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

1a Cedars Office Park,
Butt Lane,
Normanton,
Loughborough,
LE12 5EE

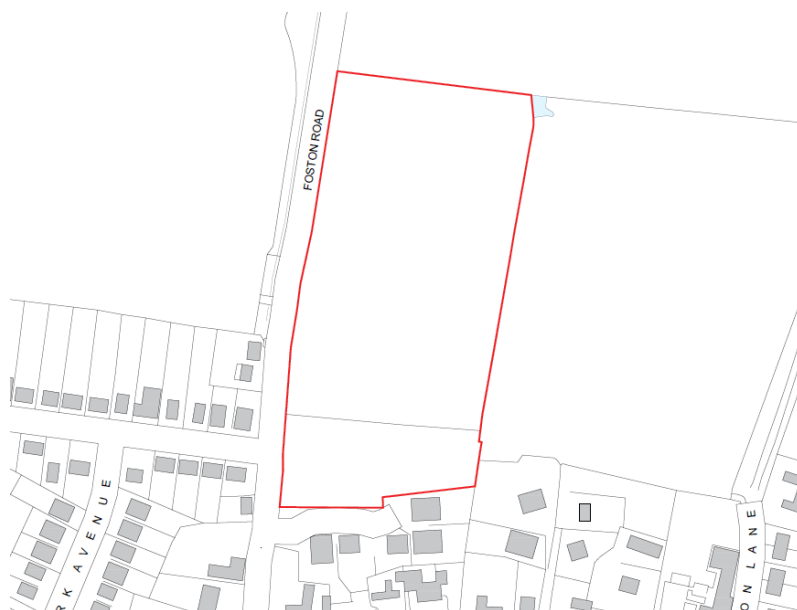
Our ref: SKDC.ALL.1
18th August 2025

Dear Sir/Madam,

Re: South Kesteven District Council Regulation 18 Proposed Housing and Mixed-Use Allocations Consultation – Land east of Foston Road, Allington, South Kesteven, NG32 2ED (Title Reference: LL275377)

These representations have been prepared by Boyer on behalf of our client Mr Ian P Bailey ('the Client') in respect of the South Kesteven Draft Local Plan Further Consultation (Regulation 18). The primary focus of this letter is to highlight the suitability, availability and deliverability of our Client's site at the above location.

These representations make specific reference to Land east of Foston Road within the settlement of Allington. The site extends approximately 3.30 hectares and has previously been submitted as part of the Council's Call for Sites Consultation which took place in June 2017 for consideration for residential development (Site Reference: ALL16-338). For clarity, the extent of the landholding is outlined within the location plan below.



The Site was subsequently assessed as part of the Council's Strategic Housing Land Availability Assessment (SHLAA) June 2017. The Council did not identify any environmental or heritage constraints however chose to reject the Client's site due to the land not according with the spatial strategy which sought to steer development towards higher order settlements with more services and facilities as Allington was not identified as a location for development.

National Policy & Changes to Housing Needs

The National Policy Framework (NPPF) outlines the Government's approach to significantly boosting the supply of homes across the Country. In December 2024, the Government published a new version of the NPPF which introduced revisions to the standard method for calculating housing requirements for Local Authorities. The new standard method introduced as part of the December 2024 NPPF is no longer based on the 2014 household projections and instead focuses on a stock-based approach. Most authorities see an increase in housing requirement as a result of the new approach. This approach aims to increase the amount of housing stock within an area by 0.8% year on year. This is then further adjusted for areas facing the greatest affordability challenges, using a more robust affordability multiplier. For South Kesteven, taking into account the 2024 affordability ratio, this sees an increase in housing requirement from 701 dwellings per (as originally set out in the April 2024 Draft Plan) year to 886 dwellings per year, an increase of 185 dwellings a year.

Local Plans which are at advanced stages of preparation, subject to complying with the transitional arrangements, may progress under the previous version of the Framework. However, in the case of SKDC, the Plan is at the early stages of Plan making and therefore the transitional arrangements do not apply. The Plan therefore is to be progressed under the December 2024 version of the Framework which seeks a higher housing requirement.

Across the 20 year plan period, the greater housing requirement equates to 17,720 homes which is an increase of 3,700 homes. Therefore, in order for the Plan to be found sound and meet the higher housing requirement the Council must identify additional housing sites beyond those previously consulted upon to ensure compliance with the NPPF.

Furthermore, as stated in the South Kesteven District Council Five Year Housing Land Supply Statement, published in March 2025, South Kesteven can only demonstrate a housing land supply of 4.07 years equating to a shortfall of 872 dwellings against its five year housing requirement. Therefore, in accordance with the above to support the provision of a 5 Year Supply across the Plan period we consider further sites should be proposed.

We welcome the approach the Council has taken to reconsider the proposed number of sites across the Plan period in order to appropriately meet the updated requirements as set out within the NPPF December 2024. The way in which the Council have sought to meet this increased need is through amendments to previous proposed allocation's site capacities and the identification of additional housing sites.

For the sites in which the capacity was increased, this was informed by the Housing Density Study which was published by the Council in July 2025. This study recommended that in order to accurately represent the current landscape of house building within the District, that the density in the four main market towns should be increased from 30 to 35 dwellings per hectare, whilst density in all other settlement types remain 30 dwellings per hectare (dph).

The Planning Practice Guidance (PPG) which considers effective use of land, outlines in relation to housing density that a range of tools and considerations can be taken into account when establishing appropriate densities for a particular area (PPG, Para 004). Previously SKDC have used the indicative number of 30 dph to achieve balanced land use across the District 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 consistently since 2020. This therefore helps to demonstrate the recommendations for the increased housing density figures applied as part of this consultation. We generally support the approach taken by the Council which has informed this increase and there is clear evidence which demonstrates consistent higher density rates in these locations.

As well as increasing the capacity of sites, the Council have identified 10 further sites for allocation. In total it is proposed from the increased site capacities and additional sites put forward, this will provide a further 4,500 new homes. This would meet the shortfall as a result of the new standard method as well as providing a buffer.

Although we support the approach and the identification of additional housing sites to meet the increased housing need, as considered within the below commentary, we consider the Council need to go a step further to ensure flexibility is built into the plan and sites do not risk under delivering and the plan remains sound.

Plan Period

As part of this Consultation the Council state the Plan period has been amended to cover the period from the 1st April 2023 through to the 1st April 2043, previously the Plan period was proposed to run from 2021 to 2041. The most recent Local Development Scheme (LDS) published by the Council in February 2025, states that adoption is anticipated for November 2027, equating to a 16 year plan period. Due to November's position towards the end of the year, this is more likely to equate to a 15 year plan period to avoid double counting of the year 2027.

Although it is welcomed that the Council have amended the start and end date of the plan, we regard further consideration needs to be given as the Plan's start date is over two years ago. Furthermore, the majority of the supporting evidence base of the Local Plan has been commissioned and published in 2024 which is past the current start date of 2023. We therefore consider the start date should be brought forward to accord with

the most up to date evidence and to make the Plan sound in line with the requirements of the NPPF. We would recommend the start date is amended to 2024 and to reflect this the end date to 2044, in line with the proposed 20 year period set by the Council.

Plan Buffer

As part of the further Regulation 18 Proposed Housing & Mixed-Use Allocations Consultation the Council have set a plan buffer of 11%, this would equate to a housing supply of 19,672 dwellings across the plan period (set out at Paragraph 2.3 of the Consultation Document).

Although the 11% buffer is in accordance with Paragraph 78 of the NPPF (Dec 2024) we query why the Council have reduced the 21% buffer which was previously proposed during the April 2024 Consultation. It was stated previously that a buffer of 21% was retained to reflect the 20% buffer currently in place as part of the Adopted Local Plan and to provide a greater choice of sites, as well as to provide a contingency in case of a lack of delivery. Although the Council meet the Housing Delivery Test by 95% of needed housing, the figures from the last three years indicate delivery is way below the new standard method requirement of 886 homes per year (See Table 1 below).

	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

Table 1 Summary of HDT in Comparison to New Standard Method

Based on the new standard method of 886 homes per year and by applying this to the number of homes delivered from the period of 2020/21- 2022/23 this would mean only 62% of housing needs are 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.

Therefore, we consider the Council should still ensure contingency is provided in the event of under delivery and a 20% buffer should be retained to also consider the implications of the increased standard method figure. By having a 20% buffer, this would result in an overall housing supply figure of 21,264 homes across the plan period. This is 1,592 dwellings higher than what is being sought with an 11% buffer in place.

Proposed Housing Allocations

This section reviews the delivery assumptions of several of the large strategy sites put forward as part of the emerging Local Plan that we consider are not deliverable under the proposed timescales set by the Council.

1. Policy SKPR-65: Prince William of Gloucester Barracks

The Prince William of Gloucester Barracks were previously put forward as a proposed allocation within the April 2024 Regulation 18 Plan for 4,000 new homes and 8 Ha of employment land. As part of the further Regulation 18 Housing & Mixed-Use Allocations Consultation this proposed allocation has been carried forward however the number of new homes has been reduced to 3,000 and the 8 Ha of employment land retained. The Council state the reason for this reduction is due to further consideration of Biodiversity Net Gain requirements on site. As a result of this reduction, this therefore means only 1,890 dwellings are set to be provided within the plan period through to 2043.

The Ministry of Defence (MoD) are due to vacate the Barracks in 2028 however given the current geopolitical climate, alongside Local MP lobbying, it is uncertain whether this closure will go ahead as scheduled. As it is uncertain when delivery will commence on the site, the Lichfield Start to Finish Report (March 2024) can be utilised to provide anticipated timescales. For a site of this nature, on average from validation of the first application to completion of the first dwelling is 6.6 years. To reflect the site's constraints and realistic timeframes should the MoD vacate the site as anticipated in 2028, the initial year of delivery should not be before 2034/35. Furthermore, Table 4.2 of the Lichfields Start to Finish Report outlines that average build out rates for sites of 1,500 – 1,999 dwellings is 110 per annum. Taking into account the above timescales for delivery, with commencement on site in 2034 at the earliest, this would mean that within the plan period to 2043 only 990 dwellings would be delivered. This is significantly lower than the anticipated 1,890 dwellings which Policy SKPR-65 outlines.

Although we support the overall approach proposed by the Council, we do not consider that the allocation of the Prince William of Gloucester Barracks will be deliverable in its current form.

2. Policy SKPR-278: Spitalgate Heath – Garden Village

The Spitalgate Health Garden Village is set to provide 3,700 dwellings and 11 Ha of employment land, with 1,512 of these dwellings anticipated to come forward within the plan period. An outline planning application has been submitted on the proposed Spitalgate Health Garden Village since September 2014 (Ref: S14/2169) for 3,700 dwellings however on 30th June 2025 this was decreased to 3,400 dwellings. This has therefore triggered the need for further information to be submitted to allow a full assessment of the proposed development through the Environmental Statement to ensure accordance with Regulation 22 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (EIA Regulations). The reduction in the number of dwellings which are anticipated to be delivered alongside the further information required raises questions about when delivery will start on site. This has been further emphasised through the delay in

construction of the Grantham Southern Relief Road (GSRR) which is a key piece of infrastructure which needs to be delivered in order for Spitalgate Heath Garden Village to come forward.

By once again considering the Lichfields Start to Finish Report, an initial start on site is not realistic until 2034/35 and therefore by 2043 only 990 dwellings would be delivered considering the above average build out rates. This is significantly lower than the anticipated 1,512 dwellings which Policy SKPR-278 outlines.

Although we do consider the GSRR will eventually come forward and the site will deliver housing, we do not believe the current proposed trajectory of 1,512 homes is realistic or reflects the recent amendment made to the description of development. Therefore, we consider this site should be pushed back and further housing allocations brought forward in order to address short term growth needs.

3. Policy SKPR-323: Land north of Gorse Lane, Grantham and Policy SKPR-334: Land south of Gorse Lane

The Land north of Gorse Lane (SKPR-323) and Land south of Gorse Lane (SKPR-334) are two new proposed site allocations which have been brought forward as part of this Consultation. Combined, both of these sites would deliver 1,404 dwellings and 2 Ha of land for permanent Gypsy & Travellers and Travelling Showpeople pitch/plot provision.

Proposed Policy SKPR-323 outlines requirements for a Transport Assessment, Travel Plan and Construction Management Plan to be produced and a pro-rata contribution to be provided for the upgrade of Gorse Lane. Although this has been stated in relation to the SKPR-323 proposed allocation this has not been included in relation to the SKPR-334 allocation. We consider as these sites are to be brought forward via a comprehensive masterplan, then these requirements should be applied to both proposed allocations.

Gorse Lane is a country lane with no footpath on either side of the road and a give way priority bridge over the A1, therefore we do not consider the access for this number of dwellings suitable at this location. As part of the Draft Site Assessment Report (July 2025), produced by the Council, an individual site assessment report has been provided for SKPR-323 considering the impact of development on surrounding highways. From a national perspective, it has been outlined that there will be major (red) impact on the Strategic Road Network (SRN) from the scheme. Furthermore, impact on the local highway network has been marked as moderate (amber).

Overall, we consider the assessment outlines issues with the deliverability of the scheme and that additional work should be undertaken to demonstrate the site can come forward for development without serious impact to the SRN and a suitable access has not yet been demonstrated as achievable from Gorse Lane. We therefore consider the proposed allocation should be postponed and alternative sites brought forward to address short term growth needs.

Housing Trajectory

Based on the above commentary on the proposed housing allocations we therefore consider further revision of the housing trajectory is required. Currently the only housing trajectory published by the Council is outlined at Figure 1 of the Consultation Document. This is only a high-level indicative housing trajectory for the plan period and sets out that the majority of housing allocations are proposed to come forward in 2030/31 where it is indicated over 1,400 dwellings will be provided. However, from the year 2036/37 onwards there is an anticipated under delivery against the annual housing need. Instead, the Council are relying on over delivery in the earlier years of the plan.

The trajectory does not provide a detailed breakdown of when each proposed allocation is anticipated to deliver housing over this period and how many homes each site would deliver per year. It is also unclear whether constraints to development have also been accounted for within the trajectory. In respect to the above considerations of the proposed housing allocations delays in the progress of the GSRR and implications on the Spitalgate Heath allocation as well as the uncertainty over the Prince William of Gloucester barracks should be considered as part of the trajectory.

Overall, we support the approach put forward by the Council and consider this to be consistent with national policy however we consider the following recommendations which have been detailed above would assist in aiding the plan to be capable of being found sound when examined by a Planning Inspector. We consider the Council need undertake further work in relation to the housing trajectory and support additional sites to meet housing needs due to the potential delay of some of the proposed allocations.

Spatial Strategy

Given the significant increase in housing requirement, there is a need to rethink the spatial strategy to ensure the Council is getting the most out of the housing market across the District. Proposing allocations in medium size villages such as Allington which are proportionate to the scale of these villages would offer a whole new supply of housing in underutilised housing markets. These sites would benefit the vitality of these communities and local businesses while providing vital support to SME housebuilders that favour these smaller scale opportunities. Development should not just be located in the largest settlements, smaller yet still sustainable settlements can play a vital role in the housing market and can support the Council's housing delivery, particularly in the short term while the larger sites are stalling.

Land east of Foston Lane, Allington

Allington is located in the north west region of South Kesteven, adjacent to the sub-regional centre of Grantham. The settlement is identified as a smaller village by Policy SP2: Settlement Hierarchy within the adopted Local Plan. The village provides several services and facilities including primary education, a public house and public transport which links Allington with Grantham and other surrounding settlements. The

village further benefits from its proximity to the A1 and the A52 which connect to Newark and Nottingham respectively.

The land east of Foston Lane, Allington extends across 3.30 hectares and is currently used for agricultural purposes. The site has a relatively flat topography, lies entirely within Flood Zone 1 and does not contain any listed buildings, scheduled ancient monuments or tree preservation orders (TPOs).

Further work has been undertaken by the Client to support the promotion of the site. This includes an illustrative Concept Framework Plan (Appendix 2) which provides for a landscape led scheme with capacity for 44 dwellings as well as a Transport Access Appraisal (Appendix 3).

The Concept Framework Plan (Appendix 2) outlines a residential development that respects the rural character of the site and the surrounding area to the north. An area of dedicated greenspace has been retained along the northern boundary of the site to help mitigate the visual impact of the development and provide a locally equipped area of play as well as space for attenuation ponds. The Concept Framework Plan also allows for a pedestrian and cycle access along the southern boundary which connects the site to the settlement centre.

As part of the Government's commitment to delivering 1.5 million new homes this Parliament, it is looking to support and encourage SMEs to unlock development. This would be achieved by focusing on streamlining the regulations governing site size thresholds. In order to create a graduated approach that ensures planning requirements are more proportionate and responsive to different development needs, the Government is considering introducing a new medium development threshold for sites between 10 and 49 homes. Sites within this threshold, such as the land east of Foston Lane, may be exempt from certain requirements or benefit from simplified conditions. This potentially refined process may make medium sized developments more appealing to SMEs and could therefore provide a greater comfort that sites such as the land east of Foston Lane can be delivered, contributing to the District's increased housing requirements.

There could be an opportunity in the future to extend the site into the neighbouring land to the east. Given this parcel is next to the school, there could be an opportunity for an extension to the school and potentially a reconfiguration to the parking and drop off arrangements which currently cause congestion in the centre of the village. Early conversations have been had with the neighbouring owners and any progress will be reported in future representations.

The Transport Access Appraisal (Appendix 3) outlines a safe and suitable access is achievable from the site in accordance with relevant local design guidance. The appraisal outlines that a suitable primary access point from Foston Lane can be achieved through the form of a T-junction. The access provides footways on both sides of the carriageway that connect with the existing infrastructure on Foston Lane that extend south into Allington.

Conclusion

We generally support the South Kesteven Local Plan and the proposed strategy, including the identification of additional sites, increasing the capacity of sites and greater housing density in the four market towns. However, as outlined above we consider further sites need to be brought forward to ensure a level of flexibility is built into the Plan in case of under delivery and therefore not meeting the increased housing requirements for the District. We also consider that the Spatial Strategy could go further to distribute housing to smaller yet still sustainable settlements such as Allington which could play a vital role in supporting smaller scale development to the benefit of these communities and local businesses.

We consider our Client's land presents an opportunity to create a logical small scale extension to Allington and will help to provide South Kesteven with an additional suitable, available and deliverable site for development which would aid in meeting the Council's housing requirement.

Yours sincerely,

David Hutchinson MSc MRTPI
Land & Planning Director
