



Boyer

2nd July 2026
Our Ref: 25.3013



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

Dear Sir / Madam

Re: Barrowby Neighbourhood Plan Basic Conditions Statement Addendum Consultation

Boyer are writing on behalf of Land First Barrowby Ltd in response to the Barrowby Neighbourhood Plan Basic Conditions Statement Addendum Consultation. The consultation is taking place in response to the legislative implications of sections 98 and 99 of the Levelling-up and Regeneration Act 2023 which came into effect on 25th March 2026. The consultation seeks to establish that the Barrowby Neighbourhood Plan continues to satisfy the revised Basic Conditions and relevant legislation requirements.

Whilst we acknowledge the legislative changes, we remain concerned that the Barrowby Neighbourhood Plan has not demonstrated compliance with the revised Basic Conditions in regard to national policy, sustainable development, and housing provision.

Housing Evidence

We consider that the housing evidence which underpins the Barrowby Neighbourhood Plan is materially out of date. The Housing Needs Assessment (2024) which forms a part of the evidence base for the Neighbourhood Plan is based on a housing requirement set out within a now out-of-date Local Plan.

Changes to the standard method within the National Planning Policy Framework (NPPF) (2024) have resulted in an increased housing requirement for South Kesteven District Council (SKDC). SKDC's housing requirement has increased to approximately 899 dwellings per annum (dpa) when considering the 2025 Affordability Ratio published in March 2026 and the updated housing stock data published in May 2026. This results in a housing need increase of 13 dpa for SKDC from 886 dpa as outlined within the Regulation 18 Local Plan consultation document.

It is our view, the material changes to the housing context calls into question whether the Neighbourhood Plan continues to satisfy the revised Basic Conditions regarding national policy and sustainable development. The implications of the increased housing requirement within the district as defined by the standard method within the NPPF (2024) has not fully been



considered in the context of housing within the Neighbourhood Plan. Furthermore, we consider that the Neighbourhood Plan does not contribute to achieving sustainable development due to the housing evidence being materially out of date.

It is acknowledged that the Neighbourhood Plan does not remove any existing housing allocations and, on that basis, the Parish Council concludes that the revised housing Basic Condition is satisfied. However, the revised housing Basic Condition requires consideration of whether the Neighbourhood Plan would result in less housing being provided than would otherwise be the case. In our view, this assessment should extend beyond existing allocations and consider whether the combination of draft Policy 3 'Housing Development' and the Development Footprint could constrain otherwise sustainable future housing opportunities within Barrowby.

Moreover, we question the ambiguity of Policy 3 and how this satisfies revised Basic Condition b regarding sustainable development. In terms of the spatial approach, we remain unconvinced that sufficient evidence has been produced to justify the reasons for infill sites within the Development Footprint and land within the Parish to the east of the A1 identified as sites suitable for development.

Development Footprint

It is unclear from the wording of Policy 3 whether land at the edge of the village adjacent to the Development Footprint is acceptable or unacceptable for new development. The definition of 'scale' within Policy 3 is unclear and therefore the Neighbourhood Plan does not align with revised Basic Condition a due to the definition not having regard to national policy. The NPPF (2024) refers to 'scale' in the context of physical size of development and in the context of the character of local areas.

Furthermore, we consider that the '15-minute walk' methodology set out within the Neighbourhood Plan is inconsistent due to some areas of the village falling within the 15-minute walking catchment area not being included. Consequently, if the Neighbourhood Plan excludes sustainable edge of settlement sites despite satisfying its own accessibility criteria it may unnecessarily restrict any housing opportunities in the future. Therefore, under the revised Basic Conditions, the Neighbourhood Plan would fail to comply with the revised housing Basic Condition.

Our client's site provides an example of a sustainable edge-of-settlement opportunity that would be capable of contributing to future housing needs. It is our view opportunities such as these should not be unnecessarily constrained by the Neighbourhood Plan.

Active Farmland and Best and Most Versatile Agricultural Land

We consider that the reference to 'active farmland' rather than 'best and most versatile agricultural land' within the Neighbourhood Plan is inconsistent with paragraph 187b of the NPPF (2024). Therefore, we consider that the Neighbourhood Plan does not comply with revised Basic Condition a regarding national policy.



Summary

In summary, we maintain our position outlined within our previous representations to the Barrowby Neighbourhood Plan Regulation 16 consultation in March 2026. Whilst we recognise the legislative changes to the Basic Conditions, the Addendum Statement does not address underlying concerns regarding housing evidence and future housing delivery within the Parish. For these reasons we remain of the view that the Addendum does not adequately address the implications of the revised Basic Conditions in respect of housing provision, national policy and sustainable development. We respectfully request that the Examiner gives careful consideration to whether the Neighbourhood Plan, in its current form, satisfies the revised statutory tests.

Yours sincerely

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