

27th August 2025

Dear Sir or Madam,

Re: South Kesteven Local Plan Regulation 18 – Proposed Housing and Mixed-Use Site Allocations Consultation

Context

These representations provide the response of Nightingale Land to the current consultation held by South Kesteven District Council (SKDC) under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. These representations are focused on specific matters relating to the content of the draft South Kesteven Local Plan Review (SKLPR) as currently proposed and follows from our previous representations to the Regulation 18 consultation submitted by Carter Jonas in April 2024. Despite our previous representations to the Regulation 18 consultation, it appears that land at Wilsford Lane has not been reassessed. These representations are therefore included at appendix 1 of this submission and should therefore be read in conjunction with this response which seeks to build upon representations previously made and focus on specific matters in an effort to avoid undue duplication.

Nightingale Land has land interests in South Kesteven at land at Wilsford Lane, Ancaster. The site forms part of an adopted Local Plan allocation for 35 dwellings. The emerging Local Plan seeks to retain the existing Local Plan allocation and the principle of development in this location is therefore supported. Notwithstanding this, since our previous representations an outline application (ref: S24/2066) is currently pending consideration for residential development of up to 73 dwellings at 30dph. The proposed residential development part of the scheme under ref: S24/2066 will be fully contained within the residential allocation boundaries identified in the adopted Local Plan (see Policy LV-H2) but at the higher density of 30dph which is the same density as other allocations in Ancaster. The outline application also incorporates a wider area of land which includes significant provision of public open space. Historic England have confirmed they have no objection to the increased density in response to application ref: S24/2066. Therefore, consultee responses to ref: S24/2066 demonstrate that there are no planning related reasons for a lower density in this part of Ancaster when compared to other allocations in Ancaster. Furthermore, there have been no objections from statutory consultees regarding technical matters which cannot be overcome by way of condition or s106 agreement.

National Planning Policy and Guidance

The National Planning Policy Framework (the Framework) is clear that the planning system should be genuinely plan-led. It is vital that up-to-date Local Plans are in place which provide a positive vision for the future of the area and to ensure housing and economic needs are met in full.

Paragraph 20 states that strategic policies should set out an overall strategy for the pattern, scale and design quality of places. National policy is clear that sufficient provision should be made for housing (including affordable housing), employment, retail, leisure and other commercial development.

The Framework sets out four tests that must be met in order for the Local Plan to be found sound. In this regard, the plan must be:

- Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective – Deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

The Planning Practice Guidance (PPG) was first introduced in 2014 and has been updated in the intervening period and provides clarification on how the requirements of the Framework should be interpreted.

South Kesteven Local Plan Review

These representations are made in response to the matters outlined in the consultation document and focus specifically on the proposed allocations and direction of growth to ensure Local Housing Needs are met in full.

Plan Period

The SKLPR will need to accommodate a minimum 17,720 dwellings over the plan period 2023 – 2043. Nightingale Land support the Council’s decision to extend the plan period over a 20 year period to allow for a minimum 15 years from adoption.

Buffer

Paragraph 2.3 outlines that the plan provides around 11% buffer of sites above the minimum requirement of 17,720 dwellings. This equates to a housing supply of 19,672 dwellings over the plan period. The use of a buffer to provide flexibility within the housing supply is supported. However, a larger buffer of sites should be considered given that some sites identified within the consultation document relate to large strategic extensions/garden villages. Whilst these sites can make an important contribution to the overall planning strategy for the area, they will inevitably take longer to deliver due to pre-commencement conditions, infrastructure requirements, land reclamation etc. The Council should therefore consider whether the buffer should be increased to allow further flexibility within its housing land supply to respond to changes in circumstance which may affect housing delivery.

Policy SKPR-271 (LV-H2): Wilsford Lane

The continued allocation status of this site is supported. It does not appear that there are any substantive changes to the proposed policy wording than what is currently set out in the adopted Local Plan where the site was originally identified to provide 35 dwellings at 16dph.

Paragraph 1.9 of the consultation document confirms the Council is considering all comments submitted as part of the previous consultation in 2024. Despite this, no consideration has been given to land at Wilsford Lane on its ability to accommodate a higher level of growth originally identified in the adopted Local Plan. As such, the Council should be mindful that the site offers the opportunity to increase the density of the site from 16dph to 30dph. An increase of density is more in keeping with surrounding development notably site allocation LV-H1 land north of Wilsford Lane which the Local Plan set a density of 30dph for. Allocation LV-H1 is currently being built out. Indeed, the proposed allocation which acts as a phase 2 of this scheme (SKPR-168) is identified for 58 dwellings at 30dph.

It is proposed that the overall site area is expanded to 6.2ha as outlined in figure 1 below.

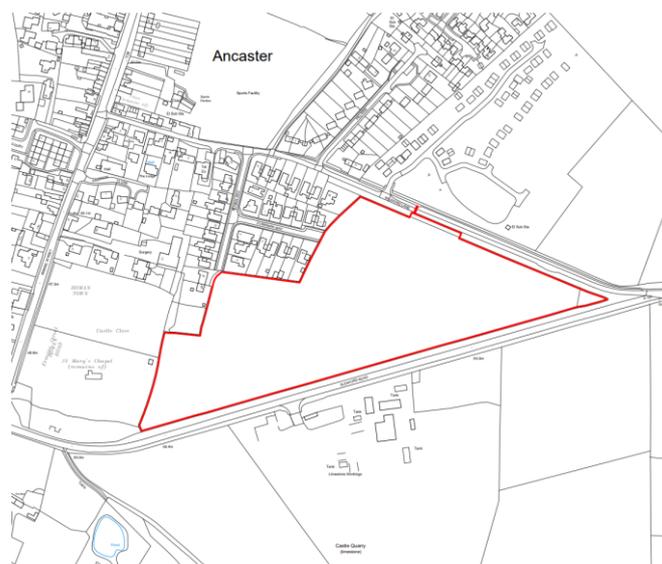


Figure 1: Location Plan

By extending the overall site area this will ensure additional benefits including a Local Equipped Area of Play, meadow grassland, allotments and additional tree planting can be provided (see attached Illustrative Framework Plan at Appendix 2). No development is proposed outside of the area already allocated for residential development.

Both the adopted policy and emerging policy state that the lower density at Wilsford Lane (south) is to take account of the gateway location and heritage features to the south. No evidence has been provided by the Council to demonstrate that a density greater than 16dph would be harmful to this location or to nearby heritage assets. The previous Regulation 18 consultation response demonstrates that there are no landscape or heritage features which prevent increasing the density of the site.

An outline planning application (ref: S24/2066) for residential development of up to 73no. dwellings was submitted and validated by SKDC on 17th December 2024. The application is currently pending consideration. The technical information submitted demonstrates there are no constraints to development of this site at the scale proposed. There have been no objections from statutory consultees regarding technical matters which cannot be overcome by way of condition or s106 agreement. In a letter dated 29th April 2025, Historic England confirmed that they do not object to current outline application (ref: 24/2066) on heritage grounds. Therefore, Historic England have no objection to a density of 30dph at Wilsford Lane (South).

Development of the site at a higher density would still represent a logical extension to the settlement with an overall positive effect for residents and will assist in providing the necessary type of housing to meet local housing need. Further, it will assist the Council in increasing the buffer of sites to maintain a flexible and responsive housing land supply.

The evidence prepared by the Council (to support the allocation) and that submitted by Nightingale Land demonstrates that the site is suitable for allocation and is capable of accommodating a higher density. The proposed development includes the following planning benefits:

- The developable area extends 2.42ha of the 6.28ha site. The developable area is fully contained within the adopted residential allocation boundaries. The remaining land is set aside for public open space, landscaping etc.
- The delivery of up to 73no. dwellings at 30dph is consistent with the character and appearance of the surrounding area.
- The site will deliver 4no. bungalows providing an appropriate mix of house types and caters for the needs of the older and disabled persons.
- The site will provide 2no. self-build homes and makes a beneficial contribution to self and custom build housing needs not typically seen on sites of this scale.
- The site delivers a Biodiversity Net Gain of +22.82%. In terms of hedgerow measurement, the proposed native hedgerow planting provides a hedgerow score of +14.64%. The increase of Biodiversity Net Gain is therefore in excess of the minimum 10% required by national planning policy.
- Increased economic activity in the area as a result of new construction jobs associated with the construction phase together with increased expenditure associated with new residents to existing local services and facilities improving the economic vitality of the area.
- The development will enable a choice of new homes suitable for a wide demographic. The proposed development will also deliver a policy compliant affordable housing contribution.
- The proposed public open space results in heritage benefits allowing for publicly accessible views westwards to the Scheduled Monument as well as views to Ancaster Hall, The Rectory and the Church.
- A Locally Equipped Area of Plan, meadow grassland, allotments and additional tree planting can be provided to the benefit of the local community.

As such, the figure set out in the policy wording should be increased to 73 dwellings at 30dph, consistent with the technical evidence supporting the outline application.

Conclusions

Nightingale Land hope you have found this letter to be constructive and would welcome the opportunity to discuss the contents of this letter with the Council in greater detail and invite the Council to contact us in this regard.

Kind regards

Yours sincerely

John Fleming
Development Manager
Nightingale Land

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