

## Reg 18 Consultation Response on behalf of William Davis Homes

### Land South of Casthorpe Road, Barrowby (Ref. SKPR-206)

#### Introduction

1. This submission has been prepared by Cerda Planning on behalf of William Davis Homes and landowner in response to the South Kesteven Local Plan 2023-2043 Regulation 18 Consultation.
2. William Davis currently has an interest in and are promoting Land south of Casthorpe Road, Barrowby. The site is currently agricultural land, measuring at 15.1 hectares with the capacity to deliver 200-250 dwellings circa.



Figure 1 – Site Location Plan

3. As part of the Local Plan Review, the site of interest was submitted for Call for Sites (Ref. SKPR-206) and assessed as a 'not preferred site' in the Draft Site Assessments Report (July 2025) due to the potential to have a purported major highways impact on Casthorpe Road, and the potential need to widen it along its length if accommodating more than 150 dwellings, and purportedly other more suitable sites to meet the need across the plan period.
4. 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, including providing information for consideration of the previous SHELAA assessment which overcomes the concerns

raised. However, notwithstanding this, first and foremost comments are made in respect of delivering the Local Housing Need and associated proposed allocations.

5. These representations 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.
6. William Davis 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.
7. 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 the 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.*

8. 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.
9. Comments are principally made in relation to the housing need being planned for and the proposed allocations of future development, as well as discussion on the new standard methodology, which has increased the need for housing in South Kesteven.

### **Previous Consultation**

10. 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
11. The consultation on the Reg 18 Draft Local Plan was the second consultation, and based on:
  - The District's development need;
  - Which policies the Council intends to amend;
  - Sites received through the Call for Sites exercise which was launched in 2020;
  - Proposed new policies; and
  - The Sustainability Appraisal and Habitat Regulations Assessment.
12. In the Reg 18 Statement of Consultation, which was published by the Council on February 2025, it is identified that the main objections 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 reliant on large sites in Grantham, delivering over half of the housing requirement on large strategic sites, that 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 for 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'."*

13. 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

14. 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 consultants

15. 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**

16. 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 site allocations in the emerging Local Plan, as opposed to 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**

17. 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.

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

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

Minimum annual local housing need figure = 539.328 x 1.6574

Minimum annual local housing need figure = 894

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

## 2. Plan Period

19. The LDS which was published in February 2025 provides key milestones and timescales for the Draft Local Plan, in which the anticipated adoption 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).
20. It should be noted that the plan runs until 2043 with the view to cover a 20-year period. However, if the adoption is delayed by even a small margin and falls into 2028 there is a risk this means that strategic policies will not look ahead over a minimum 15 year time period from adoption (notwithstanding the acknowledgment 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>.”*

21. 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 extend beyond the anticipated November 2027 deadline. Given the potential for ‘slippage’ in 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 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.

## 3. Appropriateness of the Buffer

22. The Plan allocations and trajectory presently contain a buffer of around 11% above the minimum requirement of 17, 720 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. William Davis has concerns regarding the sufficiency of the buffer/allocations made, and associated potential for delays resulting in an 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.

23. 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.
24. 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, 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.
25. 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 650 dpa 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 changed as a consequence of updated monitoring in 2018/19 and various modifications recommended to the housing allocations."*

26. 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 later 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)

27. In considering the appropriateness of the existing buffer, it is worth noting that 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 = 4297

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 = 4001

Number of years supply = 5.22

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

Total requirement, including shortfall, plus buffer = 3557 (10% buffer)

Supply = 4077

Number of years supply = 5.2

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

Total requirement, including shortfall, plus buffer = 3583 (10% buffer)

Supply = 3950

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, and the 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):

Page 8 of 20

Total requirement, including shortfall, plus buffer = 4699 (5% buffer)

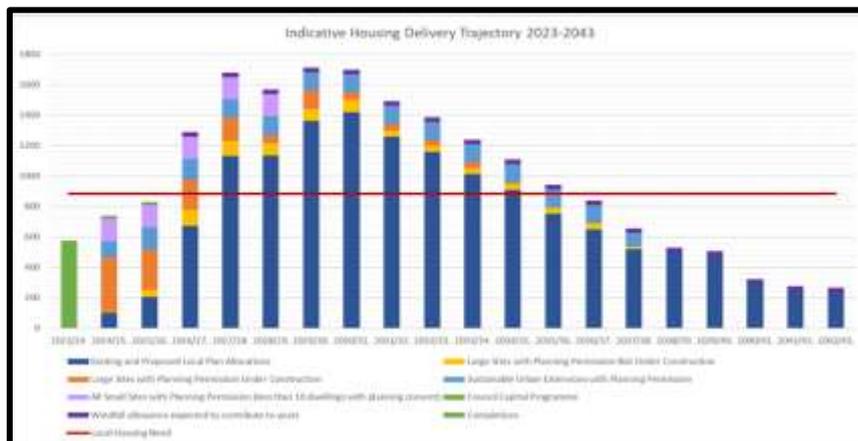
Supply = 3827

Number of years supply = 4.07 years

28. In considering why that supply has fallen, it is notable that this is largely as a result of delays to the largest strategic sites. In the adopted Plan, Spitalgate was anticipated to construct 2,150 units by 2036 and 1,775 units for Prince William of Gloucester Barracks.
29. 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.
30. 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.
31. Additionally, for the Prince William of Gloucester Barracks, there has been no indication of submitting a planning application, with the future remaining uncertain. The Council have not included this site in the latest five-year housing 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. Considering those two sites moving forwards, 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, and uncertainty remains around the timescales for the deliverability of these sites. 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 to meet the identified local housing need.
32. 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 supply through allocations above the plan's housing requirement.
33. The Local Plan Expert Ground 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.

34. It is suggested that the Council increase the buffer to 20%.
35. 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.
36. Taking this into account, based on the current housing requirement 19,672 (11% buffer), South Kesteven should make further allocations for an 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 extension of the plan period as suggested.
37. 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:



38. 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 the 5-year housing supply statement which suggests 799 units. A disparity of 901 units which is a significant number 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.

39. 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 increased 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**

40. In this section, comment is made in respect of concerns with potential delays to the delivery of the strategic allocations. These representations do not seek to oppose the allocations, merely to query realistic delivery and build-out rates. In this 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 (hereafter 'The Letwin Review'). The Letwin Review sets out that on investigation into large sites, the median build-out period for these sites from the moment a 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.

41. 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 supplies of building materials, and
- Limited availability of skilled labour

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

42. The Draft Plan is unable to shed any light on 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.

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

43. 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.
44. This site was allocated in the Adopted Local Plan under Policy GR3-H4 originally anticipating to deliver circa 4000 dwellings. However, since its original allocation a number of technical constraints have come to light regarding BNG issues, as well as Highway issues. Despite uncertainties around the deliverability of the site, the site is proposed for allocation, albeit with a reduced number of units.
45. 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 of Gloucester Barracks site in 2029, when originally the site was intended 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 that this could be pushed back further if having regard to recent Government announcements on increasing the budget for Defence spending as a percentage 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.
46. 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."*
47. The Inspector also raised concerns during the examination of the current Plan. In the Inspector's report, paragraph 89 states:

*"There is concern that boosting the role of the 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 GSRR being completed; and (ii) the ability of the market to sustain two urban extensions in broadly the same peripheral location of the town."*

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

#### **Concluding remarks on delivery and build-out rates**

49. 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.

50. 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."*

51. 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.

52. 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, can be delivered quicker.

#### **Other Proposed Allocations**

53. There have been proposed allocations in other large villages which William Davis believe are less well suited in comparison to William Davis Homes' site in Barrowby.

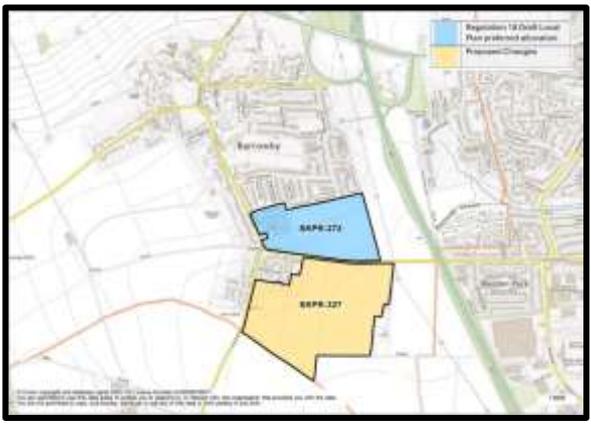
54. For instance, site SKPR-37 – Land to West of Pointon Road, which is proposed to deliver 130 units is less sustainably located in comparison to other Large Villages such as Barrowby. Although Billingborough has been identified as a large village in the settlement hierarchy based on it having a pre-school, public house, a primary school, a post office, and a butchers shop. It is situated approximately 10 miles north from Bourne and 10 miles south from Sleaford, and when travelling to meet day-to-day needs, these journeys would be over a greater distance than development

at Barrowby which is located in very close proximity to the greater range of facilities and services at Grantham.

- 55. Additionally, proposed allocation has been made in Baston for site SKPR-319 – Land South of Greatford Road and West of King Road for 283 units. However, in the Settlement Hierarchy Review, the village compared relatively low with only 38 points. Again, this location is less sustainable to accommodate further growth due to being isolated from those locations identified as the top tier in Settlement Hierarchy. The village of Baston is located on the edge of South Kesteven. It is 12 miles north of the City of Peterborough and 25 miles away from Grantham. Although, the village has some services such as a post office a village hall and an independent school for children aged 3 to 18 years.
- 56. As such, out of the larger villages, Barrowby would be considered as the most suited to accommodate further growth to meet the identified Local Housing Need. The location is sustainable and in close proximity to Grantham, as well as offering good access to public transport such as the Rail service providing connections to the rest of the country. Barrowby has been identified a key growth area and top of the Settlement Hierarchy.
- 57. William Davis are pleased to see the Council have identified that Barrowby is well suited to accommodate future growth by identifying that proposed allocations could be made there (currently identified as: SKPR-327 Land east of The Drift and land south of Low Road, Barrowby – 455 units). However, the Council should further consider alternative and additional proposals in Barrowby to be able to meet the Local Housing Need. As such, the Council should consider Land south of Casthorpe Road, Barrowby (SKPR-206). This site is available immediately and would aid towards meeting the housing targets within South Kesteven.

**Barrowby**

58. Barrowby is defined a 'larger village' identified as able to accommodate growth. The Reg 18 Plan proposes two allocations in Barrowby. This can be seen in the extract below:



59. With further allocations proposed in Barrowby, this is supported. It shows that the Council considers Barrowby as a sustainable location for housing, being in close proximity to Grantham. SKPR-327 Land east of The Drift and land south of Low Road, Barrowby are anticipated to deliver circa 455 units. Proposed allocations in the village would ease the pressure on Grantham to deliver most of the growth across the Plan period. Whilst we support growth in the village of Barrowby, we are concerned with the additional allocations proposed for the specific sites in Barrowby in the draft Plan. In our view, Land south of Casthorpe Road, Barrowby is much more well suited than the proposed allocation – land east of The Drift and land south of Low Road for the reasons mentioned below.
60. Since the adoption of the 2020 Local Plan, part of LV-H3 (SKPR-272) has been completed with 49 new homes delivered in 2021/2022 (ref. S19/2140). The site has planning permission granted for 175 units (ref. S23/2175) The remainder of the site currently has planning permission pending for 67 dwellings (S23/0299). It is presently unclear whether given both the consents on the site and the allocation numbers, there is some double counting of housing numbers in the Local Plan. Notwithstanding, 49 homes have already been built out and therefore allocations for an additional 49 houses in the emerging Plan should be made.
61. William Davis believe that the proposed allocation in Barrowby (Site SKPR-327) is considered to be less well suited in comparison to sites that came forward in Barrowby during the Call for Sites exercise, namely Land south of Casthorpe Road, Barrowby. The proposed allocation is clearly located on the edge of settlement and seeks to expand the settlement into the countryside to the south in a manner which is isolated from the core and heart of the settlement, and the associated facilities and services. Whilst the allocation is not beyond a reasonable walking distance into the settlement, future residents may be less likely to integrate as part of the existing community. Although, Barrowby is a sustainable location to accommodate further growth due to its close proximity to Grantham. The proposed allocation for site SKPR-327 is considered to be less sustainable due to its location on the settlement edge, which means that the site is more isolated from the communities of both Barrowby and Grantham.
62. In light of the above, the Reg 19 Consultation should consider additional sites in Barrowby that could help meet the identified housing need, rather than to put pressure on Grantham – namely the large allocations such as Prince William of Gloucester Barracks, Spitalgate and the Rectory Farm sites to deliver majority of the housing across the plan period.

#### **Land South of Casthorpe Road, Barrowby (SKPR-206)**

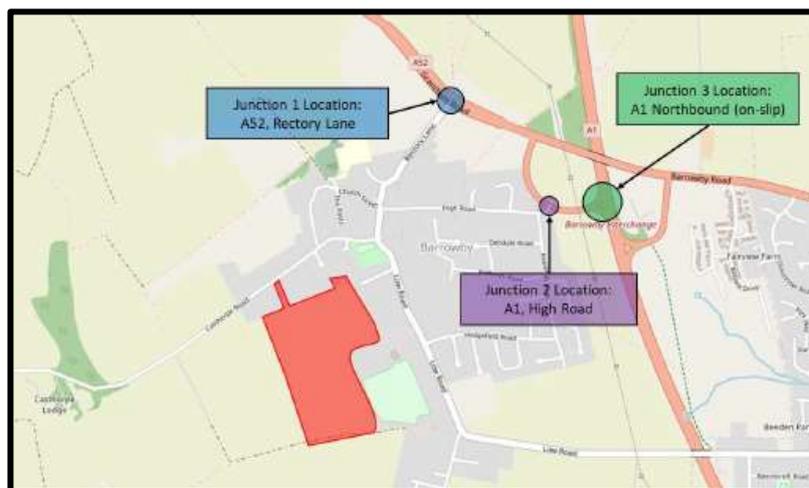
63. William Davis believe Land south of Casthorpe Road, Barrowby should be considered as an allocation in the emerging Plan. This parcel sits adjacent and sympathetically to the core of Barrowby village – which makes the site sustainable in terms of access services within the village and good access links to Grantham via existing public transport (such as the excellent Rail service

connecting Grantham to the rest of the country). It makes a logical development to meet the identified local housing need.

64. The site is available immediately, as opposed to the more strategic larger sites proposed in the emerging Plan, and there are no technical or legal constraints to its deliverability.
65. It is noted that, during the Draft Assessment of Sites report (2025), the site was considered acceptable against a number of criteria; Settlement hierarchy, not within a flood zone, not impacted by minerals and waste policy, good location to shops, not included within an air quality management area, and potential for Green Infrastructure opportunities.
66. This site was, however, seen as having major impacts on the strategic highway network, local highway network and local road network and the access was suitable in part, with the highway authority commenting that:
- ‘See Site SKPR-206. Due to problems on Casthorpe Road with width constraints, it is considered that 150 is around maximum number of houses acceptable. For 271 houses Casthorpe Road would need widening along its length which is not achievable.’
67. In response to these comments from the Council, JPP Consulting Limited, on behalf of William Davis, undertook a Transport Assessment which is submitted alongside these representations.
68. The statement sets out that the development site is shown to be well served and accessible to more sustainable modes of transport. The proposed development has a good level of accessibility to education, health, employment, retail and leisure facilities. Evidence showed that there would be a lack of adverse vehicular impact on the strategic highway network; in addition to the sites excellent access to sustainable alternative transport. Furthermore, the site provides excellent connectivity to the existing pedestrian footway network, facilitating safe pedestrian passage to the centre of Barrowby.
69. In order to assess the impact of development trips from the site, three off-site junctions; which provide direct access onto the wider and primary highway network have been assessed. The junctions are namely:
- Junction 1 – A52 / Rectory Lane;
    - It can be seen that the A52 / Rectory Lane (Priority Junction) junction operates well within capacity for all scenarios during both peak periods. With a maximum RFC (Ratio of Flow to Capacity) of 0.20 (2029 + Development Flows AM peak scenario), the metrics from the capacity analysis further demonstrate that this junction has a significant amount of residual capacity to accommodate future growth on local baseline traffic levels beyond 2029.
  - Junction 2 – A1 / High Road;

- It can be seen that the A52 / Rectory Lane (Cross Junction) junction operates well within capacity for all scenarios during both peak periods. With a maximum RFC of 0.45 (2029 + Development Flows AM peak scenario), the metrics from the capacity analysis further demonstrate that this junction has a significant amount of residual capacity to accommodate future growth on local baseline traffic levels beyond 2029.
- Junction 3 – A1 Northbound (on-slip)
  - It can be seen that the A1 / High Road junction operates well within capacity for all scenarios during both peak periods. With a maximum RFC of 0.38 (2029 + Development Flows AM peak scenario), the metrics from the capacity analysis further demonstrate that this junction has a significant amount of residual capacity to accommodate future growth on a local baseline traffic levels beyond 2019.

70. The locations of the above junctions can be seen below:



71. The above confirms that the site would not have the purported effects on the strategic and local highway network.
72. Additionally, the site location is considered to be sustainable with access to a bus stop within a few minutes' walk, as well as the Barrowby Village Green, restaurant, pub, and a convenience store.
73. In respect of the access, there was concern that proposed access was not seen as suitable by the Council. However, since then an alternative access solution has been assessed which comprises access through Grange Paddock, with a potential emergency access only onto Casthorpe Road, subject to dwelling numbers. This would mean that access would now be

considered acceptable, overcoming the previous concerns. An extract of this access route is provided below:



74. There were some constraints identified by the Council during the SHELAA assessment which we comment on as follows:

- The site deliverability timetable was identified as medium-term (5-10 years) during the latest assessment. In the 2024 assessment, the site was assessed as being deliverable in the short-term. The site is immediately available, and would be delivered in the short-term.
- The site was also assessed as being in a high surface water risk. However, this is not the case, the site is not located within a high surface water risk area. The latest flood risks map by the Environment Agency as shown below, indicate that there is no surface flood risk as indicated in the sites assessment:



- The assessment identifies that there are some TPO trees on site. The TPOs in question are those adjacent to the former proposed access onto Casthorpe Road. With access now being taken from Grange Paddock, TPO'd trees would be unaffected, albeit some of the

lower quality trees may be removed to make way for access. If an emergency access is proposed onto Casthorpe Road, given the limited width of this, it is achievable without unacceptably effecting the RPAs of TPO'd trees.

- Whilst reviewing the assessment of sites report, it is clear there are no notable constraints which would prohibit the deliverability and suitability of Land south of Casthorpe Road, Barrowby and no further reasons why the site should not be considered favourably as a proposed allocation for housing. There are no technical constraints which could not be overcome with appropriate design / mitigation measures. The site is well located within Barrowby and would integrate well into the village, whilst providing good access through to Grantham via a short journey on public transport.

75. Land south of Casthorpe Road, Barrowby is available, suitable and deliverable within an early part of the plan period and should be considered in the reg 19 Plan.

## **Conclusion**

76. In conclusion, our 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 full 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. Using the Standard Method calculation, the figure is 894dpa, and therefore 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 the homes during the plan period; with particular concerns in relation to timescales for delivery of the

Prince William of Gloucester Barracks and Spitalgate Heath, and a lack of detail on the Council's detailed housing trajectory.

- Land south of Casthorpe Road, Barrowby should be included in the proposed allocations for the Reg 19 Plan. It is suitable, available and deliverable in the short-term, as well as sustainably located.