



AUGUST 2025

SKPR-334 (Land south of Gorse Lane)

Representations to the Regulation 18 – Proposed Housing and Mixed-Use Site Allocations Consultation

Iceni Projects Limited on behalf of
Mulberry Commercial
Developments JM Limited
August 2025

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SKPR-334 (Land south of Gorse Lane)
REPRESENTATIONS TO THE REGULATION 18 –
PROPOSED HOUSING AND MIXED-USE SITE
ALLOCATIONS CONSULTATION

CONTENTS

1. EXECUTIVE SUMMARY.....	1
2. SITE BACKGROUND AND CONTEXT.....	2
3. SKPR-334 (LAND SOUTH OF GORSE LANE).....	7
4. CONCLUSIONS.....	17

APPENDICES

A1. SITE LOCATION PLAN

1. EXECUTIVE SUMMARY

- 1.1 Mulberry Commercial Developments JM Limited **objects** to the proposed amendment to SKPR-334 (Land south of Gorse Lane) in the current Regulation 18 – Proposed Housing and Mixed-Use Site Allocations Consultation. The site is currently allocated in the adopted South Kesteven Local Plan (Policy E1: GR-SE1) as part of a strategic employment location of district-wide significance. The proposed reallocation to approximately 530 dwellings east of the A1 and 20 traveller pitches west of the A1—is not justified, effective, positively prepared, nor consistent with national planning policy.
- 1.2 The Regulation 18 consultation is underpinned by an incomplete evidence base preventing meaningful scrutiny and undermining the consultation's soundness. In the absence of compelling evidence of reduced employment land requirements, indeed, the evidence of past take-up suggests a far stronger demand for employment, the loss of part of this flagship employment site is contrary to both local and national policy objectives, which give significant weight to delivering strategic employment land to support long-term economic growth.
- 1.3 Grantham Southern Gateway is a highly accessible, infrastructure-ready location with direct access to the A1 and limited surrounding sensitive land uses. The clustering of employment uses here is integral to South Kesteven's economic strategy and removing part of the allocation for non-employment uses would dilute this strategic importance.
- 1.4 Land south of Gorse Lane is inappropriate for traveller pitches. It would be physically separated from residential areas, have poor pedestrian access to schools and health facilities, be in close proximity to industrial uses, and exceed best practice guidance on the recommended maximum of pitches on one site. This would risk poor integration with the wider community and fail to meet national policy requirements for safe, accessible, and well-located sites.
- 1.5 For these reasons, Mulberry Commercial Developments JM Limited considers the proposed amended allocation of SKPR-334 to be unsound. **It is requested that the site remain allocated for strategic employment uses in accordance with adopted Policy E1**, and that alternative, more suitable sites be identified to meet additional housing and traveller pitch needs.

2. SITE BACKGROUND AND CONTEXT

The Site

- 2.1 Mulberry Commercial Developments JM Limited are the promoters for the land immediately west of the A1, approximately 200m south of Gorse Lane ("the Site"). A site location plan is included at **Appendix 1**.
- 2.2 The Site extends to c. 35.53ha. The Site will be accessed via a recently constructed roundabout at its north-easternmost corner off Tollemache Road (A52). A public right of way ("PROW") (Gran/16/1) runs to the immediate east and south of the Site, crossing into the Site at the north-east corner.
- 2.3 The A1 borders to the Site to the east. An automobile workshop and associated yard is located to the north-west of the Site on the southern side of Gorse Lane. There are several residential dwellings located along the northern side of Gorse Lane approximately 500m north of the Site. The Site is otherwise bounded by lands in agricultural use.

Wider Site Context

- 2.4 The Site is located less than 1km south of the built-up extent of Grantham, and approximately 2.5km from Grantham Town Centre. Grantham is considered a sub-regional centre within the Local Plan's Settlement Hierarchy and includes a wide range of local amenities. This includes high street shops, restaurants, sports and medical facilities, parks and several educational facilities.
- 2.5 The A1 runs to the east of the Site, linking Edinburgh and London via Newcastle-upon-Tyne, Leeds, Sheffield and Grantham. Access to the Site from the A1 and the surrounding local road network is via the Tollemache Road North (A52). Tollemache Road North links with the B1174 approximately 865m east of the Site.
- 2.6 The B1174 (turning into another section of the A52) takes the previous A1 route through Grantham. Gorse Lane, located 200m north of the Site, is a rural road that also links with the B1174, and with the A1 via Wyville Road at the Gonerby Moor intersection, north of the Site.
- 2.7 The nearest railway station is Grantham Railway Station, approximately 2km north-east of the Site or approximately a 44-minute walk or 10-minute cycle. This railway station, served by London North Eastern Railway, Hull Trains and East Midland Railway, is located on the East Coast Main Line, providing regular and fast connections to London (Kings Cross), Leeds, Hull, West Yorkshire, Newcastle and Edinburgh.

- 2.8 The nearest bus stops to the Site are located on the B1174 approximately 1.3km north of the Site, a 20-minute walk. Here, services connect Grantham to Harston via Denton and operate Monday to Friday. To the east of the Site, beyond the A1, is another bus stop located on the B1174, approximately 1.4km away or a 20-minute walk. This stop is served by Service 28 which connects Grantham to South Witham via Little Ponton and operates Monday to Saturday.
- 2.9 There are a number of public rights of way surrounding the Site. As previously noted, PROW (Gran/16/1) runs to the immediate east and south of the Site and PROW (Harl/9/1) runs to the north-west of the Site.
- 2.10 The Site is part of a wider allocation which straddles the A1 motorway and is allocated as a strategic employment opportunity site (GR-SE1) in the South Kesteven District Council Local Plan (2011-2036) (adopted 2020).

Existing allocation within the South Kesteven District Local Plan (2011-2036)

- 2.11 As noted above, the Site forms part of a wider allocation under Policy E1 (GR-SE1) within the South Kesteven District Local Plan (2011-2036) for strategic employment uses including B1, B2 and/or B8. The map below shows the extent of land allocated within the Plan.

Figure 2.1: Grantham Southern Gateway Strategy Employment Opportunity (Policy E1) – adopted Local Plan (2011-2036)

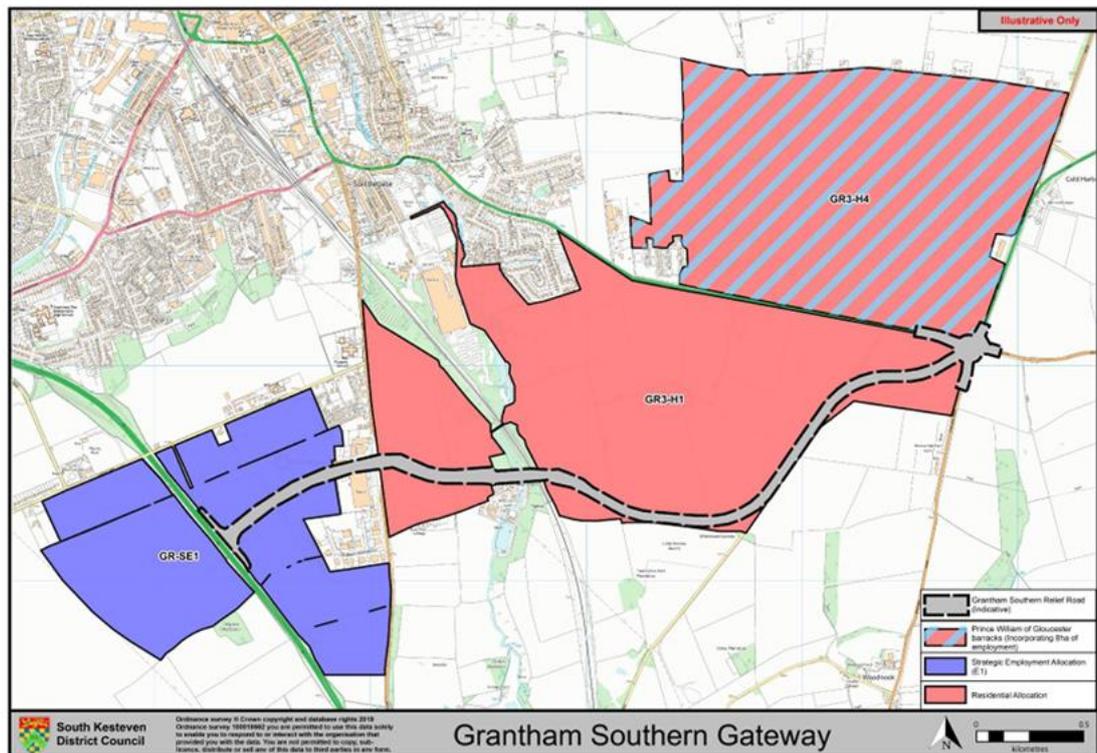


Figure 5: Grantham Southern Gateway Strategy Employment Opportunity (Policy E1)

Planning applications

- 2.12 Significant parts of the wider allocation have been granted planning permission for a variety of uses including Grantham Designer Outlet Village, highways upgrades and commercial warehouses/distribution units.
- 2.13 In addition, an application is currently pending determination on the land allocated under GR3-H1 for residential development for up to 3,400 dwellings, 28,000sqm of employment floorspace and a local centre (LPA ref. S14/2169). Further east, GR3-H4 has been allocated for residential and 8ha of employment and was subject to a Scoping Opinion in June 2021 for mixed use development and up to 4,000 new homes (LPA ref. S21/0706).
- 2.14 In March 2025, Mulberry Commercial Developments JM Limited submitted an application on the Site for:
- “Outline planning permission, with all matters reserved except for access, for commercial floorspace and industrial development providing up to 140,000 sqm total GIA of general industrial (Use Class B2) and storage and distribution (Use Class B8) floorspace with ancillary office (Use Class E(g)(i)) floorspace and supporting infrastructure including earthworks, drainage, landscaping, parking, servicing, and other associated works.”*
- 2.15 This application is currently being determined.

Emerging allocation within the South Kesteven Local Plan 2023-2043

- 2.16 The Council undertook a Regulation 18 consultation between February and April 2024. Within this draft Plan, the Site and the wider land was included for strategic employment under Policy E1: SKPR 286 (GR-SE1) – Grantham Southern Gateway Strategy Employment Opportunity), as shown on the map below.

Figure 2.2: Grantham Southern Gateway Strategy Employment Opportunity (Policy E1) – Regulation 18 consultation February 2024

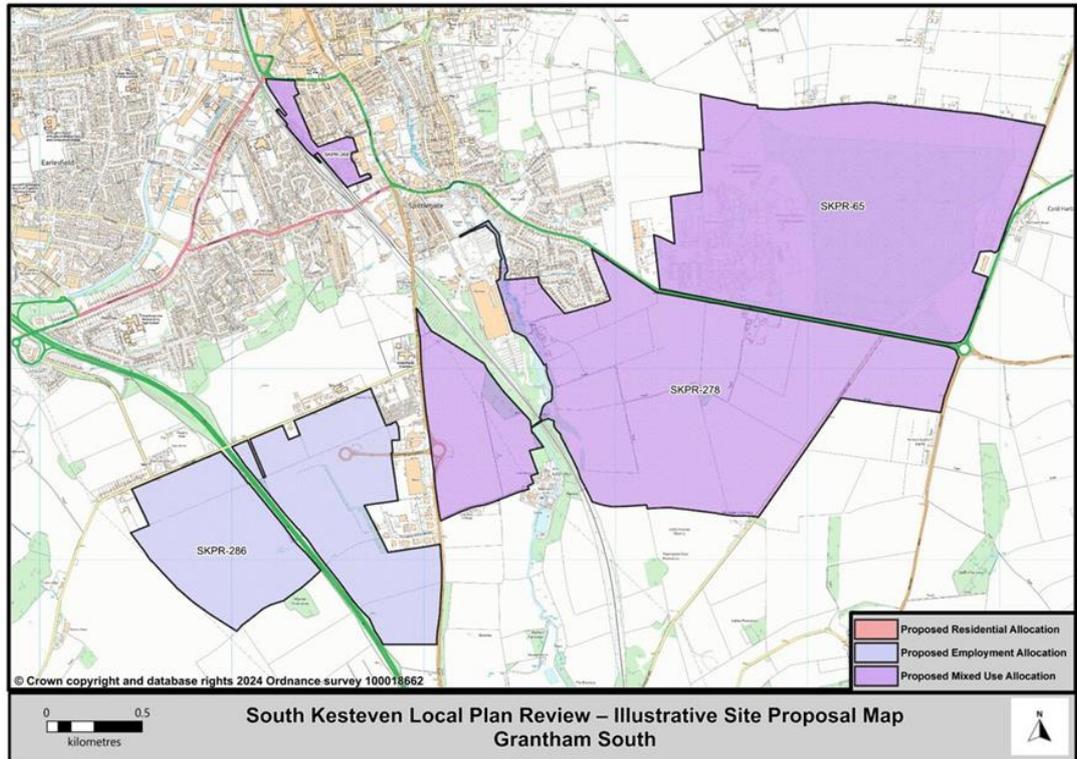


Figure 7: Grantham Southern Gateway Strategy Employment Opportunity (Policy E1)

2.17 The current Regulation 18 consultation focuses on the Proposed Housing and Mixed-Use Site Allocations. Within this document, much of the land which falls within the adopted and the emerging allocation from the previous Regulation 18 consultation that benefits from planning permission or is currently subject to a live planning application, is not referenced.

Figure 2.3: Map of Grantham showing proposed allocations in the Regulation 18 consultation July 2025

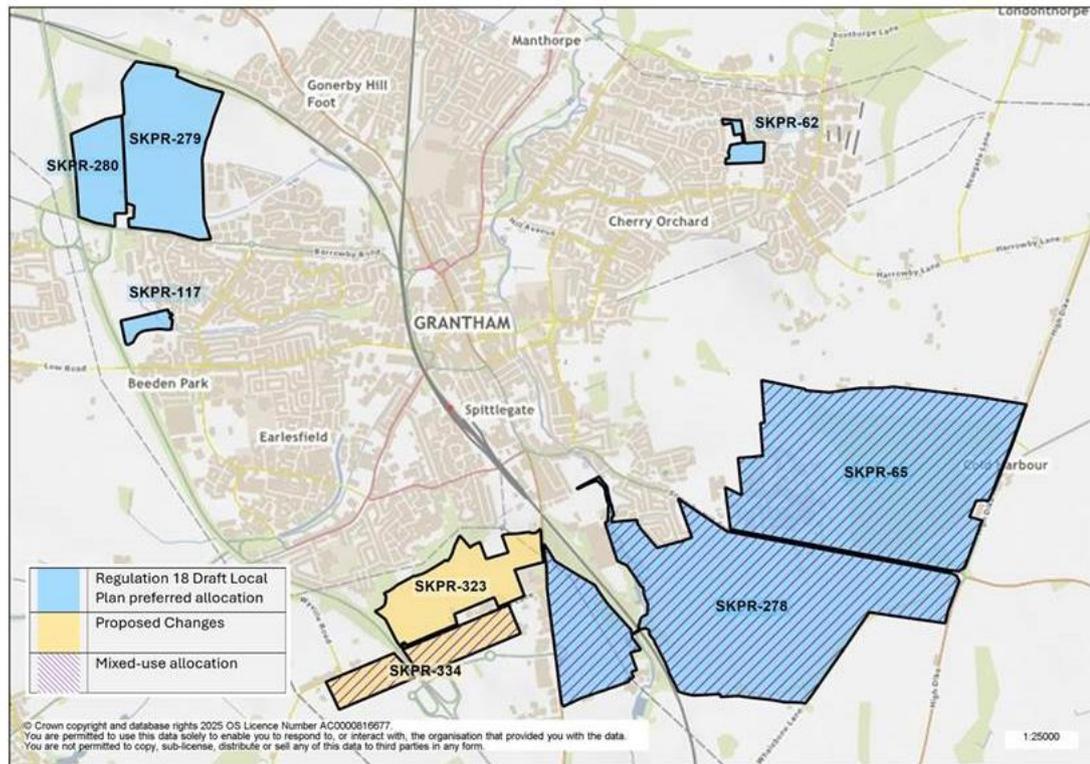


Figure 3: Grantham illustrative map

- 2.18 As shown on the map above, part of the existing allocation, is now proposed under Policy SKPR-334 to deliver “mixed use” development including approximately 530 new homes on the land east of the A1 and 2ha for 20 gypsy and traveller and travelling showpeople pitches on land west of the A1.
- 2.19 As set out in the next section of these representations, Mulberry Commercial Developments JM Limited **objects** to these proposed changes.

3. SKPR-334 (LAND SOUTH OF GORSE LANE)

- 3.1 This section sets out in detail Mulberry Commercial Developments JM Limited's objections to the amendments made to Policy E1 and SKPR-334 and why it considers these changes to be unsound in the context of national and local planning policy and guidance.
- 3.2 SKPR-334 (Land south of Gorse Lane) comprises two parcels of land, one east of the A1, which is proposed to be allocated for approximately 530 dwellings, and one to the west of the A1, which is proposed for 2ha of land to provide at least 20 pitches for gypsies, travellers and travelling showpeople.
- 3.3 The Regulation 18 – Proposed Housing and Mixed-Use Site Allocations Consultation document states that SKPR-334 is proposed *“as a new site allocation to meet the minimum housing requirement for South Kesteven over the plan period”*.

Lack of justification for amendment to allocation

Need for employment uses

- 3.4 The current Regulation 18 sets out that the Employment Land Study (February 2024) is being reviewed, however this has not been completed and does not form part of the evidence base for this consultation. Similarly, the Gypsy, Traveller and Travelling Showpeople, Boat Dwellers and Residential Caravan Dwellers Accommodation Assessment (February 2024) is being updated but this has also not been published.
- 3.5 Without these documents, it is not possible for the consultation to be effective as it is not possible to fully scrutinise the evidence base. Neither is it possible for the Council to justify amendments to the adopted policies without sufficient evidence which clearly indicates that there is a reduced need for employment uses and therefore justifies a change in proposed land use to non-employment uses. As such, there are clear deficiencies in this Regulation 18 consultation, and this raises significant concerns about the emerging Local Plan's soundness.
- 3.6 The NPPF (December 2024) at paragraph 85 sets out that significant weight should be placed on the need to support economic growth and productivity. At paragraph 86, planning policies are required to set out a clear economic vision and strategy which *“positively and proactively encourages sustainable growth, having regard to the national industrial strategy”*. Further, they should identify strategic sites to meet anticipated needs over the plan period.
- 3.7 An increased housing need is not a sufficient reason to remove land allocated for employment uses. The Government has been clear that economic growth is its key priority and removal of sites allocated

for employment uses flies in the face of this objective. The Council's approach is not consistent with national planning policy, nor is it justified or positively prepared.

- 3.8 Turning to the evidenced need for demand, the "Findings" section of the Employment Land Study 2024 includes labour demand, labour supply and past take-up forecasts for employment floorspace from 2021 through to 2041. The labour demand scenario shows a requirement of 79.5ha of land, the labour supply scenario a requirement of 88.3ha and a past take-up scenario of 89.1ha.
- 3.9 The Council has taken forward the lower labour demand scenario of 79.5ha as its preferred scenario through into the emerging Local Plan. It is not considered that this approach is justified or positively prepared.
- 3.10 The labour supply scenario takes into account population forecasts, including the housing requirement. This scenario is some nine hectares *above* the labour demand scenario. Given that the housing requirement is has increased from 701 dwellings per annum ("dpa") to 886dpa and the emerging Local Plan is seeking to deliver 5,652 more homes across the Plan Period, a 40% increase, it is likely that the labour supply forecast will be higher than the 88.3ha as suggested in the 2024 Study. As such, the labour demand scenario does not account for the positive economic impact which new housing can deliver in ensuring that new residents can find local jobs which contributes towards sustainability and retains helps economic spending within the District – a key aspiration within the Council's Vision and Strategic Objectives (please refer to paragraphs 5.33-5.36 of these representations).
- 3.11 The past take-up scenario is the highest at 89.1ha. This suggests a strong market and historic take-up of employment land. This reflects the location of South Kesteven on the Strategic Road Network, and particularly the A1 corridor. As noted in the 2024 Study at paragraphs 5.27 to 5.29, the majority of B8, E(g)(iii) and B2 uses are located in Grantham and in proximity to the Strategic Road Network. Further, at paragraph 6.48, the location of sites in Grantham having direct strategic road access is noted as being one of the key drivers of future success of these sites.
- 3.12 The 2024 Study states that the low vacancy rates in B8 space indicates that there is high demand for warehousing in the District. In fact, this is a key concern for existing employers to expand their businesses alongside a lack of suitable sites allocated for this use within South Kesteven and in proximity to the Strategic Road Network with adequate junction capacity (paragraph 6.49).
- 3.13 This clearly points towards the retention of allocations for employment uses within Grantham, and particular SKPR-334. In addition, it is considered that South Kesteven is uniquely placed to take advantage of its access to the Strategic Road Network and past trends indicate a strong market for employment floorspace. Therefore, the higher scenario of 89.1ha should be the starting point for the

emerging Local Plan and all allocations identified within the adopted and previous Regulation 18 Local Plan be retained for employment provision.

- 3.14 In terms of meeting this requirement, Policy E1: Grantham Southern Gateway Strategy Employment Opportunity (GR-SE1) of the adopted Local Plan sets out that the site is considered to be of strategic employment importance and appropriate proposals for B1, B2 and/or B8 will be supported. Other employment generating uses outside of B-use classes may be considered appropriate in consultation with the Council and provided there is an end user.
- 3.15 As previously noted, land east of the A1 was consented for up to 33,029sqm of retail and restaurant uses, alongside a hotel (LPA ref. S17/1262). This application has now been implemented. Land to the south of this (also within GR-SE1), was granted permission for up to 86,400sqm of B2 and B8 floorspace, with ancillary office space.
- 3.16 Mulberry Commercial Developments JM Limited’s application for land west of the A1 is currently awaiting determination.
- 3.17 As such, it is clear that a significant proportion of the Council's flagship allocation for strategic employment is not coming forward as B1, B2 or B8 uses. Amending the policy to allocate land for residential and gypsy and traveller and travelling showpeople pitches without sufficient evidence, further weakens this location as an area of strategic importance for employment.
- 3.18 The adopted Local Plan at Policy E2 sets out the Council’s other strategic employment sites. These are shown in the table below.

Table 3.1 Strategic Employment Sites (adopted Local Plan)

Site	Size	Status
Exeter Fields, Stamford Site ref. ST-SE1 / SKLP131	9.8ha	Currently awaiting determination for outline application for up to 268 dwellings and an 80-bed care home (LPA ref. S24/2198). The current Regulation 18 consultation allocates the site for 105 dwellings and 5ha of employment.
Land South of Spalding Road, Bourne	8ha	No application to date.

Site ref. BO-SE1 / SKLP277		
Northfields Industrial Estate, Market Deeping Site ref. DEP-SE1	14ha	No application to date.
Roseland Business Park, Long Bennington Site ref. RBP-E1	9.01ha	Various applications consented for B1/B2/B8 uses.

3.38 As demonstrated in the above table, only one of the strategic employment sites has come forward for B1/B2/B8 uses, in line with the adopted policy. Whilst it may take time for these sites to come forward, Exeter Fields has a current application for residential development and, if consented, this will be lost as part of the supply of employment land.

3.39 Therefore, Council does not appear to be meeting its requirement for employment floorspace. Simply because the Council's local housing need figure has increased, does not mean that existing allocations should be amended from employment to residential uses. Instead, the Council should be finding alternative sites to meet this increase in housing need.

3.40 In conclusion, the amendment to SKPR-334 (Land south of Gorse Lane) from employment floorspace to residential and gypsy and traveller pitches cannot, therefore, be considered to be justified, evidenced, effective, positively prepared or in accordance with national policy and, therefore, sound.

Misleading positioning of SKPR-335 (Land south of Gorse Lane)

3.41 We also have significant concerns about the positioning of SKPR-334 (Land south of Gorse Lane) within the Regulation 18 consultation. In the Regulation 18 consultation Local Plan and the Sustainability Appraisal Report Addendum ("SA") (July 2025), the site is identified as an "additional allocation". This is despite the same land being included as an allocation in the adopted Local Plan under Policy E1 and the previous Regulation 18 document (Policy E1) for employment uses.

3.42 In particular, Table 4 of the current Regulation 18 consultation document does not make it clear that Land south of Gorse Lane is an existing employment allocation under adopted Policy E1, which is proposed to be amended through this second Regulation 18 consultation to provide housing and traveller pitches.

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- 3.43 This change is also not addressed within the Draft Site Allocations document (July 2025) which accompanies this Regulation 18 consultation. It contains no justification as to why employment is no longer considered an appropriate use for the site.
- 3.44 The SA badges the site as a new allocation to meet the increased housing need, without addressing the removal of the employment provision. As set out within the Planning Practice Guidance (“PPG”), sustainability appraisals are *“integral to the preparation and development of a local plan or sustainable development strategy”*. Therefore, this is a clear deficiency in the evidence base as the SA does not address the negative impacts associated with the reduction in the allocation of this land for employment uses.
- 3.45 The SA notes the site as a mixed-use allocation which would *“support the economic vitality”* of Grantham, through *“enhancing local economic offer and employment opportunities”*, without considering that the existing allocation (Policy E1), by virtue of it being for employment uses, would already do this and indeed to a greater effect. Further, we consider that the “mixed use” reference to be misleading as the current Regulation 18 proposes the site for housing and traveller pitches – both of which are residential uses.
- 3.46 Therefore, the conclusions in the SA cannot be considered to be fully effective or justified, nor is it consistent with national policy.

Importance of Grantham as a strategic employment location

- 3.47 The previous Regulation 18 consultation highlights the strategic importance of the Grantham Southern Gateway Strategy Employment Opportunity. At paragraph 9.30 it emphasises the accessibility of the allocation to the strategic road network, and that proposals here will be *“encouraged to help create an attractive and vibrant gateway to the sub-regional centre of Grantham and...assist in delivering a step-change in the quality and quantity of employment opportunities provided in the town and wider district”*.
- 3.48 This sentiment is echoed within the Employment Land Study 2024, as set out within paragraphs 3.11 to 3.13 of these representations.
- 3.49 It is therefore unclear how the amendment to Policy E1 to remove some of the land allocated for employment uses and allocate it for residential and traveller pitches within the current Regulation 18 is in line with this aspiration or contributes to the strategic importance of Grantham Southern Gateway.
- 3.50 Further, the current Regulation 18 does not appear to reference the adopted allocation (Policy E1) to the south. Whilst it is understood that this consultation is focusing on housing and mixed-use

allocations, the absence of land allocated under Policy E1 removes important context in relation to the amendments to SKPR-334. It removes a key piece of the puzzle for the allocations at Grantham, implying that the land to the south is not allocation or coming forward for development, which is clearly not the case.

- 3.51 The most recently published Employment Needs Study (February 2024) notes the importance and suitability of land allocated within Policy E1 for industrial, storage and distribution, however, this is not taken into consideration within this Regulation 18 consultation document. The Study states at paragraph 6.34 that:

"Site GR-SE1 (including EMP G1) is rated highly favourably in terms of redevelopment potential. The site represents the adopted Local Plan allocation GR-SE1 (Grantham Southern Gateway Strategic Employment Opportunity). Contained within this wider allocation is the identified smaller EMP G1 allocation. The overall GR-SE1 site is a large site adjacent to the A1 and benefits from the recent installation of a motorway junction, meaning access to the strategic road network is direct. The site also has limited surrounding sensitive land uses and adjoins an existing designated industrial area. This site would be highly suitable for industrial, and storage and distribution functions."

- 3.52 It is therefore acknowledged within the evidence base that the access to the strategic road network and limited surrounding sensitive land uses makes the site a logical location for employment uses. This adds to the argument that the land is more suitable for employment rather than residential. The inclusion of residential and traveller pitches to the north would introduce sensitive land uses adjacent to the strategic employment area.

- 3.53 Through the surrounding consented applications, there have been significant improvements to the strategic road network which cements the importance of area and its connections to the wider country from a strategic employment perspective. The clustering of uses and a critical mass contributes to this strategic importance. Amending the allocation to remove employment uses south of Gorse Lane weakens this strategic importance.

- 3.54 The Regulation 18 Draft Local Plan 2021-2041 consultation which was undertaken in February 2024 sets out the Council's Vision and strategic objectives for the Plan. The 2041 Vision for South Kesteven states that by 2041 it will *"have strong links to the growing economies of Peterborough, Cambridge, and London in particular"*. In addition, *"The District will have a successful, diverse economy providing employment opportunities for the local workforce, equipped with a wide range of skills to meet employer needs. It will be an area of sustainable, high quality growth and a popular place to work, live, visit and invest in."*

- 3.55 In reference to Grantham, the Vision states that:

“Grantham’s role as the Sub-Regional Centre will be strengthened through significant housing and employment growth. The town will capitalise on its status as the sub-regional centre for Southern Lincolnshire and its position between Lincoln and Peterborough. The town will develop employment opportunities, particularly through the provision of a new junction to the A1 at the Southern Gateway as part of the proposed Southern Relief Road, making Grantham an even more successful sub-regional centre and leisure destination, providing for both the local community and visitors from a wider area.”

- 3.56 Further, nine of the 15 strategic objectives for the emerging Local Plan relate to “Economic: Enhancing Prosperity”. This, alongside the Vision, demonstrates how economic development, including at Grantham, is at the core of the emerging Local Plan. As such, it is not clear how the proposed amendment to Policy E1 and the changes to SKPR-334 are in alignment with this. Indeed, this appears to be at odds with the vision and objectives of the emerging Local Plan.
- 3.57 Therefore, it is not considered that the amendments are positively prepared, effective, justified or in accordance with national policy.

Residential and Gypsy and Traveller pitch provision

- 3.58 It is acknowledged that there is an increased housing need through the amendments made to the Standard Method, however, as previously set out, the Council should consider allocating additional sites or increasing density on existing allocations rather than amending existing employment allocations without sufficient evidence. In planning policy terms, there is no precedent given for the provision to meet housing or employment needs over one another.
- 3.59 In addition, it is understood that there is a statutory obligation to provide pitches for the travelling community, and it is right for the Council to try and meet this need. However, Mulberry Commercial Developments JM Limited do not consider SKPR-334 to be an appropriate location and it is not clear as to how the Council has gone about assessing sites to see if they are appropriate for this particular use.
- 3.60 Looking first as to the process for which the Council has undertaken the assessment of sites to determine whether they are appropriate for traveller pitches, paragraph 1.6 of the Regulation 18 – Proposed Housing and Mixed-Use Site Allocations Consultation states that one site was assessed as being suitable through the updated 2025 Site Assessment Report.
- 3.61 It is assumed that this is referring to the “Draft Site Assessment Report July 2025”. However, there is no information as to how many of the sites were submitted as having potential for gypsy and traveller pitch provision, nor how the sites were assessed to determine whether they were suitable for this use. In fact, the report defers to the “Gypsy, Traveller and Travelling Showpeople – Meeting

Accommodation Needs” document which has yet to be published. Without this document, the current Regulation 18 consultation is ineffective and the amendment to SKPR-334 is not justified and is unsound.

3.62 Assessing the suitability of sites for traveller pitches requires particular consideration in regard to the pattern of development and specific policy guidance. The Draft Site Assessment Report does not include reference to this or provide adequate justification for the suitability of the site for traveller pitches.

3.63 Firstly, the provision of 20 pitches on a single site is not considered to be justified or in accordance with national policy.

3.64 Generally, there is a preference for there to be no more than 15 pitches in one location, unless specifically requested by the traveller community. This is set out in the Government’s Designing Gypsy and Traveller Sites Good Practice Guide (2008). At paragraph 4.7, it states that:

“There is no one ideal size of site or number of pitches although experience of site managers and residents alike suggest that a maximum of 15 pitches is conducive to providing a comfortable environment which is easy to manage. However, smaller sites of 3-4 pitches can also be successful, particularly where designed for one extended family. These can be advantageous in making good use of small plots of land, whilst retaining the qualities described in this guidance and expected by families on modern sites.”

3.65 It goes on to state at paragraph 4.8 that:

“Sites should ideally consist of up to 15 pitches in capacity unless there is clear evidence to suggest that a larger site is preferred by the local Gypsy or Traveller community.”

3.66 It is evident, that the provision of 20 pitches on a single site is contrary to best practice. The provision of smaller numbers of pitches on multiple sites is also conducive to better levels of integration and harmony with the wider community. Dispersing pitch provision across the District also provides the traveller community with a greater level of geographic choice, enabling needs to be met more effectively.

3.67 In terms of location, the guidance states that the following should be taken into consideration when determining the suitability of a site:

- Means of access, availability of transport modes and distances from services;
- Promotion of integrated co-existence between the site and local community;

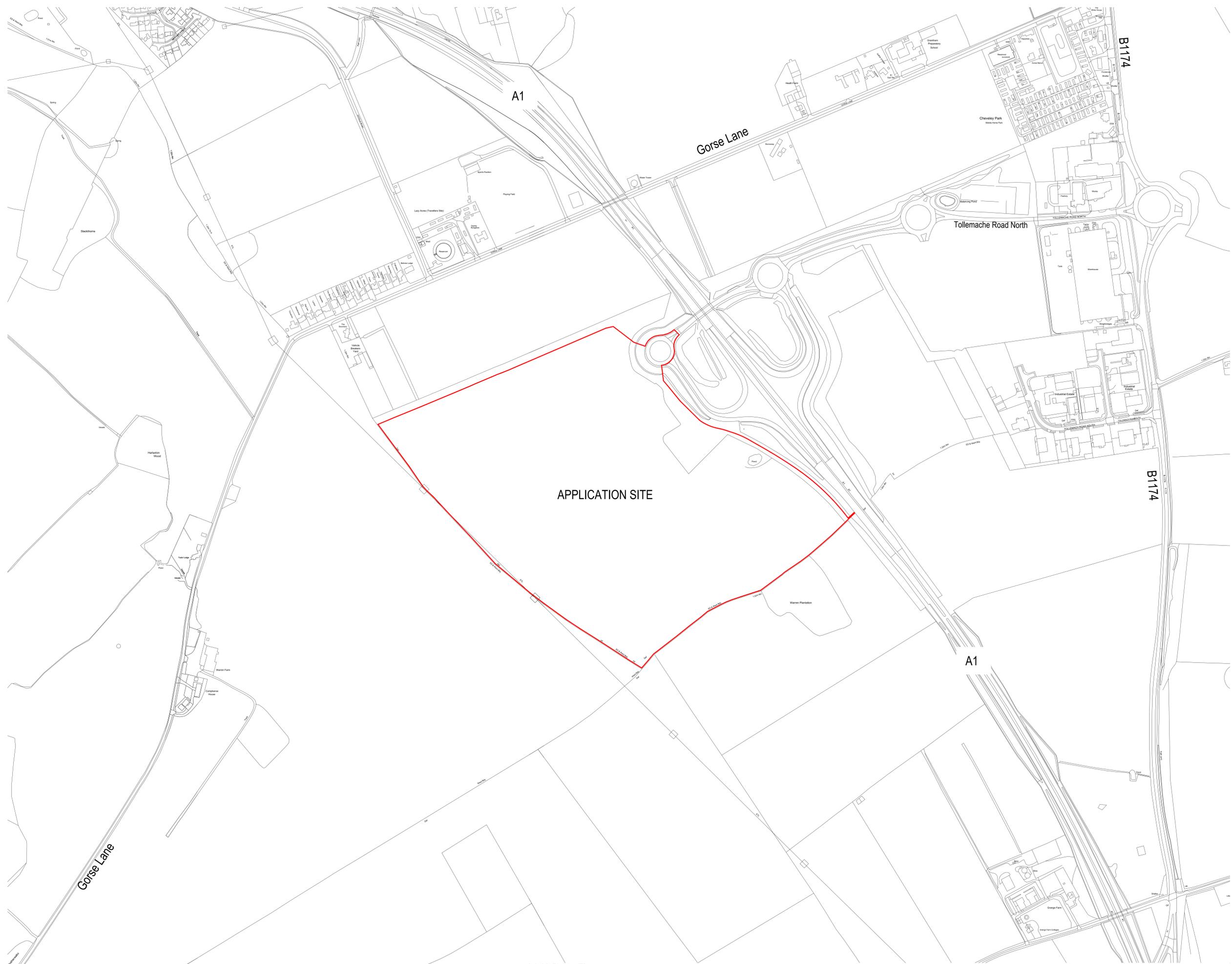
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- Easy access to General Practitioner and other health services;
 - Near to a bus route, shops and schools;
 - Ground conditions and levels of land; and
 - Not locating sites in areas of high flooding risk.
- 3.68 Consideration should also be given to the relatively high number of children likely to be on the site and potential implications of this.
- 3.69 At paragraph 3.10, the guidance states that sites adjacent to light industrial areas tend not to be popular because of their “*isolation, distance from local facilities and because of safety fears (when walking home at night for instance).*” Further, at paragraph 3.11, it states that compatibility for joint commercial and residential uses needs to be given careful consideration.
- 3.70 The guidance also sets out that when considering sites close to main road, flyovers and railway lines, careful consideration should be given to the health and safety of children and others on the site and the greater noise transference through the walls of trailers and caravans compared to conventional housing. This is also pertinent when considering sites next to areas where there are likely to be HGV movements.
- 3.71 The Government’s Planning Policy for Traveller Sites (December 2024) also emphasises the need to ensure that policies promote integration and coexistence, provide access to health services, ensure children can attend school on a regular basis and provide proper consideration of the effect of air and noise quality on health and wellbeing.
- 3.72 It is clear that the Council has not undertaken sufficient consideration of the above in its decision to allocate the land west of the A1 at SKPR-334 for traveller pitches. The Draft Site Allocations Report provides no assessment against the aforementioned criteria.
- 3.73 The site is separated from the other proposed residential by a main road, with a flyover which is not currently suitable for pedestrians. The Council has also not taken into consideration the impacts of the A1 and the employment uses to the south in terms of noise or air quality, given the sensitivity of the receptors in terms of children and vulnerable people and the operational requirements of the site and security.
- 3.74 The location of the traveller pitches is distinctly separate from Grantham and the proposed residential allocation to the east of the A1. It is not clear how the access to health and education facilities have been considered in the selection of the site.

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- 3.75 The nearest state primary school is The West Grantham Church of England Primary School, located a 31-minute walk away, followed by Harlaxton C of E Primary School, located a 52-minute walk away. Both of these options would require walking down Wyville Road which is unlit and has no footpath.
- 3.76 The nearest GP surgery is Swingbridge Surgery in Grantham, located a 29-minute walk from the site, followed by The Welby Practice in Harlaxton which is a 52-minute walk from the site. Both these options would also require walking along Wyville Road.
- 3.77 Therefore, it is clear that the ability of the travelling community to access school and health facilities on this site is severely limited and is not in accordance with guidance.
- 3.78 Lastly, a new junction has been delivered on the A1, connecting to the B1174 via the A52 (Tollemache Road North). This junction has been built at significant expense to help facilitate the delivery of the Grantham Southern Gateway Strategy Employment Opportunity alongside Spitalgate Heath Garden Village and Prine William of Gloucester Barracks. Therefore, the junction has been built with logistics and employment at its heart and the capacity to accommodate large numbers of vehicle movements. The change in the allocation from employment to residential and traveller pitches would not, therefore, make best use of these upgrades.
- 3.79 As such, it is not considered that the land at SKPR-334 is suitable for the proposed change in use, is not in accordance with national policy and is therefore not sound.

4. CONCLUSIONS

- 4.1 In summary, the proposed amendment to SKPR-334 (Land south of Gorse Lane) from a strategic employment allocation under adopted Policy E1 to residential dwellings and traveller pitch provision is neither justified nor supported by a robust evidence base. The absence of up-to-date and studies on employment land demand and traveller accommodation needs undermines the soundness of the Regulation 18 consultation and prevents effective scrutiny of the evidence base.
- 4.2 Both national and local planning policy place significant emphasis on the importance of strategic employment land to promote economic growth. SKPR-334 is a highly accessible site, directly linked to the strategic road network, and recognised in the adopted Local Plan as a flagship employment location. Its reallocation to non-employment uses would weaken Grantham Southern Gateway's strategic importance, undermine the Council's stated vision and strategic objectives for economic development, and fail to make best use of substantial investment in infrastructure.
- 4.3 Concerns are also raised with regard to the positioning of SKPR-334 as a "new allocation", failing to recognise the wider land allocated under adopted Policy E1. The Council should not seek to amend existing allocations to remove employment provision in favour of residential development without sufficient evidence. Instead, new sites should be sought to meet the increase in housing need.
- 4.4 The proposed traveller pitch provision on the land west of the A1 is also not appropriately located, with poor pedestrian links to essential health and education services, and potential conflicts with adjacent industrial uses. Furthermore, the provision of 20 pitches is inconsistent with established best practice guidance, which advocates smaller, better-integrated sites to promote community cohesion.
- 4.5 For these reasons, **the proposed amendments to SKPR-334 cannot be considered positively prepared, justified, effective, or consistent with national policy, and are therefore unsound.** It is recommended that the site should remain allocated for strategic employment uses in line with the adopted Local Plan Policy E1, and that alternative, more suitable sites should be identified to meet the District's housing and traveller accommodation needs.

A1. SITE LOCATION PLAN



APPLICATION SITE

— SITE RED LINE APPLICATION BOUNDARY
 GROSS SITE AREA
 35.53 Ha / 87.81 Acres



Revisions:			
P01	First Issue	07.03.2024	KI
P02	Red Line updated	20.09.2024	KI



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MULBERRY DEVELOPMENTS
 Grantham, West of A1
 LOCATION PLAN

Status	Preliminary
Drawn by:	KI
Checked by:	RM
Date	May 2024

Document Number:
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Scale @ A0 1:2500
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