

27 August 2025



Planning Policy Team
South Kesteven District Council
Council Offices
The Picture House
St Catherine's Road
Grantham
NG31 6TT

Jessica Graham



Sent via email only: planningpolicy@southkesteven.gov.uk

Dear Sirs

Representations to the South Kesteven Regulation 18 Local Plan – Proposed Housing and Mixed-Use Site Allocations
David Wilson Homes East Midlands - Land to the West of Swinehill, Harlaxton

On behalf of David Wilson Homes East Midlands ('DWH'), we have prepared the following submission to the South Kesteven District Council ('SKDC') Regulation 18 Local Plan – Proposed Housing and Mixed-Use Site Allocations consultation in relation to their land interests to the west of Swinehill, Harlaxton ('the Site').

Site Overview

DWH is promoting land to the west of Swinehill, Harlaxton for residential development which totals circa 18.02 hectares and 44.54 acres and is shown on the submitted Site Location Plan.

A larger site (circa 44.3 hectares and 109.6 acres) was previously submitted by DWH in 2020 and was subsequently assessed in the Site Assessment Report. This is also included in the 2025 Site Assessment Report (reference SKPR-198). DWH's representations to the April 2024 Regulation 18 consultation advised that in response to the Draft Plan consultation and evidence base, DWH are now also promoting a smaller development opportunity. This has now been assessed separately in the Site Assessment Report 2025 (reference SKPR-308).

In March 2025, an outline planning application was submitted on SKPR-308 (circa 18.02 hectares and 44.54 acres) for up to 200 dwellings, public open space, a community facility and associated landscaping and infrastructure. The application submission demonstrated that the Site offers an immediate development opportunity which could be delivered within the next 5 years.

The Site is within a sustainable location immediately adjacent to the settlement boundary of Harlaxton (a 'Larger Village') and in close proximity to the range of shops, services and facilities provided within Harlaxton and Grantham. It is therefore considered that it offers a great opportunity to deliver much needed housing with community and environmental benefits in a highly sustainable and accessible location.



Regulation 18 Proposed Housing and Mixed-Use Site Allocations Consultation Document and Evidence Response

2. Meeting Identified Need

Local Housing Need

Paragraph 2.2 of the consultation document states that the ‘*standard method [‘SM’] for South Kesteven establishes a need of 886 dwellings per annum [dpa], equating to 17,720 dwellings across the plan period 2023-2042*’ [Savills Emphasis]. DWH do not consider the SM quoted and relied upon in the consultation document is correct. South Kesteven’s Five Year Housing Land Supply statement (March 2025) states at paragraph 1.5 that the SM requirement is 895dpa¹, this is the same number that is included in Government’s revised local housing need spreadsheet, published December 2024². Therefore, the plan should be updated to state that the SM requirement is 895dpa not 886dpa, equating to a minimum of 17,900 dwellings across the plan period.

The consultation document also states at paragraph 2.3 that ‘*the housing requirement is based on the Standard Method calculation*’. We do not support this approach. SKDC’s approach to meeting housing needs fails to make the distinction between the Standard Method setting out a baseline need position (i.e. not the complete housing requirement), and the housing requirement which includes additional uplifts for reasons such as economic growth, affordable housing need or cross boundary requirements for example, as set out in the Planning Practice Guidance (PPG)³. The PPG (reference 2a-002-20190220) states that ‘*the standard method uses a formula to identify the minimum number of homes expected to be planned for...[it] identifies a minimum annual housing need figure. It does not produce a housing requirement figure*’ [Savills Emphasis]. The Government’s standard methodology identifies the minimum annual housing need which should be used as a starting point. Therefore, the plan is not currently in accordance with paragraph 36 (a) of the NPPF which states that plans are sound if they are positively prepared and provide ‘*a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs*’.

Furthermore, previous evidence demonstrated that there was significant affordable housing need. In SKDC’s Local Housing Needs Assessment (February 2024) it suggests that the Council may need to consider increasing the housing need from the standard method figure due to the affordable housing need. Therefore, it is considered that South Kesteven should be planning for more than the minimum level of housing.

Paragraph 2.3 states that ‘*whilst the housing requirement is based on the Standard Method calculation the Local Plan trajectory contains a buffer of around 11% above the minimum requirement of 17,720 dwellings, this equates to a housing supply of 19,672 dwellings across the plan period. The purpose of the buffer is to provide developers with a greater choice of sites and a contingency in case some which are included in the supply are not delivered within the timeframes anticipated*’ [Savills Emphasis]. As set out above, the standard method figure being used in the consultation document is incorrect, therefore the buffer currently being proposed, if the correct SM is used is 9%. However, it is unclear how the buffer has been calculated and therefore, as written, the consultation document is not in accordance with NPPF paragraph 36(b) which requires plans to be justified and based on an appropriate strategy and proportionate evidence.

To achieve this buffer and meet the ‘housing requirement’ identified a number of additional sites have been allocated and there have been amendments to site capacities. The consultation document and supporting evidence do not provide any evidence that the amendments to the existing proposed allocations site capacities can be achieved. This will need to be confirmed on a site specific basis and will depend on technical constraints. An additional site proposed as a draft allocation is Site SKPR-318 in Harlaxton. This has been allocated for 112 dwellings (Land to west of the Drift). It is unclear whether this Site has a developer promoting it and there is

¹ <https://www.southkesteven.gov.uk/sites/default/files/2025-03/5%20Year%20Housing%20Land%20Supply%20Statement%202024-2029.pdf>

² Please refer to: <https://assets.publishing.service.gov.uk/media/675aaeca9f669f2e28ce2b91/lhn-outcome-of-the-new-method.ods>

³ PPG Paragraph: 002 Reference ID: 2a-002-20241212

limited evidence available to demonstrate its deliverability. Due to the incorrect SM being used and lack of evidence regarding the amendments to the site capacities and densities, it is considered that further sites should be allocated to ensure the housing requirement can be met.

Moreover, as set out in our response to the last Regulation 18 (April 2024) consultation, SKPR-272 Barrowby is not considered to be capable of delivering the 270 units as identified in table 3.5 of the consultation document. Part of this site has already been delivered and the rest of the site has planning applications already submitted. Subsequently, it is considered further dwellings will need to be found to replace the allocation. Paragraph 127 of the NPPF states that *'planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability'* [Savills Emphasis]. As part of the Local Plan review, SKDC should undertake a detailed assessment of the progress of historic allocations and if these have been partly delivered or have applications submitted they should not be carried forward as the housing the site will deliver should be for the housing requirement from the previous plan. SKDC should also remove allocations where there is no evidence that they can actually be delivered within the plan period.

Furthermore, paragraph 2.2 states *'following the review of the Local Plan timetable in February 2025, the plan period has been amended to cover 1 April 2023 through to 1st April 2043. This is to ensure the plan looks forward for a minimum of 15 years from adoption which is expected in 2027'*. DWH agree that the plan period needed to be extended from the period proposed in the last consultation, however, we do not consider it has been extended sufficiently. Even if the plan is adopted in 2027 there will only be 16 years of the plan period will be remaining. As the plan is only currently at Regulation 18 stage, it is likely that the adoption could be delayed. The PPG states (Paragraph: 064 Reference ID: 61-064-20190315) *'strategic polices should be prepared over a minimum 15 year period and a local planning authority should be planning for the full plan period'* [Savills Emphasis]. The PPG (Paragraph: 083 Reference ID: 61-083-20211004) also states that *'where the proposed local plan strategy incorporates larger scale developments such as new settlements or significant extensions to existing villages and towns, policies should be set within a vision that looks further ahead (at least 30 years) to take into account the likely timescale for delivery'*. The document proposes to allocate 4 sites for over 1,000 dwellings and two of them are for 3,000 dwellings and above. We therefore consider the plan period should be extended.

If the plan period is extended, SKDC will need to find additional residential sites. If more sites are required it is considered that more development should be directed towards the Larger Villages, such as Harlaxton, to ensure that there is a sufficient spread of short, medium and long term sites being delivered across the plan period in sustainable locations. DWH's land to the West of Swinehill, Harlaxton offers a sustainable residential development opportunity that should be considered.

The conclusion within the Site Assessment Report (2025) on DWH's Site (SKPR-308) finds that *'the Site has been identified as having the potential to have a major impact on the Strategic Highway Network. Significant mitigation measures would be required through the use of transport assessments and modelling. Concerns over the sites impact on the historical environment due to proximity with Conservation Area. Other more suitable sites are available to meet required need across the plan period'*. The application which was prepared on the site demonstrated that any transport and heritage impacts could be overcome by mitigation and the benefits of the proposed scheme outweighed the harm. It is considered that the application submission should have been taken into consideration and the DWH site should have been allocated in addition to or instead of draft allocation SKPR-318.

Table 8 (paragraph 3.8)

Table 8 of the consultation document sets out the current percentage distribution of development across the settlements in SKDC. This states that 19% of all development in the plan is proposed to be focused in Larger Villages compared to 46% in Grantham and 31% across the three market towns. This is considered to be a small percentage. Paragraph 11 (a) of the National Planning Policy Framework (NPPF) states that *'all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area'*. It is considered development should be spread further across the identified sustainable settlements and not just

be concentrated in Grantham and the market towns. Harlaxton is classified a Larger Village (confirmed by the Settlement Hierarchy Review (May 2025)) and is suitable for further growth.

Settlement Hierarchy Review May 2025

DWH support Harlaxton being maintained as a Larger Village in the consultation document and Settlement Hierarchy Review document (May 2025). In the Settlement Hierarchy Review document (May 2025), Harlaxton scores 42, whereas in the 2024 Settlement Hierarchy Review the village scored 41 (the higher the score the more sustainable the settlement). Harlaxton is one out of 16 other Larger Villages identified in the Settlement Hierarchy Review document. Harlaxton scores joint 10th of the Larger Villages in regards to sustainability. However, despite being one of the higher scoring Larger Villages in the Settlement Hierarchy Review, 3 Larger villages (Barkston, Barrowby and Baston) which are classified as less sustainable than Harlaxton, are proposed to deliver more growth over the plan period in the draft local plan (see pages 9-12 of the consultation document). Paragraph 82 of the NPPF states *‘in rural areas, planning policies and decisions should be responsive to local circumstances’* and therefore it is considered a higher amount of development should be proposed in Harlaxton.

Sustainability Appraisal Addendum 2025

The Sustainability Appraisal (‘SA’) Addendum 2025 published with this consultation does not re-assess existing draft allocations carried from the Regulation 18, despite significant changes to the policy wording. In line with the PPG (Paragraph: 021 Reference ID: 11-021-20140306), the SA should be updated to reflect significant changes to policy and reassess the sites, not just the additional sites that have been added as part of this consultation which are represented in Appendix 1 of the SA. If the existing draft allocations are not reassessed, the plan will not be sound (NPPF paragraph 36 b)) and in line with procedural and legal requirements.

Draft Site Assessment Report (July 2025)

The Draft Site Assessment Report 2025 lacks evidence to justify the conclusions in line with paragraph 36 of the NPPF. Below we set out comments in relation to the site assessment undertaken in respect of SKPR-198 (wider site) and SKPR-308 (smaller site) in relation to the overall conclusions and constraints highlighted as ‘red’ in the RAG assessment.

It is also noted that SKPR-318 ‘Land West of the Drift’, which has been proposed as a draft allocation, scored 8 ‘reds’ which is only marginally better than DWH’s sites but it is detached from the settlement, unlike DWH’s site which is immediately adjacent to the primary school and health centre.

- SKPR-308 (smaller site) scored 10 ‘reds’; and
- SKPR-198 (larger site) scored 9 ‘reds’.

SKPR-308 Land off Swinehill, Harlaxton

The ‘main findings’ section concludes that the *‘Site has been identified as having the potential to have a major impact on the Strategic Highway Network. Significant mitigation measures would be required through the use of transport assessments and modelling. Concerns over the sites impact on the historical environment due to proximity with Conservation Area. Other more suitable sites are available to meet required need across the plan period’*. As stated in the response above, an outline application was submitted in March 2025 for up to 200 dwellings, which included a full set of technical work that demonstrated how the scheme would mitigate impacts. Moreover the scoring used in the assessment is considered to be too simplistic and lacks evidence.

Category	Query Regarding Assessment
Surface Water Flood Risk	The EA flood map for planning records the existence of some surface water flooding on the Site. The assessment provides a red assessment for this category on this basis. This is too broad an approach considering the ability to mitigate surface water risk through development, and indeed the fact the vast majority of site assessed are included in the same category due to the existence of surface water flood risk. The submitted application layout was

	designed to avoid any areas of surface water flooding. The Council have also not yet published their own Strategic Flood Risk Assessment and it is not considered they have enough evidence to comment on this.
Proximity to closest Designated Site (SAC, SPA, SSSI)	Considered in the application submission and ecological appraisal provided. The Ecological Appraisal of the submitted application does not highlight this as a concern and no objections from the Council's Ecologist were received.
Impact on the Strategic Highway Network	The SA notes that there will be a 'major' impact to the Strategic Highways Network. <i>The assessment states 'The site is in close proximity to the SRN junction. 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. Cumulative Impact Assessment may be required in conjunction with other policies in the area (SKPR-295, SKPR-318)'. The detailed transport work undertaken as part of the application did not find that the scheme would have a major impact on the strategic highway network.</i>
Proximity to Local Wildlife Sites	The assessment notes that the Site is within 0-1km of a local wildlife site. The Ecological Appraisal of the submitted application does not highlight this as a concern.
Proximity to Conservation Area	The assessment notes that the Site is within 0-0.4km of a conservation area. This assessment does not take into consideration the mitigation provided as part of the submitted application.
Listed Building (includes Grade 2* Grade 2 and Grade 1)	The assessment notes that the Site is within 0-0.5km of a listed building. This assessment does not take into consideration the mitigation provided as part of the submitted application.
Proximity to Registered Park or Garden	The assessment notes that the Site is within 0-2km of a registered park and garden. This assessment does not take into consideration the mitigation provided as part of the submitted application.
Proximity to Ancient Woodland	The assessment notes that the site is between 0-1.5km to an ancient woodland. Ancient Woodland was not identified by the arboriculturist as a constraint and it is not within or adjacent to the Site.
Distance from Local Nature Reserve (LNR)	The assessment notes that the site is 10+km away from a Local Nature Reserve. It is therefore not clear why this was assessed negatively. It could be considered a positive from the perspective of encouraging such development to be away from designated site, and reducing the potential for such sites to be impacted by an increase in visits from new residents.
Overlap with Agricultural Grade 2	The assessment notes that the site has a 1% overlap with Grade 2 Agricultural land, it is not considered that this should be scored red due to this. There are other sites that have a higher proportion of land identified as Grade 2 such as SKPR-318 in Harlaxton which has a 57% overlap with Grade 2 land which is far more significant.

South Kesteven Infrastructure Delivery Plan (June 2025)

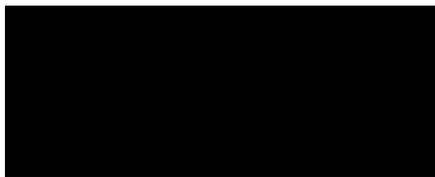
Pages 18-19 of the Infrastructure Delivery Plan highlight that Anglian Water is the potable water supplier to South Kesteven and 'along with all of Anglian Water's supply area, are classed as under serious water stress by the Environment Agency'. The document states that 'Anglian water plans to overcome the predicted deficit in 2050' and 'across their company area, Anglian Water are investing £5 billion between 2025-2050 to mitigate future risks to the wastewater network from expected growth and climate change' the detail of this is currently unknown. Table 6.9 which presents the headroom of the Water Research Centres (WRCs) in South Kesteven confirms 'approximately 46% of the planned growth from the development sites is to occur where headroom for the growth does not exist'. To ensure the plan is in accordance with NPPF paragraph 36 (b and c) which requires plans to be justified and effective the capacity issue needs to be overcome and systems urgently upgraded, otherwise there is a risk that sites proposed as allocations will not be able to be delivered in the plan period.

Housing Density Study (July 2025)

The Housing Density Study (July 2025) concludes by reviewing application approvals and the sites developable average that 'the current housing density target of 30 dwellings per hectare in the Local Plan 2020 is appropriate for the Larger Villages'. Paragraph 2.5 of the consultation document states '*Planning Practice Guidance states that housing potential should be guided by local conditions, including housing densities and the sites' potential using an average development density of 30 dwellings to the hectare*'. We consider that density should be agreed on a site by site basis rather than a blanket figure, which fails to take account of prevailing character and density of existing development. In the next draft density policy, it is considered that the wording 'on a site by site basis' should be included and using a range should be considered such as '*approximately 30-40 dwellings, to be agreed on a site by site basis*'.

I trust the above is helpful. I look forward to receiving confirmation of receipt of these representations.

Yours faithfully



Jessica Graham
Associate Director

Enc