



Mulberry Land

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

24/04/2024
Submitted via email

Dear Sir / Madam,

Re. South Kesteven District Council Regulation 18 – Draft Local Plan 2021-2041

Thank you for the opportunity to provide consultation responses to the above exercise. I am writing on behalf of Mulberry Land and the Machin Family, who wish to make representations to this consultation.

Please find attached a copy of the following information:

- site location plan
- GON-PHP-XX-XX-DR-A-4682-001-P02 – proposed masterplan

Background

Mulberry Land is a privately owned, multi-disciplinary developer within both the commercial and residential sectors. Through our in-house experience, we work closely with planning authorities to deliver proposals that directly address relevant economic, social and environmental objectives, embracing local and national policies. Together, working in partnership with landowners, planners, public authorities, and local communities, we create places of lasting appeal that maximise the true value of sites and have a positive impact on the surrounding area. Mulberry Property Developments is a privately owned and funded multi-disciplinary developer within the commercial and residential sectors.

Established in 2004, the company started out developing commercial properties, focusing on industrial and logistics developments, before expanding into the luxury residential property sector in 2011.

Today, we have three divisions: Mulberry Developments, Mulberry Homes and Mulberry Land. Mulberry Land builds on our expertise as a trusted developer, providing private and public sector partners with a comprehensive strategic land service. Our specialist team understand

the intricacies of strategic land and know what it takes to successfully manage the planning process, from start to finish; helping to build vibrant, flourishing communities that complement their surroundings.

Mulberry Experience

Mulberry Commercial Developments has extensive experience in delivering new build projects in the industrial and logistics sector. Below are some examples of some current and completed projects of relevance:

Mulberry Logistic Park, Doncaster, granted consent in 2017

- 2,321,000 sq ft in total
- First phases delivered two buildings totalling 1,100,000 sq ft and let top the Culina Group
- Achieved BREEAM Rating of 'Excellent'

Midlands Logistics Park

- 2,500,000 sq ft in total requiring extensive ground remediation and infrastructure provision

Delivered full site within 4 year period of commencing development with 4 large buildings including lets to Eddie Stobart (844,000 sq ft), B/S/H Home Appliances 945,000 sq ft

Mulberry Logistics Park, Corby

- Secured planning for 4,300,000 sq ft., including single building of up to 2,000,000 sq ft
- Infrastructure completed and under construction

Primark, Thrapston

- 1m sqft on a 69-acre site
- Promoted from open storage land to detailed consent
- Sold to London Metric and let to Primark

Mulberry has developed some excellent relationships with numerous commercial operators including The Culina Group, Europa Warehouse, CEVA Logistics and has established relationships with several institutional funders including L&G, Tritax Big Box, Bentall Green Oak, TPG Capital, GLP, Blackstone, Arrow Capital Partners and DWS.

Our established relationships have formed the ability to deliver high quality schemes from acquirement to completion in a shortened period of time. Our flexibility and understanding of the market has been instrumental in the success of developments as our business model enables quick decision making and implementation.

Representations

Mulberry Land are specifically promoting land at Oakdale Farm, Manston Lane, Great Gonerby at Grantham (SKPR-182). The site is in a highly sustainable location to deliver a significant amount of strategic commercial floorspace, in excess of 3,000,000 sq ft of Warehousing space, along with ancillary uses and office accommodation. It sits directly adjacent to and opposite an existing well established employment area (identified as Gonerby Moor Existing Employment under the 2020 Local Plan) which includes a number of successful business outlets along the Occupation Road area. This also includes the approved application S/17/2155 for A Designer Outlet Centre, delivering up to 20,479sqm of floorspace, comprising retail units (A1), restaurants and cafes (A3), and storage, with approx. 1,350 gross FTE jobs generated.

The Moto Grantham North A1 service station is also directly opposite the site, enabling excellent access onto the A1 trunk road, which is a crucial element for the logistics sector. The site comprises approximately 80 hectares of vacant arable pastureland and importantly is in

the ownership of a single family who are committed to seeing the land developed immediately. The land is currently vacant and available for sustainably located development. There is existing access and significant road frontage along the B1174, heading south into Great Gonerby and Grantham. The existing grade separated junction provides very quick and convenient access to the A1, both North and South.

Mulberry Land are supportive of the **Vision and Strategic Objectives** contained in the draft plan. Maximising the potential of the District, specifically through supporting the delivery of jobs and growing the economy is crucial for a sustainable future for the District.

Identifying Grantham's role as the Sub-Regional Centre is supported, given its position between Lincoln and Peterborough, being alongside the A1. In addition to the Vision for Grantham specifically, reference should be made to the allocation of significant levels of employment growth to the north of the town, at the Gonerby Moor junction of the A1.

We welcome the **Objectives** of the draft local plan. In particular, **Objective 2**, whereby the Council are looking to develop a strong, successful and sustainable economy that provides a sufficient number and range of employment opportunities. Land at Oakdale Farm (SKPR-182) is extremely well located being just off the Gonerby Moor junction of the A1, and opposite an existing and established employment area. Certainly, support for this as an employment location will attract inward investment, promoting additional growth and diversification of the District's economy along with employment and training opportunities for local people.

Objective 3 is fully supported, in particular the identification of employment opportunities at Grantham, under bullet point 1, through the supply of appropriate land, under bullet point 2.

Objective 8 requires accessibility to employment services, ensuring new development is located where it is accessible by a range of modes of transport. Land at Oakdale Farm (SKPR-182) is located directly adjacent to then junction of the A1, which will enable the delivery of a significant amount of strategic commercial floorspace. The site sits directly adjacent to and opposite an existing employment area which includes a number of successful business outlets along the Occupation Road area. The Moto Grantham North A1 service station is also directly opposite the site, enabling excellent access onto the A1, which is a crucial element for the logistics sector. Providing a critical mass of employment uses in this location; both the existing EMP-R3 allocation and additional SKPR-182, will provide opportunities to bolster existing public transport links to reduce the reliance on car travel, with improved patronage.

Mulberry Land are supportive of the **Key Diagram** included within the draft Local Plan. This clearly identifies an Employment Growth Location covering land to the north of Grantham at Gonerby Moor, on the east of the A1.

Mulberry Land are supportive of **Policy SP1: Spatial Strategy**, which sets out that the focus for the majority of growth is in and around the sub-regional centre of Grantham and the three market towns, with Grantham being a particular focal point. For the town to continue to function effectively, we appreciate the importance for growth to be focussed at this location.

The same points apply when reviewing **Policy SP2: Settlement Hierarchy**, whereby the policy sets out that the majority of development will be focused in Grantham in order to support and strengthen its role as a sub-regional centre.

NEW POLICY 2: Best and Most Versatile Agricultural Land. We would suggest this policy should not apply to sites which have been allocated for residential or employment purposes through the Local Plan as the Council should already be considering the need to protect the Best and Most Versatile Agricultural Land through the land allocations process. As an example, the land at Oakdale, SKPR-182 is grade 3 land (good to moderate), whereas there

are pockets of grade 1 and 2 land immediately around Grantham and extensively around Bourne and the Deepings which should be taken into account in allocating land at this stage.

Generally, Mulberry Land are supportive of the proposals and policies set out under **Chapter 9 – Employment and Economic Prosperity**. The ambitions of both South Kesteven and the GLLEP are welcomed, supporting the capacity of the LEP area to deliver high-quality economic growth. They are clearly aligned with the Corporate Plan for the District, and it is clear the updated Economic Development Strategy for 2024-28 will underpin this focus. The acknowledgement that (**paragraph 9.14**) the *'study will set out how South Kesteven's location at the gateway of significant established and potential economic activity means it is perfectly placed to lead, and drive continued economic growth to meet the needs of incumbent and new businesses for years to come'*, is welcomed and should be part of the evidence base going forward to support the Local Plan Review.

Table 7 of the Local Plan Review presents the amount of employment land needed to 2041, split by use class type, as identified in the Employment Land Study 2023. This need amounts to 79.5ha, however, it falls significantly below the amount of employment sites allocated within the Plan, at circa 338ha. The Review at **paragraph 9.35** states that *"Whilst this is significantly higher than the requirement identified in the Employment Land Study 2023, the sites offer a suitable choice to the market through the identification of new land for a range of employment uses. This will ensure the further economic growth scenarios can be met by attracting substantial inward investment and providing a wide range of jobs in various sectors and industries to meet the allocated housing and population growth across South Kesteven."* We would wish to expand on that paragraph as it is clear that the Employment Land Study used a Labour Demand Scenario to establish the need figure. The implication for using such data and limiting land allocations to that figure is growth will largely follow a historic trend and curve.

That is clearly at odds with the emerging Economic Development Strategy and ambitions to make a step change in harbouring the opportunities around the sub-regional centre of Grantham. The unique opportunities afforded to the District with Grantham's potential to attract large scale inward investment and strategic distribution space has largely been limited in recent years owing to lack of allocations of land through the last economic cycle and in particular delays to infrastructure provision and at Grantham Southern Gateway. This has been a limiting factor to enable South Kesteven to experience similar economic growth to nearby authorities such as Peterborough and Bassetlaw as examples. The warehousing market was particularly buoyant from 2019-23 and should serviced land have been available at that time to accommodate units of 250,000 sq ft or more we consider the demand and take up would have been significant. Given wider economic matters the market is less resilient now in the short term however the medium- and long-term outlook remains positive.

Policy E2: Employment Sites:

Policy E2 lists the other Employment Sites, excluding SKPR 286 Grantham Southern Gateway and SKPR-278 Spitalgate Heath and, SKPR-65 Prince William of Gloucester Barracks and SKPR-268 Station Approach, which are covered by their own policies. E2 however includes 10 sites all within the same policy. In acknowledging that sites in Stamford, Bourne, The Deepings, and Long Bennington are of a scale whereby they will largely be satisfying local demands we feel it is appropriate that they be covered by a generic policy. The land at Gonerby Moor is however strategic in scale and as the Inspector in the previous Local Plan concluded with SKPR286 Grantham Southern Gateway in recommending Main Modifications to the plan we consider specific policies should be provided to acknowledge the strategic role of the site and how development should be phased, and infrastructure facilitated.

Save for the above remarks Mulberry Land are supportive of this policy, and positively welcome the allocation of land at Oakdale, Gonerby Moor, Grantham for 80ha of employment

land, under reference SKPR-182. In addition, 2 other sites are also allocated at Gonerby Moor, under Policy E2:

- SKPR-202 – Land at Gonerby Lane, 29ha; and
- SKPR-100 – Land south of Gonerby Lane, West of the A1, 63.7ha

The combination of allocations at Gonerby Moor total 172.7ha, and these allocations alone will deliver well in excess of the identified need presented by the Employment Land Study 2023 (79.5ha). We believe the ambitions of the District through this plan should be fully supported if they are to effectively realise the economic potential afforded to Grantham through its attractive transportation routes.

Our concern relates to the delivery of these allocations and the necessary infrastructure in a timely manner and the implication for overproviding land will have in stimulating inward investment. In context the combination of all three sites would have the equivalent floor space of the original Magna Park in Lutterworth (circa 7m sq ft). That is a bold ambition however simply allocating the land will not necessarily nor automatically mean its delivery is straightforward.

Grantham presents as a similar market (price and transport options) to Bassetlaw where we have first hand experience in delivering a large-scale logistics park in Harworth over the past 7 years. The issues we faced was there was an abundance of available land both neighbouring our site within Bassetlaw as well as within the neighbouring district of Doncaster. The impact has been that the rate of development has been particularly slow, and it has proved difficult to attract investment. Having developed this site at the height of the market and only having completed two units of circa 1.1m sq ft in that time we are concerned that without some measures in place to phase and release land through the plan period South Kesteven could inadvertently create a similar market stagnation through releasing too much land at the same time. In response to **paragraph 9.35**; there is a genuine risk that whilst the identification of suitable land to meet the Districts growth ambitions is supported, without appropriate measures in place to phase land an oversupply will have an opposite effect to that which the plan is looking to achieve.

We understand the emerging Infrastructure Delivery Plan (IDP) intends on dealing with the Districts Infrastructure requirements in order to deliver the residential and employment allocations and the implications should be carefully considered as the plan moves forward to Regulation 19. Without proper phasing and policies in place the planning authority will face an unenviable task of dealing with planning applications in an ad hoc manner. Our range of experience has identified a similar scenario at the settlement of Towcester, West Northamptonshire. In this case, a number of employment applications are currently stalled due to holding objections from National Highways, who have significant concerns about their cumulative impact on the highway network and ultimately who should fund the mitigation works. It is important therefore to ensure the IDP and subsequent policies provide a clear mechanism for delivering infrastructure and pooling developer contributions where appropriate for all sites; in the absence of District adopting a CIL regime which we understand is not being considered.

Under **Policy E2 – Employment Sites**, considering the above points, **criteria C** of the policy could come into question and could end up stifling delivery of the allocations if there is a cumulative impact on the local and/or strategic highway network.

Given the above comments in our view, an additional policy should be introduced to the LP Review which deals with phasing of the Gonerby Moor allocations. This would continue to fully support the growth ambitions of the District, and in fact would better aid in reaching its potential, to ensure that each site is genuinely deliverable, albeit in a considered phased manner.

In addition to Policy E2 and our proposal to contain a phasing policy, we would also recommend a site-specific policy for land at Oakdale Farm (SKPR-182), and indeed, site specific policies for each of the proposed employment allocations, of a similar nature to Policy E1: SKPR 286 (GR-SE1) – Grantham Southern Gateway Strategy Employment Opportunity. The allocation policies should remain flexible, so as not to deter occupiers nor constrain delivery.

In terms of phasing, Mulberry Land recommend land at Oakdale Farm should be considered at the soonest opportunity for delivery, ahead of allocations SKPR-202 and SKPR-100. Land at Oakdale Farm presents a prime opportunity for the development of 3,000,000 sq ft of commercial floorspace to the north of Grantham as demonstrated by the enclosed masterplan. It also has the opportunity to include ancillary uses such as lorry parking, truck washing facilities, welfare and overnight accommodation for workers and drivers.

The site fronts onto the B1174, and an appropriate access point could be obtained from the roundabout with Occupation Road. To the north and west of the site is the consented application for a Solar Farm¹, covering 76.19ha in total. This has introduced significant urbanising effects to the landscape, enclosing the allocation at Oakdale Farm and reducing the wider impacts on surrounding landscape. The site abuts the Sleaford to Nottingham railway line and benefits from around 1400m of track with runs along the eastern boundary. There are therefore opportunities to consider in the context of providing a rail freight spur, which is unique to this land parcel. The land is in single ownership and can be delivered without significant upgrading works or reliance upon neighbouring land or cooperation with neighbouring landowners in delivering a comprehensive site access as may be the case with SKPR-202 and SKPR-100.

The sites relationship with the existing EMP-R3 was previously acknowledged in the 2015 Employment Land evidence base which supported the existing Local Plan. The report identified part of SKPR 286 as a Tier 1 site and suitable for employment development, whilst noting SKPR-100 could be considered a Tier 2 site as suitable in the longer term as a contingency site. As noted above, since the publication of that report the EMP-R3 was further developed and also now consented for a new designer outlet village. SKPR 286 is due to be completely surrounded with solar on the northern and western boundaries, railway line to the east and the B1174 and EMP-R3 to the south. It is a logical extension and development should be focussed on the east of the A1, sequentially to a completely undeveloped western side of the A1.

In response to **Paragraph 10.1** under the Landscape Character heading, Oakdale Farm is not subject to any statutory landscape designations. The land falls partly within the Trent and Belvoir Vale and partly within the Grantham Scarps and Valleys Landscape Character Area². We do however question if reliance on the 2007 document remains relevant as evidence base, given that the consented solar farm development has and will have an impact on the landscape. The consented solar farm will have a lasting impact on the landscape character around land at Oakdale Farm, introducing an urbanising effect with the future solar proposal effectively 'wrapping around' the proposed allocated site.

The site does not contain any designated built heritage assets. The site would be seen in the context of existing large-scale employment units alongside the A1 and B1174, and forming the eastern boundary is the mainline railway, thus further compounding the urbanising influences on the landscape.

¹ S21/1018 Installation and operation of a Solar Farm together with all associated works, equipment, and necessary infrastructure.

² South Kesteven Landscape Character Assessment, 2007

When reviewing the sites and the **sustainability appraisal** undertaken by the Council, the allocation of SKPR-182 is assessed as supporting the vitality of settlements, including through enhancing local economic offer and employment opportunities and supporting cultural activities. In terms of the assessment undertaken looking at Impact on Strategic Highway Network, the allocated site is identified as a high priority, given it's located very close to the Strategic Highway Network, and the trips are 'greater than 100'. The other 2 Gonerby Moor allocations have the same assessment, but they are recognised as 'likely to have cumulative impact with SKPR 202 and 185'. The assessment for the allocated site identifies complete suitable access, whereas the other 2 allocations can only provide 'part' suitable access. There are some ambiguities between these site assessments, particularly where the impact on the local highway network has been assessed. All three sites should be considered as only having moderate impact, whereas just SKPR-202 has moderate impact while SKPR-182 and SKPR-100 are assessed as having a major impact.

Allocated Employment Sites

The table below sets out a list of the existing allocated employment sites, under the 2020 Local Plan, and the proposed future employment sites to be allocated through the Review Local Plan. Of the existing allocations, to date, none have been delivered. This could be down to their more urban locations, being on smaller constrained sites, potential landowner issues, making their delivery more complex and delayed. These allocations would be unlikely to suit larger scale commercial occupiers who are looking for large strategic sites, close to the A1 corridor and is part of the reason for suggesting that they are subject to an appropriate policy designation acknowledging the local needs such sites may be able to deliver.

The table then lists the new employment allocations, all of which are large scale, greenfield and strategic in nature. The new allocations total 178.9ha, which combined with the existing allocations (totalling 42.11ha) provides a total of 221.01ha. This total does not include the Grantham Southern Gateway site, which totals 118.19. The Council therefore has 339.2ha of allocated employment land, which is a vast amount to be delivered during the plan period. We welcome the ambitions of the authority, however more detail in the Local Plan Review consultation is required to address how this amount will be phased, and how local and strategic infrastructure will deal with the additional requirements on capacity.

The Council should satisfy themselves that they have an up-to-date position and commitment from each of the landowners / developers who are promoting these sites. In conclusion none of these sites which were allocated for development in Jan 2020 have come forward for development in the intervening 4 years. No planning applications have been submitted for any of the sites which would be consistent with their employment allocation status. As noted, the only planning activity would appear to be at odds with the Councils intention to retain these SKPR-55 as an employment site as a planning application for a new food store for part of the land was refused.

In the interests of ensuring the plan is soundly and positively prepared each of these sites should be subject to the same scrutiny as new allocations as relying upon sites and evidence which supported the previous plan risks undermining the Local Plan Review and overstating the employment land position. It would be wise to ensure the council has an agreed delivery statement for each of the sites in question.

| Employment Allocations brought forward from the January 2020 Local Plan | | | | |
|---|--|--------------------|-----------|---|
| | Location | Reference | Area (ha) | Commentary |
| A | Land East of Ryhall Road, Stamford | SKPRR-288(ST-E1) | 3.9 | No planning application submitted to date, although approved application for 200 dwellings located to the south (Vistry, S21/0938) |
| B | Land South of Spalding Road, Bourne | SKPR-285 | 8 | No planning application submitted to date. Half the allocation is covered by Flood Zone 2. |
| C | Land North of Bourne Eau and East of Car Dyke, Bourne | SKPR289(BO-E2) | 3 | No planning application submitted to date. |
| D | Extension to Northfields Industrial Estate, Market Deeping | SKPR-284 (DEP-SE1) | 14 | No planning application submitted to date. Adjacent to existing employment site to the west, Northfields Industrial Estate. Adjacent to draft residential allocation Land at Linchfield Road, to the south. |
| E | Land Fronting Peterborough Road, Market Deeping | SKPR-55 (DEP-E1) | 4.2 | Application refused for part of site frontage to erect a new Lidl food store (Use Class E) (S23/0956). No planning application submitted to date for remainder of the site. |
| F | Roseland Business Park | SKPR-287 (RBP-E1) | 9.01 | No planning application submitted to date. |
| | | | 42.11 | |
| New Employment Allocations presented in the Local Plan Review 2024 | | | | |
| G | Land at Valley Lane | SKPR-262 | 6.28 | |
| H | Land at Gonerby Lane, Gonerby Moor, Grantham | SKPR-202 | 29 | |
| I | Land South of Gonerby Lane, West of the A1, Gonerby Moor, Grantham | SKPR-100 | 63.7 | |
| J | Grantham Oakdale, Gonerby Moor, Grantham | SKPR-182 | 80 | |
| | | | 178.9 | |

GR3: Grantham Allocations

SKPR-278 – It is unclear from the amendments presented and evidence base as to what has led to the policy changes for this site in including 110,000 m² of employment land. It is noted that the quantum of units anticipated to be constructed remains the same at 3,700 dwellings however delivery in the plan period has dropped significantly 1,350 from 2,150, despite the extended plan period by 5 years.

As noted at **paragraph 9.32** for ‘Grantham, there is considerable housing growth expected in the town over the plan period which will require the creation of a considerable number of new jobs if out-commuting is to be reduced’. We need to ensure good progress is made in delivering new homes within Grantham to underpin the economic growth within the plan. It is unclear as to how complementary the employment land as part of this allocation will be to achieving the Garden Village principles set in the context of the SKPR 286 Grantham Southern Gateway. If the inclusion of the employment land is reducing the scope for residential properties or limiting delivery in the short-term changes should be resisted where the Garden

Village should focus on maximising the residential benefits and remove pressures on allocating additional sites within the Town which have less beneficial transport options.

Transport – ID2: Transport and Strategic Transport Infrastructure

Drivers of many heavy goods and public service vehicles are subject to a regime of statutory breaks and other working time restrictions, such that roadside facilities are critical enablers of compliance with such requirements. In areas where there is an identified need, National Highways will work with local planning authorities to ensure that local plan allocations and planning application decisions address the shortage of HGV parking on or near to the Strategic Road Network (SRN). In these circumstances, local planning authorities should have regard to the following spacing requirements:

- (i). the maximum distance between motorway facilities providing HGV parking (being service areas, rest areas or truck stops) should be no more than 14 miles; and
- (ii). the maximum distance between All Purpose Trunk Road (APTR) facilities providing HGV parking (being service areas or truckstops) should be the equivalent of 20 minutes driving time for HGVs.³

A review of the existing provision for Lorry Parks, and parking has identified that the A1 does have existing provisions for such facilities, however there is very limited lorry parking available within and around Grantham:

- Colsterworth Truck Stop (200 spaces) 12 miles to the south
- Newark Lorry Park (180 spaces) 15 miles north
- Markham Moor Truckstop (120 spaces) at 26 miles to the north.

The current Moto Grantham services only has provision for 18 truck parking spaces so unless plans exist to expand that facility an additional truck stop should be delivered to support the Local Plan proposals as the distance between Colsterworth and Newark at 27 miles exceeds DfT guidance.

The National Survey of Lorry Parking 2022 produced by AECOM, commissioned by the DfT, provided an assessment of lorry parking provision and demand through audits within 5km of the strategic road network in England. This study highlighted that there remains a shortfall in the provision of on-site parking facilities, with the demand for parking spaces significantly outweighing the supply. The East Midlands has a total of 669 parking sites, with a capacity of 2,661 spaces. However, 3,852 vehicles were recorded as 'parked', leaving an excess of 1,191 vehicles.

Mulberry have previously developed a very successful Truckstop in Rothwell (situated off the A14). The company secured planning and completed the build in 2019. The facility provides parking for 250 HGVs with refuelling, catering and overnight facilities and is now operational and run by Welcome Break.

The cost of delivering such facilities has risen significantly in recent years which has seen fewer facilities delivered due to their viability and initial costs of servicing and developing land. There is a strong push as well to see facilities improved and expanded, with National Highways promoting match-funding of projects within the vicinity of the strategic road network⁴.

Land at Oakdale Farm (ref: SKPR-182) is allocated for employment purposes, which we fully support. Given the scale of the land and the relationship with both the local and strategic road

³ DfT Circular 01/2022 – Strategic Road network and delivery of sustainable development – updated 23rd December 2022 -para 81.

⁴ National Highways Lorry Parking Facilities Improvements Scheme

network the site is uniquely placed to provide a new Lorry Park. The indicative masterplan has identified the necessary land which would provide around 150 spaces however there is significant opportunity to increase this scale. Such facilities are becoming more important when it comes to attracting investors and operators away from more established routes such as the M1 which is much more mature as a market and has greater number of trucks tops.

Additional comments

In addition to the above comments made to the Local Plan Review, we wanted to highlight some inconsistencies identified within the AECOM Employment Land Study (February 2024). These are set out below:

Employment Land Study February 2024: “Table 6.11 RAG Rating by domain (Grantham sub-area), Page 99.

Comments: The below extract relates to SKPR-185 and we wanted to challenge the “Amber” rating for Accessibility. The rationale behind this query is the site is very well accessed via both the A1 and B1174, better perhaps than SKPR-202’ and ‘SKPR-100’ which scored a “Green”. In context it has the same scoring SKPR-234 and noting comments below we did query if the two references had been confused.

SKPR-185 Land to north east Gonerby Moor, Great Gonerby



Employment Land Study February 2024: Paragraph 6.34, Page 100, 4th bullet point:

“Site SKPR-182 is also rated highly favourably in terms of redevelopment potential. The site forms part of the wider adopted Local Plan housing allocation GR3-H1 (Spitalgate Heath – Garden Village). This is a very large site adjacent to the A1 and B1174 routes meaning access to the strategic road network is virtually direct and a high volume of HGV movements could be easily facilitated. Moreover, there are no sensitive surrounding land uses. Ambitious redevelopment of the currently agricultural use site may utilise the adjacent railway line. The site would be suitable for a range of industrial and storage and distribution functions owing to its high accessibility.”

Comments: The site reference – The first part of this paragraph refers to the wrong site and should be deleted (as highlighted), however, the remainder of the wording appears to align with the allocation.

Employment Land Study February 2024: Paragraph 6.35, Page 101:

Comments: Penultimate bullet point should include reference to SKPR-182.

Employment Land Study February 2024: Paragraph 6.42, Page 101/102:

“Through consultation with landowners, agents and developers, the review also identified the potential for major developments at Gonerby Moor (SKPR-100 and SKPR-202, to the west of the A1) and Gorse Lane (SKPR-234, to the west of the A1). These sites were identified through SKDC’s “call for sites” process.”

Comments: This section deals with future supply. In this paragraph, the site Gorse Lane (SKPR-234, to the west of the A1) has been referenced in place of our proposed site SKPR-182 Grantham Oakdale, Gonerby Moor, Grantham. There is further commentary on the site 'SKPR-234' in Paragraph 6.44 which we believe has been misplaced, as the site is not a preferred site within the Draft Local Plan.

Ongoing work

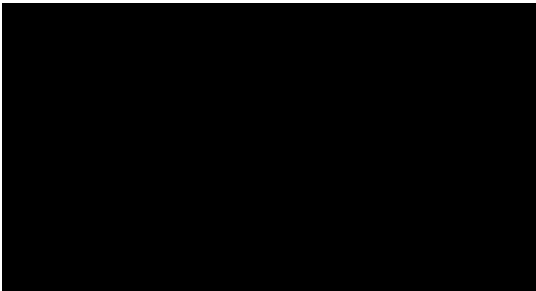
We note that the Infrastructure Delivery Plan is currently under preparation and is not available to support the Regulation 18 consultation. We would wish to preserve our position as regards providing further comments relating to site specific matters which may need to be further considered once the IDP is made available to review.

Concluding remarks

Mulberry Land and the Machin family welcomes the opportunity to comment on the Draft South Kesteven Local Plan at the consultation stage and the comments provided within these representations focus on the questions posted within the consultation local plan.

These representations are made with the desire to assist the Council in adopting a successful and sound Local Plan which positively meets the needs of the District, delivering sustainable development. Mulberry Land are supportive of the need and justification for a new Local Plan for the South Kesteven area.

Yours sincerely,



Emily Bishop
Mulberry Strategic Land



Solar Farm
Planning Approved

Redline area
30.97ha / 199.95ac

Overhead brideway

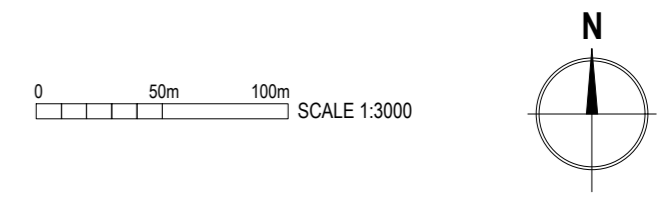
Field to be retained for agricultural use

Proposed new roundabout

potential management suite

Constraints Key

- development site boundary
80.91 hectares
199.93 acres
- estimated exclusion zone 20m
either side of overhead power lines
(subject to further expert advice)
- existing brideway
- proposed brideway diversion



Revisions:
P01 first issue
P02 solar farm layout included

01mar2023 PL
12apr2024 SH

Areas Schedule (note office GIA includes Hubs)

Parking and docks - figures quoted are minimum, plots may allow additional.

| Plot No. | Warehouse GIA SQFT | Warehouse GIA SQM | Offices GIA SQFT | Offices GIA SQM | Total GIA SQFT | Total GIA SQM | Car Parking @1/120sqm | HGV Parking | Docks | Level Access | cycles | PTW's |
|--------------|--------------------|-------------------|------------------|-----------------|----------------|---------------|-----------------------|-------------|------------|--------------|------------|------------|
| A | 1000000 | 92902 | 43000 | 3995 | 1043000 | 96897 | 807 | 232 | 100 | 4 | 242 | 40 |
| B | 487000 | 45243 | 33000 | 3066 | 520000 | 48309 | 403 | 113 | 50 | 4 | 121 | 20 |
| C | 626000 | 58157 | 43000 | 3995 | 669000 | 62152 | 518 | 145 | 64 | 4 | 155 | 26 |
| D | 577000 | 53605 | 40000 | 3716 | 617000 | 57321 | 478 | 134 | 60 | 4 | 143 | 24 |
| E | 217000 | 20160 | 17000 | 1579 | 234000 | 21739 | 181 | 50 | 22 | 2 | 54 | 9 |
| Total | 2907000 | 270067 | 176000 | 16351 | 3083000 | 286418 | 2387 | 675 | 296 | 18 | 716 | 119 |

The Old Rectory Rectory Lane Milton Malsor
NORTHAMPTON NN7 3AQ
t: +44 (0)1604 859116 f: +44 (0)1604 859123
www.peter-haddon.com

pHp
architects

Gonerby Moor Grantham

Masterplan

Status Preliminary

Drawn by: PL Checked by: RM

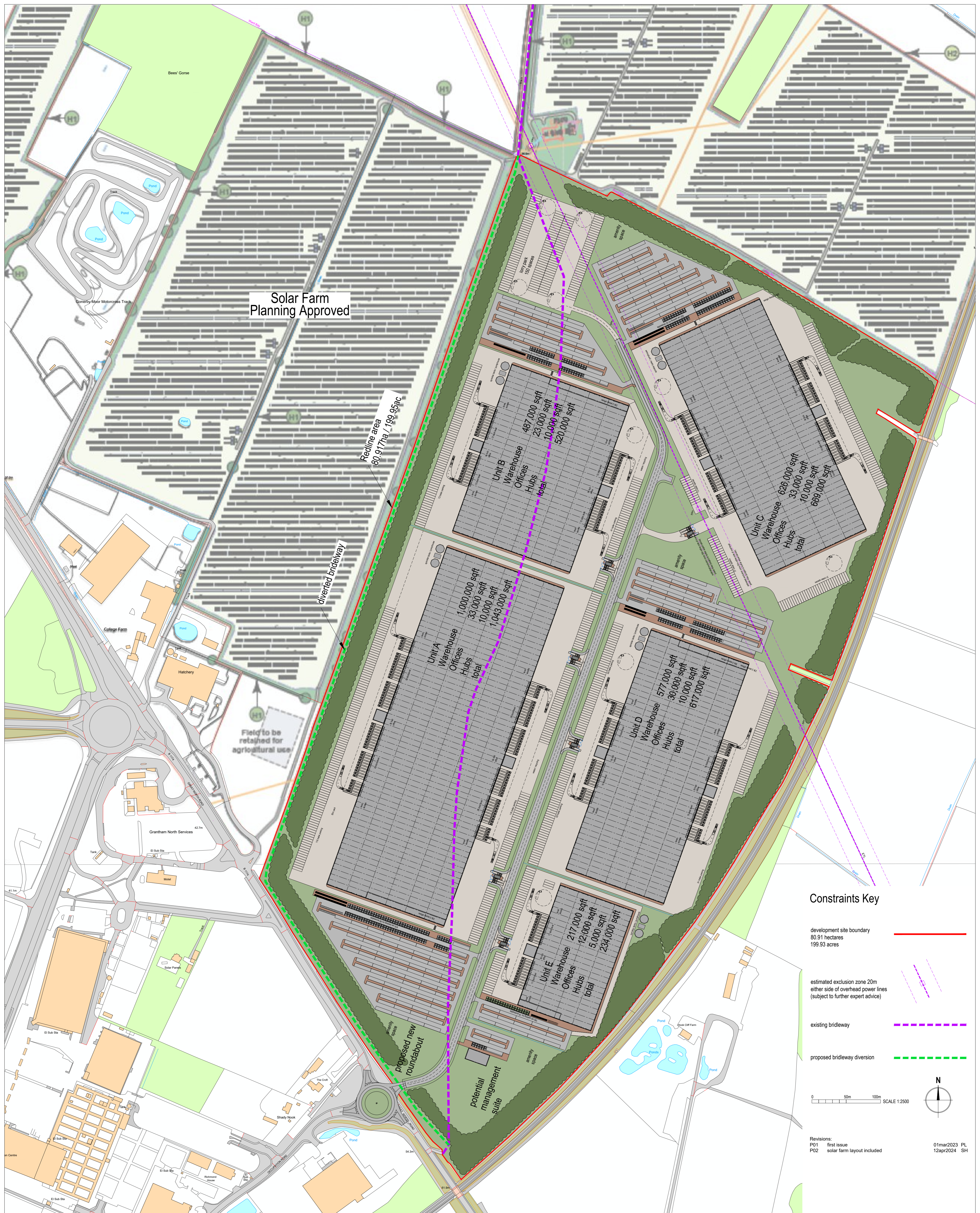
Date mar2023

Document Number:
GON-PHP-XX-XX-DR-A-4682-001-P02
Scale@A1 1:3000

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Solar Farm Planning Approved



Redline area
80.917ha / 199.95ac

diverted brideway

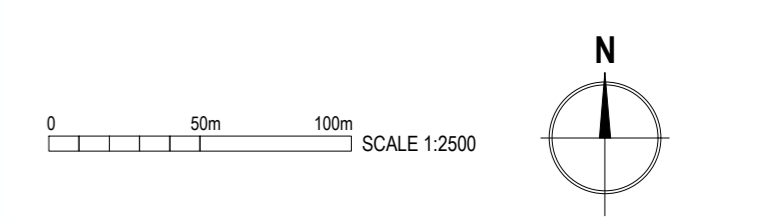
Field to be retained for agricultural use

proposed new roundabout

potential management suite

Constraints Key

- development site boundary
80.91 hectares
199.93 acres
- estimated exclusion zone 20m
either side of overhead power lines
(subject to further expert advice)
- existing brideway
- proposed brideway diversion



Revisions:
P01 first issue
P02 solar farm layout included

01mar2023 PL
12apr2024 SH

Areas Schedule (note office GIA includes Hubs)

| Plot No. | Warehouse GIA SQFT | Warehouse GIA SQM | Offices GIA SQFT | Offices GIA SQM | Total GIA SQFT | Total GIA SQM | Car Parking @1/120sqm | HGV Parking | Docks | Level Access | cycles |
|--------------|--------------------|-------------------|------------------|-----------------|----------------|---------------|-----------------------|-------------|------------|--------------|------------|
| A | 1000000 | 92902 | 43000 | 3995 | 1043000 | 96897 | 807 | 232 | 100 | 4 | 242 |
| B | 487000 | 45243 | 33000 | 3066 | 520000 | 48309 | 403 | 113 | 50 | 4 | 121 |
| C | 626000 | 58157 | 43000 | 3995 | 669000 | 62152 | 518 | 145 | 64 | 4 | 155 |
| D | 577000 | 53605 | 40000 | 3716 | 617000 | 57321 | 478 | 134 | 60 | 4 | 143 |
| E | 217000 | 20160 | 17000 | 1579 | 234000 | 21739 | 181 | 50 | 22 | 2 | 54 |
| Total | 2907000 | 270067 | 176000 | 16351 | 3083000 | 286418 | 2387 | 675 | 296 | 18 | 716 |

Parking and docks - figures quoted are minimum, plots may allow additional

The Old Rectory Rectory Lane Milton Malsor
NORTHAMPTON NN7 3AQ
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