assist SKDC ('the Council') in formulating an approach within the emerging Local Plan that is both consistent with national planning policy and the tests of soundness.
- 5.6 In this regard, our representations relate to the tests of soundness set out at paragraph 36 of the National Planning Policy Framework ('NPPF') (December 2024); namely, whether the emerging Local Plan is: *Positively prepared*; *Justified*; *Effective*; and *Consistent with national policy*.
- 5.7 Wates Developments supports the emerging Plan and considers the approach currently being undertaken with regard to the housing needs, is consistent with national policy, effective, justified, and positively prepared.



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