

Our Ref: P8222/PB/hr  
Date: 26 August 2025

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Dear Ms Brannon

**South Kesteven Local Plan 2023 – 2043  
Regulation 18 Local Plan – Proposed Housing and Mixed-Use Site Allocations  
Hanbury Properties**

We act on behalf of Hanbury Properties Limited (“HPL”) and are instructed to make representations to the updated Regulation 18 consultation for the South Kesteven District Council’s (“SKDC”) Local Plan.

Our client’s site is located to the south of Gorse Lane, Grantham, and is identified as reference SKPR-234 in your Draft Site Assessment Report (July 2025). The site has been promoted for an employment allocation. While Harris Lamb was not the original agent, we enclose at **Appendix A**, a copy of the previous representations submitted to the District Council in April 2024 on behalf of our client, which provides a detailed record of the promotion undertake to date.

To assist your assessment, we have structured our comments under the following subsections:

1. South Kesteven District Council’s Previous Consideration of the Site;
2. The Scope of the ongoing Local Plan Consultation;
3. The Employment Potential of the Site;
4. the Residential Opportunity for the Site; and
5. Access

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On behalf of HPL, we wish to formally object to the omission of this site from the emerging Local Plan for the reasons set out below. We consider that the emerging Local Plan contains shortcomings in its assessment and allocations and that there are strong grounds for the inclusion of our client's land, whether as an employment or mixed-use allocation.

The proposed access arrangements for this site have repeatedly been misrepresented as showing a 'lack of suitable access.' In fact, there is a clear and deliverable strategy for access via GR-SE1, which has already been set out in previous submissions to SKDC and is reaffirmed in this representation, supported by a Transport Note at Appendix C. This evidence confirms that there are no technical constraints preventing the development of this land. The site is well located due to its proximity to the wider highway network, its ability to connect to pedestrian and cycle infrastructure, and the potential access from the existing A52 western roundabout, which is unlikely to result in any severe impact on local highway junctions. This is addressed further within our representation.

### **South Kesteven District Council's Previous Consideration of the Site**

You will be aware that my client has made various submissions to the emerging plan at various stages for proposing the allocation of the site for employment land.

Within SKDC's published Statement of Consultation dated February 2025, my client's site (reference SKPR-234) was considered one of the "Additional sites to be considered allocation." It was advised that:

***Comments have been noted as to the additional proposed employment sites for inclusion within policy E2. Additional employment sites will be considered through the Employment Land Study (2024) and Site Assessment process. Employment allocations may be reviewed depending on the outcomes of the draft Local Plan Review consultation and decisions will be reflected within the Pre-Submission version of the Local Plan review and its subsequent evidence base.***

We wrote to you in May 2025 to request that the scope of the current consultation be expanded to also include an assessment of the employment land in the district given the significant increase in the Council's housing need from 686 to 912 dwellings per annum. A copy of this letter is enclosed at **Appendix B** for reference.

These submissions have been unsuccessful, and the site was described in your Council's *Draft Site Assessment Report* (1 July 2025) as follows:

***Site has been identified as having the potential to have a major impact on the Local Road/Highway/ Strategic Highway Network. Significant mitigation measures would be required using transport assessments and modelling. Site has also been identified to fall within an area affected by a minerals and waste policy from the adopted Lincolnshire County Council Minerals and Waste Plan (2016). Appropriate measures would be required to ensure compliance with the affected policy. Other more suitable sites are available to meet required need across the plan period.***

The detailed comments within the *Draft Site Assessment Report* from both Highways England and Lincolnshire County Council Local Highway Authority (LHA) are inconsistent. National Highway's comments are summarised as:

***The site is in close proximity to the SRN junction. The development is likely to produce significant impacts on the SRN. Subject to further traffic and capacity***

**assessments. Likely to require a Transport Assessment, Travel Plan and CTMP. Cumulative Impact Assessments may be required in conjunction with other policies in the area.**

Importantly it is significant to note that National Highways do not object to our client's site being allocated as an employment site but rather set out a range of documents required to assess the impact on the Strategic Road Network (SRN). The documents which National Highways list are not extraordinary. The assessments would ordinarily be supplied as part of a planning application, and any of the other proposed allocations (in close proximity to the new junction) would have a comparable impact on the SRN.

The LHA comment:

**Proposals show industrial not residential? Site is dependent on adjacent site to get access to A1 junction. TA required for impact on junction - may require significant upgrade to roundabouts to accommodate demand. Site very remote from town centre for residential use. more suitable for industrial use.**

The first and last sentence of the LHA's response are both confusing and conflict with each other. The site's promotion to date has been for employment use, therefore we do not understand the LHA's comments.

The LHA continue to advise the site is dependent on access through the adjacent site to access the A1 junction. However, as demonstrated in our client's previous submissions, and as set out in detail within the representations enclosed at **Appendix A**, there is already a clear and deliverable strategy for access. This strategy makes use of the significant infrastructure already delivered as part of the A1 junction improvements and the Southern Relief Road, enabling our client's site (SKPR-234) to come forward in a coordinated manner alongside the existing wider allocation (GR-SE1).

In this context, it is difficult to understand why the LHA continues to raise the same concerns without addressing, or even acknowledging, the evidence and representations previously submitted on behalf of our client.

Notwithstanding Highways England's and the LHA's consideration that the access to our client's site is inappropriate, a Mixed-Use Allocation for 530 dwellings and 2ha of Traveller site (SKPR-334) is proposed immediately adjacent to our client's with only access onto Gorse Lane. Clearly if SKPR-334 is acceptable in terms of access it is not unreasonable to assume our client's site is also acceptable, especially as our client's site has access both to the A1 junction and Gorse Lane. This is discussed further in the section regarding Access below.

### **The Scope of the ongoing Local Plan Consultation**

We query why the consultation into the emerging Local Plan centres on Housing rather than Employment. We have previously raised concerns that the scope of the consultation should be expanded to include an assessment of the employment land in the district. Without this further work, there is a significant risk that the emerging Local Plan Review may be found unsound at Examination.

As raised previously in our letter dated 23<sup>rd</sup> May, we understand the South Kesteven Employment Land Study (February 2024) (ELS) found that no additional employment allocations were needed. However, paragraph 8.2 of the ELS advised:

**However, SKDC's Local Plan should take into consideration the opportunities of each site, their strengths and weaknesses as an employment location as well**

***as the surrounding context and environment when making the new designations. For instance, it might be appropriate to release some existing allocated sites and allocate new sites. It would also be recommended that SKDC protects the most suitable employment sites to ensure that unforeseen growth (or growth beyond the Plan Period) can be met.***

It is our view that the employment land identified is in the wrong place, which is why – five years post adoption of the Local Plan - some allocated employment sites have not progressed beyond allocation.

We consider site-specific and market constraints are preventing delivery of these employment allocations, and these issues should be clearly identified in order new employment allocations- that are better aligned with current market demand and infrastructure connectivity- can be delivered on alternative sites.

In addition, some of the existing less attractive employment allocations may, in fact, be better suited for residential development. When identifying new housing sites, it is important that the Council also re-examines current employment land allocations to ensure a balanced and effective spatial strategy that responds to both housing and economic need. This has not been completed.

Further, the limitation to restrict the scope of consultation to Housing is also not strictly adhered within the progression of the emerging plan, as there are some elements of employment provision which have been discounted as being surplus to requirements. SKPR-266 Stamford Gateway (Exeter Fields) a mixed-use site proposes to decrease 5ha of Employment Land; and SKPR-65 Prince William of Gloucester Barracks (mixed-use) proposes to decrease 8 ha of employment land. We suggest it is impossible to reduce allocations in this way without a holistic understanding of the employment need and supply in the district.

### **Employment Potential of the Site**

Our client's site is well located for both employment and residential development. To date our client has promoted the site for employment use given it is located immediately to the west of the new A1 junction and adjacent to the GR-SE1 'Grantham Southern Gateway' employment allocation, which is currently the subject of an outline planning application for up to 140,000sqm of general industrial and storage and distribution uses.

Our client's land is ideally located to support the district's employment growth, particularly in the logistics sector given the easy access to the A1. The need for employment sites to have easy access to the A1 is emphasised by the ELS which identifies that 52.7 hectares of the required 79.5 hectares of employment land is anticipated for warehousing (B8 use), which typically requires proximity to high-quality transport links. In combination with GR-SE1, it would enhance the opportunity to attract major large-scale operators both regionally and nationally.

The site would provide a sustainable location for employment development and the further Technical Highways note enclosed, sets out clearly the access to the site is appropriate.

Further, the proposed mixed allocation SKPR-334 is immediately adjacent to our client's site. If this site is being allocated with a poorer access arrangement, we can see no reason why our client's site has been discounted on access grounds.

### **Residential Potential of the Site**

Whilst our client's previous promotion to date has been for employment, the provision of draft allocation SKPR-334 broadens the ranges of uses that the site is suitable for, as there will be

a residential allocation immediately adjacent to our client's site. There is no reason why our client's site could not be allocated for residential use in combination with employment.

The site is located immediately adjacent to Grantham and all the services and facilities which residents would expect to be able to access are within easy reach of our client's site. The site is clearly in a sustainable location for residential use.

We also 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. However, we are concerned about the deliverability of any housing on this site given the ongoing Member of Parliament campaign to save the Barracks which you will no doubt be aware. The Ministry of Defence advised it would be vacating the barracks site during the preparation of the existing adopted Local Plan, and that it would come forward for development. Despite this, the site is not yet vacant and there is still no clear timeframe when the site will become vacant.

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.

We consider there are potential issues with sites identified for allocation, whereas our client's site offers a readily available alternative in a suitable location, with a willing landowner and the site is clearly developable and deliverable.

### **Access**

It is significant that National Highways have not objected. However, given the continued assertion that access to our client's site is inappropriate, HPL have instructed Highgate Transportation to prepare a supporting technical note (25135 /TN/01/A) which is enclosed at **Appendix C**. The Technical Note supports the promotion of 45ha of employment and mixed-use development on the site. The note sets out the designated access corridor through the neighbouring allocation to the east, and how the A52 roundabout will be modified. The allocation of the site cannot reasonably be resisted on highway grounds.

Significantly the note undertakes a trip generation exercise to understand the capacity in the area and concludes the proposed 45ha of employment and mixed-use development would be appropriate in this location. It states the potential access arrangement that can be provided with the existing A52 western roundabout. The note highlights the site would be sustainably located; and the proposed trip attraction associated with employment use would not likely result in a severe impact at the existing local highway network junctions.

### **Summary**

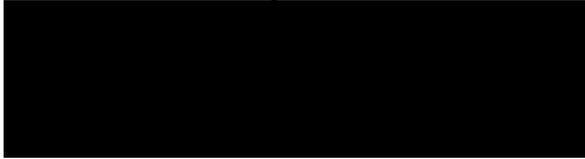
In summary our client has made exhaustive submissions over the progression of the emerging Local Plan, and it is not clear why a location in such close proximity to the new junction on the A1 and adjacent to employment use has been resisted on access grounds which have been resolved. However, we hope the above assists any further consideration.

We consider the scope of the emerging Local Plan to be too narrow and should have been expanded to consider employment uses- especially as some employment allocation has been withdrawn. It is impossible to assess the need for Housing without assessing the need and supply of Employment land – the issues are intrinsically tied.

The site is plainly both suitable for employment and residential use for the reasons we set out above and there are identified allocations which have potential issues.

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



**Paul Barton BSc (Hons) MRTPI  
Director**



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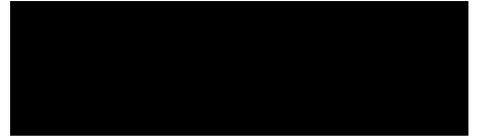
Appendix A – Previous Representations dated 24 April 2024

Appendix B – Letter to SKDC Policy Team dated 23 May 2025

Appendix C – Highgate Transportation Technical Note (25135/TN/01/A) dated August 2025

**APPENDIX A :  
PREVIOUS REPRESENTATIONS  
DATED 24<sup>th</sup> APRIL 2024**

Planning Policy Team  
South Kesteven District Council  
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24 April 2024

Our Ref: 88114768/1/BE/MB

**Submitted via email:** [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Dear Sirs,

## **SOUTH KESTEVEN DISTRICT COUNCIL: REGULATION 18 DRAFT LOCAL PLAN CONSULTATION**

We act on behalf of Hanbury Properties Limited ("HPL") and are instructed to make representations to the Regulation 18 draft Local Plan consultation.

In summary, our representations comprise:

- Support for the overall economic ambition of the proposed Local Plan through the extent of the quantum of land that SKDC seeks to allocate for employment development.
- **OBJECTION** to Policy E2 on the basis of the distribution of the allocation of employment sites. The objection relates to the decision to allocate 172.7ha of greenfield land at Gonerby Moor. This is unjustified by evidence and the Gonerby Moor allocations perform poorly in respect of opportunities to connect to sustainable travel due to their remote location from Grantham town centre and the existing settlement.
- The solution is to maintain the overall economic ambition but through a re-distribution of proposed employment land to the south of Grantham. An expansion of the existing allocation (GR-SE1) through the land to the immediate west (reference SKPR-234) would represent a more sustainable focus for employment development, given future growth established by existing SUE/Garden Village allocations and the Grantham Southern Gateway. The expansion of the existing Grantham Southern Gateway allocation to include the SKPR-234 land enjoys full support and endorsement from Buckminster, the landowner of the majority of the Grantham Southern Gateway. SKPR-234 benefits from existing infrastructure and in combination with GR-SE1 would enhance the opportunity to attract major large-scale operators both regionally and nationally.
- The Employment Land Study misrepresents the access constraints of SKPR-234, identifying that there is a 'lack of a suitable access'. This fails to account for the clear strategy for

accessing the site through GR-SE1, which has been explained in previous submissions to SKDC and reaffirmed within this representation.

### **Key Background Information**

HPL's principal interest in the Local Plan is in relation to employment development. HPL is promoting approx. 45ha of land to the west of employment allocation GR-SE1 'Grantham Southern Gateway' in the adopted South Kesteven Local Plan (2020) ("the Site"), which has secured full support and endorsement from Buckminster, the landowner of the Grantham Southern Gateway. Buckminster has advised that they be further supporting our promotion of the Site through their own representations.

A 'call for sites' submission was made to the Council in August 2021 (by Savills, prior to HPL's involvement). The Site is identified as reference number SKPR-234 in the 'Draft Site Assessment Report (February 2024).

HPL met with SKDC in December 2022 to introduce the Council to the opportunities of allocating the Site including providing a briefing note (12 December 2022, Freeths LLP) and a letter from, Buckminster, the owner of the adjacent allocation (GR-SE1) to HPL (dated 14 December 2022) advising that in principle the landowner was willing to permit access through the existing allocation, subject to agreement of commercial terms. This access arrangement has now been formalised, a corridor designed and excluded from the option agreement Buckminster has with Mulberry Developments, and as shown coloured blue on the enclosed plan GRN-PHP-WO-XX-DR-A-4674-902-PO4, at **Appendix A**.

Further meetings between HPL and SKDC were held in July and December 2023 with the Head of Economic Development and Planning Policy Officers respectively. HPL has sought to engage with SKDC consistently through the preparation period of the Regulation 18 Local Plan.

HPL is a private property company specialising in strategic land and commercial development. With expertise across all phases of the development process, they have a proven track record of successfully delivering complex and diverse projects, with a particular focus on planning and major challenging infrastructure-led projects. HPL has successfully secured planning consents for over 2,000 residential units and are currently working on a pipeline which has the potential to deliver a further 4,500 units, alongside mixed-use development. Notable recent commercial projects include the delivery of a 60 acre site for Rolls Royce, Lidl, and Amazon in Bognor Regis, as well as a 12-acre mixed-use business park in Chichester, featuring drive-thrus, a hotel, a builder's merchant and over 8,000sqm employment floorspace.

The allocation of the Grantham Southern Gateway holds significant strategic employment importance for Grantham due to its connection and proximity to key growth areas. Expanding the allocation to include SKPR-234 would greatly boost the Gateway's appeal and its potential for large-scale manufacturing and employment development of which there are scarce few in the region of such large scale and potential high quality. HPL has the infrastructure expertise, experience, and market relationships to unlock and facilitate the site's full potential, aligning with the economic ambitions of the Local Plan.

## **Policy E2: Employment Sites**

Firstly, HPL strongly supports the economic ambition of the proposed Local Plan. Policy E2 in combination with carrying forward the strategic allocation (GR-SE1- Grantham Southern Gateway) in the existing Local Plan, allocates approx. 338ha of new employment sites across the District. Whilst this commitment to employment and economic prosperity is welcomed, the location of the 'new' allocations, specifically Gonerby Moor, is not justified and shifts the economic focus from the Southern Gateway.

HPL OBJECTS to Policy E2 and specifically the extent of proposed allocation for employment development at the three Gonerby Moor sites, identified as the following within Policy E2:

- SKPR-202 Land at Gonerby Lane, Gonerby Moor Grantham – 29ha
- SKPR-100 Land South of Gonerby Lane, West of A1, Gonerby Moor, Grantham – 63.7ha
- SKPR-182 Grantham Oakdale, Gonerby Moor, Grantham – 82ha

The three sites which are clustered around existing employment sites EMP R3 and R10, and are proposed either side of the A1, amount to a total of 172.7ha of land.

Whilst HPL has no objection to an increase in employment land in this broad location per se, the extent of the proposed allocation is disproportionate and wholly unjustified. It shifts the economic focus established through the existing adopted Local Plan (2020) from the Southern Gateway, noting that Gonerby Moor was not identified as a growth location in the adopted Local Plan. The rationale of allocating GR-SE1 in the adopted Local Plan (and which is carried forward in the Local Plan review) was very clear given its presence directly adjacent to the A1, and critically, its proximity to strategic housing allocations GR3-H1 and GR-H4 and its connection to these allocations via the new £150m Grantham Southern Relief Road linking the A1 to the A52 road network . The site benefits from uniquely comprehensive road connectivity from North to South and East to West.

Paragraph 9.19 of the Local Plan states: *“the Employment Land Study (2023) recommended that in terms of planning for any further employment land, consideration should be given to the opportunities of each site by assessing their strengths and weaknesses, as well as the surrounding context and environment when making new designations. The Employment Land Study (2023) therefore undertook an assessment into a suite of proposed employment sites across the district (both vacant and occupied) and endorsed them for either designation, retention, or release. The outputs of these endorsements were used when determining the most appropriate employment land allocations as part of the Local Plan Review.”*

It is evident that SKDC is reliant on the Employment Land Study (“ELS”) to justify the proposed allocations and in particular the Gonerby Moor allocations. However, the justification is unconvincing, particularly for such a large allocation.

The ELS states *“Sites SKPR-100, SKPR-185, SKPR-202, and SKPR-41 comprise a suite of additional sites located around the A1 junction at Gonerby Moor and thus benefit from virtually direct access to the strategic road network and could facilitate intense HGV movements. The current low intensity of use on these sites, primarily for agriculture, presents opportunity for future development*

*and intensification of use which, potentially in complement, could significantly increase the provision of employment land in this location. The adjacency of these sites indicates that, although suitable for a range of uses, industrial, storage and distribution functions could be successful here". (penultimate bullet point para. 6.35.)*

*"Two sites at Gonerby Moor were put forwards through a "call for sites". The sites are referenced as SKPR-100 and SKPR-202 (see Table 6.10 and Table 6.11), both are open greenfield/agricultural land and located north of Grantham, on the west of the A1. The sites are in two different ownerships, with both developers coming together to propose a combined delivery of their site. In total, the sites (based on master plans shared by developers) are expected to deliver in the region of 370,000 sqm of B2 and B8 space (4,000,000 sqft)." (Para. 6.43 ELS)*

*"Site SKPR-182 is also rated highly favourably in terms of redevelopment potential. The site forms part of the wider adopted Local Plan housing allocation GR3-H1 (Spitalgate Heath – Garden Village). This is a very large site adjacent to the A1 and B1174 routes meaning access to the strategic road network is virtually direct and a high volume of HGV movements could be easily facilitated. Moreover, there are no sensitive surrounding land uses. Ambitious redevelopment of the currently agricultural use site may utilise the adjacent railway line. The site would be suitable for a range of industrial and storage and distribution functions owing to its high accessibility." (Para. 6.34 ELS).*

We question the reference to GR3-H1 in para 6.34 which is to the south-east of Grantham and far removed from the proposed allocations at Gonerby Moor. GR1-H2 & H3 are much closer, but even these are significantly separated from the proposed allocations, such that they do not have any potential for direct connections.

The above ELS extracts and a vague reference at para. 9.4 to 'strong market interest' constitutes the justification for the Gonerby Moor allocations but there is an absence of critical analysis of why they have been selected. There are other sites in close proximity to the A1, with established infrastructure and there is no recognition within the ELS of the sustainable transport challenges of the Gonerby Moor allocations.

Paragraph 109 of the NPPF states: *"The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes."*

Paragraph 114 further advises *"In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:*

- (a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location"*

There is no analysis in the ELS about how the Gonerby Moor allocations could be serviced by sustainable transport connections. As the site is remote from Grantham itself, prospects of access via walking are highly unlikely. Whilst there is a footway on the eastern side of the B1174, it is narrow and not an attractive walking route. There is also an absence of cycling connections.

Enclosed at **Appendix B** is an accessibility comparison plan, that analyses the proximity of the proposed Gonerby Moor allocations and site SKPR-234 to Grantham town centre. The drawing reinforces that the Gonerby Moor allocations are isolated from the principal built up areas of Grantham and that measures for encouraging walking and cycling to these sites are highly unlikely to be realistic in practice.

The reliance on private car trips is recognised in the Draft Site Assessments document. For SKPR-182 at page 325, comments from the Highway Authority (Lincolnshire County Council) state “*This site could take access from the B1174. However, due to its remote location from Grantham Town Centre and its access to the A1, it is likely to be predominantly reliant on the private car for travel. Active travel and sustainable modes would be unlikely to mitigate the impact of traffic which on the B1174 junctions is likely to be severe.*” A very similar comment is also made by LCC in relation to SKPR-100. For SKPR-202 LCC don’t specifically raise the same issue, but we would see no reason why the same concerns would not apply, given the proximity and the potential for cumulative impact. There are significant concerns relating to the proposed allocations’ ability to be accessed by sustainable transport and for the local road network to cope with the additional traffic, noting LCC’s conclusion that junctions with the B1174 are likely to experience ‘severe’ impact. There is no evidence as part of the Regulation 18 consultation that appraises this in any further detail. Although the ELS provides no reference to the number of jobs projected to be created by the three Gonerby Moor allocations, given the size of the respective sites, this would be in the magnitude of thousands and therefore having strong accessibility by non-car modes is critical to the overall sustainability of the allocations and the wider Plan.

Overall, across the evidence base there is a distinct lack of justification for the size and extent of the allocations at Gonerby Moor. The ‘Main Findings’ summary within the Draft Site Assessments for each of the proposed allocated sites (SKPR-100 P259; SKPR-202 P286; SKPR-182 P326) states:

*“Employment Land Study 2023 recommends that the site is allocated for employment generating uses. The Employment Land Study 2023 concludes that the site benefits from direct access to the strategic road network and could facilitate intense HGV movements. The current low intensity of use on this site presents opportunity for future development and intensification, which can significantly increase the provision of employment land in this location.”*

However, there is a lack of justification in the ELS or the Draft Site Assessments for the selection of the allocations. In short anyone analysing the Plan and the evidence base is unable to clearly distinguish why the proposed allocations at Gonerby Moor perform better than reasonable alternatives. We have identified significant sustainable transport issues with the location of such a vast allocation and LCC has raised serious concerns about the ability of the local road infrastructure to accommodate the development. Further these allocations would represent significant incursions into the open countryside, detached from settlement boundaries.

In addition to the above concerns, we are very surprised by the absence of a specific policy for the allocation of these three sites. At a combined total of 172.7ha, the three sites are comfortably the largest allocation within the Plan and evidently would require a detailed site-specific policy to guide future development and delivery. The omission of such a policy within the Regulation 18 version of the Plan makes further analysis of the suitability of the sites extremely difficult. Further, there is no information on what infrastructure would be required and how this may be delivered. This contrasts sharply with the approach to the Grantham Southern Gateway. This strategic site has its own policy

(E1) which sets out in detail, the key parameters for development and secures that appropriate infrastructure is in place. It is also noteworthy that the final sentence of the policy for this strategic site states “*Proposals will not be supported that cause harm to the strategic employment focus of this site.*” Whilst we acknowledge the purpose of the wording in the policy, we would suggest that the Gonerby Moor allocation approach directly harms the strategic employment focus of the Grantham Southern Gateway.

The examination of the Local Plan will be subject to the tests in paragraph 35 of the NPPF and we submit that Policy E2, by virtue of the scale of the allocations at Gonerby Moor would fail the ‘justified’ test in that it is not an appropriate strategy, having regard for alternatives, and it is not based on clear evidence. Further, it would not be consistent with national policy in respect of sustainable transport objectives.

## **Recommendations**

To address the above objection and to ensure that any Regulation 19 Submission Draft has strong prospects of meeting the tests of soundness, HPL submits that the location of new employment allocation should be re-distributed. The adopted Local Plan has a strong focus for both residential and employment development to the south of Grantham through the Southern Gateway site and the very large Sustainable Urban Extensions. In summary terms this area offers the best opportunity to deliver sustainable employment development in a timely manner, benefiting from immediate access from the A1 and with the advantage of significant infrastructure already in place through the construction of the new A1 junction and the Southern Relief Road (which we understand will be complete in 2025).

HPL’s site (SKPR-234) should be a significant part of the solution here. Having examined the evidence base, there are some concerns with how the Site has been appraised.

The ELS states:

*Site SKPR-234 is a large greenfield site which presents as being suitable for redevelopment in light of present low intensity agricultural use. The site could support a range of industrial functions given the lack of sensitive surrounding land uses, although in reality the lack of suitable access is prohibitive for most uses. The unsuitable access routes represent constraints on the viability of future developments in this location without significant investment in upgrading access routes. (Our emphasis)* (para 6.35 of Employment Land Study.)

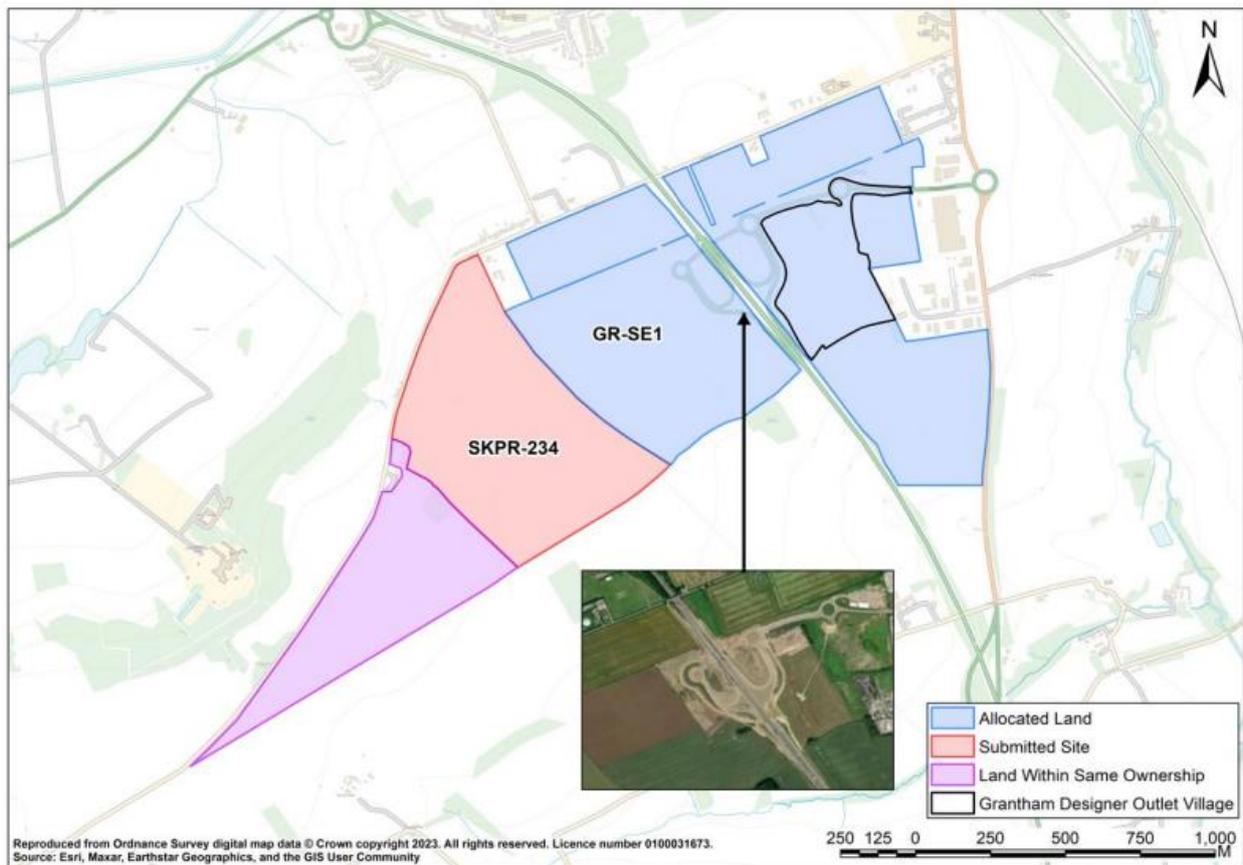
The underlined text is significantly misrepresentative of the proposed access solution for the Site. In promoting the Site HPL has always identified that access would need to be achieved through the existing allocation GR-SE1. This access proposal actually pre-dates HPL’s involvement and we note from the call for sites submission in August 2021, submitted by Savills, that it was identified at this stage that access would need to be achieved through GR-SE1. The call for sites submission states:

*“We are aware of the planned construction of a new access junction onto the A1 as part of Phase 2 of the Grantham Southern Relief Road project which we understand will be fully operational by 2023. The site would therefore be able to utilise this new road infrastructure and gain access through the allocated Grantham Southern Gateway employment site, subject to further negotiations with the*

*adjacent landowner, to enable the use of their land for through access to the subject site in due course.”*

As referenced earlier in these representations, a letter from the landowner of GR-SE1 has been submitted, confirming that the principle of access through their site is acceptable. Further the ELS contains a plan provided by HPL to demonstrate access will be provided via the new A1 junction (see figure 6.1 extracted from ELS below). Whilst the plan did not expressly show a road connecting through GR-SE1, supporting correspondence submitted by HPL, including the letter from the landowner evidently demonstrated that this was the intent. We have above provided the further detail. You will note on the plan enclosed as **Appendix C** - GRN-PHP-W0-XX-DR-A-4674-003-P01 the two new arms on the existing roundabout. The detail is included in the Pre-application by Mulberry Developments made to SKDC in March 2024. The initial response of County Highways and National Highways towards the pre-application transport scoping assessment was positive, although formal responses are awaited.

**Figure 6.1 Land southeast of Gorse Lane, Harlaxton Manor (SKPR-234)**



Having regard to this, it is difficult to understand how the ELS has arrived at a conclusion that there is an absence of a suitable access or that it would be prohibitive for most uses. As identified above, SKDC has always been aware that access to SKPR 234 was via the existing allocation (GR-SE1) and plans have previously been submitted to demonstrate this. In addition, further drawings are

enclosed with these representations, which propose this. These comprise the Development Framework Plan (2151-11-02) as **Appendix D**, and the Context, Connectivity and Access Plan (2151-12-02) as **Appendix E**. These re-enforce that not only is access achievable but it is based on a coherent strategy, that utilises the significant infrastructure that has been constructed in respect of the A1 junction and the Southern Relief Road. The context plan at Appendix E demonstrates how the Site sits in a more strategic location on the road network in comparison to Gonerby Moor. We note that the key diagram at Figure 5 does not identify the new A1 junction or the Grantham Southern Relief Road but this is key infrastructure and should be acknowledged.

The Buckminster/Mulberry proposal allows for access to GR-SE1 and in turn SKPR-234 such that both areas west of the A1 can come forward in a co-ordinated manner, as part of the existing wider allocation.

The Draft Site Assessment (P295) summarises the Site as follows:

*“Site has been identified as having the potential to have a major impact on the Local Road/Highway/Strategic Highway Network. Significant mitigation measures would be required through the use of transport assessments and modelling. Site has also been identified to fall within an area affected by a minerals and waste policy from the adopted Lincolnshire County Council Minerals and Waste Plan (2016). Appropriate measures would be required to ensure compliance with the affected policy. Other more suitable sites are available to meet required need across the plan period.” (SKPR234) Draft Site Assessment P295.*

In respect of the impact on the Strategic Highway Network, the Site is identified as ‘major’ (see below extract)

**SKPR-234 (P294, Draft Site Assessments)**

Impact on the Strategic Highway Network	Major
Statutory comments on Highway Network (Highways England)	More than 100 trips, affects multiple SRN, less than 3km from SRN
Impact on the Local Highway Network	Moderate
Impact on the Local Road Network	Moderate
Statutory comments on Highway Network (Lincolnshire County Council)	Proposals show industrial not residential ? Site is dependent on adjacent site to get access to A1 junction. TA required for impact on junction - may require significant upgrade to roundabouts to accommodate demand. Site very remote from town centre for residential use. more suitable for industrial use.

**Gonerby Moor Allocations:****SKPR-100 (P257, Draft Site Assessments)**

Impact on the Strategic Highway Network	Major
Statutory comments on Highway Network (Highways England)	High priority as it is located abutting the SRN and the trips are greater than 100. Likely to have cumulative impact with SKPR 202 and 185
Impact on the Local Highway Network	Major
Impact on the Local Road Network	Major
Statutory comments on Highway Network (Lincolnshire County Council)	This site could take access from Gonerby Lane, which would need upgrading to the A1 junctions. However, due to its remote location from Grantham Town Centre and its immediate access to the A1, it is likely to be predominantly reliant on the private car for travel. Active travel and sustainable modes would be unlikely to mitigate the impact of traffic which is likely to be severe on the adjoining highway network.

**SKPR-182 (P325, Draft Site Assessments)**

Impact on the Strategic Highway Network	Major
Statutory comments on Highway Network (Highways England)	High priority as it is located very close to the SRN and the trips are greater than 100.
Impact on the Local Highway Network	Major
Impact on the Local Road Network	Major
Statutory comments on Highway Network (Lincolnshire County Council)	This site could take access from the B1174. However, due to its remote location from Grantham Town Centre and its access to the A1, it is likely to be predominantly reliant on the private car for travel. Active travel and sustainable modes would be unlikely to mitigate the impact of traffic which on the B1174 junctions is likely to be severe.

**SKPR-202 (P285 Draft Site Assessments)**

Impact on the Strategic Highway Network	Major
Statutory comments on Highway Network (Highways England)	High priority as it is located abutting the SRN and the trips are greater than 100. Likely to have cumulative impact with SKPR 185
Impact on the Local Highway Network	Moderate
Impact on the Local Road Network	Major
Statutory comments on Highway Network (Lincolnshire County Council)	The proposals show employment uses and not residential? This site is same as Parcel A of SKPR-185, not suitable for residential.

There is no differential between the Site and the allocated Gonerby sites in terms of the strategic network (indeed local road impact is less for HPL's site). The Site also benefits from comprehensive North to South and East to West connections, which is not the case with the Gonerby sites. It appears that sites have been discounted for reasons/constraints that equally apply to allocated sites but with no explanation for this. Given the scale of the Gonerby Moor allocations cumulatively, it is not unreasonable to suggest that the impact may be significantly higher for those allocations than the Site. Whilst it is accepted that the Site Assessments are not a precise tool for site selection and there is wider planning benefits/balance to be considered, the same apparent constraints cannot be ignored on selected sites just because the ELS recommends that they be allocated, particularly when there is an absence of coherent justification for doing so.

In respect of minerals, from review of the Lincolnshire Minerals and Waste Local Plan (2016), it would appear the site would fall within a Limestone Minerals Safeguarding Area (Figure 11). However, the extent of this safeguarded land is significant, extending far north of Grantham (to the east of the A1) and considerably to the south (towards Stamford and Market Deeping). The designation also appears to cover land previously released in the adopted Local Plan for the Southern Gateway and the SUEs. Whilst minerals resource is a consideration, the availability of other land for mineral resource and the benefits of allocating the Site, far outweigh any potential loss of safeguarded land. The site assessment also refers to an existing waste facility, which is assumed to be AW32 in the Waste Plan. This is Harlaxton STW, but the development of the Site would have no impediment on this facility and again would not be a justified reason to discount the Site.

Notwithstanding the above concerns with the evidence base and how sites have been selected, the allocation of the Site has a number of significant benefits. These comprise:

- **Sustainability** – It enables the creation of employment in the most sustainable location in close proximity to the focus of growth, through large-scale housing allocations committed at Spitalgate Heath Garden Village and the Prince William of Gloucester Barracks sites. The Site would connect with existing employment and residential allocations providing significant sustainable transport link opportunities. The Plan at Appendix E shows the context of SKPR-234 and how it would be a logical addition to existing allocations both employment and residential, to the south of Grantham. Pedestrian and cycle connections could be extended through GR-SE1, which would link to wider access to bus services.
- **Deliverability** – The site has excellent connectivity to the A1 (N/S), the A52 (E/W) and hence the national road network via the new junction with the Grantham Southern Relief Road which is partially open and will be fully operational by 2025. This delivered infrastructure is not replicated in other sites such as Gonerby Moor, and such public investment in the order of £120m was promised in the expectation of an economic payback from the Southern Gateway it was designed to serve.
- **Maximised Potential** – Expanding the allocation enhances the marketability of the existing allocation and helps unlock the site's full potential, aligning with the economic ambitions of the Draft Local Plan.

- **Comprehensive Planning & Efficiency** – the allocation of the Site, as an expansion of GR-SE1 will enable coordination of resource to facilitate joint delivery of essential infrastructure and utilities and therefore enhance efficiency. The Site's clear relationship with the existing allocation also should ensure both a comprehensive land use approach and provides a strong framework for clarity and consistency of design.

Appendix D presents a Development Framework Plan which demonstrates the high-level principles of how the site could come forward, including access from GR-SE1; strategic landscaping around the northern, southern and western perimeters and opportunities to create wider pedestrian and cycle connections. The Framework Plan shows three indicative plots but there is a high level of flexibility on how development could be developed and any scheme could be required to accord to a wider masterplan to encompass the GR-SE1 allocation and maximise the opportunities that exist.

**Appendix F** is a plan showing a high-level visual analysis of the constraints and opportunities of the Site and its wider context. Of particular note is that Harlaxton Manor (mix of Grade I, II\* and II listed buildings and a designated Grade II\* Park and Garden) to the northwest is already well screened and protected by significant woodland and changes of topography. This relationship would be further protected by strategic landscaping as part of the development of the Site. Consideration of issues such as heritage/landscape impact could form part of any strategic policy for the potential allocation, but there are no technical constraints that would prevent the site from being sensitively developed.

In conclusion, we suggest that the Site be allocated as part of a more sustainable approach to the distribution of employment allocations, and that the Local Plan Review supports the previous focus of development around the Grantham Southern Gateway. The economic ambitions of the Plan can still be fulfilled, and we would suggest further enhanced by re-distributing employment development to the Grantham Southern Gateway, the Site being a natural extension to this.

We trust that these representations will be taken into consideration in the formulation of the Submission Draft Local Plan (Regulation 19). In the meantime, should you require any further information, or wish to discuss any element of this submission, please do not hesitate to contact me.

Yours faithfully

*This letter is approved but unsigned as it is sent electronically.*

Mark Bassett

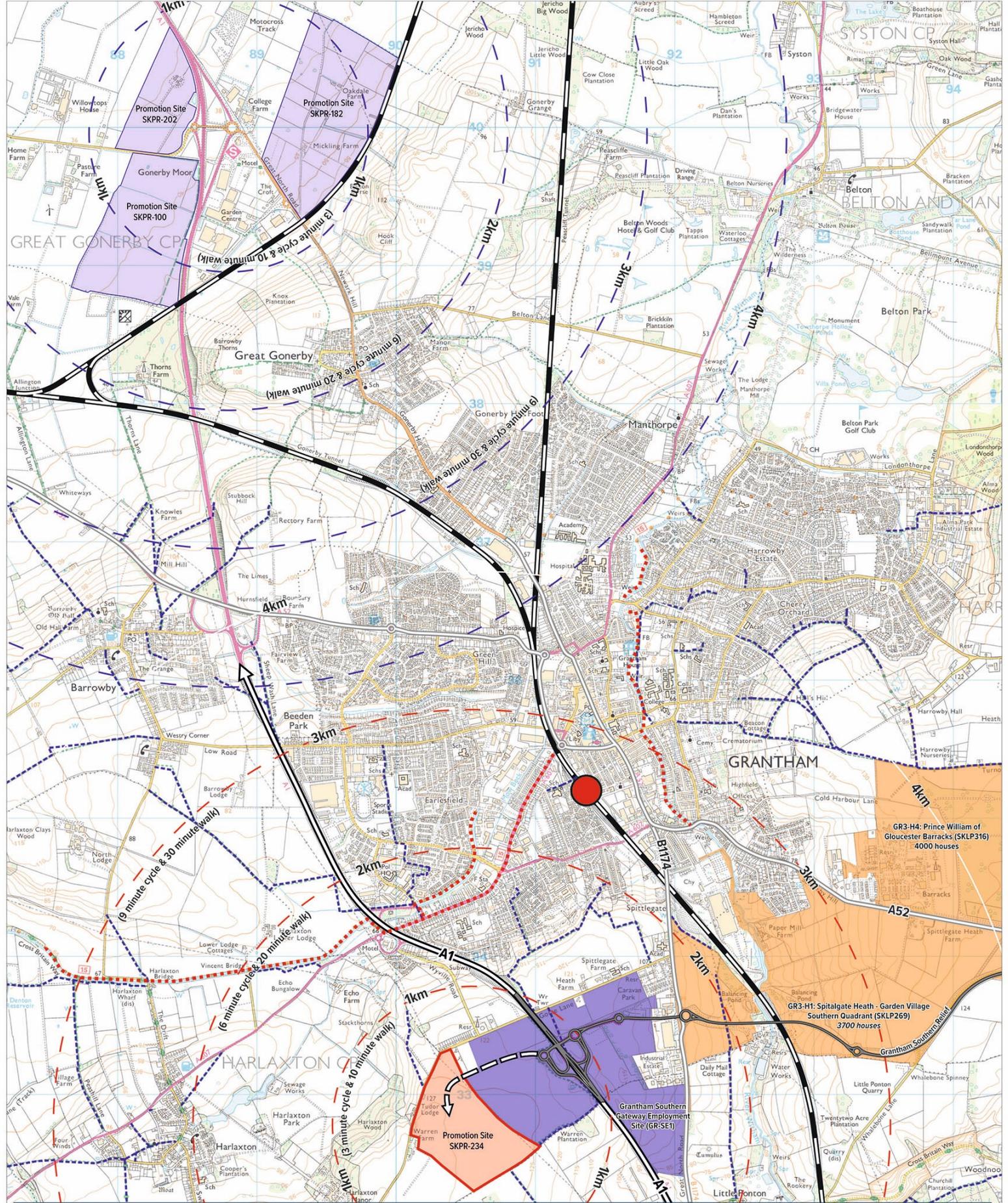
Director

Please respond by e-mail where possible

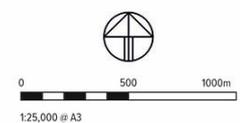
Enc:

Appendix A - Legal plan showing access arrangement - GRN-PHP-WO-XX-DR-A-4674-902-PO4  
Appendix B – 'Accessibility Comparison Plan' (DLA.2151.L11.S04)  
Appendix C - 'Pre-app' plan GRN-PHP-WO-XX-DR-A-4674-003-P01  
Appendix D – Development Framework Plan (DLA.2151.L11.S02)  
Appendix E – Context, Connectivity and Access (DLA.2151.L.12.S03)  
Appendix F – Visual Analysis (DLA.2151.L.10.S04)





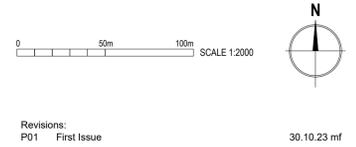
- KEY**
- Promotion site
  - Distance radii from centre of site
  - Gonerby Moor Employment Land
  - Distance radii from Gonerby Moor Employment Land
  - Land for Strategic Employment Development allocated within South Kesteven Local Plan
  - Land for Residential Development allocated within South Kesteven Local Plan
  - Existing railway line and station



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 V:\Server DATA\Project Files\2151 Gonerby Moor Employment Land\landscape\Drawings\Sketch\LT1 Accessibility Comparison Plan

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 www.dla.co.uk e.info@dl.co.uk t.01453 760380

CLIENT	Hanbury Properties
PROJECT	Grantham Employment
TITLE	Accessibility Comparison Plan
NUMBER	DLA.2151.L11.S04
DATE	23/04/24
SCALE	1:25000 @ A3



Revisions:  
 P01 First Issue 30.10.23 mf

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 www.peter-haddon.com



**MULBERRY DEVELOPMENTS**  
 Grantham, West of A1

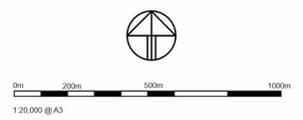
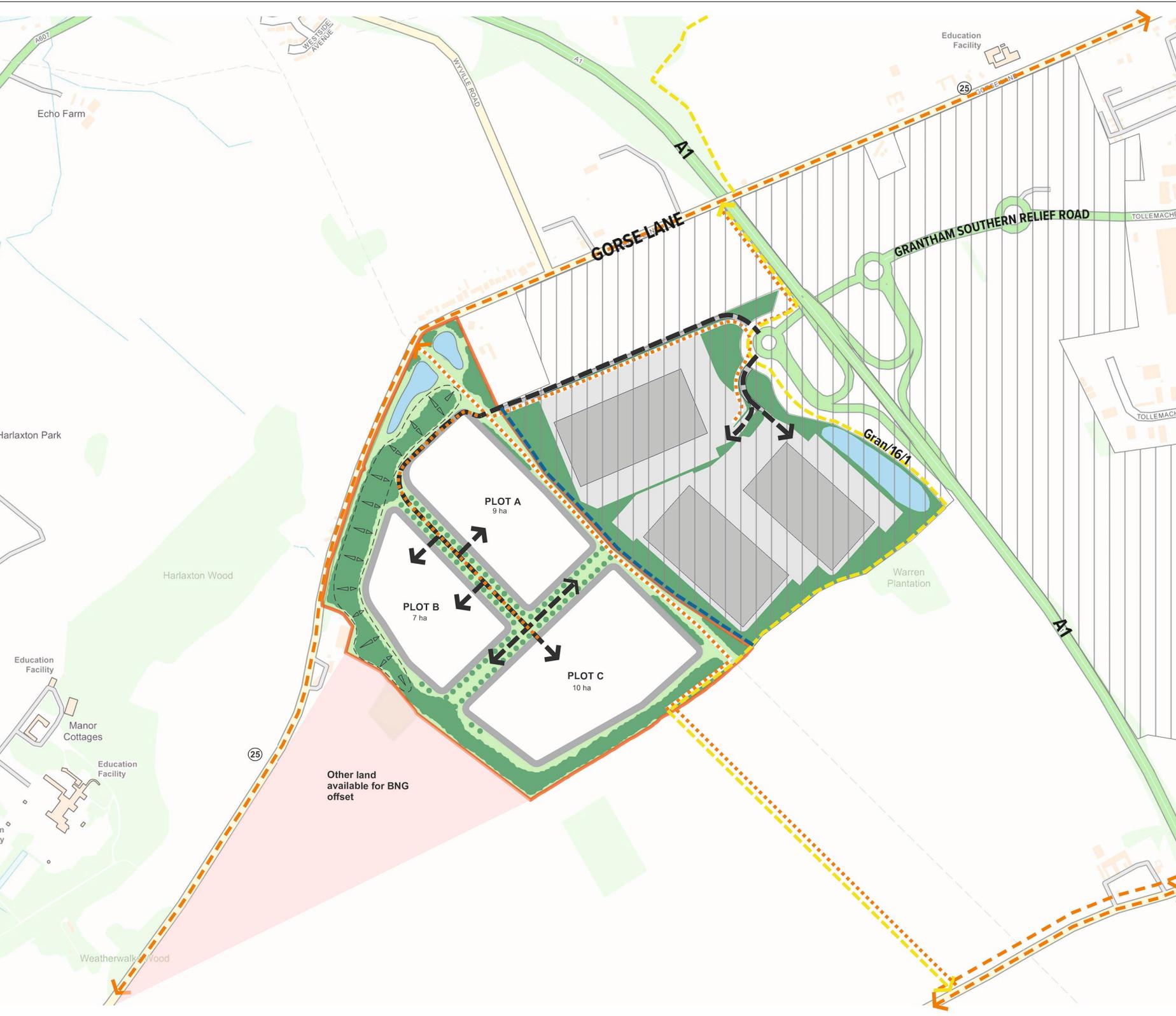
Indicative Masterplan  
 3 Unit Scheme + Proposed Access Overlaid

Status Preliminary  
 Drawn by : MF Checked by : -  
 Date 30Oct2023

Document Number:  
 GRN-PHP-W0-XX-DR-A-4674-003-P01  
 Scale@ A1 1:2000

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- KEY**
- Site Boundary
  - Existing Grantham Southern Gateway Employment Allocation (GR-SE1)
  - Mulberry Developments pre-app scheme
  - Surface Water Storage
  - Strategic Landscape
  - Primary Vehicle Access
  - Existing Cycle Route
  - Proposed Cycle connections
  - Existing Public Right of Way
  - Proposed footpath

Rev	Date	Details	By	QA

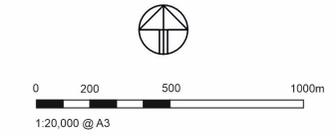
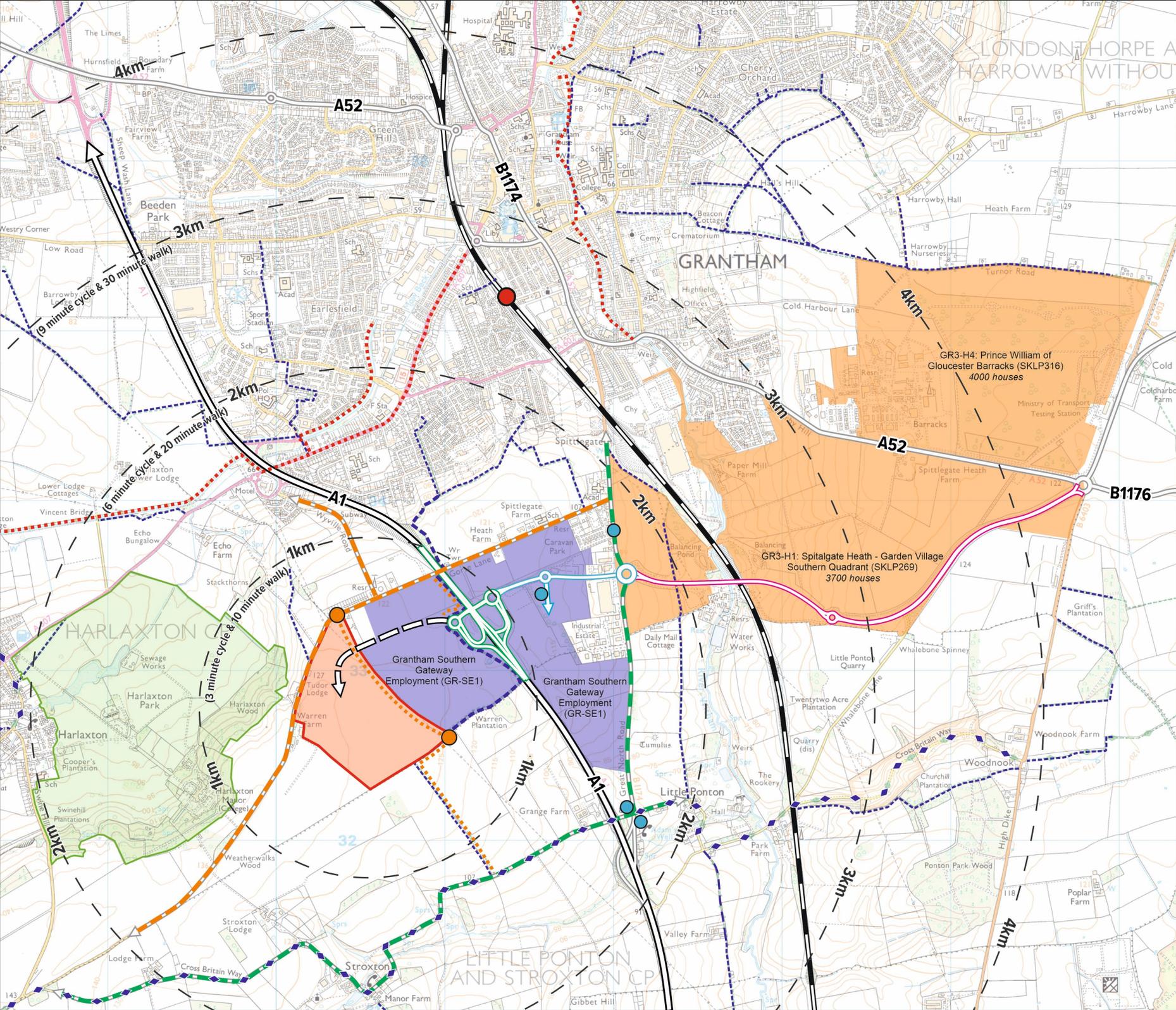
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CLIENT
PROJECT
Grantham Employment
TITLE
Development Framework
STATUS
Sketch

NUMBER	ORIGIN	VOLUME	LEVEL	TYPE	DISCIPLINE	NUMBER	REV
2151	DLA	XXX	XXX	DR	L	11	02
Job Number 2151		Scale 1/7500		Size		A3	

**DAVIES LANDSCAPE**  
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Suite F1, Stroud House, Russell Street, Stroud, Gloucestershire, GL5 3AN  
 w. www.d-la.co.uk e. info@d-la.co.uk t. 01453 760380



- KEY**
- Application site
  - Distance radii from centre of site
  - Land for Strategic Employment Development allocated within South Kesteven Local Plan
  - Land for Residential Development allocated within South Kesteven Local Plan
  - Grantham Southern Relief Road Phase 1 - Completed/Open
  - Grantham Southern Relief Road Phase 2 - Completed/Open
  - Grantham Southern Relief Road Phase 3 - Project Completion 2025
  - Site access
  - Cycle/pedestrian access along existing road
  - Cycle access along existing road
  - Existing National Cycle Network route
  - Potential cycle connectivity
  - Existing Public Right of Way
  - Existing Public Right of Way - Long Distance Path
  - Existing railway line and station
  - Bus stop
  - Future cycle / pedestrian access link into site
  - Registered Park and Garden

Rev	Date	Details	By	QA
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**CLIENT**  
Hanbury Properties

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**PROJECT**  
Grantham Employment

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**TITLE**  
Context, Connectivity & Access

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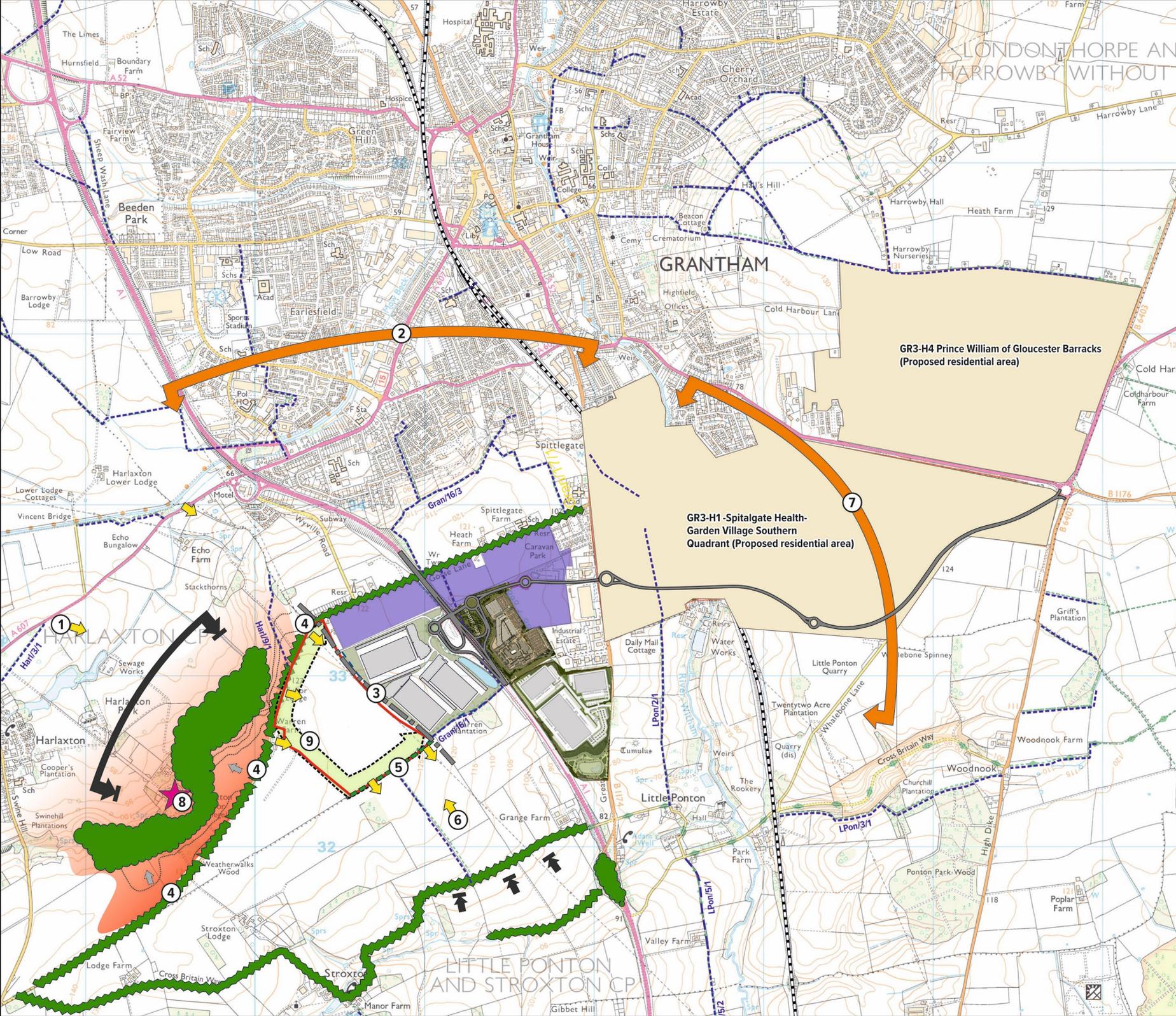
**SKETCH**

NUMBER	STATUS	Project	Origin	Volume	Level	Type	Discipline	Number	Rev
2151	DLA				DR	L	12	03	

Job Number 2151 Scale 1:20000 Size A3

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-  Site Promotion
-  Woodland screening
-  Vegetation screening
-  Open views
-  Screened views
-  Harlaxton Manor
-  Proposed residential area
-  Proposed employment area
-  Steep embankment
-  Grantham Southern Relief

- ① Limited views from A607 and adjacent footpaths, towards the west boundary, partially screened by woodland around Harlaxton Manor.
- ② Views blocked by existing urban area and allocated employment sites
- ③ Pylon corridor acts as a visual detractor in the area.
- ④ Occasional views from Gorse Lane towards northern part of allocation site where hedgerow is gappy
- ⑤ Weak, open southern boundary to be reinforced.
- ⑥ Open views towards the site influenced by the proposed allocation sites
- ⑦ Elevated views from proposed garden village will be largely blocked by foreground development
- ⑧ Views from Harlaxton Manor and ground blocked by steep topography and woodland.
- ⑨ Opportunity for additional landscape buffer screening on north and west boundaries of the site.

Rev	Date	Details	By	QA
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CLIENT	Hanbury Properties
PROJECT	Grantham Employment
TITLE	Visual Analysis

NUMBER	STATUS	TITLE				SKETCH
2151	DLA XXX XXX DR	L 10 04				
Job Number 2151		Scale	1/20000	Size	A3	

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**APPENDIX B :  
LETTER TO SOUTH KESTEVEN  
DISTRICT COUNCIL POLICY TEAM  
DATED 23<sup>rd</sup> MAY 2025**

Our Ref: P8222/PB/hr  
Date: 23<sup>rd</sup> May 2025

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Ms Shaza Brannon  
Planning Policy Department  
South Kesteven District Council  
Council Offices  
The Picture House  
St Catherine's Road  
Grantham  
NG31 6TT

Dear Ms Brannon

## **SOUTH KESTEVEN DISTRICT COUNCIL: REGULATION 18 DRAFT LOCAL PLAN, SCOPE OF RE-CONSULTATION**

We are instructed by Hanbury Properties, to write to Officers in advance of your Council's forthcoming decision to consult on the emerging South Kesteven Local Plan Review (Regulation 18). We understand this decision is scheduled for your Council's Cabinet Meeting on 3<sup>rd</sup> June 2025.

We respectfully request that the scope of the consultation be expanded to include an assessment of the employment land in the district. Without this further work, there is a significant risk that the emerging Local Plan Review may be found unsound at Examination. Expanding the scope of the consultation would not delay the plan preparation but would provide more robust evidence for Examination.

As Officers will be aware, the South Kesteven Employment Land Study (February 2024) (ELS) found that no additional employment allocations were needed. The ELS estimated future demand of 79.5 hectares under the "Labour Demand" scenario and identified 236 hectares of allocated "vacant" land, along with 35 hectares suitable for intensification – suggesting a sufficient supply.

However, paragraph 8.2 of the ELS advises:

***“However, SKDC’s Local Plan should take into consideration the opportunities of each site, their strengths and weaknesses as an employment location as well as the surrounding context and environment when making the new designations. For instance, it might be appropriate to release some existing allocated sites and allocate new sites. It would also be recommended that SKDC protects the most suitable employment sites to ensure that unforeseen growth (or growth beyond the Plan Period) can be met.”***

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STOKE-ON-TRENT  
01782 272555

TELFORD  
01952 979 530  
WORCESTER  
01905 22666



Given that we are now five years beyond the adoption of the Local Plan (January 2020), it is essential to assess why some allocated employment sites have not progressed. Where site-specific constraints are preventing delivery, these should be clearly identified. It may be appropriate to consider new employment allocations that are better aligned with current market demand and infrastructure connectivity, and therefore more likely to be brought forward.

Furthermore, some of the existing employment allocations may, in fact, be better suited for residential development, particularly in light of the Council's increased housing need. In identifying new housing sites, it is important that the Council also re-examines current employment land allocations to ensure a balanced and effective spatial strategy that responds to both housing and economic need.

Under the revised Standard Method set out in the December 2024 National Planning Policy Framework, your Council's housing need has increased significantly—from 686 to 912 dwellings per annum. This results in a total requirement of approximately 18,240 dwellings for the 2021–2041 plan period, up from the 14,020 figure used in the February 2024 draft Local Plan Review.

In this context, it would be unsound to plan for a c30% increase in housing without undertaking a corresponding review of employment land provision. While the overall quantum of employment land may appear adequate, it is critical to assess whether those sites are genuinely deliverable and suitably located to support the district's economic growth – both during and beyond the plan period. This assessment should also take into account any additional housing sites that may be identified, to ensure a balanced and sustainable approach to growth.

A review of current employment allocations alongside the need to identify new housing sites would not materially delay the Local Plan review. Instead, it would help to ensure that future employment provision aligns with the Council's housing and growth strategy, strengthening the soundness of the Plan.

In this context, we draw attention to our client's land (reference SKPR-234), located immediately to the west of the new A1 junction and adjacent to the GR-SE1 'Grantham Southern Gateway' employment allocation, which is currently the subject of an outline planning application for up to 140,000sqm of general industrial and storage and distribution uses. For ease of reference, we include a site context plan.

This site is ideally located to support the district's employment growth, particularly in the logistics sector. The ELS identifies that 52.7 hectares of the required 79.5 hectares of employment land is anticipated for warehousing (B8 use), which typically requires proximity to high-quality transport links. In combination with GR-SE1, it would enhance the opportunity to attract major large-scale operators both regionally and nationally. It would represent a more sustainable focus for employment development, given the proximity to the focus of growth, through large-scale housing allocations committed at Spitalgate Heath Garden Village and the Prince William of Gloucester Barracks site. While previous assessments have raised concerns regarding access, our client has confirmed that there is a clear strategy for accessing the site within their most recent representation in April last year. It has excellent connectivity to the A1 (N/S), the A52 (E/W) and hence the national road network via the new junction with the Grantham Southern Relief Road.

We would welcome the opportunity to meet with Officers to discuss these matters in further detail.

Yours sincerely

A large black rectangular redaction box covering the signature area.

**Paul Barton BSc (Hons) MRTPI  
Director**

A black rectangular redaction box covering contact information, likely a phone number and email address.

**APPENDIX C :  
HIGHGATE TRANSPORTATION  
TECHNICAL NOTE**

## TECHNICAL NOTE

PROJECT: Land to the south of Gorse Lane, Grantham (ref: SKPR-234)

REPORT: 25135/TN/01/A – Technical Note

DATE: August 2025

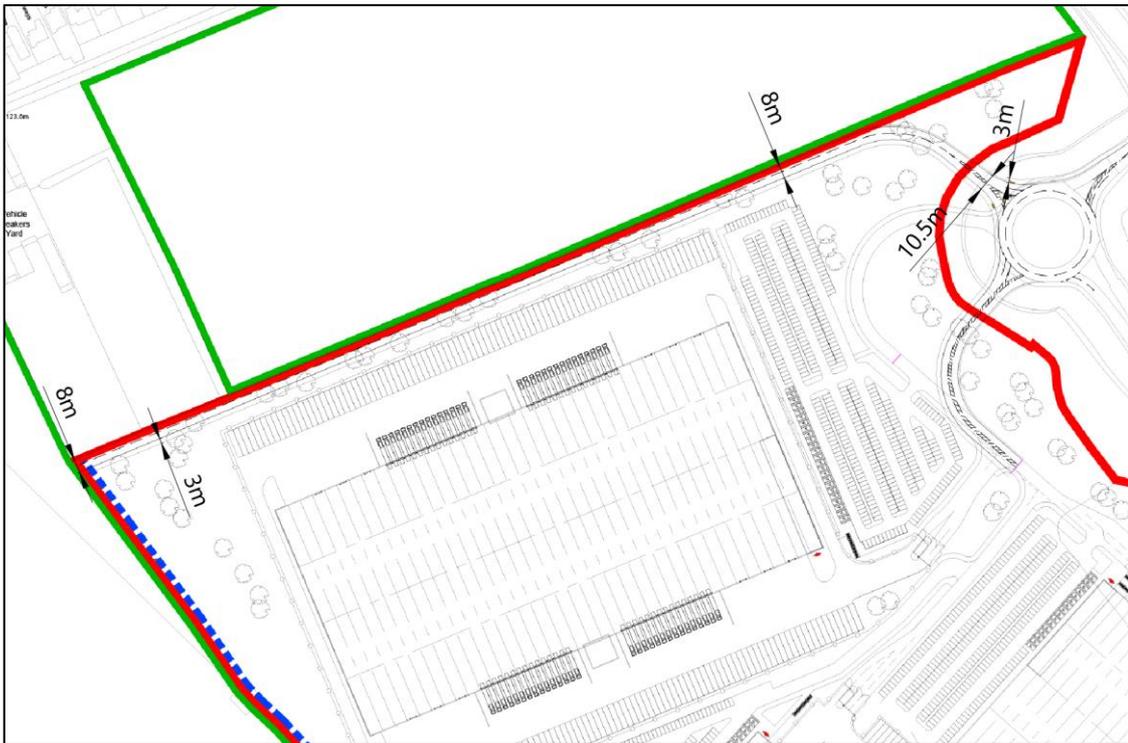
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1. This Technical Note (ref: HTp/25135/TN/01) has been prepared to support the promotion of 45ha of employment and mixed-use development on land to the south of Gorse Lane, Grantham. The site has been included within the South Kesteven District Council (SKDC) Draft Site Assessment Report, dated July 2025, as reference SKPR-234.
2. The promotion site has previously had representations to the Regulation 18 draft Local Plan consultation in April 2024, which included a proposed access arrangement from the existing roundabout.
3. Access to the site will be via a new vehicular access on the existing A52 roundabout with the A1 northbound on/off slip roads. The promotion site is located west of an existing allocation site (GR-SE1), with access permitted through GR-SE1 by the landowner. There is currently a live application (ref: S25/0505) for 140,000sqm of employment use on GR-SE1.
4. This Technical Note will set out that the access arrangement and location of the site is appropriate for the proposed land uses. This report will also set out the expected trip attraction of the site.

### Access Arrangement

5. Access for the potential site has been formalised as part of the neighbouring site promotion, with a designated corridor excluded from the option agreement between Buckminster and Mulberry Developments, as shown on GRN-PHP-W0-XX-DR-A-4674-902-P04 contained in **Appendix 1**.
6. It is proposed to modify the existing A52 western roundabout to provide a four-arm roundabout, with one arm providing access to the promotion site within the blue highlighted land (shown on the plan contained in **Appendix 1**) and one arm providing access to GR-SE1 for 140,000sqm of employment use. The proposed access arrangement is shown on pHp Architects plan Indicative Masterplan (ref: GRN-PHP-W0-XX-DR-A-4674-003-P01) dated October 2023, contained in **Appendix 2**, with an annotated extract shown in **Figure 1**.

Figure 1 – Annotated extract of pHp Architect Indicative Masterplan

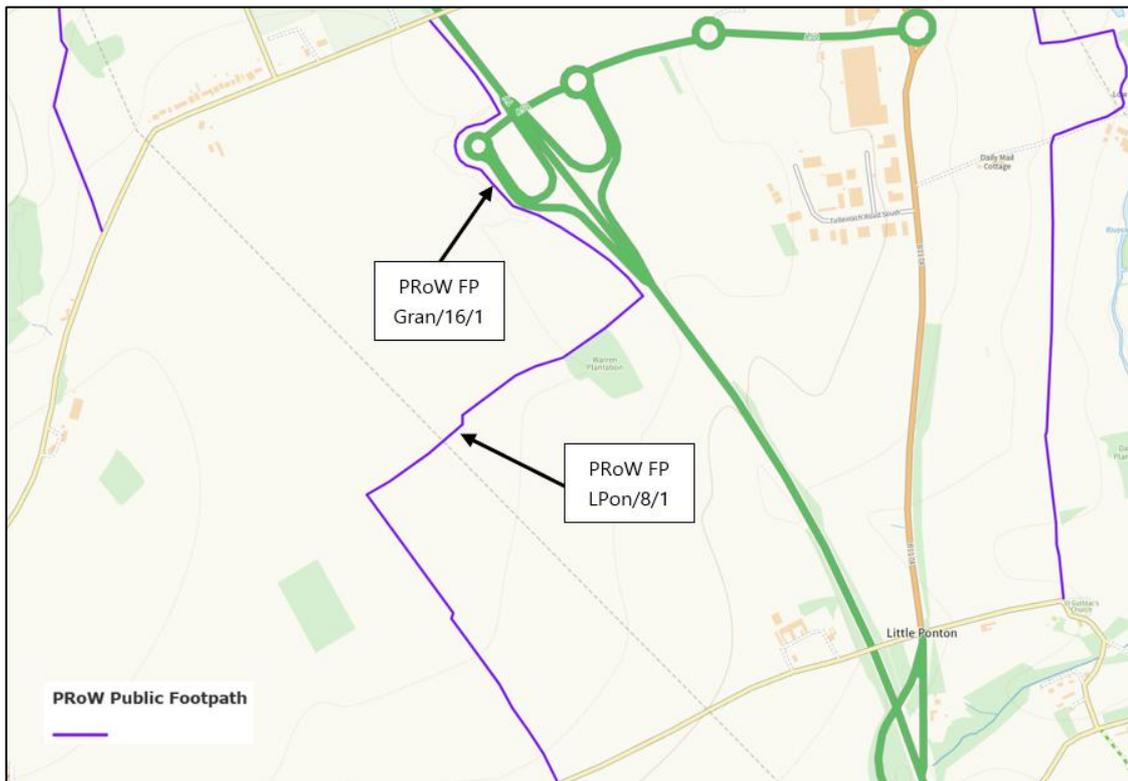


7. From **Figure 1**, it can be seen that:
  - i. An 8.0 metre wide access road is provided along the northern boundary of site GR-SE1, which will continue west into the promotion site
  - ii. The carriageway widens to circa 10.5 metres at the roundabout, with a single lane entry into the site, and a two lane exit onto the roundabout
  - iii. A 3.0 metre wide path which is wide enough for a shared path for pedestrians and cyclists is provided on the southern site of this carriageway, which continues to the south western arm to the adjacent access
  - iv. A crossing point with tactile paving is shown across the access road, connecting to a new 3.0 metre wide path on the existing carriageway, and will join the existing footway provided under the bridge of the A1
8. Given the proposed width of the access road, and the design of the roundabout, it is considered that the access arrangement is suitable to support a development of employment and mixed use.
9. Swept path analysis of a 16.5 metre HGV at the roundabout has been provided as part of the live application (ref: S25/0505) for GR-SQ1. Therefore, it is considered that the roundabout is appropriate to accommodate vehicle movements associated with development of SKPR-234

### Sustainability of the Site

10. The site is well located for employment and mixed-use, with direct access to the A1.
11. As set out in **paragraph 7**, the access arrangement includes a 3.0 metre wide path to the south of the carriageway, which is an appropriate width to be used as a shared pedestrian/cycle path.
12. To the east, the approved works for the Grantham East-West Relief Road includes a continuous footway/cycleway link to facilitate access between the site to the south of Tollemache Road and the existing footway along the B1174.
13. Public Right of Way (PRoW) footpath Gran/16/1 has previously been diverted around the western roundabout, and connects Gorse Lane in the north to FP LPon/8/1 which continues to an unnamed road in the south. The PRoW footpaths within the vicinity of the site are shown in **Figure 2**.

**Figure 2 – PRoW Footpaths**



14. Furthermore, it is clear from the approved and live applications within the vicinity of the site that there will be pedestrian and cycle infrastructure in place, which the site can tie into, giving future users of the site opportunity to travel via sustainable modes of transport.

### Trip Attraction

15. A trip attraction exercise has been provided for employment use, which is considered to be the worst case scenario for trip attraction at the site.

16. An estimation of the proposed GFA of the site for employment development is as follows:
  - i. Plot A – 45,000sqm
  - ii. Plot B – 35,000sqm
  - iii. Plot C – 50,000sqm
17. The TRICS database has been used to provide an indication of the likely number of AM and PM peak hour and daily weekday multi-modal trip movements that could be attracted by the development.
18. The site is likely to be B2/B8 use, therefore trip rates have been obtained for both land uses for the total potential development of 130,000sqm.
19. The latest TRICS database (8.25.6) has been searched for B2/B8 use. The search was carried out using the default survey dates and the following criteria:
  - i. Land use 'Employment – Industrial Unit / Industrial Estate / Warehousing (Commercial)
  - ii. Multi-modal trip rate surveys
  - iii. Default selection of regions
  - iv. Use of weekday data (Saturdays and Sundays excluded)
  - v. Sites within 'Edge of Town' locations
20. The total vehicle and HGV trip rate for each use is set out in **Table 1** with the expected trip attraction set out in **Table 2**.

**Table 1 – Total vehicle and HGV trip rates**

Trip Rate per 100sqm	AM Peak Hour (0800-0900)		PM Peak Hour (1700-1800)		Daily
	Arrivals	Departures	Arrivals	Departures	
Industrial Unit					
Total Vehicles	0.112	0.022	0.050	0.151	2.100
HGVs	0.006	0.006	0.000	0.000	0.123
Industrial Estate					
Total Vehicles	0.365	0.126	0.104	0.310	5.280
HGVs	0.021	0.017	0.01	0.009	0.451
Warehousing (Commercial)					
Total Vehicles	0.255	0.093	0.109	0.314	4.229
HGVs	0.031	0.031	0.017	0.039	0.861

Table 2 – Total vehicle and HGV trip attraction

Trip Attraction (130,000sqm)	AM Peak Hour (0800-0900)		PM Peak Hour (1700-1800)		Daily
	Arrivals	Departures	Arrivals	Departures	
Industrial Unit					
Total Vehicles	146	29	65	196	2,730
HGVs	8	8	0	0	117
Industrial Estate					
Total Vehicles	475	164	135	403	6,864
HGVs	27	22	13	12	428
Warehousing (Commercial)					
Total Vehicles	332	121	142	408	5,498
HGVs	40	40	22	51	818

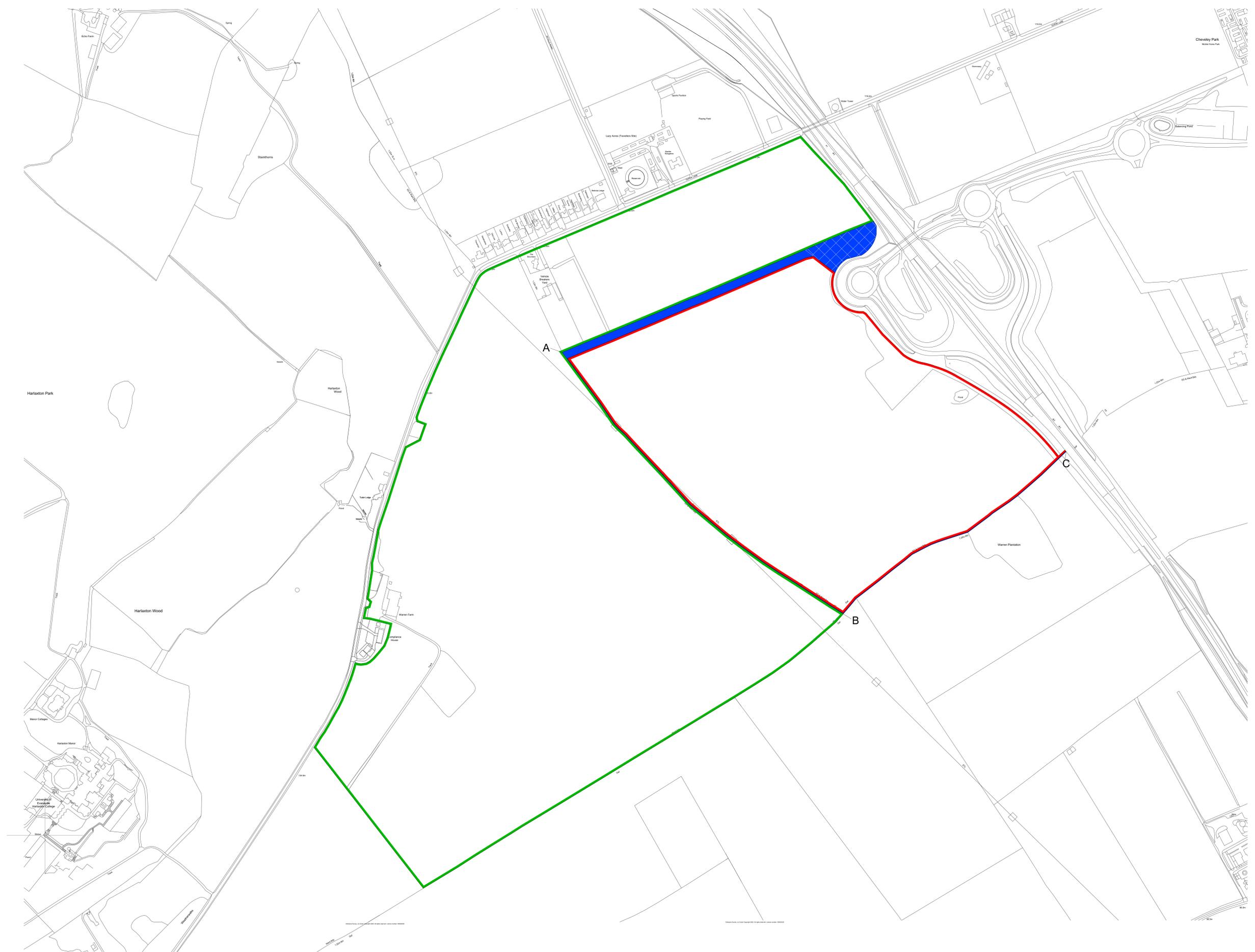
21. The expected trip attraction for the employment development of 130,000sqm could be in the order of up to 639 vehicular movements in the AM peak hour and up to 550 vehicular movements in the PM peak hour, with up to 6,864 vehicle trips daily. Furthermore, there could be up to around 80 HGV movements in the peak hours, and around 800 HGV trips daily.
22. As part of a planning application, the trip attraction exercise would provide a more in-depth understanding of the number of multi-modal trips associated with the proposed development quantum and mix.
23. Based on capacity assessments of the local highway network contained within recent planning applications, it is considered that there is capacity at the junctions within the vicinity of the site to accommodate such land uses on this site, and that a development at this site would not result in a severe impact at the junctions.

### Summary

24. It is considered that 45ha of employment and mixed-use development on land to the south of Gorse Lane, Grantham would be appropriate in this location due to:
  - i. The potential access arrangement that can be provided with the existing A52 western roundabout
  - ii. The site would be sustainably located in terms of the proximity to the wider highway network and the ability to connect into the pedestrian and cycle infrastructure being proposed as part of wider applications
  - iii. The proposed trip attraction associated with employment use would not likely result in a severe impact at the existing local highway network junctions
25. Therefore, the site at land south of Gorse Lane, Grantham should be allocated as additional employment or mixed-use development land.

## Appendix 1

GRN-PHP-W0-XX-DR-A-4674-902-P04



- THE PROPERTY
- ADJOINING LAND
- RETAINED LAND



Revisions:	date	by
XXX desc:	25.10.2023	MF
P01 First issue	25.10.2023	MF
P02 White cross-hatch added	25.10.2023	MF
P03 Boundaries updated	25.11.2023	MF
P04 Retained and Adjoining Land boundaries	01.12.2023	MF

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**MULBERRY DEVELOPMENTS**  
 Grantham, West of A1

LEGAL PLAN 3

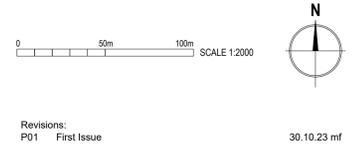
Status	Preliminary
Drawn by:	MF
Checked by:	-
Date	25/10/2023
Document Number:	GRN-PHP-WO-XX-DR-A-4674-902-P04
Scale @ A0	1:2000

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## Appendix 2

GRN-PHP-W0-XX-DR-A-4674-003-P01



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**MULBERRY DEVELOPMENTS**  
 Grantham, West of A1

Indicative Masterplan  
 3 Unit Scheme + Proposed Access Overlaid

Status Preliminary  
 Drawn by : MF Checked by : -  
 Date 30Oct2023

Document Number:  
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