

**Reg 18 Consultation Response on behalf of Bloor Homes (East Midlands)**

**Phase 2, Somerby Hill, Grantham (Part of the Site was submitted for Call for Sites – Ref. SKPR-238)**

**Introduction**

1. This submission has been prepared by Cerda Planning on behalf of Bloor Homes in response to the South Kesteven Local Plan 2023 – 2043 Regulation 18 Consultation.
2. Bloor Homes currently have an interest in and are promoting Phase 2, Somerby Hill, Grantham. The site is located to the southeast of Grantham beyond the extent of the existing built up area/urban area of Grantham. The site comprises two agricultural fields. The land slopes notably from the south, up to the north towards Cold Harbour Lane. The site is not covered by any restrictive designations within the Local Plan, although is identified as forming part of a Mineral Safeguarding Area for limestone. The site measures circa 18 ha, with the prospects of delivering 200-250 dwellings.



Figure 1 – Site Location Plan

3. As part of the Local Plan review, part of the site was submitted for Call for Sites (Ref. SKPR-238) (as shown in the extract below) and assessed as a 'not preferred site' in the Draft Site Assessments Report (July 2025) with the only commentary noted being due to the site falling within an area

affected by a minerals and waste policy from the adopted Lincolnshire County Council Minerals and Waste Plan (2016).

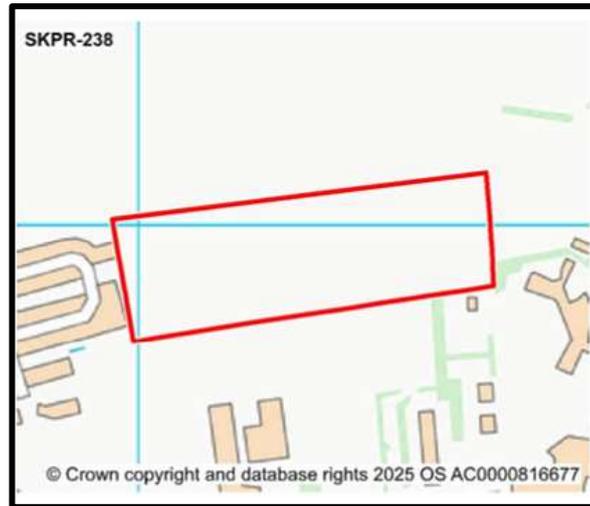


Figure 2 – Call for Sites

4. Since the original Call for Sites submission which was made by the landowner, Bloor Homes has secured permission and started construction Phase 1 (see below), secured an option on the part of the site submitted previously for the call-for-sites as well as having acquired the remainder of the field to the north and an additional parcel of land to the west which was not originally included in the Call for Sites exercise. The complete parcel which Bloor Homes are now promoting can be seen in Figure 1 – Site Location Plan.
5. This proposal would seek to build on from the Phase 1 – Land on North Side of A52 Somerby Hill, Bridge End Road, Grantham (Application ref. S23/1240) which has planning permission for the erection of 250 dwellings with landscaping, open space, access and associated works with Bloor Homes being the applicants. This site is immediately to the south of Phase 2, Somerby Hill, Grantham. See extract below:



Figure 3 – Phase 1 Sommerby Hill

6. Comments are made below in respect of the appropriateness of the above site to make a contribution towards meeting the Local Housing Need over the plan period. However, notwithstanding this, first and foremost comments are made in respect of delivering the Local Housing Need and associated proposed allocations.
7. These representations submitted seek to constructively comment on the emerging position of the Regulation 18 Consultation – Proposed Housing and Mixed-Use Site Allocations. It is acknowledged that the Local Plan Review was due to go to Regulation 19 consultation but in the period following Regulation 18 consultation, the NPPF was updated and published in December 2024. The updated NPPF and associated Planning Practice Guidance included revisions to the standard method for calculating local housing need. The revisions have increased the need for South Kesteven District from 701 homes per annum to, purportedly, 886 per annum. In response to the revised housing targets for the district presented in the latest NPPF, South Kesteven are completing a focused Regulation 18 consultation on 'Proposed Housing and Mixed-Use allocations' as per the Regulation 18 stipulations of the Town and Country Planning (England) Regulations 2012.
8. Cerda welcome and applaud the Council's pro-active approach to re-visiting the Regulation 18 plan in seeking to meet the full local housing need as soon as possible, as opposed to seeking to delay delivery by hastily progressing a substandard plan to Regulation 19 under the transitional arrangements as set out at Paragraph 234 of the NPPF.

9. The consultation focuses on any changes to the site allocation policies and proposals within the Draft Local Plan in response to the increased housing requirement for the district within the latest National Planning Policy Framework. Paragraph 36 of the NPPF – Examining Plans states:

*“Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are ‘sound’ if they are:*

- a) **Positively prepared** - providing a strategy which, as a minimum. Seeks to meet the areas objectively assessed needs<sup>20</sup>, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** – deliverable over the plan period, and is based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with policies in Framework and other statements of national planning policy, where relevant.

**Footnote 20** – Where this relates to housing, such needs should be assessed using a clear and justified method, as set out in paragraph 62 of this Framework.”

10. As such, these representations are submitted seeking to constructively comment on the emerging position and key aspects of the Local Plan, to help South Kesteven to refine and shape the strategy and policies of the Plan.

11. Comments are principally made in relation to the housing need being planned for and the proposed allocations of future development. Proposed allocated sites coming forward, as a result of the new standard methodology which has increased the need for housing in South Kesteven.

### **Previous Consultation**

12. It is acknowledged that two consultations have already been undertaken, prior to this Regulation 18 – Proposed Housing and Mixed-Site Allocations consultation, as follows:

- Consultation on the scope of Plan – 12 October – 23 November 2020

- Consultation on Draft Local Plan – Regulation 18 – 29 February – 25 April 2024

13. The consultation on the Reg 18 Draft Local Plan was the second consultation, and based on:

- District's development need;
- Which policies the Council intends to amend;
- Sites receive through the Call for Sites exercise which was launched in 2020;
- Proposed new policies; and
- The Sustainability Appraisal and Habitat Regulations Assessment.

14. In the Reg 18 Statement of Consultation, which was published by the Council on February 2025, it is identified that the main objections during the identified were; proposed allocations, particularly regarding the infrastructure capacity, lack of facilities, loss of green/open space, loss of habitats, traffic impact, and surface water/flood risks. There were also concerns that the Plan is reliance on large sites in Grantham, delivering over half of the housing requirement on large strategic sites, which may not be deliverable for the reasons stated above. For instance, paragraph 3.14 states the main themes raised through the consultation were:

- *“Significant number of objections to proposed residential allocations. Concerns particularly regarding infrastructure capacity, lack of facilities, loss of green/open space, loss of habitats, traffic impacts and surface water/flood risks.*
- *Concerns that the Plan is reliant on Grantham delivering over half of the housing requirement on large strategic sites.*
- *Support for the overall settlement hierarchy and distribution of growth. However, comments on the settlement hierarchy also raised objection to growth being limited in smaller villages.*
- *Objections identifying Claypole as a larger village and Hough on the Hill retaining its status as a smaller village.*
- *Support for the inclusion of a climate change chapter and the Council's ambitions to national net-zero targets.*
- *Concerns that the affordable housing percentage requirement is such a large range.*
- *General support for the new policy on Biodiversity Opportunity and Delivering Measurable Net Gains.*

- *Concerns that The Deepings will have a lack of open space.*
- *Concerns over the employment growth forecast scenario that has been used to determine employment need within the Plan review.*
- *Concerns about the lack of employment within Stamford.*
- *That Brownfield should be developed before greenfield.*
- *The Plan period is not considered to be long enough for the next stages, and it should be rolled forward to ensure that the plan period provides a minimum of 15 years at adoption.*
- *Objections to the requirement of community support on edge of settlement schemes, as well as ambiguity over the definition on 'edge of settlement' and 'community support'. "*

15. In terms of progressing the Local Plan, it is noted that the published Local Development Scheme (February 2025) sets out the key milestones and timescales for the Emerging Local Plan. It sets out the following dates:

- Consultation on Draft Local Plan Focussing on Additional Sites (Regulation 18) – June – July 2025
- Consultation on the Pre-submission Local Plan (Regulation 19) – January – February 2026
- Submission (Regulation 22) – November 2026
- Examination (Regulation 24) – November 2026 – October 2027
- Inspector's Report (Regulation 25) – October 2027
- Adoption (Regulation 26) – November 2027

16. The Council note the risks to the preparation of the Local Plan which could affect the work programme and timetable, these include:

- Changes in legislation or to National Planning Policy
- Higher than expected response to consultation
- The Planning Inspectorate (PINS) unable to meet the timetable
- Failure to comply with Duty to cooperate
- Plan being found unsound

- Legal challenge to the Local Plan
- Reduced number of officers and knowledge within the team because of staff sickness/turnover
- Financial resources
- Failure of external consultations

17. In the following section, comments on the Draft Proposed Housing and Mixed-Use Allocations will be made. It will consider the 'soundness' of the Plan, in line with Paragraph 36 of the NPPF.

### **Consultation Draft Comments**

#### **Housing Need**

18. It is pleasing to see the Council have used the Government's Standard Method in calculating the need for the new Plan, and are seeking to meet the increased local housing need through further allocations in the emerging Local Plan, as opposed seeking to justify a reduced requirement for housing. However, in considering the housing requirement, there are three matters raised: 1, is the local housing need of 886 dwellings per annum up-to-date, 2. is the plan period sufficiently robust to ensure it meets requirement of the NPPF at the point of adoption and 3. is the plan subject to an appropriate buffers of housing sites to ensure need is met.

##### 1. Local Housing Need

19. Using the Standard Method, it is identified that the revisions have increased the need for South Kesteven District from 701 homes per annum to 886 per annum, equating to 17,720 dwellings. It is not clear when the calculation was undertaken to ascertain if it was calculated correctly; it is assumed this is prior to March 2025 with the release of the updated affordability statistics. However, we calculate the local housing need to be as follows:

2024 housing stock figure (unrounded) is 67,416

Calculate baseline using 0.8% of stock -  $67,416 \times 0.008 = 539.328$

The housing stock baseline figure is then adjusted based on the affordability of the area.

$((\text{five year average affordability ratio}-5)/5) \times 0.95 + 1$

$((8.46-4)/5) \times 0.95 + 1 = 1.6574$

Minimum annual local housing need figure =  $539.328 \times 1.6574$

Minimum annual local housing need figure = 894

20. Having regards to the above, based on an annual requirement of 894, we calculate the housing requirement over the plan period should be increase by 160, to a total of 17,880 and additional sites allocated to meet this further need.

## 2. Plan Period

21. The LDS which was published in February 2025 provides key milestones and timescales for the Draft Local Plan, in which the anticipated adoptions runs in November 2027. The LDS also notes that there are some risks that these key milestones could be delayed by a range of factors (as stated in the above section).
22. It should be noted that the plan runs until 2043 with the view to over a 20-year period. However, if the adoption is delayed even by a small margin and falls into 2028 there is a risk this means strategic policies will not look ahead over a minimum 15 year time period from adoption (notwithstanding the acknowledgement that some allocations do extend beyond the plan period) as stated in the NPPF 2024 which has potential implications on the soundness of the Plan. Paragraph 22 of the NPPF states the following:

*“Strategic policies should look ahead over a minimum 15 year period from adoption<sup>14</sup>, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery<sup>15</sup>.”*

23. As stated in the above LDS, the Council note that there are some risks associated with timescales of adopting the New Local Plan. it is not unreasonable to factor in a contingency on the timescale given the potential risks which could see the adoption date taken extend beyond the anticipated November 2027 deadline. Given the potential for 'slippage' in the LDS programmes which is commonly seen on the majority of Local Plan examinations, it would be advisable that the Council extend the plan period by one or two years to anticipate the delays with adopting the Plan. This would result in an increase in the housing requirement by 894 units for one year resulting in a total of 18,744 or 1,788 for two years to a total of 19,688.

### 3. Appropriateness of the buffer

24. The Plan allocations and trajectory presently contain a buffer of around 11% above the minimum requirement of 17,729 dwellings (less when accounting for the minimum 17,880 homes identified above, and notably less if extending the plan period), this equates to a housing supply of 19,672 dwellings across the plan period. Cerda has concerns regarding the sufficiency of the buffer/allocations made, and associated potential for delays resulting in inability to meet the housing need/requirement, maintain a sufficient supply of housing, and resultingly maintain an up-to-date plan delivering plan-led growth; as well as the current buffer potentially limiting choice and competition in the market for land.
25. In comparison to the currently proposed 11%, a notable parallel can be drawn from a comparison with the current Adopted Plan and comments made during its examination.
26. The Adopted Plan contains a buffer of 18% to provide a greater choice of sites, as well as to provide a contingency bin case of lack of delivery. However, there has been no justification as to why the buffer has now decreased to 11%, despite there being an increasing housing need; arguably to ensure robustness, the buffer should remain at the same percentage, or even be increased.
27. When the previous Plan was examined, the Inspector's Report following the examination, comments on the housing requirement and appropriate 20% buffer on forward provision from paragraphs 135-146. At 135 they set out:

*"135. The housing requirement over the plan period [2011-2036] needs to be increased from 15,625 to 16,145. In profiling the annual requirement this would need to reflect a step-change from 625dpa to 650dpa from 2016/2017 onwards. The submitted plan asserted that the identified supply of 8,726 dwellings faced in a 13% "over allocation" to offer choice and contingency to the market, recognising the plan's reliance on strategic greenfield sites, particularly at Grantham and Stamford. Given the updated housing requirement this needs to be revisited as the figure is very likely to have as a consequence of updated monitoring in 2018/19 and various modifications recommended to the housing allocations."*

28. At 145 and 146, they conclude

145. Looking over the entirety of the plan period and total deliverable and developable supply, the latest evidence in the revised trajectory indicates a supply buffer of 18%. This would amply provide for an ongoing supply of housing land.

146. Taking all of this into account, the plan needs to contain an up-to-date trajectory and explanatory text that reflects the following:

- The adjusted higher housing requirement from 2016/17 onwards;
- Updated completions 2011/12-2018/19 and the shortfall since 2011
- The application of a 20% buffer, brought forward from latest in the plan period to provide a realistic prospect of achieving the planned supply;
- The shortfall to be dealt with over the plan period (Liverpool method); and
- A positive windfall allowance (2021-2036)

29. In considering the appropriateness of the existing buffer, it is worth noting the Council is unable to demonstrate a 5-year housing land supply position after only five-years following the adoption of the plan. whilst it is acknowledged that this in part due to the local housing need having increased recently, the Council's forward supply position has continued to decrease since adoption of the plan. The following sets out the position over the last few years.

**2020 5YHLS summary** (five year housing land supply assessment for 2020-2025):

Total requirement, including shortfall, plus buffer = 3,403 (20% buffer)

Supply = 4,297

Number of years supply = 5.26

**2021 5YHLS summary** (five year housing land supply assessment for 2021-2026):

Total requirement, including shortfall, plus buffer = 3,481 (10% buffer)

Supply = 4,001

Number of years supply = 5.22

**2022 5YHLS summary** (five year housing land supply assessment for 2022-2027):

Total requirement, including shortfall, plus buffer = 3,557 (10% buffer)

Supply = 4,077

Number of years supply = 5.2

**2023 5YHLA summary** (five year housing land supply assessment for 2023-2028):

Total requirement, including shortfall, plus buffer = 3,583 (10% buffer)

Supply = 3,950

Number of years supply = 5.01

**2024 5YHLS summary:** N/A – the Council had previously confirmed its five year supply position through an Annual Position Statement, and the latest published housing land supply position of 5.01 years was confirmed until 31 October 2024. A subsequent APS was not prepared for 2024-2029 as at the time under the 2023 NPPF (paragraph 76) the Council was not required to update the housing land supply position as the adopted Local Plan was less than five years old.

**2025 5YHLS summary** (five year housing land supply assessment for 2025-2030):

Total requirement, including shortfall, plus buffer = 4,699 (5% buffer)

Supply = 3,827

Number of years supply = 4.07

30. In considering why that supply has fallen, it is notable that this is largely as a result of delays to the largest strategic sites.
31. In the adopted Plan, Spitalgate was anticipated to construct 2,150 units by 2036 and 1,775 units for Prince William of Gloucester Barracks. In the proposed Allocations,
32. In December 2022, the Council's Authority Monitoring Report stated that the Spitalgate Heath Garden Village (GR3-H1) would deliver a total of 2000 homes by 2036, and Prince William of Gloucester Barracks (GR3-H5) would deliver a total of 1175 homes by 2036.
33. In the Council's latest published version of the report (March 2025), the Council have identified significant delays with these sites. In regard to Spitalgate Heath Garden Village, the Council have reported delays with this site, with the Outline application (S14/2169) pending for more than 10 years – timescales for the detailed consent must also be factored in considering the Outline application took more than a decade and still pending consideration.
34. Additionally, for the Prince William of Gloucester Barracks, there has been no planning application submitted to date.. The Council have not included this site in the latest five-year housing land supply position. As stated above, there have been significant delays in bringing the large sites

forward, with no real progress made. This means that there are still uncertainties around the delivery of these schemes.

35. Considering those two sites moving forward, Spitalgate (proposes to deliver 1,512 units across the plan period) and Prince William of Gloucester Barracks (proposed to deliver 1,890 units across the plan period) which is approximately 20% of the total housing requirement of the plan to be delivered on two sites. These sites have not presently delivered, due to the specific constraints associated with bringing forward schemes of such scale. This puts pressure on the Council's supply if they were to retain the proposed buffer of only 11%, as it may not be enough meet the identified local housing need especially in the short term.
36. To take account of potential delays in the delivery of housing across all sites (which inevitably arise as part of the planning and construction process), and to provide flexibility in South Kesteven's housing land supply position through the plan period (which requires a buffer of at least 5% against the planning requirement / LHN), a buffer should be provided in the actual housing land supply through allocations above the plans housing requirement.
37. The Local Plan Expert Group prepared a Local Plans Report to the Communities Secretary and to the Minister of Housing and Planning (March 2016). The report recommends that in order to significantly boost housing land supply Local Plans should make a further allowance; equivalent to 20% of their housing requirement, in developable reserve sites as far as is consistent with the policies set out in this Framework, for a minimum fifteen year period from the date of plan adoption, including the first five years. The purpose of reserve sites is to provide extra flexibility to respond to change (for example, to address unmet needs) and/or to help address any actions required as a result of the Government's housing delivery test.
38. It is suggested that the Council increase the buffer to 20%.
39. The current housing need with the 11% buffer proposed equates to a housing supply of 19,672 dwellings. If a 20% buffer was applied this would increase the housing requirement to 21,264 across the plan period.
40. Taking this into account, based on the current housing requirement 19,672 (11% buffer), South Kesteven should make further allocations for additional 1,592 units (+ 9% buffer), bringing the total to 21,264 units. Notwithstanding that this is based on the out-of-date LHN, corrected above, and would not account for any extensions of the plan period as suggested.

41. Additionally, in the Draft Plan the Council provide an indicative housing trajectory. However, the Council have not provided any justification or detail on the delivery strategy. There are sites included within the housing trajectory which remain 'uncertain' with how long it will take to deliver such as the large urban extensions referred to the above but no light on how the Council look to overcome the uncertainties and deliver. For instance, the Council have combined the existing and proposed Local Plan Allocations (not highlighted uncertainties with previous large allocations / delays) as well as included large sites with planning permission not under construction – not highlighting that some sites have not progressed due to technical constraints which could cause further delays. An extract of the housing trajectory can be seen below:

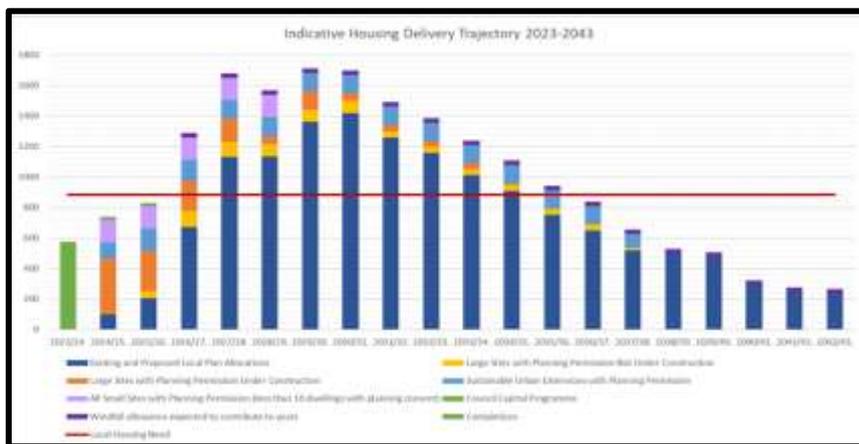


Figure 4 – Reg 18 Housing Delivery Trajectory

42. There remain concerns with the indicative housing trajectory issued in the Reg 18 plan, compared to the Five-year Housing Land Supply Statement. The indicative housing trajectory shows a housing delivery in year 2027/28 of circa 1700 dwellings compared to 799 units suggested in the Housing Land Supply Statement. A disparity of 901 units which is a significant amount of units. Notwithstanding the above, calculations have included sites within the proposed allocations – however, it is not guaranteed that the new Plan will be adopted by 2027, which provides inflated figures.

43. Ahead of the Regulation 19 document, it is suggested that the Council increase the buffer from the proposed 11% to 20% for the reasons stated above. The increase buffer from 11% to 20% would provide a safety net for the Council ensuring the housing need targets are met, as well as, providing developers with more choice.

## **Proposed Site Allocations**

### **Delivery and Build-out Rates**

44. In this section comment is made in respect of concerns with potential delays with the delivery of the strategic allocations. These representations do not seek to oppose allocations, just query realistic delivery and build-out rates. In respect, reference is made to the 'Independent Review of Build Out Rates draft analysis June 2018 (which focuses on build-out rates compared to the final report) by Rt Hon Sir Oliver Letwin MP. The Letwin Review sets out that qualitative results on investigation into large sites, the median build-out period for these sites from the moment when the housebuilder has an implementable consent is 15.5 years; implementable consent being a detailed planning permission, not just an outline consent. There is a negative relationship between the size of the site and the percentage of the site built out each year which suggests that the larger the site, the more likely it is to have a low build out rate.
45. In addition to the above, Chapter 5: Other Potential Constraints, provides an assessment of the extent to which the rate of build out on very large sites might be held back by constraints other than the market absorption rate. The effect on build rates is identified as being caused by:
- Lack of transport infrastructure
  - Difficulties of land remediation
  - Delayed installation by utilities companies
  - Constrained site logistic
  - Limited availability of capital
  - Limited supply of building materials, and
  - Limited availability of skilled labour

### **Spitalgate Heath Garden Village (GR3-H1)**

46. The Draft Plan is unable to shed any light on the lead-in times and Guide Build Out Rates due to the scale of the development. There have been some estimates provided; however, there is a concern that these may not provide a true reflection of the realistic build out rates. As mentioned in the section above, the Spitalgate Heath planning application was submitted in 2014, it has been over a decade with no decision for the Outline application. Consideration for the timescales for the detailed Reserved Matters applications alongside delivery of infrastructure etc must also be factored in, and it is unclear at present how this is being considered by the Council.

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## **Prince William of Gloucester Barracks (GR3-H4)**

47. The Prince William of Gloucester Barracks site has not yet had an application submitted, as numerous technical constraints have been identified. The timescales still remain uncertain, however, the Council do not provide any commentary on this.
48. This site was allocated in the Adopted Local Plan under Policy GR3-H4 originally anticipating to deliver circa 4,000 dwellings. However, since its original allocation a number of technical constraints have come to light regarding BNG, highways, as well as acquiring the land. Despite uncertainties around the deliverability of the site, the site is proposed for allocation with a reduced amount of units.
49. Additionally, there are concerns whether/when the site will be delivered in the context of operational needs of the armed forces. For instance, the Ministry of Defence published 'DEFO Disposal Timeline' in 2024, in which it is anticipated to dispose of the Prince of William Gloucester Barracks site in 2029, when originally the site was supposed to be made available from 2020-2024. This creates a predicament, as the site is allocated with its future remaining in uncertainty. Considering timescales for the decommissioning of the site, there is the potential this could be pushed back further if having regards to recent Government announcements on increasing the budget for Defence spending as a % of GDP. For instance, Keir Starmer has indicated that the UK will commit to spending 5% of GDP on defence by 2035. If the Government increase their budget on defence, they may be less likely to dispose of existing assets and may well retain sites such as this.
50. In the published Infrastructure Delivery Plan (2025), Lincolnshire Highways have comments on the transport infrastructure in relation to Prince William of Gloucester:

*"A significant amount of active travel and sustainable transport measures would be necessary to reduce car mode share and make the traffic impact of this development acceptable. Several junctions between the site would need re-configuring."*

51. The Inspector also raised concerns during examination of the current Plan. Paragraph 89 of the report states:

*"There is concern that boosting the role of PWOGB site during the plan period would be undeliverable due to: (i) constricted highway capacity at A52/B1174 Gainsborough Corner junction in advance of the GSSR being completed; and (ii) the ability of the market to sustain two urban extensions in broadly the same peripheral location of the town."*

52. Despite the uncertainties around of deliverability, the Council have allocated this site, albeit with reduced number of units. The allocation equates to a significant amount of the identified housing need, despite justification or evidence provided that this site would be suitable for development.

**Concluding remarks on deliver and build-out rates**

53. Concern is raised with the two above sites, both of these sites together are proposing to deliver 3,402 units across the plan period, which is approximately 20% of the housing allocation on two sites to meet the identified housing need. These sites have not presently delivered as anticipated in the current Plan, and uncertainty remains around the deliverability of these sites. Whilst we do not seek to suggest that these sites, should not be allocated, we consider that a cautious approach should be taken when anticipating the expected housing delivery from these sites over the plan period as allocations. The Council's proposed allocations within the emerging Plan focus heavily on a smaller number of large strategic sites, each expected to deliver in excess of 500 dwellings.

54. However, these sites have historically failed to deliver at the anticipated pace due to their scale and the significant technical and infrastructure constraints associated with them. There is no evidence to suggest that these barriers will be overcome in the short term, and as such, the continued reliance on these large allocations is unlikely to meet the identified local housing need within the required timeframe. Notwithstanding this, Grantham remains the most sustainable location for accommodating growth due to its infrastructure, services, and connectivity. However, to ensure timely and flexible housing delivery, the Plan must allocate a more diverse range of smaller to medium-sized sites, particularly those capable of deliver approximately 200-300 units, which can be brought forward immediately and are capable of delivering housing in the short term. A more balanced strategy provides greater resilience and responsiveness in meeting the Council's housing needs.

55. There were also comments from the Inspector during report on the Examination of the South Kesteven Local Plan 2011-2036 on the Council's strategy of allocating a limited number of large sites to focus growth. Paragraph 75 of the report states:

*"There is concern that there is not sufficient diversity of supply in Grantham and that the submitted plan continuing, and arguably increasing, a strategy reliance on large-scale greenfield urban extensions will fail to significantly boost supply."*

56. Taking the above into account, the Letwin Review places an emphasis on the need to consider potential delays in initial delivery of homes and achieving a detailed planning permission whilst

infrastructure issues and other technical constraints are fully considered, and that LPAs should be cautious when considering build out rates from such sites.

57. There is a need for the Council to increase the proposed allocations within Grantham which rely on smaller sites such as 200-300 units, which will be deliverable quicker, and are immediately available. The current proposed allocations in Grantham take up a significant amount of the identified housing need, despite justification or evidence provided that this site would be suitable for development. Whilst large sites may be great strategic allocations, they are unable to meet the current housing needs due to longer build out rates, as well as longer times to get planning permission.
58. Similar approach was taken in the current Plan, which reflects the Council not being able to meet their current housing needs, as the large sites did not come to fruition due to technical constraints. This is evidenced in the latest Housing Delivery Tests shown in the table below for South Kesteven:

	Year			Total
	2020/21	2021/22	2022/23	
Number of Homes Delivered	525	485	642	1652
Number of Homes Required	434	650	650	1734
Housing Delivery Test Measurement				95%

59. The Housing Delivery Test Measurement for South Kesteven shows that in the last two years there have been a smaller number of homes delivered compared to the required, to meet the local housing need. If you were to measure the results against the new local housing need, the delivery test would show further disparity. With the new Standard Method, the local housing need is identified to be circa 895dpa (without any buffer applied). As such, with the current housing delivery rates, there would be a significant downfall in the delivery of the required housing.
60. It would be advisable for the Council to consider reducing the number of homes to be relied upon from large strategic sites, and seeking to deliver these through a greater number of alternative sites, which generally, are delivered quicker.

**Other Proposed Allocations**

61. It is important to note the Reg 18 Plan proposes to allocate a significant amount of housing to lower order settlements. This can be seen from distribution of housing development table:

Current percentage distribution of development	
Grantham	46%
Stamford	11%
Bourne	9%
The Deepings	11%
Larger Villages	19%
Other Settlements	4%

62. Whilst we support growth across all settlements to meet the identified housing need for South Kesteven. It should be considered that any lower settlements in the hierarchy should not be prioritised for housing allocations over Grantham. As the spatial strategy shows, Grantham is the most suitable location to accommodate growth and sits on top of the settlement hierarchy.
63. Sites such as Land South of Bourne Road and east of Stamford Road (SKPR-233) which, although, classified as 'larger villages' are relatively isolated, and not next to Grantham, Stamford, Bourne, or the Deepings. This site is a new proposed allocation, anticipating to deliver 293 dwellings. This site, similar, to Phase 2 Somerby Hill is situated in a Mineral Safeguarding Area. One of the reasons stated for not proposing allocation of Phase 2 Somerby Hill Grantham. As shown below, in the policies map:

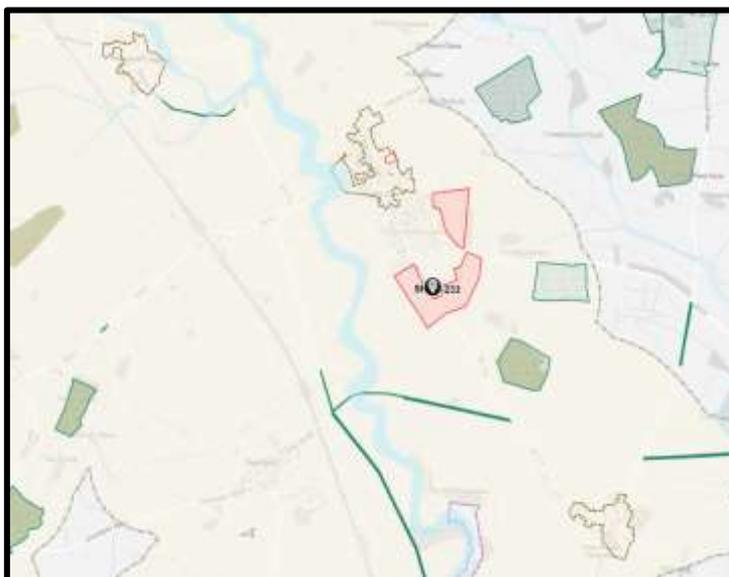


Figure 5 – SKPR-233 Proposed Allocation

64. Corby Glen although is classified as a larger village, it is isolated from Grantham, and the other towns on top of the settlement hierarchy. Corby Glen may have the services required to accommodate some growth, but is not as sustainable compared to Grantham to deliver this type of growth. This would put more pressure on the village, and a strain on existing services. It should also be noted that Corby Glen should not be prioritised over Grantham, when there are sites such as Phase 2 Somerby Hill available and deliverable in the short term. Corby Glen is set in wooded

countryside 12 miles south of Grantham and 15 miles north of Stamford with the village lying on the A151 Colsterworth to Bourne road.

**Phase 2, Somerby Hill, Grantham (Part of the Site was submitted for Call for Sites – Ref. SKPR-238)**

65. Cerda believe that South Kesteven should proposed an additional allocate of this site – SKPR-238 Phase 2, Somerby Hill Grantham, which is suitable, deliverable, and immediately available. There is an opportunity in Grantham to accommodate more growth and deliver more houses, particularly if the trajectory of some larger sites in Grantham are overestimated.
66. Cerda on behalf of Bloor Homes are promoting Phase 2, Somerby Hill which is a sustainable and deliverable greenfield site. It is capable to deliver approximately 200-250 homes. The site represents Phase 2, following an ongoing residential development currently under construction (Phase 1), demonstrating immediate deliverability and a precedent for the suitability of development in this location.
67. Before analysis of the site is undertaken below. It is important to demonstrate that the principle of development is well suited, in accordance with the Council's strategy. Majority of the development proposed within the district is intended to take place in Grantham. The Council support this approach, as Grantham is considered the sub-regional centre, located in the most sustainable location. Grantham is viewed to be able to accommodate majority of the growth during the Plan period.
68. With the current situation, the increased local housing need and being unable to demonstrate a five-year housing land supply, there is a need for more land to come forward. Phase 2, Somerby Hill would make a logical allocation due to its location. The site would infill between the Prince Willaim of Gloucester Barracks allocation, the David Eatch Estate, Phase 1 and Cold Harbour Lane as a natural defensible boundary. It is also noted that the Barracks allocation has seen a reduction from the original 4,000 unit allocation to 3,000 units. The reduction in 1,000 units, means that Phase 2, would be suitably located to accommodate some of those reduced unit numbers. This would also make a logical extension to the Bloor Homes – Phase 1 Somerby site, which has been granted approval to deliver 250 units, in which they have demonstrated that the site was immediately available and deliverable, and will continue to do with Phase 2. Additionally, south of the site is the Spitalgate Heath allocation, which is anticipated to deliver 3,700 units.

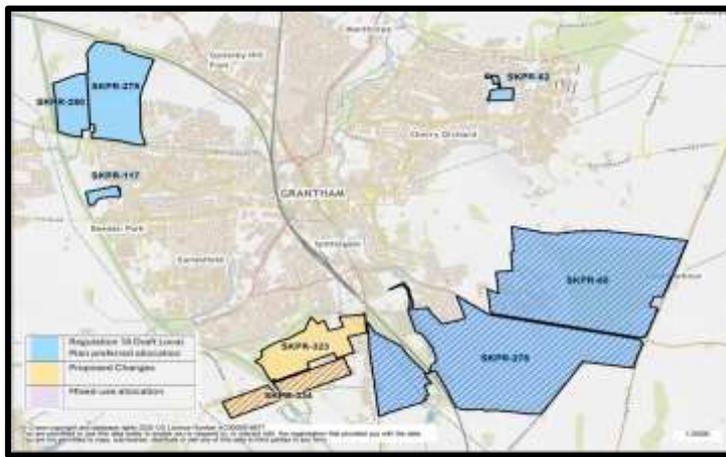


Figure 6 – Reg 18 Proposed Allocations

69. The site forms a logical continuation of development patterns and connects well with Phase 1, Spitalgate Heath, Prince William of Gloucester Barracks and surrounding areas. There are plenty of opportunities for walking, cycling, and public transport already in place or could be enhanced, supporting sustainable travel. Grantham is identified at the top of the Council's settlement hierarchy and is the most sustainable location for growth in South Kesteven. The site is well related to the existing built form and benefits from excellent connectivity to local services, facilities, and transport infrastructure.
70. Phase 2, Somerby Hill was included in the Draft Sites Assessment Report (July 2025). However, only part of the site was assessed as shown in the extract below. Notwithstanding, we respectfully request the full extent of the Phase 2 site be considered moving forwards as part of the Local Plan preparation.

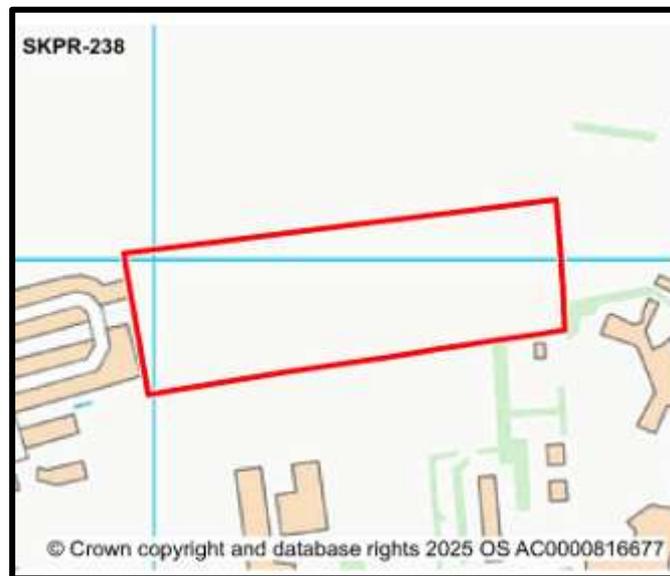


Figure 7 – Phase 2 Somerby (SKPR-238) – Draft Sites Assessment

71. Despite only part of the site being assessed in the Draft Sites Assessment Report by the Council. It provides an indication that the site is suitable for development. Although, it was classified a 'not preferred site', there were no notable reasons as to why the site was not included in the proposed allocations. The Council stated the site was:

*"Site has been identified to fall within an area affected by a minerals and waste policy from the adopted Lincolnshire County Council Minerals and Waste Plan (2016). Appropriate measures would be required to ensure compliance with the affected policy. Other more suitable sites to meet required need across the plan period."*

72. We note that the Council's draft site assessment report identifies that the site falls within an area affected by minerals and waste safeguarding policy as set out in the Adopted Lincolnshire Minerals and Waste Local Plan. We recognise the importance of the safeguarding policies, particularly Policy M11 of the Plan, which seeks to prevent the unnecessary sterilisation of mineral resources. However, it is important to emphasise that inclusion within a Minerals Safeguarding Area does not preclude development, and the policy allows for a balanced and proportionate assessment to be made. Policy M11 states:

*"...Applications for non-minerals development in a minerals safeguarding area must be accompanied by a Minerals Assessment. Planning permission will be granted for development within a Minerals Safeguarding Area provided that it would not sterilise mineral resources within the Mineral Safeguarding Areas or prevent future minerals extraction on neighbouring land. Where this is not the case, planning permission will be granted when:*

- The applicant can demonstrate to the Mineral Planning Authority that prior extraction of the mineral would be impracticable, and that the development could not reasonably be sited elsewhere; or*
- That incompatible development is of a temporary nature and can be completed and the site restored to a condition that does not inhibit extraction within the timescale that the mineral is likely to be needed; or*
- There is an overriding need for the development to meet local economic needs, and the development could not reasonably be sited elsewhere; or*
- The development is of a minor nature which would have a negligible impact with respect to sterilising the mineral resource; or*

- *The development is, or forms part of, an allocation in the Development Plan...*

73. Notwithstanding the above, it should also be noted that the Phase 2 site would not be suitable for mineral extraction by virtue of its proximity to residential development. Working the site would require a buffer from residential development which is located to both the south and west; this would sterilise significant areas of the site making it unviable and additionally, there is no vehicular access to the site that would be suitable for HGVs, with access only available through the Phase 1 site or along Cold Harbour Lane.

74. In respect of achieving a suitable access, Lincolnshire County Council Highways also commented:

*“Access through adjacent (Persimmon Site) to Somerby Hill would be acceptable, but allocation is dependent on that site. Cannot be suitably access from Coldharbour Lane.”*

75. It is appreciated that when the site would have been assessed with the SHELAA, the Phase 1 site (formerly a potential Persimmon site) would have been being delivered and as stated, deliverability would have been dependent on its delivery. Clearly that no longer remains the case as Phase 1 is presently being delivered.

76. Phase 2 would not propose access through Cold Harbour Lane. Instead, it is anticipated that there could be two access points into the site from their existing Phase 1. This would provide a seamless integration into the proposed allocation, without putting pressure on Cold Harbour Lane to accommodate increased traffic. See extract below:



Figure 8 – Proposed Access into Site

77. The Council have identified that there is a significant shortfall in meeting the local housing need, as well as not being able to show a 5-year housing land supply. Despite this, the current allocations do not envisage enough allocations to meet the identified housing need. The Council have not considered the time scales for the larger sites / urban extensions, despite significant delays in these sites comes forward.

78. Phase 2, Somerby should be included in the Reg 19 Plan, it is available, suitable and deliverable within an early period part of the plan period.

### **Conclusion**

79. In conclusion, the views on Regulation 18 – Proposed Housing and Mixed-Site Allocations Consultation are as follows:

- It is positive to see the Council's pro-active approach to re-visit the Reg 18 plan in seeking to meet the fill local housing need as a result to changes in the NPPF 2024.
- The current emerging Plan indicates that there is a need of 886dpa, equating to 17,720 homes. Using the Standard Method calculation, the figure is 894dpa, the requirement over the plan period should be increased by 160, to a total of 17,880.
- It would be advisable that the Council extend the plan period by one or two years to anticipate delays in adopting the Local Plan. this would also result in an increase in the housing requirement by 894 units for one year resulting in a total of 18,744 or 1,788 for two years to a total of 19,668.
- The Adopted Local Plan contains a buffer of 18% to provide a greater choice of sites, as well as to provide a contingency in case of lack of delivery. However, in the emerging plan the buffer is only 11%. Given the trend in housing delivery at the current rate, and reliance on a small number of large sites, it is suggested that a 20% buffer should be applied; if this were the case, this would increase the housing requirement to 21,264 across the plan period (notwithstanding the updated LHN and consideration of extending the plan period above).
- There is an over reliance on large strategic sites to deliver majority of homes during the plan period; with particular concerns in relation to timescales for delivery of the Prince of William of Gloucester Barracks and spitalgate Heath, and a lack of detail on the Council's detailed housing trajectory.

- Grantham is viewed to be the sub-regional centre, with a view to accommodate most of the growth. Phase 2, Somerby Hill should be included in the proposed allocations as it available and deliverable in the short-term, as well as sustainably located.