

SOUTH KESTEVEN DISTRICT LOCAL PLAN

REGULATION 18 – DRAFT LOCAL PLAN 2021 – 2041

GRANTHAM – BROOKFIELD LOGISTICS PARK – PHASE 2 (LAND EAST OF SPITTLGATE LEVEL)

REPRESENTATIONS ON BEHALF OF AMATRIX GRANTHAM PROPCO LIMITED (PART OF THE BROOKFIELD GROUP)

(ID REFERENCE NOS. 1397 AND 1400)

Introduction

1. Freeths LLP are instructed by Amatrix Grantham Propco Limited (part of the Brookfield Group) to make representations on the Regulation 18 Draft Local Plan and specifically in respect of the policies set out at Chapter 9 – Employment and Economic Prosperity the stated purpose of which is to deliver strong and sustainable local economic growth in South Kesteven.
2. Amatrix object to the draft policy framework because it does not sufficiently recognise the strategic importance of, nor properly support continued investment in the Southern Gateway Employment Opportunity area over the extended plan period to 2041.
3. The adopted Local Plan which runs to 2036 is very clear as to where the focus of new development at Grantham should be and allocates both employment land and a significant quantum of land for residential use including at Spitalgate Heath Garden Village and the Prince William of Gloucester Barracks. The latter will also continue to be the focus for residential development in the review of the Local Plan to 2041 and beyond.
4. Notwithstanding the above the Draft Local Plan provides no commensurate increase in employment land in this location. This is an oversight, and the further allocation of land is required in order to support ongoing investment in this location to 2041.
5. Accordingly, Amatrix have identified 17.42 hectares of land to the east of Spittlegate Level as a logical, sustainable and deliverable extension to the circa. 23 hectares of land that they currently have under development as Brookfield Logistics Park to the west of Spittlegate Level.
6. The case for allocation is set out in this Planning Briefing Note and associated suite of documents comprising:
 - i. Context Plan (Rev. P02) prepared by AEW Architects (**Enclosure 1**)
 - ii. Illustrative Masterplan (Rev. P2) prepared by AEW Architects (**Enclosure 2**)
 - iii. Illustrative Site Sections (Rev. P1) prepared by AEW Architects (**Enclosure 3**)
 - iv. Landscape and Visual Statement (25 April 2024) prepared by Influence (**Enclosure 4**)
 - v. Heritage Technical Note (April 2024) prepared by Cotswold Archaeology (**Enclosure 5**)
 - vi. Transport Technical Note (19 April 2024) prepared by SLR (**Enclosure 6**)
 - vii. Flood Risk Review (24 April 2024) prepared by I&L Consulting Limited (**Enclosure 7**)
 - viii. Employment Land Supply and Demand Commentary (23 April 2024) prepared by Cushman & Wakefield and CBRE. (**Enclosure 8**)

7. The above documents demonstrate that there is no insurmountable technical constraint to the delivery of land to the east of Spittlegate Level for employment uses and that market demand is anticipated as the site will function as an extension to Brookfield Logistics Park.
8. Moreover, the proposed allocation of 172.7 hectares of land for employment use at Gonerby Moor is counterproductive to the committed strategy of directing growth to the Southern Gateway. Those allocations are also poorly located away from the significant committed residential growth to 2041 and beyond.

Amatrix/Brookfield Group Credentials

9. Amatrix are a Brookfield Group company who are already delivering circa. 23 hectares of employment land within the Southern Gateway which represents a £100 million investment in the local area which will generate up to 1,715 new – full time – equivalent – jobs for local people.
10. Brookfield are a global company with over \$900 billion in assets under management, and an over 100 year heritage as a global owner and operator. They specialise in logistics and distribution and also invest across a wide range of sectors including office, science and innovation, infrastructure and renewable energy amongst others.
11. To date Brookfield's UK assets equate to \$27 billion and their interest in expanding Brookfield Logistics Park reinforces the importance of Grantham and specifically the Southern Gateway as a location for business and investment.

The Adopted Local Plan Strategy for Southern Gateway

12. The South Kesteven District Council (SKDC) Local Plan (LP) 2011-2036 was adopted in January 2020 and sets out the development strategy for the growth of the District to 2036.
13. The LP sets out that SKDC has an ambitious vision for sustainable growth of the District. The LP aims *“to help meet the objectives of the Council's Economic Development (ED) Strategy, whilst recognising that it essentially sets out land use policies and proposals. It seeks to ensure that there is sufficient land available in the right locations to support a strong and growing local economy in the District”*.
14. SKDC's Economic Development Strategy ran from 2016-2021. It evaluated the strengths, weaknesses and opportunities in the local economy, and identified strategies for encouraging and enhancing community economic development. The Council are in the process of updating this for the period 2024-2028.
15. The LP identifies that the majority of development proposed in the District is to take place in Grantham. The LP recognises that *“there is a need to maximise the locational potential of parts of the District with good access to the A1 and A52 as well as the East Coast mainline, as these strategic transport routes provide economic opportunities”* (para 1.64)
16. Policy SP2 therefore 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 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”*.

17. The 2015 Employment Land Study (“ELS”), which formed part of the evidence base for the LP, identified a requirement for between 47 to 79 hectares of employment land within that period.
18. However, the adopted LP sought a more ambitious growth agenda and increased proposed provision to 179.2 hectares.
19. Policy E1 ‘Grantham Southern Gateway Strategy Employment Opportunity’ allocated 118.19ha of land at the Grantham Gateway Strategy Employment Opportunity (GR-SE1).
20. Policy E2 ‘Strategic Employment Sites’ allocates a further 4 employment sites totalling 40.81 ha.

Site Reference	Settlement	Address	Site Area (hectares)
ST-SE1	Stamford	Exeter Fields, Empingham Road	9.80
BO-SE1	Bourne	Land South of Spalding Road	8.00
DEP-SE1	The Deepings	Extension to Northfields Industrial Estate, Market Deeping	14.00
RBP-E1	Long Bennington	Roseland Business Park	9.01

21. Policy E3 ‘Employment Allocations’ also identifies a further 5 smaller sites for employment use, totalling 20.2ha

Site Reference	Settlement	Address	Site Area (hectares)
ST-E1	Stamford	Land East of Ryhall Road	3.80
BO-E1	Bourne	Adjacent to A151 Raymond Mays Way	1.20
BO-E2	Bourne	Land North of Bourne Eau and East of Car Dyke	3.00
DEP-E1	Market Deeping	Land Fronting Peterborough Road	4.20
GR-E1	Grantham	Princie William of Gloucester Barracks	8.00

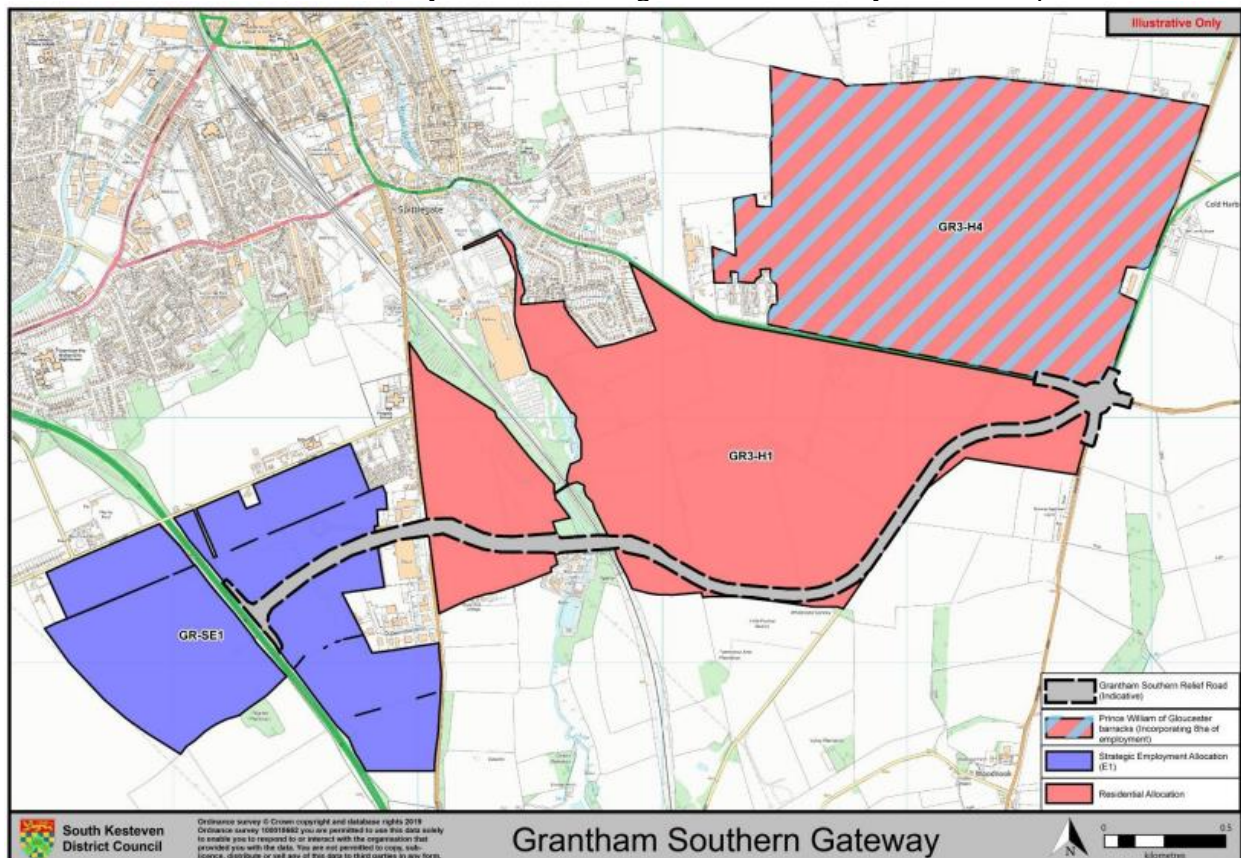
22. Supporting text for the Local Plan identified that “the strategy of Policies E1, E2 and E3 is to focus economic development on Grantham in the first instance, and then the other three market towns and the A1 corridor” (para 2.72). As such “overall the employment strategy will help to create a better balance between homes and jobs in all four towns, providing the opportunity to reduce out-commuting in the south of the District and create a sustainable pattern of development”.
23. The Local Plan Inspector endorsed the focus of growth on Grantham. He noted that

“The principle of the Grantham Southern Gateway as a sub-regionally significant employment area at the nexus of the A1 and Grantham Southern Relief Road represents a significant and soundly-based strategic employment land opportunity. It is also important to take into account the evidence published alongside the ELS of the potential to relocate existing businesses within predominantly residential areas of Grantham. New high-profile sites better related to the A1 are likely to enable this. As such, it would seem prudent to err on the side of flexibility to support latest strategies and ambitions for economic growth rather than cut the cloth of employment land supply too tightly”

24. In housing terms the assessed requirement was for 16,125 new dwellings in the period 2011 to 2036. The LP seeks to meet that requirement and Policy H1 allocates 4 sites in Grantham, delivering 9,254 dwellings (4,929 in the plan period). Those sites are as follows:

Policy Code	Settlement	Location	Site Area (hectares)	Indicative number of units
GR3-H1	Grantham	Spitalgate Heath – Garden Village	215	1,650 to be delivered by 2036 (total capacity estimated as 3,700)
GR3-H2	Grantham	Rectory Farm (Phase 2 North West Quadrant)	61.05	1,150
GR3-H3	Grantham	Rectory Farm (Phase 3 North West Quadrant)	22.54	404
GR3-H4	Grantham	Prince William of Gloucester Barracks	184	1,775 to be delivered by 2036 (total capacity estimated as 4,000)

25. The relationship between the allocated housing sites GR3-H1 and GRS-H4 and employment site GR-SE1 is shown below. Delivery of both housing sites extends beyond the LP period to 2036.



The Local Plan Review – Employment Land Study (2023)

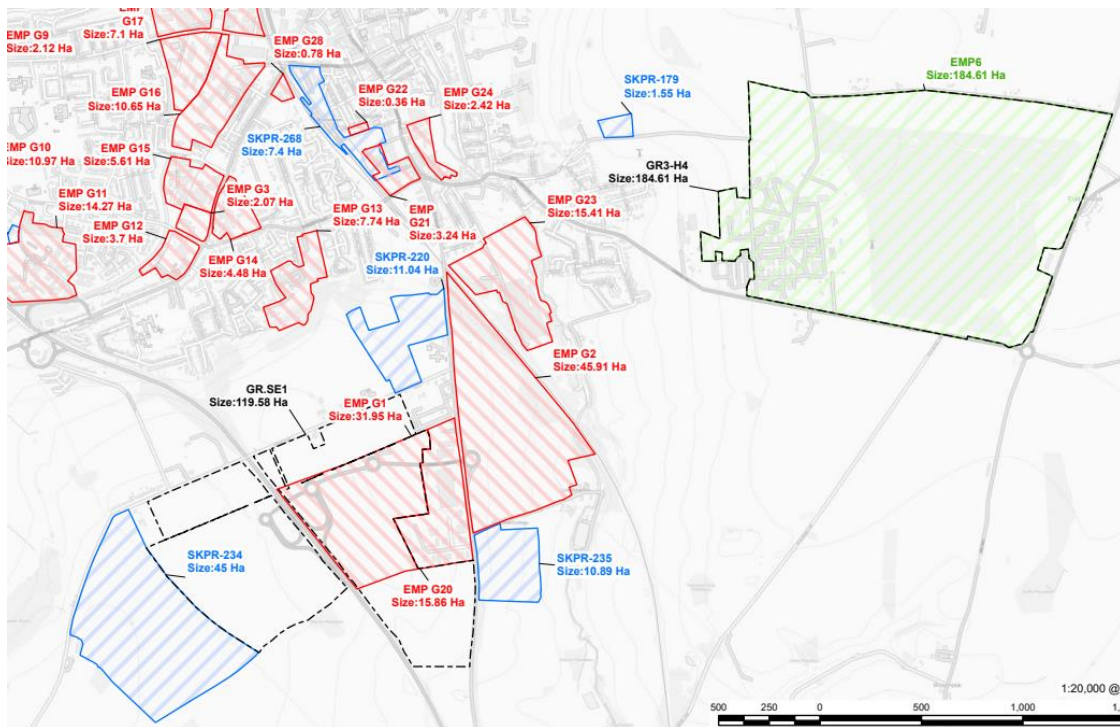
26. Aecom have undertaken an Employment Land Study (ELS) (February 2024) which sets out a detailed evidence base upon which an appropriate supply and mix of employment land and

premises can be planned for. The study forms part of the evidence base for the Regulation 18 Draft Local Plan.

27. The ELS recommends that a ‘Labour Demand’ scenario is used when considering employment floorspace needs across South Kesteven. This scenario is based off Experian forecast modelling and Business Register and Employment Survey (BRES) data and sets out the following forecast changes over the plan period (broken down by use class type):

Use Class Type	Forecast Change to 2041
Eg(i) (offices)	7.1ha
Eg(ii) (research and development or products and processes)	1.6ha
Eg(iii) (light industrial processes)	11ha
B2 (General industrial)	7.1ha
B8 (Storage or distribution)	52.7ha
Total	79.5ha

28. It is clear from this that the largest demand is for B8 floorspace. Indeed par 6.49 states ***“The low vacancy rate in B8 space indicates demand for warehousing floorspace within South Kesteven district is high. A growing concern is the capacity for existing employers to expand their operations given low vacancy rates and the potential lack of suitable sites allocation for this type of activities in South Kesteven (close proximity to the strategic road network and adequate junction to this network is primordial)”***.
29. The conclusions of the ELS therefore established a need for 79.5 hectares of employment land to be designated (on top of currently developed designated sites). The ELS found that the future demand was under the amount of vacant land currently designated. As such the ELS considered that no additional designation of land should be required over the Plan Period to 2041.
30. Nevertheless the ELS also assessed each site by looking at their strengths and weaknesses, as well as the surrounding context and environment when making new designations.
31. Part of the land to the east of Spittlegate Level now promoted for allocation by Amatrix was considered in the ELS under site SKPR-235 ‘Land east of B1174, Grantham’ which equates to 10.89 hectares of land. On the plan extract below the blue shading shows an assessed employment site, the red shading an assessed employment cluster, the green shading ‘additional site’ and the black hatching current employment land allocation.



32. The ELS states:

“Site SKPR-235 aligns with existing designated sites to the south of Grantham and is contiguous with existing employment sites. The site benefits from being virtually directly accessible to the strategic road network, namely the A1, owing to the recent installation of a new junction in this location. The development of a range of employment uses which could include industrial, storage and distribution, or broader business park uses such as offices, could complement the wider development of designated and additional sites in this emerging cluster to the south of Grantham”.

The Local Plan Review – Proposed Employment and Residential Allocations

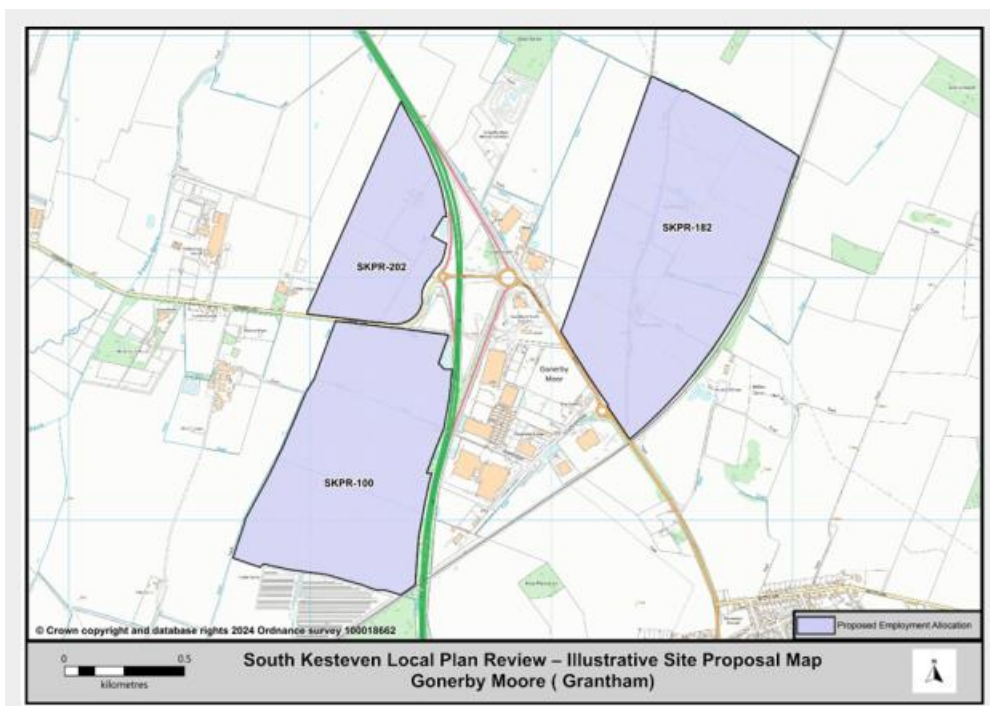
33. The Regulation 18 Draft Local Plan states that it seeks to “ensure that well located, good quality employment land which is attractive to businesses is allocated in appropriate, accessible and sustainable locations” (para 9.2).
34. The Draft Local Plan allocates circa 338 hectares of new employment sites across the district. This is an increase of 158.8 hectares above the adopted Local Plan.
35. 338 hectares is significantly higher than the requirement identified in the ELS (which is 79.5 hectares) but the Draft Local Plan identifies that this offers a suitable choice to the markets through the identification of new land for a range of employment uses. There is no further detailed explanation as to why the allocation is so much higher than the identified need. It is noted that this represents a further 158.8 hectares of land over and above that which was in the adopted Local Plan.
36. Policy E1 in relation to the Grantham Southern Gateway is retained with only minor changes to text. This allocates 118.19ha of land for B2 and or B8 uses, with E(g)Uses which can be carried

out in a residential area without detriment to its amenity ((i)offices, (ii) research and development or (iii)light industrial)) being acceptable where an end-use has been positively identified.

37. In addition to the strategic allocation in Grantham at Policy E1, 10 further sites are proposed for allocation throughout the District, including three at Gonerby Moor totalling 172.7 hectares. The sites highlighted red are new sites which were not in the adopted Local Plan

Site Reference	Settlement	Address	Site Area (hectares)
ST-SE1	Stamford	Exeter Fields, Empingham Road	9.80
BO-SE1	Bourne	Land South of Spalding Road	8.00
BO-E2	Bourne	Land North of Bourne Eau and East of Car Dyke	3.00
DEP-SE1	The Deepings	Extension to Northfields Industrial Estate, Market Deeping	14.00
DEP-E1	The Deepings	Land Fronting Peterborough Road, Market Deeping	4.20
RBP-E1	Long Bennington	Roseland Business Park	9.01
SKP2-262	Long Bennington	Land at Valley Lane	6.28
SKPR-202	Gonerby Moor	Land at Gonerby Lane, Gonerby Moor, Grantham	29
SKPR-100	Gonerby Moor	Land South of Gonerby Lane, West of the A1, Gonerby Moor, Grantham	63.7
SKPR-182	Gonerby Moor	Grantham Oakdale, Gonerby Moor, Grantham	80

38. The additional allocations at Gonerby Moor are shown below:



39. There are also allocations for employment use at Spitalgate Heath, Prince William of Gloucester Barracks and Station Approach, within Mixed Use Policies.
40. Paragraph 9.23 of the Draft Local Plan states that *“other employment allocations through the District are set out in Policy E2. These allocations have been endorsed by Employment Land Study (2023) are strategic in location and provide a choice to the market so that business and job growth are not constrained by the lack of suitable available sites”*.
41. In housing terms the Draft Local Plan uses the Government’ Standard Methodology, which establishes a need of 14,020 dwellings from 2021 to 2041, equating to 701 dwellings per annum. The Local Housing Needs Assessment has been prepared which confirms the use of the Standard Method.
42. The Draft Local Plan contains of buffer of 20% to provide developed with greater choice of sites and have a contingency in case sites are not delivered. The 20% buffer creates a requirement of 16,975 homes across the plan period. The existing supply creates a shortfall of 2,750 homes and so an additional 23 sites to accommodate 2,901 dwellings have been proposed. This creates a buffer of 21% above the minimum housing requirement. Adopted Local Plan allocations have been retained where they have been reassessed as developable, unless the whole site has been completed or has full planning permission.
43. There are 8 sites proposed in Grantham, delivering 5,693 dwellings:

Policy Code	Settlement	Location	Site Area (hectares)	Indicative number of units
GR3-H1	Grantham	Spitalgate Heath – Garden Village	215	1,350 to be delivered by 2041 (total capacity estimated as 3,700)
GR3-H2	Grantham	Rectory Farm (Phase 2 North West Quadrant)	61.05	1,150
GR3-H3	Grantham	Rectory Farm (Phase 3 North West Quadrant)	22.54	404
GR3-H4	Grantham	Prince William of Gloucester Barracks	184	1,775 to be delivered by 2036 (total capacity estimated as 4,000)
SKPR-117	Grantham	Land to the East of Sheepwash Lane	4	72
SKPR-268	Grantham	Land at Train Station (Mixed Use Allocation)	7.4	268
SKPR-57	Grantham	Land off Belton Lane	34.9	628
SKPR-62	Grantham	The Grantham Church High School Playing Fields, Queensway	4.2	76

44. The four sites highlighted in red are the additional housing developments.

Basis of the Amatrix Objection to the Draft Local Plan – Summary Points

45. The focus of the adopted Local Plan strategy with regards to both employment and residential allocations was on Grantham and specifically the Southern Gateway.
46. The above equated to 118.19 hectares of employment land and 399 hectares of land for residential use delivering 3,425 new homes in the period to 2036 (1,650 at the Spitalgate Heath Garden Village and 1,775 at Prince William of Gloucester Barracks).
47. The Prince William of Gloucester Barracks site has capacity for at least 4,000 new homes and will therefore continue to deliver beyond 2036, and beyond the Draft Local Plan period to 2041.
48. The above strategy is supported by the provision of and proximity of the allocated sites to the Grantham Southern Relief Road.
49. Notwithstanding the above the Draft Local Plan makes no additional provision for additional employment land at the Southern Gateway in the extended plan period to 2041.
50. The failure to allocate additional employment land at Southern Gateway is not predicated on the Employment Land Study which identifies an existing over allocation because both the Council and the Inspector for the adopted Local Plan strongly endorse over allocation to ensure a range of sites in order to provide choice to the market. Although to be clear the over allocation supported by the Inspector was in respect of the Southern Gateway only due to the unique locational characteristics including proximity to new road infrastructure.
51. Whilst over allocation of employment land is again proposed there is no commensurate increase at Southern Gateway over the extended plan period to 2041. Rather the proposed percentage over allocation is significantly increased to 425% of the identified requirement compared to 225% in the adopted Local Plan.
52. Amatrix support the principle of over allocation but not to the extent currently proposed by the Draft Local Plan where 67% (172.7 hectares) of the over allocation of 258.5 hectares is proposed at Gonerby Moor in an isolated and unsustainable location to the north of Grantham. The Gonerby Moor allocations should be deleted from the Plan as they are counterproductive to continued investment in established locations of strategic importance such as Southern Gateway.
53. For the above reasons Amatrix propose the allocation of 17.42 hectares of land as an extension to Brookfield Logistics Park which would be commensurate with the extended plan period to 2041 and reflective of the strategic importance of the Southern Gateway area for continued employment development and inward investment.
54. Amatrix have agreed an option to purchase the land and as set out below there are no insurmountable technical constraints that would prevent delivery in the short term.

Land East of Spittlegate Level as Proposed for Allocation

55. The land proposed for allocation sits to the east of Spittlegate Level (B1174) and the existing Tollemach Industrial Estate, Amatrix's Brookfield Logistics Park which is currently under development, the wider Southern Gateway allocation (GR-SE1) and the site of the implemented planning permission for a Designer Outlet Village.

56. Land to the north is allocated for residential development (site GR3-H1) 'Spitalgate Heath Garden Village' and includes Phase 3 of the Grantham Southern Relief Road with the proposed masterplan showing employment uses to the immediate north of the proposal site. To the north east is the Prince William of Gloucester Barracks (site GR3-H4) also allocated for residential development.
57. To the east of the site is a Water Treatment Works (Slatersford) and the River Witham. Immediately joining the northern boundary are a couple of residential properties.
58. Land to the south of the site is in agricultural use.
59. The Context Plan provided as **Enclosure 1** to these representations shows the site relative to the employment and residential allocations, the Designer Outlet Village and the relief road. It clearly represents a logical extension to development in the Southern Gateway area.
60. The site itself is also in agricultural use and the site assessment in the DSAR identifies that to be Grade 3.
61. The site, along with large swaths of the District, sits in a Limestone Mineral Safeguarding area
62. The majority of the site is in Flood Zone 1, although a small strip immediately adjacent to the River Witham is in Flood Zone 3.
63. The site is not within a Conservation Area and there are no Listed Buildings on the site. South of the site however there is a cluster of Heritage assets including:
- Bowl barrow, scheduled monument (circa 350m south)
 - Church of St Guthlac (Grade I) (circa 690m south)
 - Old School House (Grade II) (circa 740m south)
 - Little Ponton Hall and Service Range with Yard (Grade II) (circa 850m south-east)
 - Stables and Coach house at Little Ponton Hall (Grade II) (circa 850m south-east)
 - Pigeon Cote at Little Ponton Hall (Grade II*) (circa 875m south east)
64. Land around the River Witham, where it adjoins the site, is identified as a Local Wildlife Site (River Witham). Circa 880m east of the site is Little Ponton Quarry Local Wildlife Site. Woodnook Valley SSSI sits circa 1km to the south-east of the site and alongside that Ponton Park Local Wildlife Site and Ancient Woodland.

Suitability and Deliverability

65. The Illustrative Masterplan at **Enclosure 2** demonstrates that the land proposed for allocation is capable of accommodating 47,473 sq m (511,000 sq ft) of floorspace for flexible Eg(iii), B2 and B8 uses. along with servicing and 407 car parking spaces. The associated Illustrative Site Sections at **Enclosure 3** show how the 2 proposed units can be sited on development plateaus that assist in ensuring that development on the site is assimilated into the surrounding landscape taking advantage of the fact that ground levels to the west are higher.
66. In so far as detailed development management issues are concerned then supporting documents included with these representations demonstrate that:

- i. In respect of landscape and visual impact the Landscape and Visual Statement prepared by Influence and attached at **Enclosure 4** concludes that *“although there are some large changes to the views experienced by some receptors, overall, there are few sensitive receptors to the proposals and adverse effects are limited to those in very close proximity. The local area is the subject of several large consents which fundamentally alter the landscape of this area, changing it from countryside to a new urban settlement edge. The proposals will appear contiguous with this scale and form of development and will not extend development further south than the adjoining site”*. In tandem with those conclusions significant opportunities are identified to enhance the riverine corridor to the east so the focus will be on the river itself and the associated landscape rather than the surrounding developments.
 - ii. In respect of Heritage Impact the Technical Note prepared by Cotswold Archaeology and attached at **Enclosure 5** considers the setting and significance of designated heritage assets nearby to the site and concludes that it is possible that development could be brought forward without harm to the significance of those.
 - ix. In respect of transport and highways matters the Transport Technical Note prepared by SLR and attached at **Enclosure 6** concludes that the Site can be accessed by a range of non-car travel modes, particularly with the addition of the enhanced bus service conditioned in application S17/1262, that a swept path analysis has demonstrated that the site access can sufficiently accommodate a 16.5m articulated vehicle, that modelling undertaken as a part of application S21/1507 was applied to the development proposals’ trip generation concluding that its development flows had an immaterial impact on the highway network in the 2038 Future Year scenario, and that junctions where the development flows were the highest have ample capacity to accommodate the additional trips.
 - x. In respect of flood risk and drainage the Flood Risk Review prepared by I&L Consulting and attached at **Enclosure 7** concludes that there is no risk of proposed flooding from either fluvial and tidal, surface water, ground water or sewer sources.
67. Cushman & Wakefield and CBRE are the commercial agency advisors to Amatrix and their initial advice on market supply, demand and deliverability is attached at **Enclosure 8**. They conclude that the critical factors in meeting market demand are commitment to delivery and location. This is borne out by the fact that there is little to no current development between Grantham and Peterborough to the south whilst there is significant interest in Phase 1 of Brookfield Logistic Park with discussion with prospective tenants progressing well such that the expectation is that the scheme will be fully built out and let by Q4 of 2027.

Requested Amendments for Regulation 19 Submission Draft Local Plan

68. In summary Amatrix request that the Council amend draft Policy E1 to include the allocation of 17.42 hectares of land to the east of Spittlegate Level for employment uses and amend draft Policy E2 to delete the allocation of 172.7 hectares of land for employment uses at Gonerby Moor.

25 April 2024

Paul Brailsford
Partner
National Head of Planning and Environment

