



Planning Policy Team
South Kesteven District Council
Council Offices
The Picture House,
St Catherine's Road,
Grantham,
NG31 6TT

Martin Seldon
Spatial Planner
National Highways
3 Snowhill,
Snow Hill Queensway,
Birmingham,
B4 6GA

Via email:
Planningpolicy@southkesteven.gov.uk

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Dear Sir / Madam,

Local Plan Review - Regulation 18 Proposed Housing and Mixed-Use Site Allocations Consultation

Thank you for providing National Highways with the opportunity to comment on the Regulation 18 Proposed Housing and Mixed-Use Site Allocations document prepared by South Kesteven District (SKDC), which is expected to cover the plan period from April 2023 to April 2043.

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth.

With regards to the South Kesteven District and this consultation, National Highways' principal interest is in safeguarding the A1 and A52 trunk roads, which route through the district.

National Highways has been engaged in the South Kesteven Local Plan, with the most recent involvement relating to comments provided on the proposed housing and mixed-use site allocations identified during the original Call for Sites consultation between 2020 and 2022. Later, we provided comments on the Draft Local Plan Consultation (Regulation 18), which took place between February to April 2024. More recently, in February 2025 and April 2025, we participated in the Call for Additional Sites consultation, submitting comments on newly identified site proposals.

Policy Context

In responding to Local Plan consultations, we have regard for the Department of Transport's (DfT) Circular 01/2022: The Strategic Road Network and the Delivery of Sustainable Development ('the Circular'). This sets out how interactions with the Strategic Road Network should be considered in the making of local plans. Paragraph 28 of the Circular sets out that:

The policies and allocations that result from plan-making must not compromise the SRN's prime function to enable the long-distance movement of people and goods. When the company assists local authorities in the development of their plans and strategies, the local authority should ensure that the SRN is not being relied upon for the transport accessibility of site allocations except where this relates to roadside facilities or SRN-dependent sectors (such as logistics and manufacturing). The company will also work with local authorities to explore opportunities to promote walking, wheeling, cycling, public transport and shared travel in plan-making, in line with the expectations set out in the NPPF and the Transport Decarbonisation Plan.

In addition to the DfT Circular 01/2022, the response set out below is also in accordance with the National Planning Policy Framework (NPPF) and other relevant policies.

Proposed Housing and Mixed-Use Site Allocations

Background and General Approach

South Kesteven District Council is updating its adopted Local Plan, currently covering the period from April 2011 to April 2036. The new plan, once adopted, will extend the plan period up to April 2043, adding seven years to the current plan. It will include polices and locations of sustainable growth and investment across the district, replacing the current plan adopted in 2020.

Housing and Mixed-Use Allocations

We acknowledge that the new NPPF, published in December 2024, modified how housing needs are calculated. As such, South Kesteven District's annual housing need has now increased by 185 dwellings per year from 701 dwellings to 886 dwellings per year, resulting in a minimum housing need of 17,720 dwellings across the plan period (2023-2043). To accommodate the growing housing requirements, SKDC has identified additional housing sites beyond those previously consulted on.

Although this consultation focuses on housing and mixed-use site allocations only, it is noted that housing can be delivered as part of mixed-use schemes, including employment.

National Highways acknowledges that, the proposed housing and mixed-use allocations closely align with the Local Plan’s spatial strategy and welcomes the approach to allocating the most suitable and sustainable sites across the district.

Additional Proposed Site Allocations

We acknowledge that within the Housing and Mixed-Use Site Allocations document, allocations have been removed, amendments have been made to site capacities, and additional sites have been proposed.

National Highways also notes that a new site has been submitted (Land south of Gorse Lane) to meet the needs of the district’s Gypsy, Traveller & Travelling Showpeople community

The additional proposed locations identified to meet the district’s increased housing needs are outlined in Table 1 below. The table provides details on the site area, the indicative number of dwellings for each site, the nearest SRN junctions to each site, and the potential impact on the SRN. Each site has been assigned a level of priority through an indicative Red/Amber/Green (RAG) rating to categorise the impact of the site on the SRN. This analysis considered the following key elements: Proximity to the SRN, sharing a boundary with the SRN, likely trip generation and likely cumulative impacts. We have also included some comments to support our rationale.

Please note that this analysis is based on a high-level assessment of the sites based on desktop research and using generic density assumptions. Therefore, the findings are only indicative and subject to further detailed review.

Table 1: Additional Proposed Allocations

Policy Code	Settlement	Location	Site Area (Hectares)	Indicative Number of Dwellings	Nearest SRN Junction (s)	Potential SRN Impact	National Highways Comments	Further Assessment Likely
SKPR-330	The Deepings	Land east of Linchfield Road	40	840	A1 / A606 A1 / A6121	Moderate AMBER	The site is not in close proximity to the SRN; however, due to its size it is likely to generate some cumulative impacts on the SRN.	Subject to further traffic and capacity assessments. Likely to require a Transport Assessment and Travel Plan. Cumulative Impact Assessments may be required in conjunction with other policies in the area.
SKPR-55	The Deepings	Towngate east	3.7	104	A1 / A1175 Kettering Rd	Low GREEN	This site is not in close proximity to the SRN and is unlikely to generate significant impacts on the SRN.	Subject to further traffic and capacity assessments. Likely to require a Transport Assessment and Travel Plan. Cumulative Impact Assessments may be required in conjunction with other policies in the area.

SKPR-323	Grantham	Land north of Gorse Lane	41.6	874	A1 Spittlegate Junction	High RED	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.
SKPR-334 (SKPR-189, SKPR-263, SKPR-310, SKPR-313)	Grantham	Land south of Gorse Lane (mixed-use)	27.2	530 dwellings and 2ha of land for Gypsy & Traveller accommodation (approximately 20 pitches)	A1 Spittlegate Junction	High RED	This site is located in close proximity to the SRN. Likely to generate high levels of trips, and to involve operational and boundary-related matters.	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.
SKPR-7	Bourne	Land to the south west of Raymond Mays Way	17.3	270	A1 / A151 Colsterworth Junction	Moderate AMBER	The site is not in close proximity to the SRN junction. The development is	Subject to further traffic and capacity assessments. Likely to require a Transport Assessment, Travel Plan and CTMP.

					A1 / B1081 Junction		likely to produce significant impacts on the SRN.	Cumulative Impact Assessments may be required in conjunction with other policies in the area.
SKPR-168	Ancaster	Land to the north of Wilsford Lane	2.4	58	A1 / B1174 Gonerby Moor	Low GREEN	This site is not in close proximity to the SRN and is unlikely to generate significant impacts on the SRN.	Likely to require a Transport Assessment, Travel Plan. Cumulative Impact Assessments may be required in conjunction with other policies in the area.
SKPR-327	Barrowby	Land to east of The Drift and land south of Low Road	25.3	455	A1 / A52 Barrowby Interchange	High RED	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.
SKPR-322	Claypole	Doddington Lane	3.6	86	A1 / B6326 Interchange	Moderate AMBER	The site is near the SRN junction. The development is	Subject to further traffic and capacity assessments.

							likely to produce some impacts on the SRN.	Likely to require a Transport Assessment and Travel Plan. Cumulative Impact Assessments may be required in conjunction with other policies in the area.
SKPR-233	Corby Glen	Land fronting Bourne Road and Swinstead Road	16.3	293	A1 / A151 Colsterworth Junction	Moderate AMBER	This site is not in close proximity to the SRN. Due to its size it is likely to generate some impacts on the SRN.	Subject to further traffic and capacity assessments. Likely to require a Transport Assessment and Travel Plan. Cumulative Impact Assessments may be required in conjunction with other policies in the area.
SKPR-318	Harlaxton	Land to west of The Drift	6.2	112	A1 / A607 Interchange	Moderate AMBER	The site is near the SRN junction. Due to its size, it is likely to generate some impacts on the SRN.	Subject to further traffic and capacity assessments. Likely to require a Transport Assessment, Travel Plan and CTMP. Cumulative Impact Assessment may be required in conjunction with other policies in the area.

Potential impact on the SRN

Based on our high-level review of the Proposed Housing and Mixed-Use Site Allocations, it is anticipated that three out of the ten proposed sites have the potential to have a significant impact on the operation of the SRN, most notably the A1 Spittlegate Junction and the A1/A52 Barrowby Interchange.

Should the sites listed in Table 1 proceed to the final Local plan, during the Regulation 19 process, we would expect to see further assessment work carried out to ascertain the impact on the SRN and to determine the need for any mitigation if required. Whilst we have identified the immediate SRN junctions in close proximity to the housing site allocations where there is a potential for impacts on the SRN, it should be noted that the assessments should not be limited to these junctions only, and a wider extent might need to be considered based on the scale of the proposed development.

Existing and Proposed Housing Supply

As stated in Table 6 of the Proposed Housing and Mixed-Use Site Allocations document, the total projected housing supply across the plan period (2023-2043) in South Kesteven District is 19,672. This includes housing completions since the start of the plan period (2023), current commitments (full, reserved matters, and outline permission), and current adopted and proposed Local Plan allocations. It is noted that the housing supply is primarily distributed across South Kesteven's four market towns: Grantham (46%), Stamford (11%), Bourne (9%), and The Deepings (11%), with larger villages (19%) and other settlements (4%) making up the remainder of the housing supply.

Housing allocations

In relation to the additional housing allocations, we have the following site-specific comments:

Grantham

SKPR-323 Land north of Gorse Lane - 874 dwellings

We welcome the polices to deliver a comprehensive master plan, supported by an agreed phasing plan. A Transport Assessment, Travel Plan and a Construction Management Plan, should be agreed with National Highways to identify the need for mitigation.

This site sits adjacent to the A1 trunk road; therefore, it will be subject to potential boundary impacts, such as drainage and geotechnical matters. Planning applications

would also need to be accompanied by assessments which consider noise and air quality impacts from the adjacent A1 trunk road.

SKPR-334 (SKPR-189, SKPR-263, SKPR 310, SKPR 313) Land south of Gorse Lane – Mixed-use - 530 dwellings, 2 hectares for permanent Gypsy and Travellers and Travelling Showpeople pitch / plot provision.

This site should be supported by a Transport Assessment, Travel Plan and a Construction Management Plan and be agreed with National Highways to identify the need for mitigation.

This site also sits adjacent to the A1 trunk road, therefore it is likely to be subject to potential boundary impacts, such as drainage and geotechnical matters. Planning applications would also need to be accompanied by assessments that consider noise and air quality impacts from the adjacent A1 trunk road.

Barrowby

SKPR-327 Land east of The Drift and land south of Low Road, Barrowby - 455 dwellings

We welcome the principle of developing a comprehensive masterplan for the entire area. Given that this site is close to the SRN, we welcome that the elements of the Transport Assessment to assess impacts on the SRN are agreed upon with National Highways.

Harlaxton

SKPR-318 – The Land West of The Drift - 112 dwellings

Given that this site is close to the SRN, we welcome that the elements of the Transport Assessment to assess impacts on the SRN are agreed upon with National Highways.

Impact Assessment

Any potential site that is anticipated to have an impact on the SRN in the area is recommended to be subject to consultation with National Highways and appropriately assessed in line with the DfT Circular 01/2022 to determine the extent of their potential impacts on the SRN in the area. Depending on the scale of likely impact on the SRN in the area, the applicant/developer may need to identify suitable mitigation measures (if required). We would also expect a Transport Assessment (TA) and Travel Plan (TP) to be submitted for all proposed site allocations.

It is to be noted that the cumulative impact of the proposed site allocations also needs to be assessed in line with the Circular, for understanding the likely traffic impacts on the SRN in the area in terms of capacity & safety, as well as identifying any possible mitigation measures (if required).

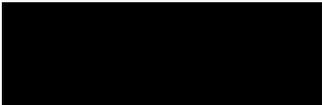
National Highways recommends that a robust transport evidence base in the form of a Strategic Transport Assessment (STA) be produced to support the development of the Local Plan, which should be reflected in the Regulation 19 evidence. We would therefore welcome further engagement, to support the development of the evidence-based assessments of the plan's infrastructure requirements and the potential impacts of the allocations on the SRN.

Sustainability Appraisal

We note that the majority of proposed site allocations are located in the district's four market towns, therefore minimising the need for long-distance travel. This will also enable residents to have greater access to existing public transport networks, reducing reliance on private vehicles and promoting more sustainable travel modes. National Highways also welcomes the fact that all site allocations are located within 1km of a PRow, ensuring that residents can safely access core services and facilities on foot.

Once again, National Highways welcomes the opportunity to comment on the South Kesteven District Council Regulation 18 Proposed Housing and Mixed-Use Site Allocations Consultation. We look forward to working with the Council in a collaborative manner to aid and support the development and adoption of the Local Plan for South Kesteven.

Yours sincerely



Martin Seldon
Spatial Planner

Email: 