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Dear Ms Brannon

**South Kesteven Local Plan 2023 – 2043
 Regulation 18 Local Plan – Proposed Housing and Mixed Use Site Allocations
 Response by Barberrry Grantham Limited**

We are instructed by Barberrry Grantham Limited (“**Barberrry**”) to submit representations to the updated Regulation 18 consultation on the South Kesteven Local Plan. Barberrry have been promoting the land at Belton Lane, Great Gonerby, Grantham as a proposed housing development to meet the needs of the District. The site was identified as a draft allocation in the previous Regulation 18 Plan as allocation SKPR-57 with a capacity of 628 dwellings. Following the conclusion of the previous consultation, the Council has decided to omit the site as a draft housing allocation in the current Reg 18 Plan ostensibly due to concerns raised by the Highway Authority about the impact of the development on the local highway network.

Barberrry, therefore, wish to lodge an objection to its omission for the reasons set out below. Barberrry remain of the view that the site remains available, achievable and is suitable. It is under the control of an experienced promoter, is in single ownership, is in an attractive location that would be of significant interest to housebuilders and is not subject to any physical, technical or environmental constraints that would prevent its development. It is a deliverable housing site that will make a significant contribution to the supply of housing in Grantham and across South Kesteven.

Notwithstanding the work that has gone into supporting the site through the promotion of the emerging Local Plan, significant work was undertaken in promoting the site through the currently adopted Local Plan. The key to this was understanding the impact of the proposed development in highways terms. It is disappointing that Lincolnshire County Council as the Highway Authority have now raised concerns about the proposed development. It is even more disappointing that the Highway Authority have not actually set out in any public document what their specific concerns are about the proposal nor have they have been willing to engage in any debate about the merits of the site or possible options to address their concerns. The Council’s decision to omit the site from the Plan does not appear to be based on any robust evidence. Paragraph 32 of the Framework states that the preparation and review of all policies should be underpinned by relevant and up to date evidence. Sadly, this is not the case in the decision to omit the site from the Plan.

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Notwithstanding the lack of evidence to explain why the site has not been carried forward, we surmise that the concerns of the Highway Authority about the proposed allocation relate to its impact on the Belton Lane / Newark Hill junction. This junction has previously been identified for improvements associated with the Longcliffe Road development (S15/3189) which proposed traffic lights to aid the operation of the junction. The Highway Authority subsequently agreed to a financial contribution of £412,635 instead of the actual works at the junction. We understand through correspondence with Lincolnshire County Council that a signal scheme is still envisaged for the junction. Having accepted a financial contribution in lieu of actual works, is the scheme going to be delivered? We also note that Lincolnshire County Council in their comments about the Barberrry site contained in the Draft Site Assessment Report (July 2025) raised concerns about the viability of the development and whether it could fund junction improvements.

Alas, Lincolnshire County Council have not spoken to Barberrry in order to understand whether such a contribution would be feasible or viable. Barberrry remain of the view that either works to the junction or a financial contribution would be entirely feasible and deliverable as part of the overall development. We would welcome the opportunity to discuss this with the Highway Authority and Council.

The Highway Authority, in having accepted that a scheme for the Belton Lane/Newark Hill junction would both be acceptable in highway terms and capable of being funded by developer contributions, we do not agree that with this in place the allocation of the Barberrry site would have a significant adverse impact on the highway network. Attached is a Note prepared by Barberrry's Highway Consultant that assesses the operation of the Belton Lane / Newark Hill junction works with the proposed scheme in place along with the associated trips generated by the Barberrry development. The report concludes with the scheme in place it could still operate with ample spare capacity in future years. The technical solution proposed by the Highway Authority is therefore capable to accommodate both the Longcliffe Road development as well as further development on the Barberrry land.

Concluding that the proposed scheme would be capable of accommodating the proposed development it is also suggested that if there are outstanding concerns from the Highway Authority the allocation and accompanying policy could be modified to:

- 1) Prevent access to the north on to Belton Lane (our previous masterplan routed all trips to south through the existing development as opposed to onto Belton Lane).
- 2) If access to the north is necessary, limit the proportion of dwellings able to use this access and split trips heading north and south so there is a differentiation in which way vehicles enter and leave the site.
- 3) Limit the overall numbers proposed as part of the allocation (we initially proposed 450 dwellings on the site).

In light of the above we object to the omission of the land at Belton Lane as a proposed allocation within the Local Plan. The concerns of the Highway Authority are not substantiated through evidence despite Barberrry producing their own evidence to confirm that the Belton Lane / Newark Hill junction can function to an acceptable standard with the proposed scheme in place. The addition of further development through this junction could be adequately accommodated. As such, we see no reason in highways terms why the site should have been omitted from the Plan when an acceptable scheme for the junction has previously been agreed with the Highway Authority and funding towards it accepted. Additional funding could be derived through the Barberrry scheme in order to facilitate and implement the proposed scheme. As it stands, there is no guarantee that the proposed scheme will be delivered and the operation of the junction as it stands will continue to operate inefficiently until the scheme is implemented. We, therefore, propose that the site is reintroduced into the Plan and

identified as a draft allocation. Having regard to the suggestions above, the allocation and accompanying policy could be amended in order to mitigate or minimise the impact arising on the Belton Lane / Newark Hill junction. We would welcome the opportunity to discuss with the Council and how this may operate in practice.

Amendments to Allocated Sites

We note that the Council is proposing to decrease the capacity of the Prince William of Gloucester Barracks site (SKPR-65) from 4,000 to 3,000 dwellings. Of these 1,890 are anticipated to be constructed in the period up to 2043. Barberry previously raised concern during the preparation of the currently adopted Local Plan about the deliverability of the Prince William of Gloucester Barracks site. At the time of examination of the current Local Plan it was stated that the Ministry of Defence would be vacating the barracks site and that it would come forward for development. Despite very clear statements to this effect to the Inspector examining the Plan the site is not yet vacant and there is still no clear timeframe when the site will become vacant. Events since the last examination have only confirmed Barberry's concerns as the site is still not available for development with the last update indicating that it would not be until at least 2029. See Attached schedule.

In light of this uncertainty of when the site may be available for redevelopment it is highly likely that a planning application on the site will not be advanced until the site will be available for development. Due to the size of the site and its relative complexity securing planning permission may take 12 – 24 months. The site will then need to be sold, reserved matters applied for and approved, conditions discharged and a start on site made. The upshot being that it is possible that first completions may not be achieved until 2035/36. This would then leave only 7 years left of the plan period to delivery nearly 1,900 homes which is a challenging delivery rate and one that Barberry consider is unlikely to be achieved.

Barberry, therefore, remain concerned that the inclusion of the site which is expected to deliver a significant contribution to the Council's housing requirement in Grantham is not actually available and will not deliver as expected within the plan period. Whilst in principle Barberry have no objection to the inclusion of the site as an allocation in the Plan our key concern is to guard against any non-delivery of housing on the site if for whatever reason the site does not come forward as expected which as evidence to date indicates is highly to be the case. Disposal and release of the site is entirely dependent on matters outside of the promoters hand and any change in the regional or geopolitical environment may mean that there is a continuing operational requirement for the barracks to remain available and in operational use. This is exactly what has happened since the last Local Plan Examination when we were told that the site was going to be available for development. Whilst in principle it is available, in reality the site cannot be concluded as being genuinely available until such time as the MoD has vacated it and disposed of it. The site is not available, achievable and therefore not deliverable.

Previously Proposed Allocations

The proposed allocation at Spitalgate Heath (SKPR-278) is identified for an indicative number of dwellings totalling 3,700. We note that the Council has recently agreed a revision to the description of development on the live planning application (S14/2169) for the site reducing the capacity of the site from 3,700 to 3,400 dwellings. It is not clear as to exactly why the applicant has agreed to reduce the capacity of the site. The implications are that if planning permission is eventually granted for the development there will be 300 less dwellings on the site than is currently envisaged within the allocation. Clearly if the site is intended to contribute the full 3,700 dwellings but only deliver 3,400 there will be a 300 dwellings shortfall against the overall requirement which will need to be found elsewhere.

In light of the fact that the proposed capacity of the Spittlegate allocation is currently envisaged to deliver less than the allocation identified within the Plan, Barberry contend that alternative sites should be identified in order to make up the shortfall. The inclusion of the land at Belton Lane as a draft allocation would help address any shortfall arising from the Spittlegate Heath site.

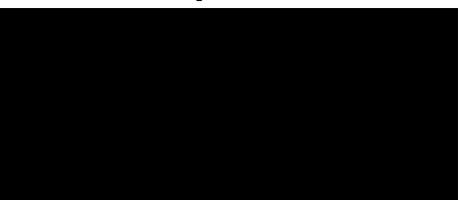
Notwithstanding the capacity issue we also note that the application for the site was originally submitted in 2014, some 11 years ago. Clearly there is an issue with the acceptability of the site otherwise planning permission would have been granted for it by now. Again, we were told at the last Local Plan Examination that the site would start delivery in the currently adopted Plan Period. That has not happened. The revised policy envisages that just over 1,500 homes will come forward in the Plan Period. This is less than is envisaged at the Barracks site despite there being a live application in front of the Council (where none has yet been submitted at the barracks). The inability to resolve matters to the point that planning permission can be granted after 11 years indicates that there remain significant concerns over the deliverability of the site. Barberry contend that if the Council persist with the allocation then additional or alternative sites should be allocated to make up any shortfall in housing in the short term brought about by the failure to deliver the site. The land at Belton Lane is one such site that could be developed to make up any shortfall in housing delivery in the short term.

We also note the continued inclusion of the proposed allocation at Rectory Farm (SKPR-279 and SKPR-280). We understand that the continued development of this site is subject to highway improvement works on the A1 which to date have currently resulted in a delay to the site coming forward as there is a restrictive condition on the permission that prevents a number of occupations on the site until the highway works have been completed. Whilst there would be every expectation that these works will be completed in the fullness of time Barberry again highlight these to ensure that there is a sufficient supply of houses within Grantham in case there are further delays to the delivery of the proposed allocations. Barberry reiterate that the land at Belton Lane is free from technical, physical or environmental constraints and could come forward for development if required.

Barberry therefore wish to register their objection to the inclusion of the Prince William of Gloucester Barracks site, Spitalgate Heath and land at Rectory Farm as proposed allocations on the basis that they are not deliverable in full and will not deliver housing in the anticipated numbers or at the envisaged timescales. In order to guard against the shortfall in delivery from these three key strategic allocations within the Plan, Barberry is proposing that alternative sites such as the land at Belton Lane are identified as an allocation in order to contribute to the supply of housing within Grantham in the short term. The land at Belton Lane is largely free from constraint and could come forward early in the plan period to smooth out the delivery of housing should this be required. We, therefore, seek the reintroduction of the land at Belton Lane as a draft allocation within the pre-submission version of the Plan and would welcome the opportunity to discuss with Officers what such an allocation may look like and what policy wording would be suitable in order to deliver this.

We trust you will take our comments into consideration but if you have any questions or would like to discuss please do not hesitate to contact me.

Yours sincerely



John Pearce BSc (Hons) MTPL MRTPI

Associate

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CC: Martyn Cartwright – Barberry Grantham Limited