

South Kesteven Local Plan Review

Regulation 18 - Proposed Housing and Mixed-Use
Site Allocations Consultation

August 2025

Professional memberships and accreditations



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1. Introduction

- 1.1. These representations have been prepared on behalf of David Wilson Homes East Midlands in respect of their land interests at land fronting Bourne Road and Swinstead Road, Corby Glen. This serves as an effective phase 2 of David Wilson Homes's Pastures Place development which is currently being delivered and progressing well, with 42 plots completed in 2024/25.



Figure 1: Phase 2 Land - land fronting Bourne Road and Swinstead Road, Corby Glen

- 1.2. This consultation follows the Council's determination to not to advance its previous Regulation 18 proposals due to changes to the NPPF and PPG in December 2024, the latter particularly relating to changes to the Standard Method. Those changes altered the Local Housing Need (LHN) applicable to South Kesteven from 687 dwellings per annum to 886 dwellings per annum (applying the most recent affordability metric published in March 2025). This increase resulted in a need for additional housing sites to ensure a robust Plan could be presented for Examination.
- 1.3. David Wilson Homes fully support the proposed allocation and approach proposed by the Council to ensure housing needs can be met in full. Our client is keen to support the Council where possible and is prepared to enter discussions on Statements of Common Ground/Memorandum of Understanding to provide the Council the confidence and evidence needed to continue to allocate the Phase 2 site in the amended NPPF 2024 compliant Plan.
- 1.4. David Wilson Homes are a respected national housebuilder, part of the Barratt Redrow group, one of the nation's most important housebuilders, who deliver high quality new residential development and who have a strong track record of delivery in the local area. David Wilson Homes are proud to have been

awarded the Home Builders Federation (HBF) 5 Star Home Builder status for 16 consecutive years. This accolade demonstrates the quality of both our client's product and service; awarded only to housebuilders who receive a higher than 90% recommendation by their customers. David Wilson Homes remain the only major housebuilder to achieve this accolade over such an extended period of time.

2. Representations

Context - The need for additional housing

- 2.1. Paragraph 1.2 to 1.5 succinctly sets out the position in respect of the changes in National Policy and Planning Practice Guidance, particularly the latter in respect to amendments to the Standard Methodology. As the Consultation Document correctly points out, Local Housing Need applicable to South Kesteven increased to 886 dwellings per annum (having regard for the March 2025 affordability adjustment data) with the amendment to the PPG last year. Paragraph 2.2 further sets out that given the delays to Plan delivery, it is expedient at this stage to amend the Plan period to 2023-2043 (former end date of 2041) to ensure a 15-year Plan period post adoption as required by NPPF Paragraph 22. The Plan affirms adoption is currently anticipated in 2027. The proposed Plan period to 2043 therefore also contains a year buffer to ensure the Plan remains robust even if adoption was slightly delayed.
- 2.2. The Consultation document also sets out that 3 allocations, all of which are considered strategic in nature (200+ dwellings), are no longer considered to be deliverable or acceptable for various reasons including site deliverability, settlement strategy and impact on highways. A final site of only 24 dwellings had achieved a Full planning permission, so was still ultimately included, just as a commitment rather than an allocation.
- 2.3. To ensure the Plan is robust and defensible at Examination, particularly given the high reliance on strategic site delivery, the Council's pragmatic approach to increase allocations is fully supported, and will hopefully prevent undue delay at Examination (particularly having regard for the Pennycook direction). Paragraph 51 of the Framework affirms it is the Government's objective to significantly boost the supply of homes. This is echoed in statements made by the Government both prior to being elected in their manifesto but also following, particularly with the introduction of the NPPF in December 2024. The Government has a clear stated ambition to deliver 1.5 million homes in the first parliament which requires expedited increase in housing delivery now.

Context – 5-year housing land supply

- 2.4. There is significant guidance as to the calculation of 5-year housing land supply both in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG).
- 2.5. The PPG confirms that *"5 year land supply is a supply of specific deliverable sites sufficient to provide 5 years' worth of housing (and appropriate buffer) against a housing requirement set out in adopted strategic policies, or against a local housing need figure, using the standard method, as appropriate in accordance with paragraph 78 of the National Planning Policy Framework"* (Paragraph: 002 Reference ID: 68-002-20241212).
- 2.6. Paragraph 003 continues *"The purpose of the 5 year housing land supply is to provide an indication of whether there are sufficient sites available to meet the housing requirement set out in adopted strategic policies for the next 5 years. Where strategic policies are more than 5 years old, or have been reviewed and found in need of updating, local housing need calculated using the standard method should be used in place of the housing requirement"* (Reference ID: 68-003-20190722).
- 2.7. NPPF Paragraph 78 states *"Local planning authorities should identify and update annually a supply of specific **deliverable** sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:*
 - A) *5% to ensure choice and competition in the market for land; or*
 - B) *20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply; or*

C) *From 1 July 2026, for the purposes of decision-making only, 20% where a local planning authority has a housing requirement adopted in the last five years examined against a previous version of this Framework, and whose annual average housing requirement is 80% or less of the most up to date local housing need figure calculated using the standard method set out in national planning practice guidance."*

- 2.8. The Council as part of this consultation have not published anticipated delivery rates of the sites or a proposed trajectory, nor updated housing land supply position. Without such information it is difficult to quantify the impact of the additional sites in terms of Plan period land supply and anticipated delivery in the first 5-years, both of which will form an important part of the Examination process. The NPPF affirms at Paragraph 11 that plans should apply a presumption in favour of sustainable development. For Plan making this means *"all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area"*. Moreover *"strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas"* with failure to achieve such goals only permissible in specific local circumstances (NPPF 11b I+II). The PPG (Paragraph: 008: Housing Supply and Delivery) states that as a part of *"plan-making, the Inspector examining the plan will test the evidence to ensure that the 5-year housing land supply identified in strategic policies is sound. If it is not, wherever possible the Inspector will recommend main modifications to the plan to ensure that the plan identifies a 5-year housing land supply from its date of adoption"*.
- 2.9. The Council last published a housing land supply position statement in March 2025, but with April 2024 base date. The Council's supply against LHN, with a 5% buffer, at that time was 4.07 years. Whilst it is conceivable supply could improve in the coming years until adoption; it is vital that there is a deliverable land supply in situ going into the examination.
- 2.10. In order for a site to qualify as deliverable, the NPPF glossary confirms *"to be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:*
- a) *sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*
 - b) *where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years."*
- 2.11. The PPG (What constitutes a 'deliverable' housing site in the context of plan-making and decision-taking? Paragraph: 007 Reference ID: 68-007-20190722) confirms that *"in order to demonstrate 5 years worth of deliverable housing sites, robust, up to date evidence needs to be available to support the preparation of strategic policies and planning decisions"* [our emphasis]. The PPG continues that such evidence to demonstrate deliverability may include:
- *Current planning status – for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters, or whether these link to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions;*
 - *Firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and the site developer(s) which confirms the developers' delivery intentions and anticipated start and build-out rates;*
 - *Firm progress with site assessment work; or*

- *Clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects”.*

- 2.12. Whilst allocations can be considered deliverable for the purposes of 5-year land supply, objectors to the Plan will argue against assumptions on site delivery not bound in evidence as required by the NPPF. There are a range of appeal decisions and other case law to demonstrate that a site should not be considered deliverable simply because there is a Statement of Common Ground (SoCG)/Memorandum of Understanding (MoU) between a site promoter and the Council with a trajectory. Whilst this can and often does form part of underpinning evidence, and is not unhelpful, it must be provided alongside clear evidence of an understanding of a site’s constraints, particularly an understanding of physical constraints required to unlock development and when this will be delivered, its viability, and how this inter-relates to the development of a given site. This more comprehensive understanding of a site’s context and delivery and how it relates to delivery, with commitments, help to demonstrate delivery. A planning application provides greater certainty on delivery and evidence of deliverability.
- 2.13. David Wilson Homes have the capacity and ability to submit an early application at an appropriate time, in consultation with the Local Planning Authority. Davis Wilson Homes welcome the opportunity to discuss this matter with officers in due course.

Context - SKPR-233 Land fronting Bourne Road and Swinstead Road

- 2.14. Our client fully supports the proposed allocation of the land fronting Bourne Road and Swinstead Road, and the proposed delivery of circa 293 units. Importantly for the Council, there are opportunities open and available to David Wilson Homes to utilise multi-outlet delivery using the Barratt and Redrow products to enable a start to be made on this allocation prior to the effective completion of phase 1. This means that this allocation has latent ability to provide housing in the first 5-year period, despite the Council’s assessment of the site suggesting deliverability is in the longer term (5-10 years). Given the group already has an active workforce on phase 1, there are clear and demonstrable benefits and efficiencies for our client to essentially move staff from Phase 1 to Phase 2 or between the phases as required. Whilst at this stage there is no explicit agreement within the group as to which other products may be on site, what is clear is that this site can be brought forward in an expedited manner and the landowner and our client are keen to work with the Council on how this can best be achieved. This includes the potential submission of a planning application in the shorter term, to demonstrate the deliverability of the site and also help the Council demonstrate deliverability at EIP.
- 2.15. David Wilson Homes are on track to complete the remainder of homes on the extant SKDC Local Plan 2011- 2036 LV-H5: Swinstead Road/ Bourne Road Allocation in the next four years (circa 120 units averaging 40 units per annum). Given the ability to submit an early application, and given the ability to utilise multi-brand delivery, this draft allocation can add additional dwellings to the land supply. Given the ability to use multiple outlets concurrently, delivery rates are not as constrained and there would be no requirement for Phase 1 to be complete to commence delivery and sales on Phase 2.
- 2.16. David Wilson Homes already benefits from a strong understanding of the site and local market through the Delivery of Phase 1 of Pasture’s Place. Whilst updated survey work will be undertaken to support the promotion of the wider site and a planning application, work to date on Phase 2 and work which supported phase 1 indicates strongly that the site is deliverable. Site specific mitigation is discussed below, including in relation to the proposed site-specific criteria proposed by this document.
- 2.17. BNG evidence was not required for Phase 1 as its approval predated the requirement for BNG (determined 07/2022). However, the site is predominantly in intensive arable use, therefore areas of higher quality habitat will be largely limited to the hedgerow which defines the fields boundaries, the majority of which will be retained and any losses compensated through replacement planting as part of an integrated landscape/ecology/drainage solution for the site. As confirmed in the SA Addendum the site is 4.6km from Grimsthorpe SAC and within 1-2km of a SSSI, but neither is likely to serve as a constraint to development. Moreover, as set out in the SA Addendum 85% of the site overlaps with Biodiversity

Opportunity Area for creation (as identified in the Regulation 18 Plan evidence (Biodiversity Opportunity Areas)). This demonstrates that the site is not of a high ecological quality currently, but there is the opportunity to improve through targeted improvements, a proposed ecological strategy which maximises the site's opportunities whilst minimising impact on areas of recognised higher quality currently. Whilst detailed survey work is ongoing, at this stage there are no known major ecological constraints which would preclude development and evidence available to the Council demonstrates the site presents an opportunity to improve local ecology.

- 2.18. The HRA further supports the above conclusions, noting that the site's allocations yields no likely significant effects. We agree with the HRA assessment that *"there are no linking impact pathways and site allocation SKPR-233 can be screened out from Appropriate Assessment"*.
- 2.19. The site sits within Flood Zone 1. As acknowledged in the SKPR-233 site assessment the site has areas of acknowledges surface water flood risk. This flood risk however impacts only parts of the site and can be mitigated through either inclusion as part of the site's open space strategy or through further drainage evidence collation and the implementation of a suitable surface water strategy. The limited area of surface water does not however necessitate a need for a sequential test.
- 2.20. NPPF Paragraph 172 states *"All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by:*
- a) *applying the sequential test and then, if necessary, the exception test as set out below;*
 - b) *safeguarding land from development that is required, or likely to be required, for current or future flood management;*
 - c) *using opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding, (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management); and*
 - d) *where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations"*
- 2.21. NPPF Paragraph 174 states *"within this context the aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test.)"*.
- 2.22. As the site can comfortably be developed without the need for utilising the areas of land identified as being impacted by surface water, including internal and external access routes, no sequential test is required and the site is not at flood risk, insofar as it relates to soundness for this Plan. Detailed flood risk and drainage work will accompany any forthcoming planning applications to justify the approach adopted.
- 2.23. The site does not contain any designated environmental or designated heritage asset. The nearest heritage asset of note is located some distance away, Round House Farm (Grade II listed) which sits in open countryside 500m to the west of the furthest western extremity of the site. Impacts on this site are considered to be low to negligible. Other heritage assets of note include Corby Glen Conservation Area and the associated listed buildings within, however again due to limited intervisibility predominantly due to existing built form, including modern neighbouring development, impacts are considered likely to be negligible.
- 2.24. The site is acknowledged to have some archaeological potential, as was understood and explored in respect of the Phase 1 scheme, however this can be managed through both non-intrusive and intrusive

field evaluation, to be agreed with the Council as appropriate at application stage. The draft policy already makes provision for this however which is discussed below.

- 2.25. Corby Glen is acknowledged in existing and emerging policy to be a sustainable settlement. The principle of residential growth was found to be sound in the extant Local Plan. The village contains a range of services, including a shop, schools, GP practice, pubs, community facilities and recreational facilities, all within walking distance of the site. Necessary improvements will be made to ensure safe access to the pedestrian network once made will ensure these are all walkable from the site site. Due to the scale of development, regard can be had for existing play provision in the village and new provision can be provided to provide a different play environment or differing equipment for example to maximise the offer of the village to the benefit of new and existing residents.
- 2.26. Access is considered in the Site Assessment document to be achievable, with the provision of new footways along Bourne Road and the B1176 required to connect the site to Corby Glen. This is discussed below.
- 2.27. Impacts on landscape are considered within the Site Assessment to be mitigatable through design, layout and landscaping. We concur with this assessment, with landscape evidence influencing the final design and landscaping strategy for the site. Again, the consultation document proposes policy criteria to safeguard this, again discussed below.
- 2.28. The site otherwise is considered to be broadly unconstrained, and those constraints that we are aware of are considered mitigatable. Experience with Phase 1 means David Wilson Homes are highly aware of the site context and the necessary mitigation. However, for the purposes of local plan soundness, it is clear the site is suitable, available and achievable. Any constraints can be mitigated suitably and such constraints will likely serve to help evolve the schemes design, creating an attractive extension of the settlement. The site is considered both deliverable and sound and should be retained as an allocation.

Proposed Policy Criteria

- 2.29. The Consultation draft Plan proposes a range of “*development principles*” for the allocation, which essentially form the site-specific policy for which any application would be considered against once the Plan was adopted (though would hold weight for any application submitted ahead of the adoption of the Plan and for which due regard would be had by the applicant). Our client generally supports the proposed site-specific criteria; however comments are provided below:
- 2.30. **a. Footway provision required along Bourne Road and B1176 to connect to village centre.** – Criterion noted and agreed as necessary to ensure the services and facilities of Corby Glen can be sustainably accessed.
- 2.31. **b. Sensitive landscaping screening to the south and west edges of the site will be required to protect the views from the open countryside.** - Criterion agreed in generality, with such landscaping to be informed by detailed appraisal work undertaken at the planning application stage. At this stage no landscape concern to suggest this approach would be unsound or necessitate landscape evidence at this stage.
- 2.32. **c. Potential landscape impacts should be mitigated through high quality design and landscaping.** – As above
- 2.33. **d. Pre-commencement archaeological investigations required.** – In accordance with work undertaken during Phase 1 thus agreed.
- 2.34. **e. This site is situated within a Limestone Mineral Safeguarding Area. Before considering a planning application for this site a Minerals Assessment will be required.** – The requirement for an assessment is noted. It is understood that for Phase 1 mineral excavated on site was utilised in that development. A similar approach could be utilised here subject to evidence and further engagement with the Council.
- 2.35. **f. 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.** – As noted above the existing ecological value of the site is not high given the current intensive arable use of the site. Opportunity

through pre-existing legal requirements relating to BNG to improve the site, but this will be done with the Council's evidence also.

- 2.36. **g. 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** - Given this is only a reference to another policy, it is not clear whether it needs to form a policy in its own right having regard for NPPF Paragraph 16F. Comments on Policy EN3 and associated mapping will be made through the next consultation if required.
- 2.37. As demonstrated within these representations, the proposed allocation at land fronting Bourne Road and Swinstead Road (SKPR-233) is a suitable and deliverable allocation. It, and the process of its selection, is considered to be sound. David Wilson Homes look forward to continued collaborative working in relation to this site with the Council, to expand upon the good work undertaken in respect of Phase 1. David Wilson Homes welcome any questions officers may have and would be welcome the opportunity to meet with officers to discuss next steps and any SoCG/MoU which can help support the site through examination. David Wilson Homes will continue to undertake evidence collation and due diligence in respect of a site promotion. Furthermore, should it be agreeable with Officers the submission of an early application, to ensure continuity of delivery through Phase 1 into Phase 2 and to assist the Council to demonstrate a 5-year housing land supply, both in generality in the short term but also as part of the examination of the Local Plan Review.