

27 August 2025



Planning Policy Team  
South Kesteven District Council  
Council Offices  
The Picture House  
St Catherine's Road  
Grantham  
NG21 6TT



Dear Sir / Madam

**South Kesteven District Council Local Plan (2023 – 2043)  
Regulation 18 Proposed Housing and Mixed-Use Site Allocations Consultation**

These representations are prepared by Savills on behalf of the Secretary of State of Defence (SSOD) and the Defence Infrastructure Organisation (DIO) in respect of their land interests at the Prince William of Gloucester Barracks, Grantham (PWG).

The site is allocated within the adopted South Kesteven Local Plan (adopted January 2020). The land is illustrated at Figure 1 below. The DIO support the Draft Plan's intention to continue to allocate the site under draft Policy SKPR-65 (GR3-H4).

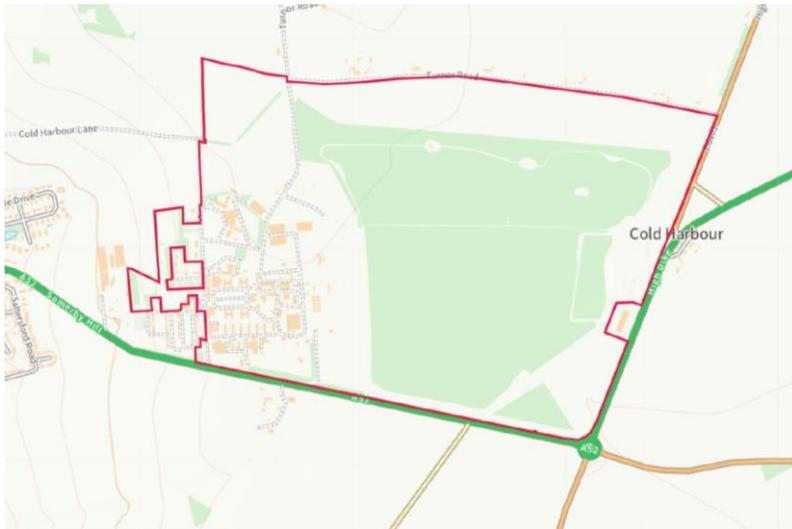


Figure 1 Site Plan

Paragraph 1.8 of the consultation document states that the focused consultation is limited to housing and mixed-use allocations only. Accordingly, we have not made representations on policies or matters which are not set out within the consultation document.

Fisher German previously made representations on behalf of DIO to the previous Regulation 18 consultation in February 2024 (response IDs 2045, 2046, 2047, 2048, 2049, 2050, 2051, 2052, 2053, 2054 & 2055) (see **Appendix 1**). These representations should be taken into account as the Council look to formulate a submission version of the Local Plan in preparation for the Regulation 19 pre-submission consultation.



The representations are structured as follows and consider the following topics:

- Housing Requirement Calculation;
- Proposed Amendments to SKPR-65 (GR3-H4): Prince William of Gloucester Barracks;
- Draft Local Plan Site Assessment Report (July 2025); and
- Sustainability Appraisal Addendum (July 2025).

### Housing Requirement Calculation

The consultation document states at paragraph 2.2 that the standard method establishes a need of 886 dwellings per annum in South Kesteven. However, the South Kesteven Five Year Housing Land Supply Statement (March 2025) states at paragraph 1.5 that the need is 895 dwellings; this is the same number that is included in the Government’s revised local housing need spreadsheet, published December 2024<sup>1</sup>. Therefore, we consider that SKDC should be planning for a minimum of 895 dwellings per annum.

The Regulation 18 consultation document states at paragraph 2.3 that: “the housing requirement is based on the Standard Method calculation”. This statement fails to make the distinction between the Standard Method setting out a baseline need position<sup>2</sup> (i.e. not the complete housing requirement), and the housing requirement which includes additional uplifts for reasons such as economic growth, affordable housing need or cross boundary requirements for example, as set out in the Planning Practice Guidance (PPG)<sup>3</sup>.

### Proposed Amendments to SKPR-65 (GR3-H4): Prince William of Gloucester Barracks

The site sits within Grantham, a settlement which the adopted and emerging Local Plan considers should be the location of the majority of development in the District.

Below we set out representations in respect of the proposed allocation policy at SKPR-65 (GR3-H4), and in particular where we consider that the current wording of the policy (as drafted in the Regulation 18 consultation document) is not justified and / or effective as required by paragraph 36 of the NPPF. The site is considered to be a highly sustainable location for future major residential development and this warrants continued inclusion in the emerging local plan.

Policy Text	Comments
Amended Indicative Housing Numbers up to 3,000 (approx. 1,890 anticipated to be constructed by 2043) including employment generating area of 8ha.	Reference is made to “upto” 3,000 dwellings in the first paragraph, whilst the second paragraph makes reference to a “minimum”.  To ensure consistency and not place an unnecessary ceiling on the ability of the site to contribute to SKDC’s housing supply, the 3,000 dwelling figure should be consistently referenced as a “minimum”.
The proposed development will comprise new homes together with employment generating uses, local services and community uses, extensive open space provision and substantial tree planting...	The policy does not include justification in respect of the requirement for: “substantial tree planting” on the site. We consider this may stem from paragraph 93 of the Inspector’s Report of the adopted Local Plan.  However, since that time, the policy landscape has changed, including the requirement for a mandatory 10% BNG uplift, which ensures required compensation.

<sup>1</sup> See: <https://assets.publishing.service.gov.uk/media/675aaeca9f669f2e28ce2b91/lhn-outcome-of-the-new-method.ods>

<sup>2</sup> Planning Practice Guidance - Paragraph: 001 Reference ID: 68-002-20241212

<sup>3</sup> Planning Practice Guidance - Paragraph: 001 Reference ID: 68-002-20241212

	<p>Wording of the policy should be amended as follows:</p> <p>“...extensive open space provision and <del>substantial tree planting</del> seek to incorporate retention of existing trees where feasible...”</p>
<p><b>Criterion a)</b> The development must include a new employment generating area of 8ha located to optimise access to the A52 in order to support the development of a sustainable new community; which includes class E, B2 and B8 uses.</p>	<p>DIO do not consider that SKDC has provided robust justification of the requirement for an 8ha employment generating area within the allocation.</p> <p>The LPA is allocating a more than sufficient amount of land for employment on allocated employment sites (244 ha vs a requirement of 89.1ha<sup>4</sup>, without the need for residential led sites to provide employment land.</p> <p>The Council appears not to have taken on board comments made by DIO in respect of the ability to deliver employment development at the site (see paragraph 2.56 – 2.60 of representations to the previous Regulation 18 consultation, included at <b>Appendix 1</b>).</p> <p>Rather, SKDC have increased the rigidity of the allocation policy by stating that 8ha of employment generating uses <b>must</b> be provided. This fails to take a balanced account of the more attractive alternative employment locations closer to the A1 and the fact that the ecology, biodiversity and woodland constraints on the Barracks have dramatically reduced the scale of proposed development which in turn affects the site wide viability to clear and decontaminate the site in readiness for future redevelopment.</p> <p>Furthermore, given the BNG and arboricultural constraints on the site, recognition is required on the impact these constraints have on the net developable area of land now available. The site is more attractive for residential than employment uses and recognition should be given to the brownfield status of the site which requires support on early delivery. Employment uses in this location will not aid the early delivery of this site.</p> <p>To now insist on employment uses as a hard requirement is not justified, when the site is located away from the majority of strategic employment sites close to the A1, which passes Grantham to the west and is the only part of the Strategic Road Network to pass through South Kesteven.</p> <p>In fact the employment Land Study states at paragraph 6.35 that: “poor connectivity and potential proximity to new housing will limit the type of employment uses that could be delivered on site”.</p> <p>To mandate employment development away from the Strategic Road Network and require access from the A52, which is expected to be downgraded and provide active travel connections seems counter intuitive.</p>

<sup>4</sup> Employment Land Study (February 2024) – Paragraph 8.10 & 8.11

	<p>As written, we do not consider that this aspect of the policy to comply with paragraph 36 of the Framework, because it is not justified, positively prepared or effective. Such a requirement either needs to be justified, or the wording of the policy amended to remove reference to a requirement for employment uses on the site.</p>
<p>Criterion e) an appropriate mix of housing types, affordability and tenures to meet housing needs, for all stages of life;</p>	<p>Further elaboration is required on what is envisaged by SKDC in terms of meeting housing needs for “all stages of life”. If optional M4(2) and / or M4(3) standards are to be required, this should be set out and suitably justified.</p>
<p><b>Criterion h)</b> Landscape buffers/green infrastructure to be provided to the north of the site.</p>	<p>This criterion should be updated to read as follows:</p> <p><i>“Landscape buffers / green infrastructure to be provided to the north of the site. The type and size of which will be confirmed at the planning application stage.”</i></p> <p>Although in principle the DIO are supportive of a landscape buffer to the north of the site, the policy should be worded to provide suitable flexibility to be informed by appropriate studies, which will support an application and dictate the requirement; based on evidence.</p>
<p><b>Criteria m, n &amp; o)</b></p> <p>m. The development must seek to improve biodiversity and avoid, or minimise, impacts on Woodnook Valley SSSI and the adjacent and nearby Local Wildlife Sites.</p> <p>n. This site is within or includes an area of Biodiversity Opportunity. Proposals on this site should incorporate the relevant principles for development within Biodiversity Opportunity Areas set out in New Policy 4: Biodiversity Opportunity and Delivering Measurable Net Gains.</p> <p>o. This site is within or includes a Green Infrastructure Area. Proposals on this site should incorporate the relevant principles for development within Green Infrastructure Areas set out in Policy EN3 Green Infrastructure.</p>	<p>We question the necessity of this criterion on the basis of them making reference to other policies in the plan. The inclusion of these criteria causes unnecessary duplication and means they are ineffective, as required by paragraph 36 of the NPPF.</p>
<p><b>Criterion i)</b> a comprehensive Travel Plan to maximise integrated transport choice and connections to services and facilities in neighbouring settlements. These could include; appropriate access arrangements and a network of dedicated pedestrian and</p>	<p>Criterion i includes a cycle path to Grantham. Practical considerations such as topography should be taken into account. Reference should be made to such links being provided where required and feasible.</p>

<p>cycle links throughout the new settlement with direct and clearly defined connections to neighbouring settlements and appropriate infrastructure to facilitate the use of electric vehicles;</p>	
<p><b>Criterion ii)</b> of how development will avoid, minimise and where necessary mitigate or compensate any adverse environmental impact, enhance the landscape and provide green infrastructure to support the creation of new habitat and an overall increase in biodiversity across the whole site;</p>	<p>Criterion ii makes reference to an overall increase in biodiversity across the whole site. This reference should be removed, as biodiversity gain can also be provided off site, to align with the mitigation hierarchy set out in the Environment Act (2021).</p>
<p><b>Criterion iv)</b> a comprehensive heritage impact assessment to demonstrate how development will avoid, minimise and enhance or compensate any adverse effect on designated and non-designated heritage assets including Belton House and Registered Park and Garden incorporating an integrated assessment of their significance and related setting. The proposal must take into account the Belton House Park Setting Study and Policy GR1;</p>	<p>The policy criterion has been updated to include reference to taking the “Belton House Park Setting Study” into account.</p> <p>It should be noted that this study formed part of the evidence base in relation to the adopted Local Plan. Reference to the study was not included in the adopted plan. It is not apparent what has changed for SKDC to consider such wording should be included now.</p> <p>It should also be noted that the study was published in 2010. The study would therefore not provide effective justification for the policy, as by the time of adoption of the Local Plan, the study will be nearly 20 years old.</p> <p>Overall, to ensure that the policy is suitably flexible, and therefore effective, it should be taken into account that any potential heritage impacts will depend on the type and extent of development proposed on the site.</p> <p>This will impact the type and level of any harm that may be caused, and by extensions opportunities that may exist for public benefits to exist in order to outweigh this.</p>
<p><b>Criterion vi)</b> The site is situated within a Mineral Safeguarding Area. A Minerals Assessment will be required to accompany any planning application for the site.</p>	<p>The updated requirement to include a Minerals Assessment is noted. However, due to the proximity of existing residential development this would restrict significantly where on the site mineral extraction could take place reducing the scale of any extraction to that which is not commercially viable.</p> <p>The Site comprises an active military establishment along with a large amount of recent tree planting. The Site has also not been identified in the emerging Waste Minerals Plan.</p> <p>In this context whilst the site may contain minerals, its extraction is unlikely to be viable, nor would it deliver the range of benefits which will be provided by the development of the site for residential and wider uses.</p> <p>We are aware of extraction sites being approved in the vicinity and there being more suitable locations for extraction being</p>

	<p>explored through the development of the emerging Lincolnshire Minerals and Waste Plan, which does not include this site.</p> <p>On this basis whilst the DIO are prepared to undertake a Minerals Assessment to support any application in accordance with the Minerals and Waste Plan, there is no requirement for there to be a policy requirement in the Local Plan to produce such evidence as this amounts to duplication of policies and thus conflict with NPPF Para 16f.</p>
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We understand that the Regulation 19 Local Plan is due to be consulted on in January 2026, based on the LDS published in February 2025. DIO will then make further representations in respect of the SKPR-65 draft allocation, especially in light of comments made in this representation.

Over the coming months a range of technical work is being undertaken by SKDC to support the preparation of this Regulation 19 draft plan. We look forward to engaging constructively with SKDC during this period, and engaging in further discussion regarding the representations submitted. We will seek continue working collaboratively with SKDC to support the progression of the Local Plan, ensuring a robust evidence base for allocation of PWG.

**Draft Local Plan Site Assessment Report (July 2025)**

The Draft Site Assessments Document 2025 is a useful tool, however its lacks evidence to justify the conclusions in line with paragraph 36 of the NPPF. Overleaf we set out comments in relation to the site assessment undertaken in respect of SKPR-65 (GR3-H4): Prince William of Gloucester Barracks.

Category	Query Regarding Assessment
Land Type	<p>The assessment states that the land type is “Mixed”. However, DIO consider that a large proportion of the site, principally around the operational military facilities present on the site should be classed as brownfield. The areas that are undeveloped are largely fields and areas of tree cover which are unlikely to be the subject of development.</p> <p>This is particularly the case when the neighbouring Spitalgate site listed as “Brownfield”, although it has very limited brownfield land, and is for the vast majority, greenfield.</p>
Site Deliverability Timetable	<p>Reference is made to the site being deliverable over the long term (10+ years). This results in an amber assessment for this category. However, the first dwellings on this site will likely begin to come forward within the first 10 years following adoption of the plan.</p> <p>It is not clear why an amber classification has been assigned on this basis. A site of this size and scale will inevitably deliver over a long period, across the extent of the plan period and beyond. Paragraph 77 of the NPPF supports significant extensions to towns as often being best achieved through planning for larger scale development.</p>
Surface Water Flood Risk	<p>The EA flood map for planning records the existence of surface water flooding sporadically across the site.</p> <p>The assessment provides a red assessment for this category on this basis, which we consider should in fact be green. Paragraph 175 of the NPPF includes an exception in relation to the sequential test, where a site specific assessment can demonstrate that development would be acceptable.</p> <p>The current methodology followed by SKDC is therefore too broad an approach considering the ability to mitigate surface water risk through development, and indeed the fact the vast majority of site assessed is included in the same category due to the existence of surface water flood risk across the majority of sites assessed.</p>

<p>Proximity to closest Designated Site (SAC, SPA, SSSI)</p>	<p>The assessment provides a red assessment in this category, based on the draft allocation being 0km – 5km from such sites.</p> <p>This is not necessarily a constraint. There should be further integration of the reasons for such designations, the potential for development to impact them, and indeed the mitigation available if any impacts are expected to occur.</p>
<p>Impact on the Strategic Highway Network</p>	<p>It is concluded that there is expected to be a “Severe” impact on the strategic Highway Network. It is considered that without a suitable level of technical assessment, including detailed modelling, it is not possible to draw this conclusion conclusively, and indeed this does not factor in potential mitigation. In the Inspectors report of the adopted local plan, it was concluded at paragraph 89 and 90 that highways capacity can be satisfactorily dealt with.</p> <p>Alternative wording should be used than severe, given the connotations this gives in respect of paragraph 116 of the Framework, especially in the absence of a Transport Assessment. Whilst significant impacts are likely to arise from the cumulative developments planned in the area, a combination of a Strategic Transport Assessment and planned major highway and public transport works should be proposed which seek to address this, along with contributions from planned developments which in turn should mitigate impacts and not result in severe highway impacts.</p>
<p>Site affected by Minerals and Waste Policy</p>	<p>The assessment provides a red assessment in this category, based on the existence of limestone safeguarding covering the site.</p> <p>This should be considered in the context that a third of land within South Kesteven is within this area; the Site comprises an active military establishment; and the Site has not been identified in the emerging Waste Minerals Plan</p> <p>It should also be considered that the largest allocation in the adopted and emerging Local Plan – Spitalgate Heath (Application S14/2169, was granted permission at planning committee in February 2019) and is within the same limestone safeguarding area.</p>
<p>Proximity to Local Wildlife Sites</p>	<p>The assessment provides a red assessment in this category, based on the site being 0 – 1 km from an LWS. The designation in question relates to an LWS near road verges. It is unlikely that such areas would be impacted by development aside from small areas of loss potentially required to facilitate access, which could be mitigated through enhancement elsewhere.</p>
<p>Proximity to Shops</p>	<p>It is correct that the site is currently over 2km from shops. This conclusion does not however take into account the fact that development on site will include a local centre, which will be supported by the critical mass of residents in the new development. Furthermore, the adjacent Spitalgate scheme also plans to include a local centre and community facilities.</p>
<p>Distance from Public Right of Way</p>	<p>The assessment notes that the site is 0.4km+ away from a public right of way.</p> <p>This assessment does not take into account new footpaths / connectivity and new access to open space will be provided as part of the proposed development.</p>

<p>Distance from Local Nature Reserve (LNR)</p>	<p>The assessment provides a red assessment in this category, based on the site being 10+km away from a Local Nature Reserve.</p> <p>It is not clear why this is considered a negative. It could be considered a positive from the perspective of encouraging such development to be away from designated site and reducing the potential for such sites to be impacted by an increase in visits from new residents. Furthermore, extensive new areas of green space will be provided on site to support the requirements of future residents.</p> <p>Proposals for the site include the retention and provision of public access to areas of woodland which can be incorporated into a new masterplan (where feasible). This overcomes any negatives associated with distance from a LNR related to access to areas for outdoor recreation.</p>
<p>Overlap with Agricultural Grade 2</p>	<p>The assessment concludes that 4.38% of the site is Grade 2 agricultural land.</p> <p>This is categorised as in the red category. It should however be noted that this is a much lower % than that seen at Spitalgate Heath, which was approved at planning committee in 2019 (ref: S14/2169).</p> <p>The threshold for Natural England to be consulted in terms of loss of Best and Most Versatile (BMV) agricultural land is 20ha on unallocated land.</p> <p>The site already allocated, so Natural England would not be required to be consulted.</p> <p>Nonetheless, on the worst-case scenario basis of 9.71% of the site being Grade 2 &amp; 3 (and indeed all of that being Grade 3a) then approx. 18 hectares of the approx. 182 hectare site would contain BMV agricultural land classification.</p> <p>In addition, it should be noted that within SKDC more widely, there is a large amount of Grade 2 agricultural land which is not proposed to be allocated for development.</p>
<p>Overlap with Agricultural Grade 3</p>	<p>The assessment concludes that 5.33% of the site is Grade 3 agricultural land.</p> <p>This is categorised as in the red category. It should however be noted that this is a much lower % than that seen at Spitalgate Heath, which was approved at planning committee in 2019 (ref: S14/2169).</p> <p>In addition, it should be noted that within SKDC more widely, there is a large amount of Grade 3 agricultural land which is not proposed to be allocated for development.</p>

<p>Air Quality Management Area</p>	<p>The assessment states that the site is 0 – 3km from an Air Quality Management Area (AQMA). The nearest AQMA is located along the A52 / B1174 in Grantham town centre.</p> <p>It is not clear whether the fact the site is currently comprises an active military establishment or the opening of the A52 bypass via Whalebone Lane has been taken into account in terms of likely reducing the traffic pollution impacts of development at PWOg on the AQMA. Furthermore, the plans to downgrade the A52 should also be taken in to account.</p>
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**Sustainability Appraisal Addendum (July 2025)**

The Sustainability Appraisal Addendum 2025 published with this consultation does not re-assess existing draft allocations carried from the Regulation 18, despite significant changes to the policy wording. There is a need for the Sustainability Appraisal (SA) to follow a systematic updating process during each stage of preparing local plans. This is in line Section 3a of Regulation 12 of The Environmental Assessment of Plans and Programmes Regulations 2004, which require current knowledge to be taken into account when considering likely significant effects, which also feeds through to advice in the PPG<sup>5</sup>. The SA should therefore be updated to reflect significant changes to policy and reassess the sites, not just the additional sites that have been added as part of this consultation which are represented in Appendix 1 of the SA.

We trust that the above and overleaf is helpful. Please do get in contact should you wish to discuss the submission in further detail.

Yours sincerely



**Michael Davies**  
Director

<sup>5</sup> Planning Practice Guidance - Paragraph: 021 Reference ID: 11-021-20140306



**Appendix 1: Draft Local Plan Consultation (Regulation 18) Representations prepared by Fisher German LLP on Behalf of the DIO**

See separate document.