



Our Ref: Cold Harbour Lane, Grantham – Regulation 18 Representations - SL/MD

Date: 25<sup>th</sup> April 2024

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Dear Sir / Madam,

**SOUTH KESTEVEN LOCAL PLAN: REPRESENTATIONS TO THE DRAFT LOCAL PLAN (REGULATION 18) CONSULTATION**

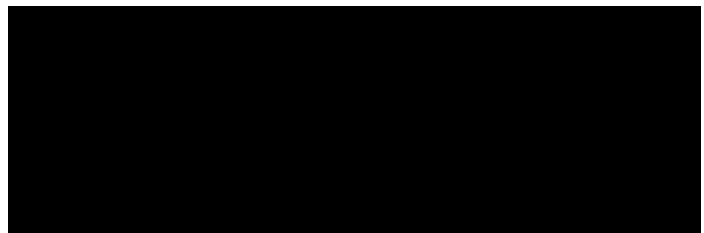
We write on behalf of our Client, Manthorpe Construction Limited Ltd, to submit representations to the South Kesteven Local Plan 'Regulation 18' consultation. These representations relate to our clients land interests at Land South of Cold Harbour Lane, Grantham (the 'Site'). A Site Location Plan identifying the Site is provided at Appendix 1. It forms part of a larger area of land assessed by the Council in their Draft Site Assessment Report (February 2024), under site reference SKPR-238.

On behalf of our client, we would like to submit the Site for consideration as a housing allocation in the Local Plan review. The Site is identified within the adopted Local Plan (2020) as open countryside and outside of the urban area of Grantham, however the Site adjoins the urban area of Grantham and to the east is Prince William Barracks SUE allocated to deliver over 4,000 homes during the current Local Plan period and beyond. The Council clearly consider this area to be a sustainable location for growth.

This response relates to the following chapters and policies being consulted on within the Regulation 18 consultation:

- Chapter 2 (South Kesteven District)
- Chapter 3 (Vision and Strategic Objectives)
- Chapter 6 (Spatial Strategy)
- Chapter 7 (Meeting Housing Needs)

We do not propose to offer a response to the other chapters and policies at this stage but wish to reserve the right to make comments at future stages of the consultation on the Draft Local Plan.



## **Chapter 2 - South Kesteven District**

### Plan Period

Paragraph 22 of the NPPF informs that strategic polices should look ahead over a minimum 15 year period from adoption to anticipate and respond to long term requirements and opportunities. Paragraph 2.1 of the Regulation 18 document sets out that the Plan period for South Kesteven will run from 1<sup>st</sup> April 2021 through to 1<sup>st</sup> April 2041. When considering the proposed Plan period, it is positive to see that the Council have adopted a forward thinking approach. However, it is noted that the Council intend to adopt the emerging Local Plan in Spring 2026. Subject to the Council keeping on track with the proposed Local Plan timescales, a Plan period of 15 years will be delivered by the Council. It is considered that the proposed timeframe of 15 years should be viewed as a minimum in accordance with the NPPF and if there is any slippage in the Local Plan review timescales, the Council should seek to ensure that a minimum 15 year period is maintained.

### Housing Growth

Paragraph 60 of the NPPF informs that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed. Paragraph 2.8 of the Regulation 18 document informs that the Council have calculated the Regulation 18 Local Plan housing need figures using the government's standard method. This approach confirms that the minimum Local Plan requirement for South Kesteven is 14,020 dwellings across the Plan period from 2021-2041, equating to 701 dwellings per annum. It is considered that the figure of 14,020 dwellings should be viewed as a minimum needs figure by the Council and all opportunities for development should be maximised. The Council state that *"Whilst the housing need is based on the standard methodology, the supply will also contain an oversupply of around 20% above the minimum required to ensure the Council delivers at least the minimum Local Plan requirement of 14,020."* The provision of a 20% buffer above the minimum need requirement is welcomed and supported by our client as it will provide flexibility in housing land supply. Additionally, it is considered that the Council should be pursuing options above the minimum need requirements to ensure that a sufficient supply of housing can be delivered in sustainable locations during the Plan period.

## **Chapter 3 - Vision and Strategic Objectives**

### The Vision for South Kesteven's Local Plan

As set out within the 2041 vision for South Kesteven, *"Grantham's role as the Sub-Regional Centre will be strengthened through significant housing and employment growth."* The designation of Grantham as a sub-regional centre in South Kesteven is supported by our client. To ensure that Grantham's role as a sub-regional centre can be fulfilled, the Council should look to allocate sustainable and available sites within the locality of Grantham's urban area. To help achieve this, it is considered that the settlement boundary of Grantham should be amended and extended to include the Site given it is located just outside of the urban area of Grantham. The extension of the Grantham settlement boundary would ensure that the vision of delivering significant housing in this area will be achieved during the Plan period.

The Site is located to the south east of Grantham just outside of the urban area and has no known planning constraints to prevent a sustainable development from coming forward onsite. Whilst access into the Site would be reliant on third party land to the south, Bloor Homes currently have a planning application (S23/1240) pending consideration land through land assembly it is entirely possible that the Site could come with access secured from the A52 through the Bloor Homes development.

It is also noted that the allocated Prince William of Gloucester Barracks Strategic Urban Extension (SUE) is located immediately to the east of the Site. On this basis, it is considered that the Site would form a logical infill between Grantham and the Prince William of Gloucester Barracks SUE, and would

significantly strengthen housing growth within Grantham, in accordance with the vision for South Kesteven. Given the vast scale of the SUE (4,000 dwellings), it is considered that the Site could be developed and delivered in a much quicker timeframe, ensuring housing delivery within Grantham in the short / medium term. Therefore, this would enable the Council to achieve their vision of strengthening the sub-regional centre of Grantham by securing significant housing growth.

#### Strategic Objectives for the Local Plan

With regards to the proposed Strategic Objectives of the Local Plan, our client is particularly supportive of Objectives 6 and 9 which promote the role of Grantham as an important sub-regional centre and the provision of an adequate supply and choice of land for new housing to meet the needs of the District to the year 2041.

### **Chapter 6 – Spatial Strategy**

#### SP1: Spatial Strategy

Policy SP1 (Spatial Strategy) states “*All allocations proposed in the Local Plan are the most suitable and sustainable development options and provide for a variety of site types and sizes to ensure choice is offered to the market and delivery is achievable.*” Whilst it is acknowledged that the allocations chosen by the Council are deemed to be suitable and sustainable, and aim to provide a variety of site types and sizes to ensure choice and achievable delivery, it is considered that the Council are over reliant on strategic scale developments around Grantham. The allocated Prince William of Gloucester Barracks SUE will take a long time to materialise given the nature of its scale and will not meet needs arising in the short term. This is particularly relevant given a planning application has not yet been submitted for the SUE. It is therefore uncertain whether the scale of development proposed is achievable, particularly given there is now a mandatory requirement to provide Biodiversity Net Gain (BNG).

To ensure that the Councils vision of promoting Grantham as a sub-regional centre which promotes significant housing growth, the Council should look to smaller scale sites which are immediately available for housing delivery in the short / medium term. The Site lends itself to deliver a major housing development in a logical infill position between Grantham and the allocated Prince William of Gloucester Barracks SUE. The Site is sustainably located within close proximity to the urban area of Grantham and would ensure that a suitable development option is provided to help meet needs arising in the short / medium term.

Policy SP1 advises that to ensure the need is met in full for South Kesteven, the minimum Local Plan requirement will consist of 14,020 dwellings across the period 2021 to 2041. As referenced to earlier on within these representations, the figure of 14,020 dwellings should be viewed as a minimum needs figure and opportunities for development should be maximised within the District.

Policy SP1 goes on to state “*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.*” To ensure that the minimum needs figure is delivered during the Plan period and the growth of Grantham as a sub-regional centre is achieved, the settlement boundary of Grantham should be extended beyond the urban area to ensure that development is not restricted and areas within close proximity to the existing settlement boundary can be developed. The amendment of the Grantham settlement boundary will ensure that development within and around the sub-regional centre of Grantham is not restricted and the required housing need figures are achieved.

#### SP2: Settlement Hierarchy

Policy SP2 (Settlement Hierarchy) states “*The majority of development will be focused in Grantham in order to support and strengthen its role as a Sub-Regional Centre. New development proposals will be*

*supported on appropriate and deliverable brownfield sites and on sustainable greenfield sites (including urban extensions), where development will not compromise the town's nature and character<sup>1</sup>.*" The approach taken by the Council in Policy SP2 and their support for new development proposals on sustainable greenfield sites where development will not comprise the town's nature and character is welcomed. This is applicable to the Site given it is located within a sustainable location and will not harm the character and nature of Grantham. Whilst it is acknowledged that the Site is currently designated as open countryside in the adopted Local Plan, given its position in between the edge of Grantham and the allocated Prince William of Gloucester Barracks SUE, it is considered that its recognition as open countryside will be lost. Therefore, given that the nature and character of the area will materially change due to the allocation of the Prince William of Gloucester Barracks SUE, the development of the Site will have no further impacts on the nature or character of the local area.

### SP3: Residential Development within Settlements

Policy SP3 (Residential Development within Settlements) proposes the following criteria for development within settlements:

- a. it is within a substantially built up area; and
- b. it does not extend the pattern of development beyond the existing built form; and
- c. it does not cause harm or unacceptable impact upon the occupiers amenity of adjacent properties; and
- d. it is in keeping with the character of the area and is sensitive to the setting of adjacent properties.

Whilst the Site is currently considered as open countryside in the adopted Local Plan, it is considered that given its position in between the built up area of Grantham and the allocated Prince William of Gloucester Barracks SUE, the extent of the settlement boundary for Grantham will need to be extended to take this into account. On this basis, the Site would be situated within a substantially built-up area with the allocated Prince William of Gloucester Barracks SUE to the east, the Bloor Homes development (S23/1240) to the south and existing development to the west. Further to this, the development of the Site would not further extend the pattern of development beyond the existing built form and would be in keeping with the character of the area.

### Policy SP4: New Residential Development on the Edge of Settlements

Policy SP4 (New Residential Development on the Edge of Settlements) proposes the following criteria for new residential development on the edge of a settlement:

- a. demonstrate clear evidence of substantial support from the local community<sup>2</sup> through an appropriate, thorough, and proportionate pre-application community consultation exercise. Where this cannot be determined, support (or otherwise) should be sought from the Town or Parish Council or Neighbourhood Plan Group or Forum, based upon material planning considerations;
- b. be well designed and appropriate in size / scale, layout and character to the setting and area;
- c. be adjacent to the existing pattern of development for the area, or adjacent to developed site allocations as identified in the development plan;
- d. not extend obtrusively into the open countryside and be appropriate to the landscape, environmental and heritage characteristics of the area; and

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<sup>1</sup> *Proposals for new residential development in these settlements will be assessed against Policies SP3 and SP4*

<sup>2</sup> the term 'demonstration of clear local community support' means that at the point of submitting a planning application to the local planning authority, there should be clear evidence of local community support for the scheme, with such support generated via a thorough, but proportionate, pre-application consultation exercise, where demonstrable evidence of local community support or objection cannot be determined, then there will be a requirement for support from the applicable Parish or Town Council or Neighbourhood Plan Group. If an application is in doubt as to what would constitute a 'thorough but proportionate', preapplication consultation exercise, then the applicant should contact the applicable local planning authority.

- e. meet a proven local need for housing and seeks to address a specific targeted need for local market housing.

With regards to part d of the policy, it is considered that the development of the Site would not extend obtrusively into the open countryside and would be appropriate to the local area given the portrayal of open countryside will essentially be lost with the allocation of the Prince William of Gloucester Barracks SUE. Further to this, the development of the Site would address a specific targeted need for housing growth within Grantham, as per the vision of the emerging Local Plan. As such, it is considered that the Site would be provided in accordance with Policies SP2, SP3 and SP4 and on this basis, it should be allocated within the emerging Local Plan for housing development.

### **Chapter 7 – Meeting Housing Needs**

Paragraph 60 of the NPPF informs that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed.

As set out within the summary of proposed changes for delivering new homes, the Council propose to retain a 20% buffer above the minimum housing requirement figures to maintain flexibility in its supply. For the emerging Local Plan, this equates to a total housing supply figure of 16,975. The Council state *"retaining this approach and considering the existing supply across the period 2021-2041 there is an approximate shortfall of 2,750 homes."* Given the Council recognise that there is an approximate shortfall of 2,750 homes across the Plan period (2021-2041), it is considered that the Council should seek to allocate further sites for development to meet this shortfall. Land South of Cold Harbour Lane is immediately available for residential development and is located within the Councils preferred growth location of Grantham. The development of the Site would form a logical infill between Grantham and the allocated Prince William of Gloucester Barracks SUE and would address shortfall within the Plan period. Whilst it is acknowledged that access into the Site is dependent on third party land, as previously mentioned, there is the potential for the Site to form part of a larger assembly of land with access from the Bloor development via the A52.

Figure 6 (Indicative Draft Local Plan Housing Trajectory 2021-2041) of the Regulation 18 Local Plan illustrates that over the next few years the Council rely heavily on large sites with planning permission under construction, small sites with planning permission, and SUEs with planning permission. However, the reliance on sites with planning permission that are not yet under construction is not a reliable method for ensuring housing delivery. The trajectory then goes on to illustrate that the Councils main form of housing delivery from 2027/28 onwards will be from existing and proposed Local Plan allocations. It is considered that given a large portion of projected housing delivery will be from the allocated Prince William of Gloucester Barracks SUE and allocated Spitalgate Heath Garden Village, the Council will need to rely on smaller sites to help meet housing needs in the short and medium term. For example, the allocation of the Site would ensure that housing growth is achieved in the short / medium term, in an area that is considered to be sustainable and acceptable. This is particularly relevant given the Prince William of Gloucester Barracks SUE which is allocated for 4,000 dwellings is yet to submit an application and is likely to encounter constraints given its strategic nature and the introduction of mandatory BNG.

#### Policy H1: Housing Allocations

With regards to Policy H1 (Housing Allocations) it is considered that the Site should be allocated for housing development. The Site has previously been considered in the 2017 Strategic Housing Land Availability Assessment (SHLAA) under reference GRA14-60 (Land at Somerby Hill [adjacent to site GRA14-120], Grantham). Whilst it is acknowledged that the Site was considered to not be suitable given it is not immediately adjacent to the existing settlement and would be reliant on third party access, as referenced to throughout these representations, the Site can secure third party access and forms a logical infill for development within Grantham. With an assembly of land access into the Site could be provided

from Bloor Homes site to the south directly off the A52 and as such, would overcome this previous concern. In addition to this, whilst the Site is not immediately adjacent to the existing settlement of Grantham, it is located between the allocated Prince William of Gloucester Barracks SUE to the east, and the Bloor Homes development (S23/1240) to the south along with existing development to the west. Therefore, the Site would be enclosed by residential development on two of its boundaries and would form a logical infill development within the area. Further to this, the Site would also help meet the identified shortfall of housing needs in the Local Plan and would be developed in accordance with the Council's preferred growth location of Grantham.

#### Policy H2: Affordable Housing Contributions

Paragraph 64 of the NPPF sets out that where a need for affordable housing is required, planning policies should specify the type of affordable housing required. It is noted that Policy H2 (Affordable Housing Contributions) requires developments of 10 or more dwellings (or an area of 0.5ha or more) to make provision for 27-57% affordable housing depending on the outcome of the Whole Plan Viability Assessment. Whilst our client accepts the principle of affordable housing provision, our client reserves the right to make further comments on this policy during the future stages of the Local Plan review.

#### **Summary**

We trust that the above comments will be taken into consideration as part of the ongoing preparation of the South Kesteven Local Plan and would be grateful for confirmation that these representations have been received and registered as duly made. We look forward to being included in the next steps of the consultation process and would welcome a discussion with you in relation to our client's land interest. In the meantime, please do not hesitate to contact myself if you have any queries.

Yours faithfully,

**MARK DAUNCEY**  
**Planning Director**  
on behalf of Stantec UK Ltd

**APPENDIX 1**  
**Site Location Plan**

