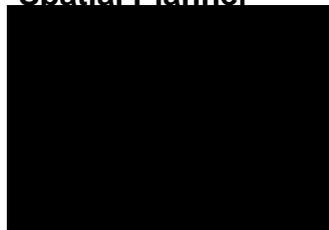




Planning Policy Team
South Kesteven District Council
Council Offices
The Picture House
St Catherine's Road
Grantham
NG31 6TT

Catherine Townend
Spatial Planner



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Via Email:
planningpolicy@southkesteven.gov.uk

Dear Sir or Madam,

Local Plan Review – Regulation 18 Draft Local Plan Consultation

Thank you for providing National Highways with the opportunity to comment on the draft Local Plan Review for South Kesteven. We understand this to be the Regulation 18 consultation which represents your preferred options.

National Highways (formally Highways England) has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth.

With regards to the South Kesteven district and this consultation, our principal interest is in safeguarding the A1 and A52 trunk roads which route through the district.

Policy Context

Our handling of development plan consultations is informed by DfT Circular 01/2022: The Strategic Road Network and the Delivery of Sustainable Development ('the Circular'). This sets out how interactions with the Strategic Road Network should be considered in the making of plans and development management considerations. In addition to the Circular, the response set out below is also in accordance with the National Planning Policy Framework (NPPF).

Background and General Approach

The new Local Plan will contain policies and proposed locations for sustainable growth and investment across South Kesteven covering the period from 1st April 2021 through to 1st April 2041. The Plan period up to 2041 provides an additional five years beyond the current plan period of the adopted Local Plan which runs to 2036.

Housing and Employment Need

The Government's standard method for calculating housing need has been used by the Council which has identified a minimum of 14,020 dwellings across the plan period 2021 – 2041, equating to 701 dwellings per annum. The Council also proposes a buffer of around 20% above the minimum required which is stated to provide developers with a greater choice of sites and a contingency in case some sites cannot be delivered within the timeframes anticipated. This equates to a total housing supply of 16,975 across the new Plan period. Many of the allocations have been brought forward from the adopted Local Plan, whilst an additional 2,901 homes from 23 new sites are newly proposed.

An employment land study carried out by the Council indicated that 79.5 hectares of employment land would be required for the district up to 2041. However, the Local Plan review allocates approximately 338 hectares of new employment sites across the district. The uplift is stated to provide a suitable choice to the market through the identification of new land for a range of employment uses.

Spatial Strategy

For new housing allocations, the spatial strategy uses a hierarchy approach, focusing new developments around Grantham, referred to as a 'sub-regional centre' followed by the market towns of Stamford, Bourne, and The Deepings. Outside the four main towns, new development will be focused primarily on larger villages where there are existing good levels of services facilities and infrastructure.

National Highways Considerations

Upon review of the draft Local Plan including policies and site allocations, we can set out our position as follows:

Housing Allocations

In relation to the proposed housing allocations, we have the following site-specific comments:

SKPR280 – Rectory Farm Phase 3

The allocation sits immediately adjacent to the north-east quadrant of the A1/A52 Barrowby junction. The Strategic Transport Assessment supporting the Plan should identify the cumulative traffic impacts of growth on the A1/A52 junction in particular. Consideration may need to be given to how this allocation might affect the longer-term ability to deliver future highways improvements given that the site abuts the junction. In addition, as the site sits adjacent to the A1 trunk road, proposals will be considered in relation to any potential boundary impacts for instance drainage and geotechnical matters. Planning applications would also need to be accompanied by assessments which consider noise and air quality impacts from the adjacent A1 trunk road.

SKPR266 – Stamford Gateway

As the site sits immediately adjacent to the southeast quadrant of the A1/A606 junction, consideration should be made as above.

We have no other specific comments to make on housing allocations which do not share a boundary with the SRN, however, please see our later comments with respect of the transport evidence base and other policies.

Employment Allocations

In relation to the proposed employment allocations, our site-specific comments are as follows:

SK286 – Grantham Southern Gateway

Policy E1 of the draft Local Plan allocates 118.19 hectares for a strategic employment site referred to as Grantham Southern Gateway (Ref SKPR 286). The allocation straddles the A1 trunk road at the Spittlegate interchange which opened to traffic in December 2022. Although the dumbbell junction itself is the responsibility of Lincolnshire County Council, the slip roads and A1 mainline are the responsibility of National Highways. As such, whilst we have no objection in principle to this allocation, the Strategic Transport Assessment supporting this Local Plan should identify the cumulative traffic impacts of Plan growth on the Spittlegate junction. Consideration may

need to be given to how this allocation might affect the longer-term ability to deliver future highways improvements given that the site abuts the junction.

SKPR262 – Long Bennington Employment Site

We note a proposed employment allocation (Land at Valley Lane) immediately to the west of the A1 Long Bennington junction. To access the site, motorists travelling south on the A1 would have to travel through Long Bennington. Lincolnshire County Council as the local highway authority may wish to provide further comments in that regard, but National Highways would question whether this constitutes sustainable development. It should further be noted that a new access directly from the A1 would be contrary to DfT Circular 01/2022 and would not be permitted.

SKPR202; SKPR100; SKPR182 – Gonerby Moor

Whilst we don't have any objections in principle to these allocations, it should be noted that the section of the A1 between Gonerby Moor and Long Bennington suffers from existing delay and safety issues. National Highways does not have any planned improvements for this location, but it has been identified as an area for further investigation in our [Route Strategies](#).

The Strategic Transport Assessment should ultimately identify the impacts on SRN junctions and the highways infrastructure needed to support Local Plan growth. It is however likely that infrastructure improvements at Long Bennington and Gonerby Moor junctions will be required and therefore our previous comment about allocations immediately adjacent to SRN junctions should therefore be noted.

We have no other specific comments to make on employment allocations which do not share a boundary with the SRN, however, please see the below comments with respect of the transport evidence base and our later comments with respect of specific policies.

Transport Evidence Base

The NPPF expects Local Plans and spatial development strategies to be underpinned by a clear and transparent evidence base which informs the authority's preferred approach to land use and strategic transport options, and the formulation of policies and allocations that will be subject to public consultation.

National Highways will expect this process to explore all options to reduce a reliance on the SRN for local journeys including a reduction in the need to travel and integrating land use considerations with the need to maximise opportunities for walking, wheeling, cycling, public transport and shared travel.

The Transport Decarbonisation Plan indicates that carbon emissions from car and van use is the largest component of the United Kingdom's total transport emissions. While action is being taken to decarbonise transport such that all new cars and vans will be fully zero emission at the tailpipe from 2035, the proposed location of growth in current plan periods and whether new developments would be genuinely sustainable remain important factors in demonstrating that a local authority area is on a pathway to net zero by 2050 and therefore compliant with the requirements of the Climate Change Act 2008.

Alongside this, the Council should identify the key issues within their study area regarding transport provision and accessibility, setting out how the plan or strategy can address these key issues in consultation with National Highways.

It is the responsibility of the Council undertaking its strategic policy-making function to present a robust transport evidence base in support of its plan or strategy. National Highways can review measures that would help to avoid or significantly reduce the need for additional infrastructure on the SRN where development can be delivered through identified improvements to the local transport network, to include infrastructure that promotes walking, wheeling, cycling, public transport and shared travel.

A robust evidence base will be required, including demand forecasting models, which inform analysis of alternatives by accounting for the effects of possible mitigation scenarios that shift demand into less carbon-intensive forms of travel.

As a minimum, we would expect that the transport evidence is shared with us for our review and comments. However, we would prefer to engage with you earlier in the process to help scope the necessary requirements for establishing a robust transport evidence base. We believe that this collaborative approach will help to ensure that the likely residual transport infrastructure needs, timescales and potential funding requirements are understood.

In advance of this piece of work however, understanding the impact at the below locations will be of particular interest to National Highways:

A1/A52 Barrowby Junction

This junction is already suffering from capacity issues and although there is a developer scheme to provide some minor capacity improvements, it is considered that the allocated growth around Grantham will necessitate the need for a wider improvement scheme. Congestion at this junction is likely to be exacerbated when the Grantham Southern Relief Road opens.

It should be noted that National Highways does not have any current improvement plans for this junction although it has been identified as an area of further investigation in our Route Strategies. Whilst this does not provide a commitment to funding of a future RIS (Roads Investment Strategy) scheme, this does mean that this location may be short listed. However, given our existing funding commitments and the timescales for

developing future RIS schemes, the earliest possible delivery for a scheme at this location would be in our RIS 4 period (2030-35).

A1 Spittalgate Junction

The A1 Spittalgate junction opened in December 2022 and there are no safety or capacity issues that we are aware of. Notwithstanding this, given the large allocations close this junction, most notably Grantham Southern Gateway (SK286); Spittalgate Heath (SKPR-288); and the Prince William of Gloucester Barracks (SKPR-65), there is likely to be a cumulative impact at this junction and the need for capacity enhancements cannot be ruled out.

A1/A606 & A1/A6121 Stamford

The adopted Local Plan for South Kesteven identified the need for highways improvements at the A1/A606 and A1/A6121 Stamford junctions resulting from the Stamford North allocation. This allocation has now been carried forward to the draft Local Plan and it can be expected that the Strategic Transport Assessment will again identify a material traffic impact on the SRN at these junctions.

A Transport Assessment submitted in support of any planning application pertaining to this site should demonstrate the extent of traffic impacts. In that regard, discussions between National Highways, the Applicant, and Lincolnshire County Council (as the local highway authority) have been ongoing for some time which has resulted in considerable progress towards agreeing the methodology for assessing the traffic impacts. Whilst this work is still ongoing, we expect that the infrastructure improvements needed at the above-mentioned junctions will be delivered by the developments themselves through a Section 278 agreement.

A1 Gonerby Moor & Long Bennington junctions

The stretch of the A1 between Gonerby Moor and Long Bennington has been flagged by National Highways as suffering from existing delay and safety issues. We don't have any planned improvements for this location, but it has been identified as an area for further investigation in our Route Strategies. Allocations such as the employment allocations SKPR-100, SKPR-182 and SKPR-202 and housing site SKPR-57 are likely to have a cumulative impact at the A1 Gonerby Moor junction whilst the employment allocation SKPR-262 is likely to impact the A1 Long Bennington junction. The Strategic Transport Assessment should ultimately identify the cumulative impacts and any required mitigation; however, it is likely that improvements to these junctions will be necessary to facilitate Local Plan growth.

Infrastructure Delivery

As per Dft Policy 01/2022 paragraph 34, the transport evidence should provide a means of demonstrating to the examining inspector that planned growth is deliverable, and that the funding, partners and relevant processes are in place to enable the delivery of *infrastructure*; or that there is a realistic prospect that longer term investment can be secured within the timescales envisaged.

As such, following the completion of the Strategic Transport Assessment, any highways infrastructure necessary to support Local Plan growth should be set out in an Infrastructure Delivery Plan (IDP). This should identify what, when, where and how/by whom infrastructure is required, as well as estimated costs and funding sources.

With regards funding, please see our later comment with respect to Policy ID1 related to infrastructure provision.

Policy Comments

In addition to the above, National Highways makes specific comments on the below policies set out in the draft Local Plan:

E1: SKPR 286 (GR-SE1) - Grantham Southern Gateway Strategy Employment

Policy E1 sets out the requirements for the Grantham Southern Gateway development which is expected to deliver 118.19 hectares of employment land.

In respect of this policy, we would welcome the inclusion of a policy point similar to point a. of GR3-H1 (Spitalgate Heath) which sets out that incremental full applications will not be accepted and that an Outline or Hybrid application will be necessary for the whole site. National Highways considers this will be necessary to identify the cumulative traffic and transport implications of the site and the highways infrastructure necessary to accommodate it. We welcome point f. of this policy which acknowledges that mitigation to the SRN may be required.

SKPR-278 (GR3-H1): Spitalgate Heath - Garden Village (Mixed Use Allocation)

Policy GR3-H1 sets out the requirements for Spitalgate Heath Garden Village which is expected to deliver a total of 3700 homes (1,350 across the Plan period).

National Highways welcomes point a. of the policy which sets out that incremental full applications will not be accepted and that an Outline or Hybrid application will be necessary for the whole site. National Highways considers this will be necessary to identify the cumulative traffic and transport implications of the site and the highways infrastructure necessary to accommodate it.

With regards highway infrastructure, National Highways notes that part t. of this policy sets out that the site will contribute to the delivery of the Grantham Southern Relief Road which facilitates this development. It may be worth bearing in mind that this allocation is likely to put additional pressure on the A1/A52 Barrowby junction, and therefore highway infrastructure improvements to the A1/A52 may also be required.

Whilst we do not consider it necessary to explicitly reference improvements to the A1/A52 junction in this policy, we would suggest that the policy wording be amended to state '*The development must contribute towards the delivery of the Grantham Southern Relief Road which facilitates this development.... and must contribute towards or deliver other off-site highways mitigation as identified through the Transport Assessment supporting the Outline planning application and as agreed with the relevant highway authorities.*'

SKPR-279 (GR3-H2): Rectory Farm (Phase 2)

Policy GR3-H2 sets out the requirements for Rectory Farm Phase 2 which is expected to deliver a total of 1150 homes across the Plan period.

In respect of Rectory Farm Phase 2, National Highways has previously been consulted on a planning application for 400 dwellings (planning reference S23/1023) for which we recommended planning conditions including the need for improvements to the A1/A52 junction.

We support the policy points for this allocation but would also welcome the inclusion of a policy point setting out the need for a masterplan which is based on an assessment of the transport impacts of the full allocation and has identified the infrastructure needed to deliver this allocation, the timings for this requirement, and how the necessary infrastructure will be secured/delivered.

SKPR-280 (GR3-H3): Rectory Farm (Phase 3)

Policy GR3-H3 sets out the requirements for Rectory Farm Phase 3 which is expected to deliver a total of 404 homes across the Plan period.

Our comments for Rectory Farm Phase 3 are the broadly the same as those for Rectory Farm Phase 2 although we note that the need for a Masterplan has already been identified under policy point a. We also welcome policy point m which sets out that the impacts on the SRN must be identified and mitigated.

It is also noted that this allocation shares a common boundary with the SRN and whilst we have no objections in principle to this allocation, planning applications will need to demonstrate their impact on National Highways network and assets, and where necessary, provide appropriate mitigation.

SKPR-65 (GR3-H4): Prince William of Gloucester Barracks (Mixed Use Allocation)

Policy GR3-H4 sets out the requirements for the Prince William of Gloucester Barracks mixed use site which is expected to deliver 3,500 – 4,000 homes (approx. 1,745 homes and 8 hectares of employment across this Plan period).

In respect of this policy, we would welcome the inclusion of a policy point similar to point a. of GR3-H1 (Spitalgate Heath) which sets out that incremental full applications will not be accepted and that an Outline or Hybrid application will be necessary for the whole site. National Highways considers this will be necessary to identify the cumulative traffic and transport implications of the site and the highways infrastructure necessary to accommodate it. We welcome point b. of this policy which acknowledges that mitigation to the SRN may be required.

SKPR-281 (STM1-H1): Stamford North

Policy STM1-H1 sets out the requirements for the Stamford North allocation which is expected to deliver 1350 homes across this Plan period. National Highways welcomes policy point a. which sets out that a high-level masterplan, supported by a detailed development brief, appropriate full transport assessment and phasing plan, is required for the entire site (to include for the land extending into Quarry Farm, Rutland with an additional capacity of 650 dwellings).

National Highways also welcomes point l. of this policy which sets out that the development should provide appropriate mitigation to the SRN. Reference to Highways England should however be replaced with National Highways.

RE1: Renewable Energy Generation

Policy RE1 sets out the Council's policy on proposed development for the production of renewable energy. National Highways is supportive of such proposals in principle, however we would draw your attention to DfT policy with respect of proposals close the SRN.

As set out in DfT Circular 01/2022 paragraph 65-67, wind turbines should not be located where motorists need to pay particular attention to the driving task, such as the immediate vicinity of connections, sharp bends, and crossings for pedestrians, cyclists and horse-riders. To mitigate the risks to the safety of road users arising from structural or mechanical failure, wind turbines should be sited a minimum of height + 50 metres or height x 1.5 (whichever is the lesser) from the highway boundary of the SRN.

In addition, as per DfT Circular 01/2022 paragraph 70, some developments, notably solar farms, wind turbines and those with expansive glass facades, have the potential to create glint and glare which can be a distraction for drivers. Where these developments would be visible from the SRN, National Highways should be consulted on an appropriate assessment of the intensity of solar reflection likely to be produced. This should satisfy National Highways that safety on the SRN is not compromised.

Policy EN5 – Water Environment and Flood Risk Management

Policy EN5 sets out requirements to ensure that new development does not increase the risk of flooding. Whilst there is no mention of allowing for discharging surface water to highway drains, we would like to highlight with respect of sites adjacent to the SRN that discharge of surface water to National Highway drainage would not be permitted (with reference to DfT Circular 01/2022 paragraph 59).

ID2: Transport and Strategic Transport Infrastructure

Policy ID2 sets out the Council's policy on the provision and delivery of transport infrastructure. National Highways notes that the policy focuses on securing transport infrastructure through financial contributions. However, we would recommend the text be amended so the delivery mechanisms under the Highways Act 1980 through Section 278 Agreements are also included for the delivery of highway mitigation.

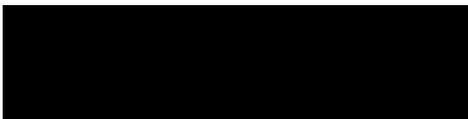
Section 106 contributions can be an effective way of securing developer investment towards necessary highways mitigation. However, securing the 'forward funding' of highways schemes in the timescales necessary to deliver growth cannot be guaranteed, and any shortfalls in funding could jeopardise the delivery of a scheme. As such, there is a risk to highway authorities in accepting a S106 contribution which allows the development to proceed without necessarily having the required mitigation in place.

A Section 278 agreement is an alternative method of securing highway improvements which puts the developer (or consortium of developers) in control of the highway scheme delivery, and subsequently more in control of when their development can come forward. For schemes on the SRN, National Highways would oversee the delivery of the highways scheme via the Section 278 process, but it would be fully designed, funded, and delivered by the developer.

Where contributions are the most suitable mechanism for securing highway infrastructure improvements, it may still be necessary to use Grampian conditions to restrict occupation of a development until the highway infrastructure has been delivered. This would be used to prevent an otherwise unacceptable safety impact or severe residual cumulative impact in terms of highway capacity, to ensure compliance with paragraph 115 of the NPPF.

We have no further comments to make at this time but look forward to engaging with you further as you progress your Local Plan.

Yours sincerely,



Catherine Townend
Midlands Operations Directorate
Email: 