

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

Ref:

Date: 25/04/2024

Planning Policy Team

**South Kesteven District Council Regulation 18 Draft Local Plan consultation.**

Please find attached the formal comments of Lincolnshire County Council (LCC) in response to the South Kesteven District Council Regulation 18 Draft Local Plan consultation.

Notwithstanding specific points raised in the response, LCC supports the vision, objectives, and overall approach to delivering sustainable growth across South Kesteven. Our county's land is under unprecedented pressure from development, and while we recognise the benefits it can bring, it must be the right growth in the right place. Matters such as: the value of food production for the nation, the needs of our communities and business as well, as the Infrastructure needs of the county must be balanced. Where the impacts of growth are not appropriately mitigated, Lincolnshire County Council will object to development.

Please also accept the Councillor comments attached in Appendix A and give them full consideration when reviewing all of the consultation responses received.

Yours sincerely

CLlr Colin Davie

Executive Councillor: Economic Development, Environment and Planning

## **South Kesteven Local Plan Review Consultation April 2024**

### **Introduction**

The Local Plan is a statutory planning document prepared by South Kesteven District Council. The Local Plan, together with adopted neighbourhood plans and supplementary planning documents (SPD), will make up the "statutory development plan" for the District.

Please find below the comments of Lincolnshire County Council in response to the Draft Local Plan consultation.

Where policies in the Draft Local Plan remain unchanged from the 2020 Adopted Local Plan, comments have largely not been made on those policies.

### **Proposed Allocations**

LCC as Highways Authority and Lead Local Flood Authority commented in the preparation of the South Kesteven Site Assessment Report (February 2024). Officers have made a technical assessment of each of the sites based on the information available to date. Any sites classed as minor, moderate or major impact on roads, highways and/or surface water will require mitigation as specified in LCC's earlier comments. For example: LCC has seen no plans for mitigation for two sites in Great Gonerby or for the Prince William of Gloucester Barracks site and therefore objects to these. Our comments must continue to be taken forward in future drafts of the Local Plan. Unless appropriate and sufficient mitigation is in place, LCC will object to the planning applications.

Learning the lessons from Storms Henk and Babet, surface water management is of paramount importance. Water management needs to be appropriately considered on all allocated sites before they come forward as an application. Unless appropriate and sufficient mitigation is in place, LCC will object to the planning applications.

Members have made specific comments on some of the site allocations based on their local knowledge. All of these comments have been copied in the appendix to this response and should be taken into consideration as part of the consultation responses received.

### **LCC Minerals and Waste Position**

We are currently preparing a new minerals and waste local plan for Lincolnshire. The new plan will replace both parts of the adopted plan which covers the period to the end of 2031. It is proposed that the updated plan will extend this period until the end of 2040.

We are currently at an early stage of plan preparation. A consultation on the issues and options for updating the plan took place from 28 June 2022 to 12 August 2022. The issues and options consultation and the accompanying call for sites was supported by a sustainability appraisal (SA) scoping report.

A large number of comments and site nominations were received and as a result, we anticipate that public consultation on the draft plan (preferred approach) will take place in 2024.

We will be able to comment further on how the SKDC draft plan aligns with the LCC document once the consultation is complete.

#### Comments on specific Policies:

##### Agricultural Housing

There does not appear to be a policy addressing agricultural housing either under the essential need for a rural worker (the approach of paragraph 84 of the NPPF) or more significant agricultural workers dwellings. The situation in the Draft Local Plan appears to be that proposals away from the towns and villages would be judged against Policy SP5 which is unlikely to support such development. LCC would support the inclusion of such more permissive policy for rural housing, where there is a demonstrated rural business need.

##### Biodiversity and Geodiversity

LCC welcomes the policy approach in EN2 and elsewhere in the plan to promote biodiversity and geodiversity net gain. Such policies will make a positive contribution to the District's future.

##### DE1: Promoting Good Quality Design

LCC welcomes the Policy DE1 approach to car parking that is 'sufficient for the location and type of development', and that 'spaces should be easy to use, fit for purpose and large enough to cater for a wide range of users'. Specifically, it is supported that each development is considered on its merits, particularly with relation to location and public transport provision. Where insufficient car parking is proposed, LCC as Highways Authority will object to the relevant planning application.

##### ID1: Infrastructure for Growth

Policy ID1, and particularly its final paragraph, is not strong enough within the context of the national Planning Practice Guidance on viability, specifically this paragraph:

*Policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage. (emphasis added)*

Moreover, national guidance puts responsibility on site promoters to engage in plan making to ensure that proposals can be policy compliant, accounting for development costs.

LCC suggests the final paragraph of ID1 is strengthened to advise that only 'particular circumstances justify the need for a viability assessment at the application stage'. In making this change, SKDC should consider the Planning Practice Guidance wording and the associated list of 'particular circumstances'.

It is appreciated that it is not possible to identify the precise infrastructure requirements for the whole plan period but LCC welcomes the early consideration of the infrastructure requirements, specifically of the site allocations. This should be considered beyond Highway infrastructure and look at the land holistically in terms of all requirements on the land such as drainage, sewerage, energy and clean water. The IDS will be integral to ensuring the long term sustainability of the plan.

Appendix A Councillor Comments:

The attached letters are comments from individual local councillors representing the South Kesteven area who know the area well and have commented on specific sites. These comments should be fully considered as part of the consultation exercise and their local knowledge taken onboard when taking sites forward to the next stage of the local plan.

1. Cllr Stokes
2. Cllr Hill
3. Cllr Wootten
4. Cllr Martin

## Appendix A. 1. Cllr Stokes

### **SKDC Local Plan**

With regards to the local plan refresh within my division there are no further developments or land been promoted by the owner. Overall in the town I have huge concerns over the inclusion of one in Great Gonerby at Church Lane the access to this land would require a huge investment by the developer to create a road adoptable by the Highways this land really needs removing from the latest plan. The proposed site the other side of the A1 within the Barrowby Parish is also questionable the infrastructure will have to deal with the Southern Quadrant and Poplar Farm a sizable number here would have myself concerned.

These are the main comments.

Many thanks

Cllr Adam Stokes

Grantham South

County Councillor

## Appendix A. 2. Cllr Hill

### **SK Local Plan**

I have serious concerns regarding the additional 140 houses in Corby Glen.

There are currently two large sites being developed simultaneously in the village which when completed in a few years will increase the size of Corby Glen by 40% which is already a sizeable challenge in terms of community cohesion and assimilation.

To add a further 140 would be an unacceptable further strain on the situation especially as the proposed development would extend the village further out from the village centre instead of infill even if the numbers were reduced.

Should not the majority of these houses be allocated to urban developments more suited to the changes?

In Billingborough, there is the question as how an additional 140 dwelling would put even further strain on a currently overloaded draining system which currently overcharges raw sewage onto village street in sustained wet weather. What mitigation would be put in place to deal with this additional capacity issue?

Finally, on the proposed additional 457 houses for the Mill Drove area of Bourne, a substantial upgrade of Meadow Drove south of Mill Drove would seem a necessity to help take the resulting extra traffic movement.

Regards

Cllr Martin Hill

Leader of Lincolnshire County Council

### Appendix A. 3. Cllr Wootten

#### **SKDC Local plan review**

With reference to our recent meeting concerning the above there was only one plan on the Grantham East Division which is the old Church School / LCC playing fields which is surrounded by housing . I don't have any problems regarding this proposal and haven't heard anything from the local District Councillors against extra housing.

Obviously there are plans for the Garden Village in the vicinity of the Southern Relief Road and the Prince William of Gloucester Barracks within the area . The latter is delayed until 2028 and I believe planning has lapsed with reference to the Garden Village.

Bloor Homes are planning to build between the Eatch Estate and the Barracks ,this area is very much subject to natural springs . My concerns are regarding building in such environments for instance on upper Harrowby Lane beneath the reservoir, planning was refused locally for housing on the hillside due to the unstable landscape, there are problems in this area with runoffs from the land.

There is infill of three bungalows at 256 Harrowby Lane where the developer has had to pipe off water cascading through the site onto the Highway to go into the drainage system.

I do believe topography and local knowledge should be given due consideration along with the environment agency views . I have houses in my Division that are built in a flood plain ,literally next to the Withambrook which subsequently became the subject of a section 19 report.

Other concerns are land banking and making sure 106 conditions are honoured.

Thank you.

Kind regards.

Linda,

Cllr. Wootten.

Grantham East.

Appendix A. 4. Cllr Martin

Document follows.





## South Kesteven local plan evaluation 2024

Author: Cllr Paul Martin

Version 3.0

March 30th 2024

## Introduction

This document is a representation from the residents of Gonerby Hill Foot and surrounding area in response to the South Kesteven District Council local plan consultation 2024.

Our response is primarily for the site allocation known as SKPR-57 Land off Belton Lane, which is proposed to the East of the Gonerby Hill Foot area.

SKPR-57 states indicative unit numbers of 628 homes.

Alongside this document is a petition from the people of Gonerby Hill Foot requesting South Kesteven District Council to listen to our concerns and remove SKPR-57 from the local plan.

We would also like it to be considered that residents of Grantham, without a Town Council, have been unrepresented with no neighbourhood plan. This leaves the levels of local participation and our ability to protect certain areas at a disadvantage.

We believe the plan itself to be flawed. It contains inconsistencies and the logic behind the allocation does not match the stakeholder comments or the associated measures within the site assessment.

Not only does this site impact on the character of Gonerby Hill Foot, but it will also impact on the approach and surroundings to Belton House NT and the villages of Great Gonerby and Manthorpe.

The site allocation will have a detrimental impact on the area's residents, landscape, agriculture, infrastructure, highways, heritage and biodiversity. The welfare and wellbeing of residents must be a priority in any such planning.

The following pages contain detailed reasons as to why we feel the site allocation is inappropriate and the plan itself flawed.

We thank you for your time reading this document.

Further information can be obtained by contacting...

**Cllr Paul Martin**

South Kesteven District Councillor, Grantham Arnoldfield  
Lincolnshire County Councillor, Grantham North.

Email: [cllrp.martin@lincolnshire.gov.uk](mailto:cllrp.martin@lincolnshire.gov.uk)

## Summary

1. Access Roads – Belton Lane weight limit
2. Access Roads – LCC statutory comments
3. Access Roads – Estate access unsuitable
4. Landscape Character Assessment
5. SKDC lack of community consultation.No protection from a neighbourhood plan
6. Development principles as listed in local plan
7. Visibility from Belton House NT
8. Consideration of developments in other areas
9. Grantham capacity and limits to growth study 2015
10. Lack of a Green and Open Space
11. Inconsistencies
12. Impact on tourism and sites of historic interest
13. Biodiversity
14. Educational need
15. Pollution in Grantham
16. Site assessment document - analysis
17. Over development and lack of infrastructure

## 1. Access Roads – Belton Lane weight limit

On the comments for site SKPR-183 to the north of Belton Lane there is a statutory comment from LCC, which says: "7.5T weight limit to Belton Lane". Yet in the LCC comments for site SKPR-57 this isn't mentioned. Given a concrete mixer weighs 20 Tonnes plus then construction traffic will have to either negotiate the Newark Hill junction or come straight through the Gonerby Hill Foot estate.



The same 7.5 Tonne comment made by LCC should apply to SKPR-57 as well.

The Newark Hill junction is not suitable for the volume of traffic, nor any larger vehicles.

The Newark Hill junction will require a very large investment to facilitate the required upgrade.

## 2. Access Roads – LCC statutory comments

SKPR-57 Site assessment document.

Lincolnshire County Council states that: **“Overall mitigation required probably too great for site”**.

Why has this been ignored?

Statutory comments on Highway Network (Lincolnshire County Council)

Access at Belton Lane acceptable in principle subject to TA. Traffic impact at junctions on Belton Lane with Newark Hill and A607 likely to need significant junction upgrades. Footway/cycleway connections needed to be provided along Belton Lane to Great Gonerby (around 1km). Site should also provide footway/cycleway connections to residential to south. Overall mitigation required probably too great for site.

There is no doubt that the access from the north of this development (Belton Lane) is extremely unlikely. This is due to the 7.5T weight restriction on the bridge, the narrow road, the dangers of overloading Belton Lane and the poor junction design, with extremely small scope for construction of a workable alternative.

Any junction costs would have to be met by the developer. On a 628 house development a multi-million pound cost for a junction or road bridge replacement would render this site unachievable.

### 3. Access Roads – Estate access unsuitable

When you zoom in on the map provided with the local plan you can see Hazelwood Drive is excluded.

Vernon, Lynden, Applewood and Beaumont would be the only access roads for 628 houses



The traffic pressure to the north of the estate, ie. the Arnold Avenue area, would be too great.

Four of the five possible access roads into the estate are within the view of Belton House NT, a grade 1 listed heritage asset. So, would all the traffic be restricted to one single access road which is narrow? Applewood Drive. This means access to the South is unsuitable.



**Bus route.** It is extremely unlikely any bus route will be able to use the access roads. They are on small roads and the majority are at height.

Locals will tell you that these roads are narrow, often clogged with parked cars and, in the case of the majority to the north, the slopes are almost impossible during wintry conditions. To allow access for 1,000+ motor vehicles through these roads is dangerous and foolhardy.

The alternative access via Belton Lane to the North of the proposed site is rendered impossible by the weight limit on the railway bridge restricting access to vehicles of 7.5 Tonnes. This weight restriction is a major issue restricting traffic to the very poor Newark Hill junction.

The increase in traffic and the impact on north Grantham, which is frequently gridlocked, will be severe.

The addition of at least 1,000 vehicles from the 628 homes will place intolerable strain on Stephenson Avenue, Cliffe Road and Hazelwood Drive.

The projected entrance and exit routes to the estate – Beaumont Drive and Applewood Drive would result in a change in use of side or access roads in to main roads. These roads are not suitable for a large increase in traffic.

On many occasions Cliffe Road is blocked with traffic and buses are unable to pass.

If Arnold Avenue is to be used as a through road for entry to the estate from Lynden Avenue and Vernon Avenue. This would inevitably bring significant additional traffic onto a very steep hill and an estate that is inhabited by a large number of families with children. There are also concerns about the ability of emergency services to access the area.

The roads and pavements become seriously dangerous in cold weather with sheet ice that takes a long time to go away. This site is also not South facing and, therefore, will be liable to remain frozen all day in the winter.

Parking on both sides of the road in Hazelwood at the point where it narrows prior to Cherrywood Road at present hinders access by ambulance or fire engine, and on occasions is only just passable by car.

The additional traffic from 628 new houses in this area will make Gonerby Road even more of a bottleneck for traffic entering Grantham. At present whenever there is an accident or roadworks on the A1 the traffic is diverted to Gonerby Road, making the town completely gridlocked. These traffic problems already significantly impact on local businesses as people decide to shop elsewhere and visit more accessible out of town restaurants and pubs.

The suggested site is not a natural location for access to the town centre and any journey on foot will be a very long trip. This goes against planning principles aimed at active travel (see below)

*“Local authorities should accommodate housing principally within existing urban areas, planning for increased intensity of development for both housing and other uses at locations which are highly accessible by public transport, walking and cycling.”*

*“Local authorities should ensure that strategies in the development and local transport plan complement each other and that consideration of development plan allocations and local transport investment and priorities are closely linked.”*

The fields for proposed development are heavily clay based, with many natural springs and are not suitable, in our opinion, for house building. Nearby houses have required underpinning due to subsidence.

### **Residents own words to describe access via Arnold Avenue (shown on image with the 10% incline):-**

A bus route up Arnold avenue is a ridiculous idea. Arnold avenue is already a hazard for vehicles travelling up and down. Poor visibility turning into Vernon avenue, a tight junction on a hill. The weather is another contribute, it is through good will of residents that Arnold avenue remains drivable most times in ice and snow. We have to go out at 6am sometimes earlier to grit the road in Winter time. Vehicles have had accidents down this road. I certainly wouldn't like to be the resident living in the house that faces up Arnold Avenue, vastly increased traffic will increase the risk of vehicles ending up in their garden.

Buses often struggle to come round Stephenson into Cliffe Road and vice versa, so would need to be mindful of trying to turn from Cliffe Road into Beaumont as would have to swing out to come round, and there are often cars parked for the housing opposite within the turning circle. They would need to undertake proper swept path analysis of all those roads, including having parked vehicles so realistic.

It's worth noting that Applewood is also only accessible by going up hill. You either have to access it by going up Stephenson Avenue and down Cherrywood Drive (which is incredibly slippery when icy) or by driving along Hazelwood Drive and then up Cherrywood Drive which is a slippery hill.

None of these routes are gritted and so are a struggle for the current traffic without adding more. I know a number of people end up having to abandon cars at the bottom of the hills when the weather is bad. Adding to the parked cars and the problems they cause.



Trying to get from Hazelwood onto Cherrywood or vice versa is a nightmare at the best of times due to the parked cars on Hazelwood opposite Cherrywood and also the ones parked on Cherrywood itself. This is 100 times worse when icy.

Applewood is also a problem in terms of turning in and out as it's on a slope and diagonal, meaning you do struggle to see when turning in and out at times, especially when cars are parked towards the end of the street.

As a number of people have already mentioned the current bus route is already a struggle for the bus due to parked cars (I've seen and heard the buses stuck in the past and having to sit beeping horns until people come and move cars) and there is no way any of these additional roads would be suitable for an extended bus route.

Beaumont Drive is steep and turning into it off Stephenson Avenue is already difficult when people are parked right on the bend/junction opposite!! And often people park on the bottom of Beaumont making it even harder because you have to drive on the right side of the road as you turn in, so it's sometimes a case of hoping nothing is coming down the road at the same time 🤔 Had a couple of near misses! And when it's very icy or snowy, forget about it!

Cliffe Road is difficult in itself, very narrow and made worse with double parking going on.

Can't imagine any of these roads being suitable for access let alone emergency vehicles.

Honestly have they even tried to drive a car up here in the icy weather? Sending a bus up there is an accident waiting to happen. As it is Cliff Road is hard enough with residential parking. Put in to that mix the regular A1 incidents / accidents and the diverted traffic being sent through Gonerby and down into town you already have to sit on Hazelwood and other roads to try and get out.

Congestion will be a huge impact on our daily work lives etc

There is absolutely no chance of getting a bus route along Arnold avenue and the joining roads, no to mention the death trap it poses on the corner of Arnold/cliffe road.

I live on that corner and I worry for my children's safety when they play with their friends, let alone anyone else. We have already had someone lose control there several times. Once our fence was demolished, another time someone hit the lamppost.

Delivery Lorries already struggle getting up there and manoeuvring too.

I own a caravan and cannot bring it up Hazelwood at most times of the day. I have to come up Stephenson to bring it home to Peachwood. The streets are not wide enough for heavy traffic. Applewood is a tiny cul-de-sac - how can traffic from all the new houses exit down this street onto Cherrywood (which is a skating rink) in winter months? Someone in SKDC needs to have a reality check.

I can show you video evidence and pictures of cars crashed on our drive at the bottom of Arnold Avenue and the bus stop at the bottom is constantly parked across via our neighbours' visitors, causing obstructions for us to get on and off the drive safely.

## 4. Landscape Character Assessment

Site SKPR-57 is on sloping land that uncharacteristically for Grantham reaches the height of the surrounding hillside. The landscape character assessment for South Kesteven contains some very important information...

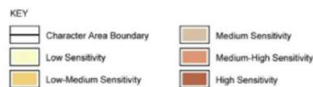
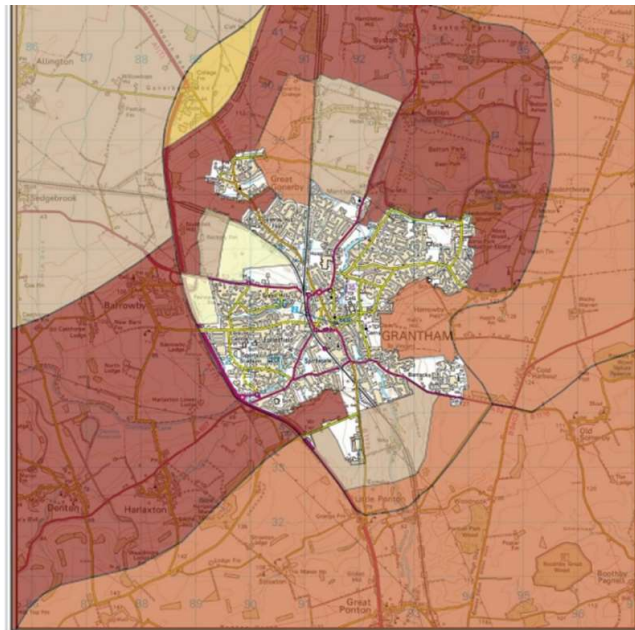
4.116 Built development on the rising ground is generally avoided, which gives the town an enclosed character.

4.119 In general, however, keeping the development to the lower slopes has maintained a rural feel to the higher land, and has contained the urban influence on the wider landscape.

"The Landscape Management Objectives for Grantham Scarps and Valleys include:

- Avoid built development encroaching on the higher scarp slopes or "skylining".
- Maintain a varied urban edge with fringes of countryside extending into the town.
- Consider opportunities for enhanced access to the countryside around the edge of the town.
- Protect gaps between Grantham and adjacent villages.

The proposed development land is also assessed to be "Medium-High sensitivity"



South Kesteven Landscape Character Assessment  
**LANDSCAPE SENSITIVITY FOR EMPLOYMENT AND RESIDENTIAL DEVELOPMENT AROUND GRANTHAM**

Figure 17

The site:...

Lies wholly within a designated landscape where localized character and scenic value is distinctive.

Important to the setting of a registered historic park and garden.

Important to the setting of a registered historic St Wulfram's Church (Grade 1 listed).

Presents locally important landscape characteristics and scenic value.

Presents important public amenity value by way of views, access, biodiversity interest and opportunity for quiet enjoyment (relative tranquility).

The conclusion to the above is that the area has a

High Landscape Sensitivity

And

High Landscape Value

**Building on the higher slopes goes against the findings of the  
"Landscape Character Assessment" and the  
"Landscape Management Objectives for Grantham Scarps and  
Valleys"**

## 5. SKDC lack of community consultation. No protection from a Neighbourhood Plan

**“Neighbourhood Plans are a powerful tool to shape their local area, as Neighbourhood Plan policies take precedence over non-strategic Local Plan policies in decision-making. In other words, the Neighbourhood Plan “trumps” the Local Plan (on certain matters).”**

The people of Grantham do not have representation at the same level afforded to all other communities in South Kesteven. Whereas all other communities have town or parish councils we, as yet, do not. Grantham only has the ceremonial charter trustees.

The impact of this is that the people and communities in Grantham cannot put together a Neighbourhood Plan, the essential informative document to inform the local plan.

Our inability to consult and inform the local plan must be considered.

The two other towns in South Kesteven, Stamford and Bourne, both have town councils and both have in place a well-considered Neighbourhood Plan.

South Kesteven District Council have taken advantage of this lack of protection for Grantham’s green and open spaces by allowing uncontrolled development to the point where we have little or no green or open space remaining.

South Kesteven District Council’s failure to consult our community and continued failure to allow us to argue our case to protect these last few areas of Green and Open Space is arguably challengeable in court.

One of the core objectives of the National Planning Policy Framework (NPPF) is to ensure local planning authorities meet the full, objectively assessed housing needs for their area through local plans.

It is vital for the SKDC local plan to have a strong up-to-date evidence base. This in the case of the Grantham community, has lacked consultation, and therefore the evidence base is weak and unrepresentative of the local knowledge and desire.

It is vital that local communities are able to create their Neighbourhood Plans because adopted Neighbourhood Plans become part of the development plan and carry significant weight in determining planning applications.

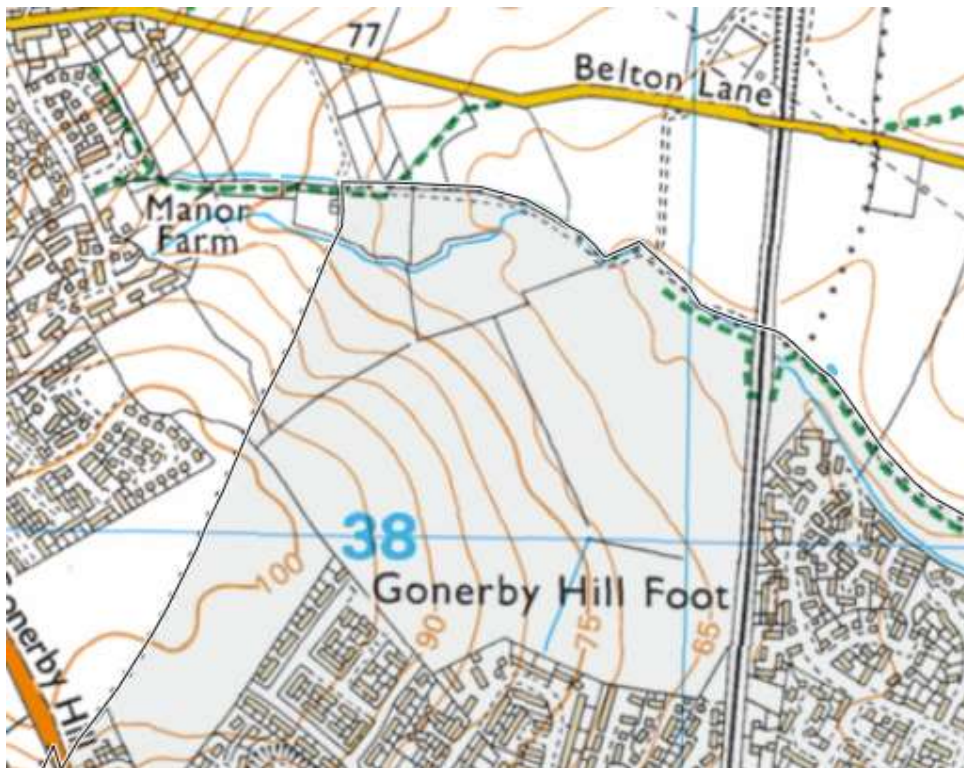
SKDC must ensure Grantham residents are afforded the same rights as other communities in the district.

## 6. Development principles as listed in local plan.

The plan contains the following “development principles” for site SKPR-57 (Land off Belton lane).

- I. “No development will occur above the 60m contour”
- II. The development will make provision for the upgrade of the Newark hill junction.
- III. Highway connections should be made with the adjacent development to the south where possible.
- IV. Impact on heritage features will need to be considered, Belmont Tower, Belton Park
- V. The development must take into account the Belton House Park Setting Study in Policy GR1.

**Item I from above. The 60 metre contour almost renders the entire site unacceptable. The top of the hill, for instance, is above the 90m contour.**

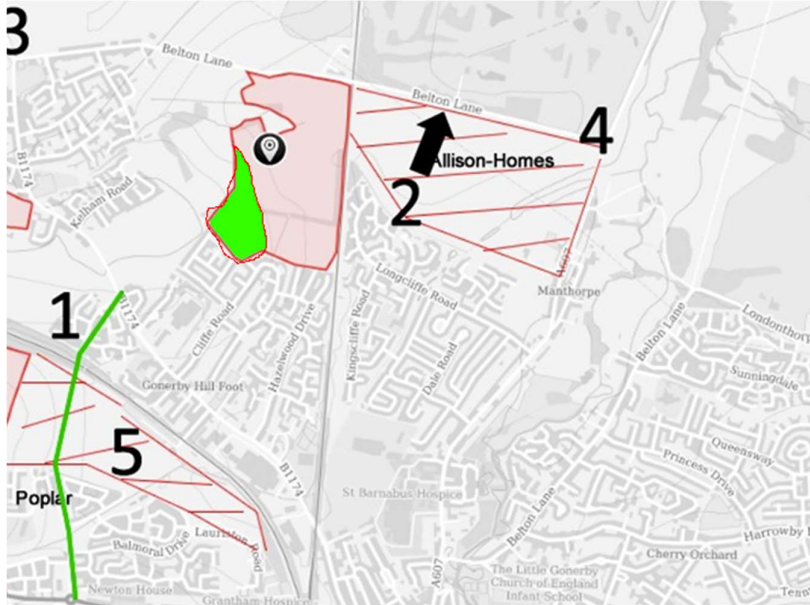


Item II – the cost to upgrade the Newark Hill junction is far too high for a development of this size. If the developer agreed to this they would likely renege on this responsibility further down the line.

Item III from above. Any road connections in to the southern estate leaves the development open to become a rat run from the north to the south of Grantham, causing vast volumes of A607 traffic to use this route through Grantham. This is completely impractical and means this development MUST be closed at either the northern or southern end.

## 7. Visibility from Belton House NT

A section of the development zone is visible from the roof of Belton House NT (Grade 1 listed shown in green on map below).



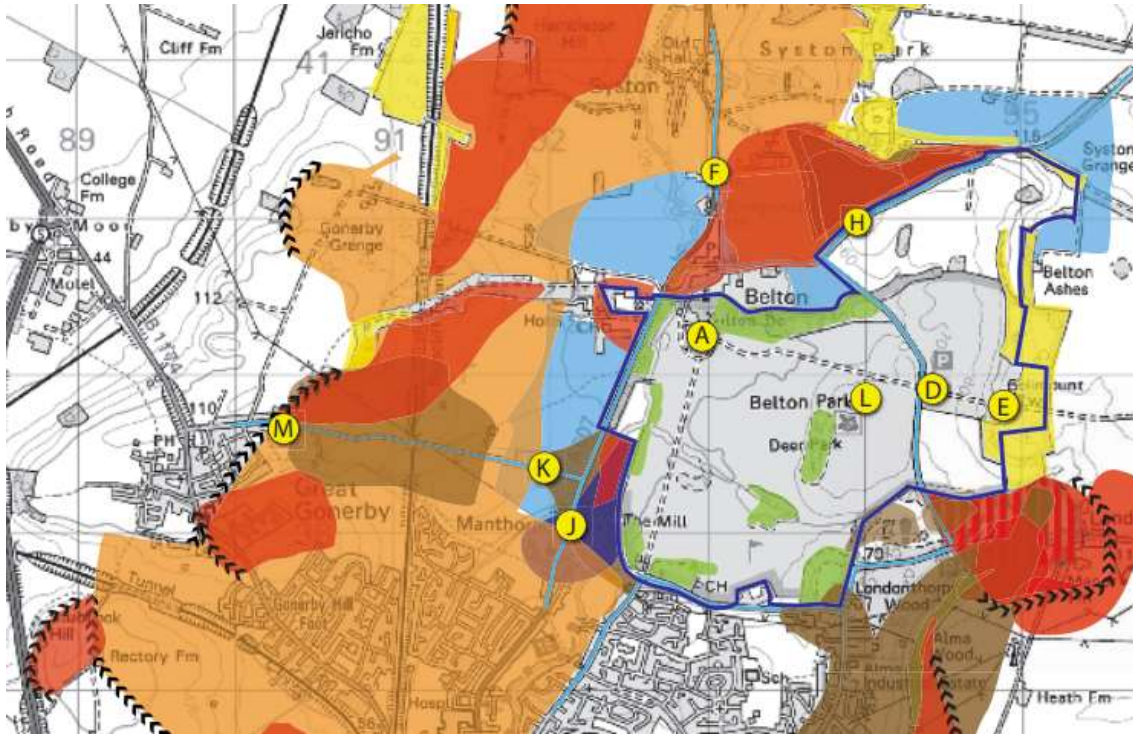
### 3.4.3 Element 3: Areas visible from the key approach points I J K and M and routes (1-9)

The views towards the park along the approach routes to the site, are sensitive to major development. Major developments are likely to interrupt views of the park, rather than being foreground features that do not interrupt views of the park itself. Additionally they are likely to affect the generally rural landscape character of the areas around the major approach routes (mainly routes 1 and 2). However this general rural context is of less significance than the designed views and other aspects of the park's setting.

The value of the park also partly lies in its function as a visitor attraction and an important heritage asset. The views into and across the park from the main access routes used by the public also need to be taken into consideration as aspects of the park's setting. Along the main access routes the appreciation of the rural context of the park, where it remains rural, is also important, although this aspect is not as important as the significant-views into and out of the park itself.

In addition the main approach to Belton House is along Belton Lane (from the A1). This is the first view that the majority of visitors get of the Belton Estate and is, therefore, sensitive to keeping the rural feel of the estate.

Note: The highly sensitive area (shown in green) contains four of the five access roads to the estate. It is visible from Belton House so we can assume only one road will carry the south bound traffic. This is unacceptable.



The approach view (shown as M) on the map is the main approach for the majority of visitors and WILL be impacted by this development.

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In January 2010 South Kesteven District Council and National Trust published: "Belton House and Park – Setting Study and Policy Development" by Atkins. On page 27 of this document – reference 3.6.6 – Table 2 summarised the sensitivity to development of the different aspects of Belton House and the Park's setting. This table states that:

"Land visible from the roof of Belton House or from Belmont Tower is unlikely to be suited for this form of development, except on flat ground 2-5km from the park, where it would have to be 2 storeys or less and in excess of 5km where development should not be tall."

We refer you to Figure 10 showing the location of the land in relation to views from the house and tower and Point 4.8.2, which states that applications for development will normally be refused if they:

- Intrude on key historical and designated views,*
- Degrade the open nature of key views,*
- Require the loss of important woodland areas,*
- Breach important ridgelines* •
- Visually dominate the setting, or significantly degrade the rural character of adjacent areas.*

On 31/10/11 the Gonerby Hill Residents Group received the following email from Alan Hubbard, planning officer at the National Trust:

*“Looking at the study document, site GRAH3 is outside the 2km zone, albeit at its north-eastern extremity it almost touches the 2km boundary. The Trust has therefore assessed it on the basis of land between 2 and 5 kilometres of Belton. The site is identified as part of the area referred to as “Element 1” being ground that is visible from a key location(s) within the property such as the roof of the Hall or Belmont Tower.*

*The related assessment of sensitivity is split up between different types of development as set out in the summary table below. (As you will see sites within 2 – 5km were determined not to be sensitive to small-scale development, but to be exceptionally sensitive to tall structures.) The scale of development being considered on Site GRAH3 (around 400 units) would constitute a “Medium” or “Major” Development – i.e. the site is, in terms of the potential impact upon the setting of Belton, exceptionally sensitive to such scales of development, with the likely impact of development depending upon both the landform and the height of development.”*

This confirms that the National Trust also believes that the land lies in an area exceptionally sensitive to development.



# South Kesteven District Council – Belton House and Park Setting Study

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<https://moderngov.southkesteven.gov.uk/ieDecisionDetails.aspx?ID=642>

The following texts are taken from the SKDC executive ruling that the Belton House and Park Setting Study should be used to support the assessment of applications for development.

## Purpose:

To seek approval to use the main conclusions from the Belton House and Park Setting Study as background evidence to support and inform the development of the LDF as appropriate and also that the conclusions of the study are used to support the assessment of applications for development.

## Decision:

**That approval is granted for the following:**

- 1. That the main conclusions arising from the Belton House and Park Setting Study be used as background evidence to support and inform the development of LDF documents as appropriate.**
- 2. That the conclusions of the Study regarding the setting and its sensitivity be used to support the assessment of applications for development.**
- 3. That the Study be approved and made available to the wider public by publication electronically on the Council's website; on CD; and in paper form. It is proposed that a nominal charge be made for the later two options.**

#### Reasons for the decision:

The study will provide clarity to applicants and officers on whether they need to take the setting of Belton House and Park into account. This is particularly important in view of Grantham's Growth Point status.

If the study is not adopted there is no other means of identifying the setting of Belton House which would inform an applicant that they needed to consider it whilst developing their application and that the planning authority would need to consider it during the determination of an application. This could lead to the approval of developments which could detract from the significance of this important heritage asset.

#### **Alternative options considered:**

Belton House is a Grade I listed building owned by The National Trust with a number of listed buildings and structures associated with the house, which include the stables and South Lodge (both Grade I) and Bellmount Tower (Grade II\*). The Park is a Grade I Registered Historic Park and Garden of Special Historic Interest. The House and Park are highly significant heritage assets of local and national importance.

The Belton House and Park Setting study was produced by Atkins Ltd and was jointly commissioned by South Kesteven District Council and The National Trust in 2008. The purpose of the report was to define and describe the setting boundary of Belton House and Park and to inform the need for and content of a new LDF policy for the setting of Belton House and Park.

The study was commissioned to comply with Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 which places a duty on the decision maker when "*considering whether to grant planning permission for development which affects a listed building or its*

*setting*”, to have *“special regard to the desirability of preserving the building or its setting or any features of architectural or historic interest which it possesses.”* In 2008 the Inspector at the Thacksons Well Wind Farm appeal referred to the impact of the development on the setting of a number of heritage assets which included Belton House and Park. This duty is reinforced by Section 67 of the Act which requires the authority to give publicity to any planning application which would in their opinion affect the setting of a listed building.

The study also addresses the Council’s requirement under Policy 27 of the East Midlands Regional Plan, to *“identify and assess the significance of specific historic assets and their settings”*. It identifies the surrounding landscape which forms the setting for the House and Park and provides an assessment of the sensitivity of the setting to various types of development classified as:

- Small scale development such as small numbers of additional dwellings, agricultural buildings or holiday chalets
- Medium sized development for example groups of 50 or more houses or large building complexes
- Major development which would require assessment under the terms of the Environmental Impact Assessment regulations, such as urban extensions
- Tall structures such as wind turbines or tall power plant/manufacturing chimneys.

The report proposed three options to address the legal requirements outlined above:

- To include a policy as part of a Development Plan Document (DPD), for example the Site Specific Allocations and Policies
- To adopt the description of the Park’s setting and its sensitivity to support the assessment of applications for development

- To prepare a Supplementary Planning Document (SPD) for the setting of Belton House and Park.

There are considerable issues regarding the first two options as they would potentially make the issue of the setting of Belton House less visible and could lead to it not being taken into account by applicants and when applications are determined.

The report concludes that the most effective option would be the preparation of a dedicated SPD which would be visible and carry significant weight in determining applications for all forms of development. It could supplement a range of existing and emerging national, regional and local policies including Policy 26 and 27 of the RSS (Protecting and Enhancing the Region's Natural and Cultural Heritage and Regional Priorities for the Historic Environment), Policy EN7 of the Local Plan (Historic Parks and Gardens) and Policy EN1 of the emerging Core Strategy (Protection and Enhancement of the Character of the District). It could also be supported by design guidance for developments within the defined area of the site's setting.

The study will contribute to the Priority Theme of Quality Living and Good for Business as the study will inform the development of an up to date planning policy framework and form a material consideration in the planning decision making process. The study will raise applicant and officer awareness on when the setting of Belton House and Park needs to be taken into account and what aspect of the setting needs to be considered when submitting and considering development proposals.

**Publication date:** 27/04/2010

**Date of decision:** 26/04/2010

**Effective from:** 06/05/2010

<https://moderngov.southkesteven.gov.uk/documents/s7803/NKD%20Report%20PLA819.pdf>

**NON KEY DECISION:  
REPORT TO CABINET PORTFOLIO MEMBER**

DECISION TO BE TAKEN BY: Councillor Mrs Frances Cartwright  
Economic Development

REPORT AUTHOR: Karen Tomlinson

REPORT NO. PLA819

DATE: 19 April 2010

<b>SUBJECT OF NON KEY DECISION:</b>	<b>Belton House and Park Setting Study</b>
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<b>PRIORITY THEME:</b>	Quality Living and Good for Business	
<b>CRIME AND DISORDER IMPLICATIONS:</b>	None	
<b>FREEDOM OF INFORMATION ACT IMPLICATIONS:</b>	This report is publicly available via the Your Council and Democracy link on the Council's website: <a href="http://www.southkesteven.gov.uk">www.southkesteven.gov.uk</a>	
<b>INITIAL EQUALITY IMPACT ASSESSMENT</b>	<b>Carried out and appended to report?</b>  Not Applicable	<b>Full impact assessment required?</b>  No
<b>BACKGROUND PAPERS:</b>	None	

**(1) RECOMMENDATION(S)**

1. That the main conclusions arising from the Belton House and Park Setting Study, be used as background evidence to support and inform the development of LDF documents as appropriate
2. That the conclusions of the Study regarding the setting and its sensitivity be used to support the assessment of applications for development
3. That the Study be approved and made available to the wider public by publication electronically on the Council's website; on CD; and in paper form. It is proposed that a nominal charge be made for the later two options.

## (2) PURPOSE OF REPORT

Belton House is a Grade I listed building owned by The National Trust with a number of listed buildings and structures associated with the house, which include the stables and South Lodge (both Grade I) and Bellmount Tower (Grade II\*). The Park is a Grade I Registered Historic Park and Garden of Special Historic Interest. The House and Park are highly significant heritage assets of local and national importance.

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The study was commissioned to comply with Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 which places a duty on the decision maker when "*considering whether to grant planning permission for development which affects a listed building or its setting*", to have "*special regard to the desirability of preserving the building or its setting or any features of architectural or historic interest which it possesses.*" In 2008 the Inspector at the Thacksons Well Wind Farm appeal referred to the impact of the development on the setting of a number of heritage assets which included Belton House and Park. This duty is reinforced by Section 67 of the Act which requires the authority to give publicity to any planning application which would in their opinion affect the setting of a listed building.

The study also addresses the Council's requirement under Policy 27 of the East Midlands Regional Plan, to "*identify and assess the significance of specific historic assets and their settings*". It identifies the surrounding landscape which forms the setting for the House and Park and provides an assessment of the sensitivity of the setting to various types of development classified as:

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to it not being taken into account by applicants and when applications are determined.

The report concludes that the most effective option would be the preparation of a dedicated SPD which would be visible and carry significant weight in determining applications for all forms of development. It could supplement a range of existing and emerging national, regional and local policies including Policy 26 and 27 of the RSS (Protecting and Enhancing the Region's Natural and Cultural Heritage and Regional Priorities for the Historic Environment), Policy EN7 of the Local Plan (Historic Parks and Gardens) and Policy EN1 of the emerging Core Strategy (Protection and Enhancement of the Character of the District). It could also be supported by design guidance for developments within the defined area of the site's setting.

The study will contribute to the Priority Theme of Quality Living and Good for Business as the study will inform the development of an up to date planning policy framework and form a material consideration in the planning decision making process. The study will raise applicant and officer awareness on when the setting of Belton House and Park needs to be taken into account and what aspect of the setting needs to be considered when submitting and considering development proposals.

**(3) REASONS FOR RECOMMENDATION(S)  
(including any alternative options considered and rejected)**

The study will provide clarity to applicants and officers on whether they need to take the setting of Belton House and Park into account. This is particularly important in view of Grantham's Growth Point status.

If the study is not adopted there is no other means of identifying the setting of Belton House which would inform an applicant that they needed to consider it whilst developing their application and that the planning authority would need to consider it during the determination of an application. This could lead to the approval of developments which could detract from the significance of this important heritage asset.

**(4) COMMENTS OF SECTION 151 OFFICER**

The report does not specify the cost of undertaking the study that is necessary to inform the Local Development Framework. However, sufficient resourcing has been given to enable the progression of the LDF in 2010/11 and therefore the costs can be met from existing budget provision.

**(5) COMMENTS OF THE MONITORING OFFICER**

This report requires the Portfolio Holder to approve the study to be used to inform the Local Development Framework generally and in particular to apply to planning

applications which may affect the buildings and their setting. This study has been produced in accordance with the Regional Spatial Strategy and is required as a result of the potential planning activity in and around Grantham arising from the status of Grantham as a growth point.

(6) **OFFICER CONTACT**

**Karen Tomlinson  
Assistant Conservation Officer  
Planning Policy, ext. 6472**

(7) **DATE DECISION EFFECTIVE:**

**If decision made on 26th April date effective will be 6th May 2010**



## 8. Consideration of developments in other areas

We need to go through the other available sites that were rejected to see if any are more suitable and ask why they were rejected in favour of our area. This involves studying the 651 page Site Assessment report. <https://www.southkesteven.gov.uk/.../Draft%20Site...>

- Why is Bourne only receiving such a small allocation?

**ADD DOCUMENTATION SUPPLIED**

## 9. Grantham Capacity and Limits to Growth Study 2015

[https://www.southkesteven.gov.uk/sites/default/files/2023-08/HOU6\\_Grantham\\_Capacity\\_and\\_Limits\\_to\\_Growth\\_Study\\_2015.pdf](https://www.southkesteven.gov.uk/sites/default/files/2023-08/HOU6_Grantham_Capacity_and_Limits_to_Growth_Study_2015.pdf)

For the land to the west of the railway line, there is complete visual separation from the hilltop heritage assets at Great Gonerby, which lie over the ridgeline as viewed from the Belton Lane railway bridge, a viewpoint with a good view across the whole site. This would be in line with the Grantham AAP and Grantham Townscape Assessment objectives to ensure growth from Grantham has minimal impact on Great Gonerby.

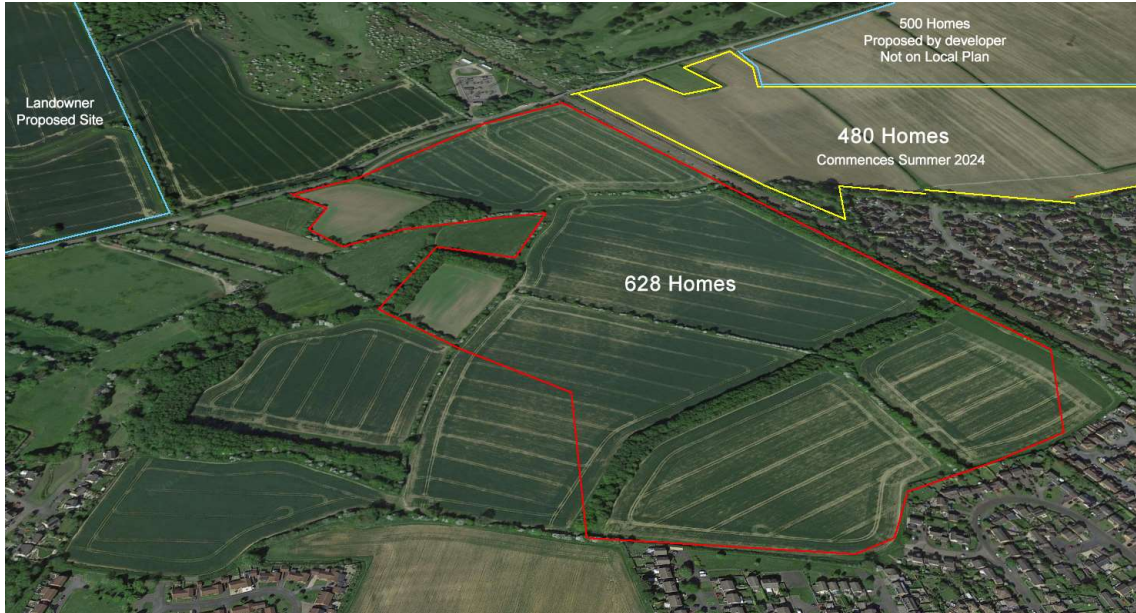
More important would be the land's visibility from Belton House and grounds, as Gonerby Hill rises steeply on the western part of the site. This land was assessed as Element 1 in the Belton House Setting Study, but much of it is just beyond the 2km mark from the centre of the park. Therefore, the assessment of the Setting Study for development on flat land in this location would be 'not sensitive'.

However, the land up the hill would be more sensitive, although it is more than 2km from the park, meaning it would be rated 'sensitive' to development rather than 'exceptionally sensitive'. Additionally, like the rest of Gonerby Hill Foot, development up the slope here would have the potential to impact on the perception of Grantham as being surrounded by a 'green bowl' of hills, particularly on views into the town from the east and south. In this regard it could therefore affect the setting of St Wulfram's Church spire, which is a Grade 1 listed heritage asset.

As stated in the "Grantham Capacity and Limits to Growth Study 2015" this site allocation is rated as "Sensitive" to development. It would impact on the perception of Grantham as being surrounded by a "green belt" of hills. AND it could affect the setting of St Wulfram's Church spire, which is a Grade 1 listed heritage asset.

## 10. Lack of a Green and Open Space

The destruction of Grantham's green and open spaces. Uncontrolled with no consultation.



Right to a Green Space. With the Allison Homes development plus their intention to add a further 500 homes to the North of the agreed site - where is the green space any more for our community? If a resident can't afford golf membership or National Trust membership how will they enjoy green open space?

Residents of Gonerby Hill Foot are sandwiched between the town and two railway lines with limited access to open green space except for the land SKPR-57 and beyond. Almost all of this open, green land is now destined for housing. Unless a resident is a private golf club member or a National Trust member they will struggle to access green open space for health and recreation.

SKPR-57 is, therefore, discriminatory against people with lower incomes and their families.

## 11. Inconsistencies

The Development Principles for the site state "Highway connections should be made with the adjacent development to the south where possible."

But then the site assessment survey says "Access at Belton Lane acceptable subject to TA".

Which access is going will be suggested? Neither works well, especially when you consider construction traffic. Both would allow major highway flow from the A1 and A607 to bypass traffic in to the town and create a major rat run.

## 12. Impact on tourism and sites of historic interest

In close proximity to the Belton House National Trust estate the view and noise from the estate will have an impact on the tourism offer in the area.

The Belton Woods Hotel, Golf Course and holiday homes will be impacted. The view from the holiday homes looks out across a quiet green field site. This will become a housing estate and directly impact the business and visitor economy.

**AWAITING RESPONSE FROM BELTON HOUSE AND BELTON WOODS**

## 13. Biodiversity

The proposed site contains a variety of important habitats, and supports many species of flora and fauna. There are hedgerows which act as crucial wildlife corridors, copses which provide shelter for many species including larger mammals, and open field habitats supporting several bird species. Loss of these types of habitat across the UK has contributed to the significant decline of much of our wildlife.

This site is known by locals to support a range of wildlife including many Species of Principal Importance in England **under Section 41 of the Natural Environment and Rural Communities Act 2006 (derived from the UK Biodiversity Action Plan). These species extant on this land include the red-listed Skylark** and many more.

Due to the range of habitats on this site and the associated high level of biodiversity, any proposed development here would therefore require a full and thorough series of in-depth ecological assessments including: entomological surveys, hedgerow surveys, tree surveys and botanical surveys. Due to the presence of bats, we believe thorough bat surveys are required: dusk emergence and dawn re-entry surveys, transect surveys of potential commuting/foraging habitat, hibernation surveys and remote bat detector surveys.

There are several veteran trees on the proposed site; the **National Planning Policy Framework states that planning resulting in the loss of veteran trees should be refused except for 'wholly exceptional reasons'** or if there is a 'suitable compensation strategy in place'. A centuries-old oak, such as those on site, supports thousands of species due to its age and unique structure, and therefore its biodiversity value cannot be 'replaced' by planting saplings or similar mitigation measures.

The impact of this plan on biodiversity would involve:

- Removal of trees including veteran trees. Proposed site incorporates several centuries-old oak trees; research published by the UK Centre for Ecology and Hydrology in 2019 revealed oak's huge significance for biodiversity. One mature oak (and its leaves, fruits, bark, crevices and deadwood) supports at least 2,300 known species, more than any other tree. 326 species are fully reliant on oak. Removing these trees for less than 'wholly exceptional reasons' contradicts the NPPF. Retaining these trees but building around them is also unacceptable as a mitigation measure, as soil compaction caused by high pedestrian footfall and traffic is highly damaging to the roots of ancient and veteran trees. Removal of hedgerows and strips of younger trees which provide crucial 'corridors' for wildlife to move between habitats as well as food and shelter; they also act as foraging routes for bats. There are 130 Biodiversity Action Plan species associated with hedgerows. The proposed site is rich in hawthorn which is a known food source for birds such as the song thrush: an amber-listed species which has declined significantly in the UK.

Hedgerows are a **Section 41 Habitat of Principle Importance**.

- Loss of natural habitat for roosting Pipistrelle bats – currently protected under Schedules 5 and 6 of the Wildlife and Countryside Act 1981. Loss of habitat and hunting grounds for the Noctule bat – a Section 41 species observed on this site as recently as 2023 (records submitted to Lincolnshire Bat Group).
  - Loss of habitat for **Species of Principal Importance in England under Section 41 of the NERC Act 2006 known to exist on this site including (but not limited to): skylarks, noctule bat, grass snake, common toad, dunnock, starling, song thrush, wall butterfly, small emerald moth, and many many more. Species records are in the process of being submitted to the relevant recording schemes for posterity.**
  - Loss of natural habitat for a variety of prey birds including, owls, hawks, kestrels, buzzards, and red kites.
  - Loss of natural habitat for a variety of garden birds including goldfinch, chaffinch and woodpeckers.
  - Loss of migration routes for migrating birds.
  - Loss of natural habitat for wildlife known to exist here including roe deer, foxes, badgers, voles and many other species.
  - Loss of natural habitat for rare plants such as varieties of wild orchids – see appendix 4.
- (9.2)

**THE FOLLOWING TEXT IS TAKEN FROM A PREVIOUS STUDY IN TO THE SITE:**

**Point 3.2.3 of the GAAP**

states that: "*The current national planning policy framework for the natural environment, countryside and landscape is set out in PPS 1 (Delivering Sustainable Development), PPS7 (Sustainable Development in Rural Areas) and PPS 9 (Biodiversity and Geological Conservation). The policies are aimed at sustainable development, which protects and enhances biodiversity, and provides for access to the countryside.*"

**We cannot understand how building on this greenfield land, which is designated as informal open space and is used by so many locals for their leisure can meet this intention.**(9.3)

**Point 3.2.4 of the GAAP**

states that: "*Investment in green infrastructure provision for Grantham will help to tackle existing deficits in the provision of accessible green space, and help provide and protect wildlife corridors, open space and accessible land.*"

**We do not believe that changing the use of the land to the north of Peachwood Close, from that of an informal open space which is the home to such a diverse range of flora and fauna, can possibly meet this intention.**(10) Review of the GAAP documents(10.1)

The evidence document that accompanies the GAAP states on

**Page 10 of 'Site Assessments about the development to the North of Peachwood Close'** that: "

*Due to the existing tree belt, the new development is unlikely to have any significant landscape impacts.*"

It is our view that the proposed development would cross an important ridgeline at the top of the site, and building would remove the mature trees across the middle of the two fields. The tree line referred to within GAAP consists of immature trees, and this would not screen a medium to large-scale development.

**(10.2)**

The evidence goes onto state that: "

*The site lies within the 5km buffer identified in the Belton House and Park Setting (Jan 2010)"*

but fails to recognise that within the same document, which SKDC commissioned and accepted, it is clearly stated that the land is 'exceptionally sensitive' to development.

**(10.3)**

Other than a paper-based exercise there does not appear to have been *any*

assessment of the transport infrastructure and therefore the evidence does not properly take into account the significant impact on existing roads that would be caused by adding to the estate. In fact, it is clear that only a paper-based exercise was carried out as the proposed Housing Allocation area does not even correspond to the established field boundaries and landscaping that borders the site, especially where the site is simply drawn almost at a right angle in its north western corner.

**(9.4)**

In the sustainability appraisal on Page 61 the Planning Policy officers have made several **significant omissions** from their evidence. They have failed to note that under biodiversity there would be a negative impact on the district's natural assets and biodiversity, and that the development would not protect and enhance the district's flora when the proposed development site includes rare orchids and a vast range of natural fauna. (10.5) Figure 4 on Page 26 of the GAAP Submissions document clearly shows that site GRAH3 is within Area M1 on that plan, identified to be the Great Gonerby Greenway and included as a 'Proposed Area of Search for Accessible Green Spaces (Community Parklands).

**We would argue that a development of 628 houses would be entirely contrary to such a proposal and would do nothing for the promotion of an accessible, green, community parkland.**

**(10.6)**

We believe that by placing a question mark in the column for 'Cultural Heritage To Protect And Enhance the District's Cultural, Built and Archaeological Heritage' the evidence document ignores the evidence from the Belton House study as referred to earlier.



## 14. Educational need

The Priory secondary school is at capacity. Neighbouring our site (SKPR-57) is an already allocated and underway development by Allison Homes. This site already presumes an expansion of the Priory Ruskin school, which we do not believe is possible.

There is no further scope in the north of Grantham for a secondary school.

## 15. Pollution in Grantham

Neighbouring our site (SKPR-57) is an Air Quality Management Zone due to having had dangerous levels of vehicular pollution in and around the north of the town centre.

Given the large number of developments in the area, this allocation is liable to increase this pollution level even further.

Nitrogen Dioxide levels are being monitored and discussed regularly in the SKDC Environment Committee as well as subject to a school monitoring programme by the Kings School, Grantham.

**Pollution.** With three large developments going on across the north of Grantham will this create pollution for the town? Construction, air quality, traffic etc. Will the traffic increase in Grantham further add to the high Nitrogen Dioxide levels found along Brook street that made SKDC set up the air zone? At one point the air on Brook Street was at dangerous levels for the residents.

<https://www.southkesteven.gov.uk/environmental-health/other-environmental-services/air-quality>

### **Air Quality Action Plan 2016**

The action plan contains 10 measures, grouped into the following areas:

Theme 1. Transport Measures

Theme 2. Leading by Example Measures

Theme 3. Measures to Raise Awareness in our Communities

*South Kesteven District Council is committed to working to improve the air quality in our district where levels of air pollutants are exceeding air quality objectives. Air quality in South Kesteven is generally good. However, there are locations where pollutant levels are high, with the highest levels being along narrow, congested street canyons (roads with properties close to the road on either side of the street) in **Grantham**.*

## 2.0 Overview of air quality

### 2.1 Grantham Air Quality Management Area

In 2013, the council declared an AQMA for the area encompassing the main roads in the town centre of Grantham. The AQMA is illustrated in Figure 2. A number of roads included within the AQMA are likely to lead to a “street canyon effect” due to the road and building layout, trapping and preventing the dispersion of air pollutant emissions from road-traffic, therefore explaining the high levels of pollution in these areas.

The 2011 Detailed / Further Assessment concluded that around 320 homes lie within the

Grantham town centre AQMA, equating to an exposed population of around 650. The necessary reduction in annual mean NO<sub>2</sub> concentration required in order to achieve compliance with the Air Quality Standards objective at the worst case location was estimated to be around 30%.

Source apportionment indicated that emissions from local moving traffic are the main contributor to overall NO<sub>2</sub> levels, although idling emissions due to queuing vehicles are also particularly important near traffic lights. Heavy-Duty Vehicles (HDVs) were estimated to be a main source of pollution, although important contributions are also noted from Light-Duty Vehicles (LDVs).

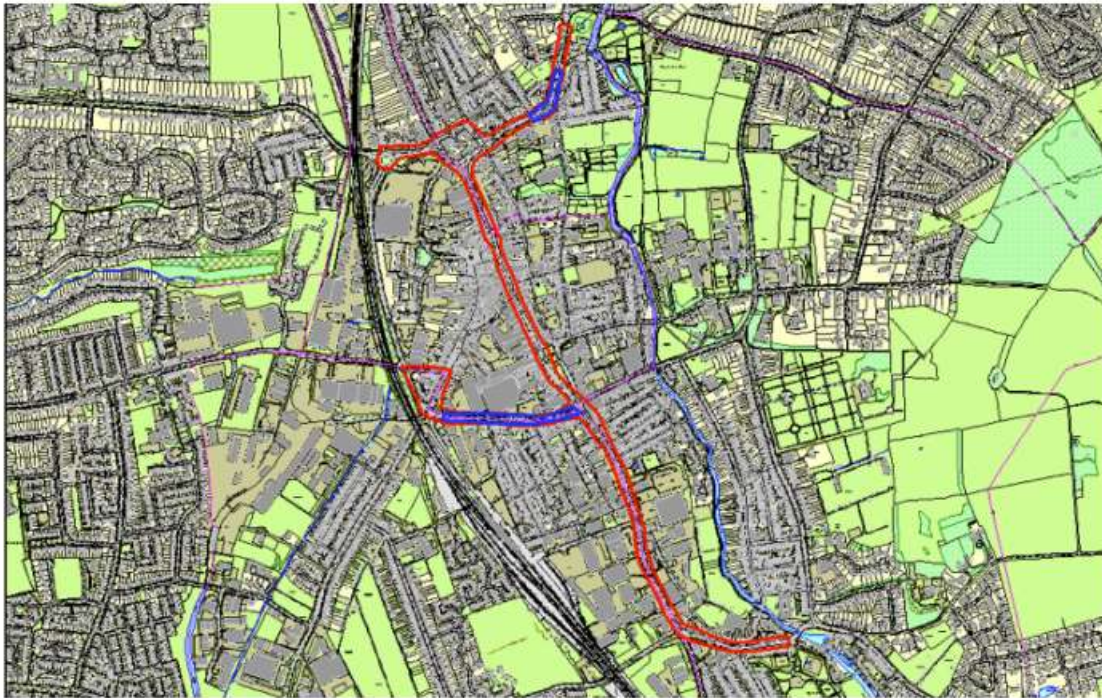


Figure 2 - Grantham Air Quality Management Area

#### 4.1 Transport measures

Road-traffic emissions contribute to about 75% of total NO<sub>x</sub> concentrations within the Grantham AQMA. Therefore, in essence, poor air quality in the AQMA can be tackled by reducing traffic volumes, smoothing the flow of traffic (to reduce the stopping / acceleration cycle), removing the most polluting vehicles and increasing modal shift

## 2.2 Monitoring data

In 2014, the council carried out passive NO<sub>2</sub> monitoring at 37 sites across the district using diffusion tubes. This included 15 duplicate tube and four triplicate tube locations, which are aimed at improving reliability of the data.

The monitoring data shows that three sites exceeded the annual mean NO<sub>2</sub> air quality strategy objective in 2014; at sites SK4/SK32/SK33 (Brook Street/Manthorpe Road),

SK37/SK38 (Wharf Road) and SK59/SK60 (Brook Street/Manthorpe Road). All of these sites are located within the AQMA. NO<sub>2</sub> annual mean results at sites within the AQMA are shown in figure 3.

The number of sites showing an exceedence of the objective has decreased in the last few years, with 13 sites exceeding in 2010, 15 in 2011, 8 in 2012, 4 in 2013, and now only 3 in 2014.

Encouraging residents to switch from cars to buses, cycling or walking is suggested. However, from such a long distance away most residents in SKPR-57 will be too far away to do anything other than drive or take the bus.

## 16. Site assessment document - analysis

The site assessment for SKPR-57 is analysed below...

- Environment Agency – no comment – Yet the next line says “Flood Risk – **YES**”
- Impact on Strategic Highway Network – **MAJOR**
- Impact on Local Highway Network – Moderate – **this needs explanation**
- Impact on Local Road Network – **MAJOR**
- Statutory comments on Highway Network (LCC) – “Access at Belton Lane acceptable subject to TA. Traffic impact at junctions on Belton Lane likely to need significant junction upgrades.... **Overall mitigation required probably too great for site.**”
- Statutory comments on Highway Network (LCC) – “Site should also provide footway/cycleway connections to residential to south”.
- Does the site have suitable access? **Yes** – **this is questionable**
- Main findings:- “Site offers a suitable location for housing development”

1. How can the impact on strategic and local road network be major, but the impact on the local highway network be moderate? This makes no sense.
2. Lincolnshire County Council Highways state: “Overall mitigation required probably too great for site”. This refers to the small lane to the north of the proposed allocation called Belton Lane. This road has a very tight junction embedded deep within an excavation cutting into the land. It is extremely difficult to navigate and a major engineering task to improve.
3. Lincolnshire County Council Highways refer to “footway/cycleway connections to residential to south” which implies vehicular access will be only from the North. This has been ruled out in other documentation which implies it has to be from the South. A major inconsistency.
4. Does the site have suitable access? Yes. This is highly questionable and we would argue completely wrong!
5. The “main findings” reads like they ignored most of the main points in the assessment in particular the roads, suitable access, steep slopes, flood risk, locals need for green open space etc.

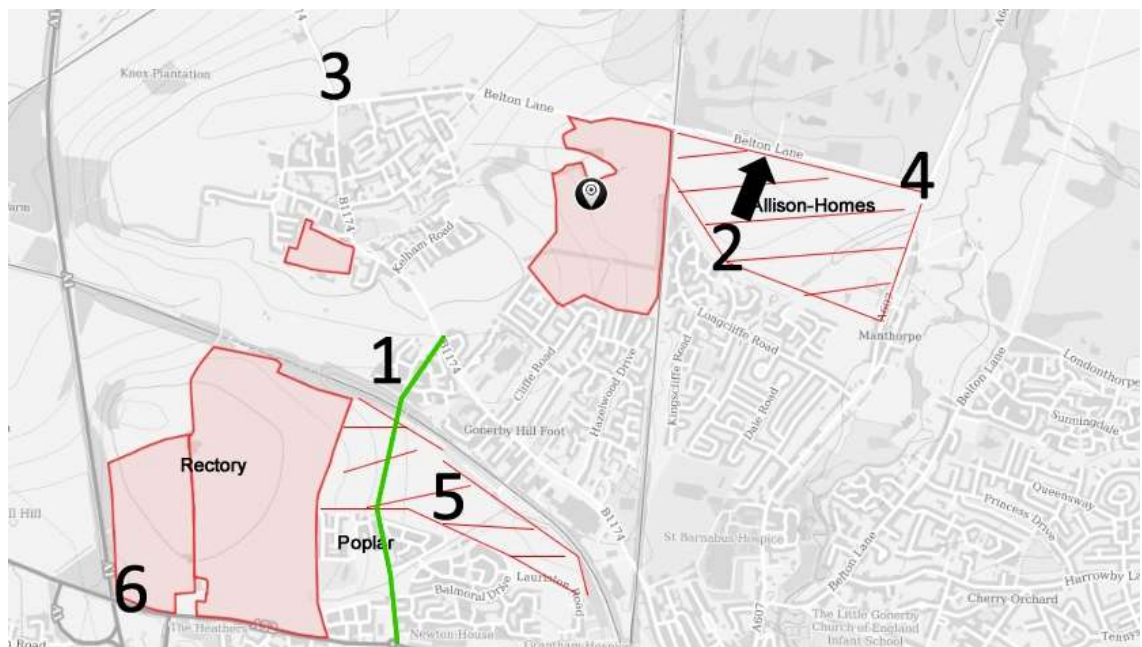
## 17. Over development and lack of infrastructure

The Northern area of Grantham currently has three major development areas. Rectory Farm (1,600), Poplar Farm (1,000+) and Allison Homes, Manthorpe, (440). That is over 3,000 new homes being built from this year.

The road structure in and around Great Gonerby and north Grantham is not designed to cope with the current housing numbers yet alone a further 5,000 people.

In particular the Gonerby Hill Foot estate is sandwiched between two railway lines. The green space to the East is being developed for housing, all the green space to the West is being developed for housing. The fields north of Great Gonerby are being positioned ready for housing. Where are the residents of Gonerby Hill Foot supposed to get some open space and green space relaxation from?

The residents would have allocated this land as required open space in any Neighbourhood Plan, but have not been afforded that option due to Grantham's unique lower tier of government.



**Transport.** Impact on Belton Lane, Gonerby village.

How will construction traffic access the site? Will the bridge on Belton Lane cope with heavy vehicles coming from the A607 junction (presume they won't be able to get around the Newark Hill turning)

[https://www.southkesteven.gov.uk/.../Grantham\\_Transport...](https://www.southkesteven.gov.uk/.../Grantham_Transport...)

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# Draft Local Plan Responses and our comments

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Our responses to the various sections of the local plan with comments.



## Section 2 – Protecting and Enhancing the environment

<https://southkesteven.oc2.uk/document/1/12#d19>

2.24 We have a rich built and natural environment in South Kesteven. The policies of the Local Plan aim to protect and enhance the character of the District.

2.25 The Local plan includes policies for **protecting landscape and biodiversity** and the requirement for developments to demonstrate biodiversity net gain, pollution control, water environment and Flood Risk Management, and the historic environment. In addition, the Local plan seeks to promote good quality design in all new developments – this has been enhanced through the production of a Design Guide Supplementary Planning Document to encourage high quality design. A new district wide Design Code is currently being prepared in accordance with the National Design Guide.

2.26 An Open Space, Sports & Recreation study has been produced which has informed district wide open space, sport and recreational standards. A Play Pitch and Outdoor Sports Strategy Framework is being produced which will provide an audit of existing play pitches across the district, and give recommendations on future provision.

*Response to 2.24/2.25/2.26:*

*The character of Grantham being urban areas interwoven with beautiful fields, a town which integrates into open countryside, is being destroyed by development. This contradicts point 2.24*

*2.25 The increased traffic along Manthorpe Road and Gonerby Road/North Parade will increase the already high levels of pollution and congestion in the north of Grantham. Levels of NO<sub>2</sub> (Nitrogen Dioxide) were dangerous not so long ago. This caused Grantham to set up the air quality management zone. Long-term exposure to high levels of nitrogen dioxide can cause chronic lung disease. It affects senses including ability to smell etc. It is a major contribution to ozone which is harmful when inhaled.*

<https://southkesteven.oc2.uk/document/1/12#d25>

## Neighbourhood Plans

2.37 Neighbourhood Plans are prepared under separate legislation by interested Town and Parish Councils, and in non-parished areas by Neighbourhood Plan forums. They set out the local communities' views on the future development of their areas. Neighbourhood Plans are required to be in general conformity with the strategic policies of the Local Plan.

2.38 A number of Neighbourhood Plans have been, or are being prepared, by communities within the District, and once approved by the Council each Neighbourhood Plan will form part of the Development Plan. As the new Local Plan progresses and gains weight, any made Neighbourhood Plans, or those currently being prepared, should be reviewed by the qualifying bodies that prepared the Neighbourhood Plans, to ensure they remain consistent with the new Local Plan.

2.39 The Local Plan establishes how much housing, employment and retail development is needed to meet the anticipated needs of the District over the plan period. The Local Plan also allocates suitable sites to meet the needs identified in the Local Plan. Neighbourhood Plans which are being prepared or reviewed after the Local Plan is adopted, can look to allocate additional sites for development within their designated area, however they cannot propose less development than that set out in this Local Plan. Neighbourhood Plans are required to meet the basic conditions as set out in legislation. One element of this is that a Neighbourhood Plan must be in general conformity with the strategic policies contained within the Local Plan.

### *Response to 2.37 to 2.40*

*Grantham residents do not have a Parish Council (Town Council) and are therefore disadvantaged towards protecting their community from over development. This consultation is lacking the opinion of the local community gained from the knowledge and general discussions associated with a Neighbourhood Plan.*

*The planning team should have consulted the townsfolk of Grantham specifically due to their lack of representation. This is a major flaw in this site allocation as government moves towards consultation and listening to local people.*

## Chapter 3 – Vision and Strategic Objectives

<https://southkesteven.oc2.uk/document/1/26#d27>

3.1 The vision for South Kesteven's new Local Plan looks to maximise the potential of the District, through supporting the delivery of jobs, growing the economy, enhancing the role of the town centres, and enabling villages and smaller settlements to deliver appropriate forms of sustainable growth. Together these will aim to provide a high quality of life to residents throughout the District, making South Kesteven the best district in which to live, work, invest and visit.

3.3 The Local Plan will consider the priorities and ambitions of the Corporate Plan, once it is adopted.

*Response to 3.1:*

*The local plan will considerably lower the quality of life of residents living in Gonerby Hill Foot and the surrounding area. Traffic congestion, pollution, removal of the little green space residents have left will leave residents vulnerable to increasing mental health issues, physical health and emotional wellbeing issues due to the removal of open walking areas.*

*Gonerby Hill Foot is sandwiched between two railway lines. This limits the availability to access green open spaces. With a private golf club as the northern boundary and a pay for NT Grade 1 listed forming another major land use, it will force dog walkers and recreational walkers in to their vehicles.*

### 2041 Vision for South Kesteven

<https://southkesteven.oc2.uk/document/1/26#d28>

In 2041 South Kesteven will continue to be a vibrant part of Lincolnshire. It will have strong links to the growing economies of Peterborough, Cambridge and London, in particular. The distinctive local character, unique local heritage and environmental and cultural assets will be a source of enjoyment of all and will be enhanced where possible. Such features will continue to make an essential contribution to the economy, such as attracting people to live and work in South Kesteven and will continue to contribute to the visitor economy.

The District will have a successful, diverse economy providing employment opportunities for the local workforce, equipped with a wide range of skills to meet

employer needs. It will be an area of sustainable, high quality growth and a popular place to work, live, visit and invest in.

The District will have drastically lower carbon emissions than present, and energy and transport infrastructure which supports low carbon lifestyles for South Kesteven residents. The built environment is suitably prepared for hotter temperatures and the impacts of disruptive weather.

South Kesteven will provide a high quality of life, consisting of sustainable urban and rural communities where people want to live and work and are able to do so in quality and enhanced environments. The District will be a safe place to live with strong communities.

The network of town and village centres will grow and develop appropriately, according to their size, and will provide a range of accessible services in a good environment. This will be achieved by:

- Creating the right balance of jobs, housing, services and infrastructure;
- Ensuring that development is sustainable in terms of location, use and form;
- Balancing the development needs of the District with the protection and enhancement of the natural and built environment;
- Addressing and mitigating any negative effects of development on the built and natural environment, including the effects of Climate Change;
- Working with partners and residents to develop a place that is welcoming to all.

### Grantham

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

New major Sustainable Urban Extensions to the south and east of the town will be developed at Spitalgate Heath in the form of a nationally designated Garden Village and the Prince William of Gloucester Barracks; there will be further significant residential development to the north and north-west of the town.

New employment opportunities, together with the good educational offer of the town, will help to retain and develop skills and talent.

A mixed use development comprising of residential development and employment opportunities will be developed at the Grantham train station. The town centre will provide a safe and attractive environment for people to shop, live and spend their leisure time. Pedestrians and other non-car users can move around safely and comfortably and there will be improved walking and cycling links from surrounding residential areas.

*Response to 2041 Vision for South Kesteven:*

*One of Grantham's best features is its combination of urban and rural areas. In recent years this characteristic has been eroded. The Gonerby Hill Foot estate is a jewel in Grantham's crown. To destroy its charm, lower the appeal of the Belton House NT site, and ignore the significant issues of road infrastructure is reckless and against the interests of the community. There is no regard given for the rights of existing residents to access a green open space or the destruction of a main characteristic of Grantham itself.*

## Strategic Objectives for the Local Plan

<https://southkesteven.oc2.uk/document/1/26#d30>

Chapter 3.4 to 3.6

<p>Social</p> <p>Housing, Health, Social and Community Needs</p>	<p>Objective 10</p>	<p>To ensure that new residential development includes a mix and range of housing types which are suitable for a variety of needs, including the need for affordable and local-need housing in the District.</p>
	<p>Objective 11</p>	<p>To support new and existing community infrastructure. To ensure that relevant community and other infrastructure needs such as facilities for leisure, new or enhanced open space provision, green infrastructure, health, education, affordable housing, transport, water infrastructure and the arts as arising from new development is delivered through on and off site contributions. To contribute to improving the health and well-being of residents.</p>
<p>Environmental</p> <p>Protection and Enhancement of Environment</p>	<p>Objective 12</p>	<p>To protect and enhance the District's natural, historic, cultural assets, blue green infrastructure (including trees, woodland, and watercourses) and the built environment through good design, sensitive use and management Improved networks that respect important local characteristics, by ensuring new</p>

		<p>development is well designed, promotes local distinctiveness, integrates effectively with its setting and secures community safety.</p>
	<p>Objective 13</p>	<p>To proactively plan for and reduce the impacts of, and address climate change through adaptation and mitigation and to move to a low carbon economy, in order for the district to play its part in meeting national ambitions to meet net zero carbon by 2050. New development is appropriately designed to significantly reduce carbon emissions and is not exposed unnecessarily to the risk of flooding nor increases the risk of flooding elsewhere. Opportunities to incorporate blue green infrastructure (including trees, woodland, and watercourses) and adaptation for wildlife as a response to increases in flood risk are properly investigated, including through the provision of biodiversity net gain.</p>
	<p>Objective 14</p>	<p>To promote the prudent use of finite natural resources and the positive use of renewable resources, through the design, location and layout of development and by optimising the use of existing infrastructure, wherever possible.</p>

	Objective 15	To minimise pollution which affects health and wellbeing and the environment.
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*Response to 3.4/3.6 Strategic Objectives for the local plan:*

*Objective 11 refers to supporting existing community infrastructure... such as enhanced open space provision. In Gonerby Hill Foot's case the unique positioning between two railway lines means this open space SKPR-57 is a vital part of the residents' open space requirements and used by many for recreational purposes.*

*Objective 15. To minimise pollution. Grantham suffers with a vehicle pollution issue due to the design of the housing and road infrastructure in the north of the town. Any new developments will rely on two main roads in to the town centre, both of which are heavily congested already and both of which are being monitored for NO2 pollution. It would be reckless to add more vehicles to this already highly problematic issue.*



## Chapter 4 – Sustainable Development in South Kesteven

<https://southkesteven.oc2.uk/document/1/32#d32>

4.2 Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.

### *Response to 4.2 Planning policies*

*The character of Grantham is being severely impacted by this proposal to build into the skyline and high in to the escarpment that surrounds the town.*

## SD1: The Principles of Sustainable Development in South Kesteven

<https://southkesteven.oc2.uk/document/1/32#d33>

Development proposals in South Kesteven will be expected to mitigate against the impacts of climate change and contribute towards creating a strong, stable and more diverse economy.

Development proposals shall consider how they can proactively minimise:

- a. the use of resources, and meet high environmental standards in terms of design and construction with particular regard to energy and water efficiency;
- b. the effects of climate change and include measures to take account of future projected scenarios in the climate locally;
- c. the need to travel, and wherever possible be located where services and facilities can be accessed more easily through walking, cycling or public transport; and

- d. the production of waste both during construction and occupation.

Development proposals shall consider how they can proactively avoid:

- e. developing land at risk of flooding or where development would exacerbate the risk of flooding elsewhere.
- f. the pollution of air, land, water, noise and light

Development proposals shall consider how they can proactively encourage, as appropriate:

- g. the use of previously developed land, conversions or the redevelopment of vacant or unutilised land or buildings within settlements; and
- h. the use of sustainable construction materials as well as the reuse of construction materials on site.

Development proposals shall consider how they can proactively support:

- i. strong, vibrant and healthy communities, by providing a supply of housing which meets the needs of present and future generations

Development proposals shall consider how they can proactively enhance the District's:

- j. character;
- k. natural environment and ability to natural store carbon through green infrastructure,
- l. cultural and heritage assets;
- m. services and infrastructure, as needed to support development and growth proposals.

*Response to SD1: The Principles of Sustainable Development in South Kesteven*

*“How they can minimise the need to travel”... the site is located too far away from the town centre for any option apart from driving. It is not a spur from the town centre but a bolt on to the northerly side of an existing and already quite distant estate.*

*Point f: Pollution. As discussed this is a major issue in Grantham. (See previous responses).*

## Chapter 6 – Spacial Strategy

<https://southkesteven.oc2.uk/document/1/44#d45>

### SP1: Spatial Strategy

The Local Plan will deliver sustainable growth across the District and throughout the Plan Period (2021-2041). To achieve new growth the Local Plan includes allocations for both housing and employment land.

All allocations proposed in the Local Plan are the most suitable and sustainable development options and provide for a variety of site types and sizes to ensure choice is offered to the market and delivery is achievable.

The housing need for South Kesteven, using the Standard Method, is 14,020 new dwellings. To ensure the need is met in full, the minimum Local Plan requirement for South Kesteven is 14,020 dwellings across the period 2021 to 2041.

The overall strategy of the Local Plan is to deliver sustainable growth, including new housing and job creation, in order to facilitate growth in the local economy and support local residents. The focus for the majority of growth is in and around the sub-regional centre of Grantham and the three market towns, with Grantham being a particular focal point.

Larger Villages will provide a supporting role in meeting the development needs of the District. Development should create strong, sustainable, cohesive and inclusive communities, making the most effective use of appropriate previously developed land (where possible) and enabling a larger number of people to access jobs, services and facilities locally. Development should provide the scale and mix of housing types that will meet the identified need for South Kesteven (as informed by the Local Housing Needs Assessment) and a range of new job opportunities in order to secure balanced communities (as informed by the Employment Land Study).

Decisions on investment in services and facilities, and on the location and scale of new development, will be taken on the basis of the Settlement Hierarchy as set out in Policy SP2.

6.8 Grantham is a sub-regional centre and to ensure that Grantham continues to function effectively in that role both for the District and wider region, the majority of growth both already consented and proposed in the Local Plan is focused on Grantham.

6.9 Grantham and the three market towns - Stamford, Bourne, and The Deepings offer services and facilities to their local communities as well as supporting the network of larger villages and smaller settlements located around them. In order to ensure the continued success of these Market Towns development proposals which support and enhance their role as service centres will be supported. The Local Plan

will aim to protect existing retail and community facilities and to ensure that new housing and employment-generating development is sustainably located so as to complement the natural and built environments of the four Towns.

6.10 Beyond Grantham and the three market towns (Stamford, Bourne, and The Deepings) the Larger Villages (as listed in Policy SP2) are considered to be the next most sustainable locations for growth within the District and therefore should positively contribute towards meeting the District's overall growth needs. Allocations are proposed in some of these settlements, and the appropriateness of these sites has been demonstrated through a robust appraisal process.

*Response to 6.8 to 6.10*

*The three market towns are "considered to be the next most sustainable locations for growth". It should be noted that Bourne seems to have a far lower level of proposed development than you would expect. Why is this?*

## SP2: Settlement Hierarchy

<https://southkesteven.oc2.uk/document/1/44#d50>

In order to address the District's growth needs the Local Plan proposes that:

1. The majority of development will be focused in Grantham in order to support and strengthen its role as a Sub-Regional Centre. New development proposals will be supported on appropriate and deliverable brownfield sites and on sustainable greenfield sites (including urban extensions), **where development will not compromise the town's nature and character.\***
2. Development which maintains and supports the role of the three market towns of Stamford, Bourne and the Deepings, will be allowed, provided that it does not compromise their nature and character. Priority will be given to the delivery of sustainable sites within the built up part of the town and appropriate edge of settlement extensions.\*

### *Response to SP2: Settlement Hierarchy*

*It is very hard to find any way that a development built on to a hillside within view of the town's Grade 1 listed heritage sites, and becoming the first major development to encroach in to the Grantham "bowl" of surrounding hillside, can not compromise the town's nature and character.*

*If the land was not prominent hillside then this would not be such an issue. But it is, and it is nonsensical to ignore these facts.*

## SP4: New Residential Development on the Edge of Settlements

<https://southkesteven.oc2.uk/document/1/44#d54>

Proposals for new residential development on the edge of a settlement, as defined in Policy SP2, which are in accordance with all other relevant Local Plan policies, will be supported provided that the essential criteria a – d below are met. The proposal must:

- a. demonstrate clear evidence of substantial support from the local community\* through an appropriate, thorough, and proportionate pre-application community consultation exercise. Where this cannot be determined, support (or otherwise) should be sought from the Town or Parish Council or Neighbourhood Plan Group or Forum, based upon material planning considerations;
- b. be well designed and appropriate in size / scale, layout and character to the setting and area;
- c. be adjacent to the existing pattern of development for the area, or adjacent to developed site allocations as identified in the development plan;
- d. not extend obtrusively into the open countryside and be appropriate to the landscape, environmental and heritage characteristics of the area; and
- e. meet a proven local need for housing and seeks to address a specific targeted need for local market housing.

\* the term 'demonstration of clear local community support' means that at the point of submitting a planning application to the local planning authority, there should be clear evidence of local community support for the scheme, with such support generated via a thorough, but proportionate, pre-application consultation exercise, where demonstratable evidence of local community support or objection cannot be determined, then there will be a requirement for support from the applicable Parish or Town Council or Neighbourhood Plan Group. If an application is in doubt as to what would constitute a 'thorough but proportionate', preapplication consultation exercise, then the applicant should contact the applicable local planning authority.

*Response to SP4: New Residential Development on the Edge of Settlements.*

*Point (a) “demonstrate clear evidence of substantial support from the local community” – we can clearly show opposition from the vast majority of the community.*

*Point (d) "be appropriate to the landscape, environmental and heritage characteristics of the area". The site will certainly degrade the Belton House NT approach and views from the house, the Belmont Tower and St Wulframs church.*

*Point (e) is questionable. Grantham already has vast numbers of houses planned. Plus we know of other sites not included in these plans which developers will want to develop.*

## Chapter 7 – Meeting Housing Needs

<https://southkesteven.oc2.uk/document/1/62#d65>

7.4 Further to identifying the housing requirement, it is also considered to be necessary to consider the distribution of housing across South Kesteven as part of the review of the Local Plan. Table 3 below sets out the percentage distribution based on completions, current commitments, adopted Local Plan allocations and windfall (see Table 2). This distribution is heavily influenced by the scale of allocations made in the adopted Local Plan.

*Table 3: Current Percentage distribution of development*

<b>Current percentage distribution of development</b>	
<b>Grantham</b>	49%
<b>Stamford</b>	13%
<b>Bourne</b>	10%
<b>The Deepings</b>	8%
<b>Larger Villages</b>	15%
<b>Other Settlements</b>	5%

*Response to 7.3: Existing and Proposed Housing Supply*

*The housing allocations do not take in to consideration delays to existing planned estates. Grantham is in danger of having too many developments occurring at the same time across the north of the town. We are potentially looking at FOUR major development sites at the same time across a TWO MILE distance. Over 3,500 new homes in such a small area.*



## Chapter 10 – Protecting and Enhancing the Natural and Built Environments

<https://southkesteven.oc2.uk/document/1/118#d121>

### EN1: Landscape Character

South Kesteven's Landscape Character Areas are identified on the map above (Figure 14). Development must be appropriate to the character and significant natural, historic and cultural attributes and features of the landscape within which it is situated, and contribute to its conservation and enhancement, and where relevant, its restoration.

In assessing the impact of proposed development on the Landscape, relevant Landscape Character Appraisals should be considered, including those within Neighbourhood Plans. Consideration should also be given to the Points of the Compass Assessments.

### *Response to EN1: Landscape Character:*

*The site allocation SKPR-57 is NOT appropriate to the character and historic/cultural attributes of Belton House NT and the Belmont Tower. The approach to Belton House NT for the majority of visitors will involve driving past site SKPR-57. At present the view is of rolling fields and gives the impression of a rural property set in a rural surround. If this is developed it will go against the heritage feel of the property.*

## Biodiversity and Geodiversity

<https://southkesteven.oc2.uk/document/1/118#d123>

10.4 The NPPF states "the planning system should contribute to and enhance the natural and local environment by:

- protecting and enhancing valued landscapes, geological conservation interests and soils;
- preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability; and

*Response to 10.4:*

*SKPR-57 is a much-valued landscape by many generations of Granthamians.*

*SKPR-57 will contribute to unacceptable air pollution in the north of Grantham due to adding many thousands more people to already congested roads. Grantham is already under an air quality monitoring programme for this exact reason.*

## Green Infrastructure

<https://southkesteven.oc2.uk/document/1/118#d128>

10.15 The concept of green infrastructure involves a connected approach to environmental management. It utilises a landscape scale approach and focuses on the relationships between habitats, greenspaces, such as green open spaces, blue spaces as networks and the wildlife/communities that they benefit, rather than on the needs of individual sites, species and neighbourhoods. Green infrastructure provides multiple benefits and vital functions for the economy, people, wildlife and communities including health, tourism, flood management, climate change mitigation and clean air. It will be highly valued and considered a priority within planning.

10.16 Green Infrastructure should provide for multi-functional uses for example wildlife, recreational and cultural experience, as well as delivering ecological benefits, flood protection and microclimate control. It includes habitats, rivers and their floodplains, greenspaces and civic areas and should operate at all spatial scales from urban centres through to open countryside. As such Policy OS1 should be read in conjunction with EN3.

10.17 Connectivity between different green infrastructure assets can help maximise the benefits that they generate. Well-connected green infrastructure assets create a network that allows and encourages movement by people and wildlife, helping to maximise the benefits and support adaptation and resilience to a changing climate.

10.18 The Council will work to ensure the promotion of green infrastructure, prioritising proposals that contribute to net gain and enhancement of green infrastructure.

10.19 Green Infrastructure and Biodiversity Opportunity Mapping has been prepared for South Kesteven District Council by the GLNP. These maps identify the known existing areas of high biodiversity value and areas of local biodiversity priority where it is considered most important and feasible to target habitat creation, extension, and restoration. To complement these maps, a set of principles has been prepared to guide development proposals that fall within or overlap the biodiversity opportunity areas. Development proposals are required to have regard to the above evidence and the biodiversity opportunity principles.

**Policy Type:** Significant Changes to Policy

*Response to 10.15 to 10.19: Green Infrastructure*

*Our site as a green open space for the community offers physical health, mental health, **enhanced emotional wellbeing** and clean air benefits to our community. The proposed development will leave this area of Grantham with no easily accessible green open space but instead will create a pollution issue, increase poor mental health and large increase in traffic with residents seeking places to walk their dogs.*

*There is also a social issue here. The residents who cannot afford to play golf or a National Trust membership will have a vastly reduced option as to where to walk for **mental and physical health benefits**. It is vital this last refuge of green open space is available for public use.*

## Pollution Control

<https://southkesteven.oc2.uk/document/1/118#d131>

10.20 The NPPF sets out the need for local authorities to consider the impact of new development on noise, air and light pollution. The aim of the NPPF is to ensure that new developments do not harm existing residents, future residents or the natural environment. This includes minimising air, noise, light pollution, managing odour and maintaining or improving water quality to ensure that new developments are not harmful to other land uses, human health, tranquillity or the natural and built environment. The NPPF states that the local plan should seek to avoid and mitigate the impacts of pollution associated with development.

10.21 Potentially noisy developments will be expected to be accompanied by an appropriate noise assessment. Developers will be required to demonstrate the potential impact of proposals on the environment and on residential amenity and the ability to mitigate to an acceptable level.

10.22 Light pollution refers to the effect of excessive or intrusive lighting arising from poor or insensitive design. The Council will seek to reduce light pollution by encouraging the installation of appropriate lighting and only permitting lighting proposals which would not adversely affect amenity or public safety. Lights should be appropriately shielded, directed to the ground and sited to minimise any impact on adjoining areas, and of a height and illumination level of the minimum required to serve their purpose.

10.23 There is one Air Quality Management Area (AQMA) within the District. This is located in Grantham. This AQMA is within the urban area where air pollution results mainly from traffic. Air quality will be considered when assessing development proposals, particularly in or near the AQMA and where significant doubt arises as to the air quality impact then a cautious approach will be applied.

10.24 The Council is committed to improving air quality in the District and, where relevant, will follow the guidance in the East Midlands Air Quality Network Air Quality and Emissions Mitigation Guidance for Developers June 2017 (or other relevant guidance).

**Policy Type:** To be reviewed once evidence is finalized

*Response to 10.20 to 10.24: Pollution Control*

*During construction this area will have a 440 home development directly to the East, and over 2,500 to the West. This will continue for at least a decade. Adding to this another 628 house development will plunge the residents of north Grantham into a decade long development pollution. Not just in the air but from construction noise, vehicles and the inevitable works required for services, drainage, waste and so on.*

#### EN4: Pollution Control

<https://southkesteven.oc2.uk/document/1/118#d132>

Development should seek to minimise pollution and where possible contribute to the protection and improvement of the quality of air, land and water. In achieving this:

Development should be designed from the outset to improve air, land and water quality and promote environmental benefits.

Development that, on its own or cumulatively, would result in significant air, light, noise, land, water or other environmental pollution or harm to amenity, health well-being or safety will not be permitted. New development proposals should not have an adverse impact on existing operations.

Development will only be permitted if the potential adverse effects can be mitigated to an acceptable level by other environmental controls, or by measures included in the proposals.

Development that would lead to deterioration or may compromise the ability of a water body or underlying groundwater to meet good status standards in the Anglian River Basin Management Plan (required by the Water Framework Directive) will not be permitted.

Where development is situated on a site with known or high likelihood of contamination, remediation strategies to manage this contamination will be required.

Subject to the Policies in this Plan, planning permission will be granted for development on land affected by contamination where it can be established by the proposed developer that the site can be safely and viably developed with no significant impact on either future users or on ground and surface waters.

*Response to EN4: Pollution Control*

*Site allocation SKPR-57 will considerably add to air pollution in Grantham. This is undeniable. Due to the nature of the northern area of Grantham the ability to build roads to ensure less congestion is questionable. Gonerby Hill Foot, in particular, resides within two converging railway lines. It is this "triangle" which provides little opportunity for traffic or pedestrians to use anything other than two main routes (one North and one South). This development will add much more traffic to the roads and further remove the local population's ability to enjoy a green open space.*

*There is no doubt that the Grantham road network along North Parade and Brook Street will be impacted with increased pollution. The local Senior school for example has no more capacity, which raises the question of where the pupils will have to travel for school from within the area.*

*The King's school has setup an air pollution monitoring station due to the dangerous levels of NO2 circulating round this area of the town.*

## The Historic Environment

<https://southkesteven.oc2.uk/document/1/118#d137>

10.43 The National Planning Policy Framework (NPPF) states that the Local Plan should set a positive strategy for the conservation and enjoyment of the Historic Environment. The Local Plan should take account of:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- the desirability of new development making a positive contribution to local character and distinctiveness; and
- opportunities to draw on the contribution made by the historic environment to the character of a place.

10.44 The Council has adopted a number of policies relating to the historic environment in the past and to date a number of conservation area appraisals have been produced and 48 conservation areas declared. The District has the following designated heritage assets:

Conservation Areas	48
Listed Buildings	2150
Scheduled Monuments	92
Historic Parks and Gardens	10

Policy Type: Significant Changes to Policy

*Response to 10.43 and 10.44 The Historic Environment.*

*The main approach to Belton House NT estate is via the Belton Lane road which already has a 440 home development being built along it. To add this further development (which runs alongside the road) will damage the rural feel to the*



*approach to the historic Belton House estate. Instead of a rural environment the visitor will feel the grounds are encroached by modern housing. A damaging feel for this historic site.*

*SKPR-57 is visible from both Belton House NT and the Belmont Tower. It lies above the 60m protection contour and should, therefore, be rejected.*

*The approved development of 440 new homes, to the East of our proposed site, is set way back from Belton Lane. No consideration or mitigation has been given by the planning team regarding SKPR-57's vicinity to Belton Lane.*

## EN6: The Historic Environment

<https://southkesteven.oc2.uk/document/1/118#d138>

The Council will seek to protect and enhance heritage assets and their settings in keeping with the policies in the National Planning Policy Framework.

Development that is likely to cause harm to the significance of a heritage asset or its setting will only be granted permission where the public benefits of the proposal outweigh the potential harm. Proposals which would conserve or enhance the significance of the asset shall be considered favourably. Substantial harm or total loss will be resisted.

### Summary of Proposed Changes

Policy EN6 has been separated out into sections on conservation areas, Designated Heritage Assets/Listed Buildings Scheduled Monuments Non-Designated Heritage Assets and Archaeological Assets. This is to allow each of these heritage assets to be assessed individually, and allows the council to provide a more detailed advice for each asset. The more detailed Policy now provides information on what needs to be considered as part of the planning process for developments.

### *Response to EN6 The Historic Environment.*

*Considering there are other sites away from the BeltonHouse NT estate that could be used I see no reason this development should be allowed so close to this leading NT Grade 1 listed national treasure.*

## Open Space, Sport and Recreation

<https://southkesteven.oc2.uk/document/1/143#d152>

11.10 This section of the Local Plan Review outlines the current open space provision and future open space requirements across South Kesteven. A Play Pitch Strategy is also being prepared to assess indoor play space provision across South Kesteven, this study will not form part of the open space section for the draft local plan review as the report is not yet finalised. The complete Play Pitch Strategy will inform the pre-submission version of the local plan review.

11.11 The district of South Kesteven has circa 2,670ha of identified open spaces, which includes Allotments, Community Gardens, Amenity Greenspace, Churchyards and Cemeteries, Natural and Semi-Natural Greenspace, Outdoor Sports Facilities, Parks and Gardens and Provision for Children / Young People. Due to its rural nature, nearly half of the identified open spaces across South Kesteven consist of Natural and Semi Natural Greenspaces.

11.12 Accessible, good quality open spaces can make a significant quality of life contribution to the residents of South Kesteven, along with providing wider benefits such as; broadening the districts tourism offer, managing flood risk, supporting biodiversity and providing valuable green infrastructure links to better adapt to changing climate. Therefore, the Local Plan review will ensure that open spaces across the district are protected in order to enhance and secure these benefits for the future.

11.13 As the population of South Kesteven continues to grow, new residential development will create additional demand and pressure on existing open spaces. Therefore, the Local Plan review will require new developments to include a level of new open space provision. In order to ensure that the future needs associated with population and development growths can be met.

*Response to 11.10 to 11.13 Open Space, Sport and Recreation.*

*Site allocation SKPR-57 is an accessible, good quality open space which makes a significant quality of life contribution to hundreds of residents of South Kesteven. The health benefits to the residents and their pets is high. This was particularly apparent during the recent lockdown. Without this area the residents will have to drive to access green open space.*



## National Open Space Policy Context

<https://southkesteven.oc2.uk/document/1/143#d153>

11.14 On a national scale the provision of open spaces and facilities within cities, towns and villages is of high importance to a sustainable future and is embedded in national planning policy. The National Planning Policy Framework (2023) recognises the opportunities that appropriately located and well-designed open spaces can provide and outlines that access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. In terms of open space policies, The National Planning Policy Framework (2023) states that policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and identify the opportunities for new provision.

11.15 The benefits of open space provision also cross over into many other parts of the NPPF including;

- Promoting Healthy and Safe Communities;
- Delivering Sustainable Development;
- Supporting a Prosperous Rural Economy;
- Promoting Sustainable Transport;
- Achieving Well Designed Places;
- Conserving and Enhancing the Natural and Historic Environment; and
- Meeting the challenges of climate change

11.16 In addition to National planning policy there is planning practice guidance in the form of 'Open Space, Sports and Recreation Facilities; Public Rights of Way; and Local Green Space (2014)' which provides advice on open space, sports and recreation facilities, public rights of way (PRoW) and the Local Green Space designations. The guidance states that it is for local planning authorities to assess the need for open space and opportunities for new provision in their areas.

*Response to 11.14 to 11.16 Open Space, Sport and Recreation.*

*“The National Planning Policy Framework states policies should be based... up-to-date assessments of the need for open space”. There is no trace of this assessment being carried out that we can find.*

## Local Open Space Policy Context

<https://southkesteven.oc2.uk/document/1/143#d154>

11.17 The Council's Corporate Plan for the period of 2020-2023 sets out a vision to be "*the best district in which to live, work and visit*". The Council aims to continue developing a clean and green future, working with others to ensure that how we live and work represents, *healthy and strong communities and* clean and sustainable environments.

11.18 South Kesteven have also published a Sport and Physical Activity Strategy (2021). The Strategy states that the district has a wealth of community assets, leisure facilities, parks, countryside paths and open spaces to provide opportunities to be active. It also outlines opportunities to be focused in areas that will make the most difference to local people, especially areas identified with health inequalities. Furthermore, an action plan has been established by the study which sets out to achieve various 'active' goals such as encouraging participation and accessibility for whole community's and investment in leisure facilities to meet needs of the district.

11.19 In terms of climate change, the Climate Action Strategy (2023) seeks to set out how the Council can respond to the global issue of climate change at a local level, and it aims to provide a clear place-based vision for District's approach to climate adaptation to living in a warmer world. The Climate Action Strategy provides a framework for the District to reduce carbon emissions and safety adapt to the unavoidable impacts of climate change. The following key co-benefits relate directly to open space:

- Improving health and wellbeing;
- Improving air quality;
- Boosting biodiversity; and
- Ensuring a fairer society.

11.20 South Kesteven also contains a number of areas which have prepared Neighbourhood Plans, some of these contain designations for Important Open Space or an equivalent. These open spaces have not been duplicated as part of this policy, as they have their own protection through the Neighbourhood Plan in which they are designated.

*Response to 11.17 to 11.20 Local Open Space Policy Context*

*11.20 states... “These open spaces have not been duplicated as part of this policy, as they have their own protection through the Neighbourhood Plan in which they are designated.” The residents of GHF have not had a Parish Council (Town Council) for decades and so the opportunity to protect local areas via a Neighbourhood Plan has been denied to the residents.*

*This inability to create a Neighbourhood Plan and protect Grantham’s open countryside leaves SKDC open to the question of fairness and equality compared to the lesser allocated areas such as Bourne, Stamford and the Deepings.*

## GR1: Protecting and Enhancing the Setting of Belton House and Park

<https://southkesteven.oc2.uk/document/1/160#d164>

### *Response to GR1: Protecting and Enhancing the Setting of Belton House and Park.*

*The park setting will be impacted by site SKPR-57 as the majority of the builds will be above the built on the ridge way and slopes facing Belton House and visible from the park, Belmont Tower and the town.*

*Some of the allocated site is also visible from Belton House roof. The all important approach to the estate will be heavily impacted. This contradicts the SKDC policy (2010) to protect Belton.*

*SKDC carried out a comprehensive study into the house and park setting. This laid out clear protections for the Grade 1 listed estate. The findings of the study were adopted by the council in 2010. The study states this policy is particularly important in view of the then growth point status.*

## GR3: Grantham Allocations

12.21 Over half of the current existing total housing land supply is located within Grantham. This also takes into account the retained allocations (Spitalgate Health Garden Village, Rectory Farm (Phase 2 and Phase 3), and Prince William of Gloucestershire Barracks).

12.22 The proposed site allocations (Land at Sheepwash Lane, Grantham Train Station, Land at Belton Lane, and The Grantham High School Playing Fields) and retained allocations are expected to deliver 5,693 new homes across the plan period up to 2041. This approach ensures development is located in the most sustainable locations and ensures Grantham meets its growth needs and fulfils its role a sub-regional centre.

### *Response to GR3: Grantham Allocations.*

*We are aware of various other developments which are intended to be built in and around Belton Lane and the village of Great Gonerby. It is vital for the already overdeveloped north of Grantham that SKDC planning listen to local people and developers in order to ensure the area is developed in a controlled and sustainable manner.*



## SKPR-57 Land off Belton Lane

<https://southkesteven.oc2.uk/document/1/160#d180>

Indicative Unit Numbers: 628

Assumed Density: 30 Dwellings per hectare

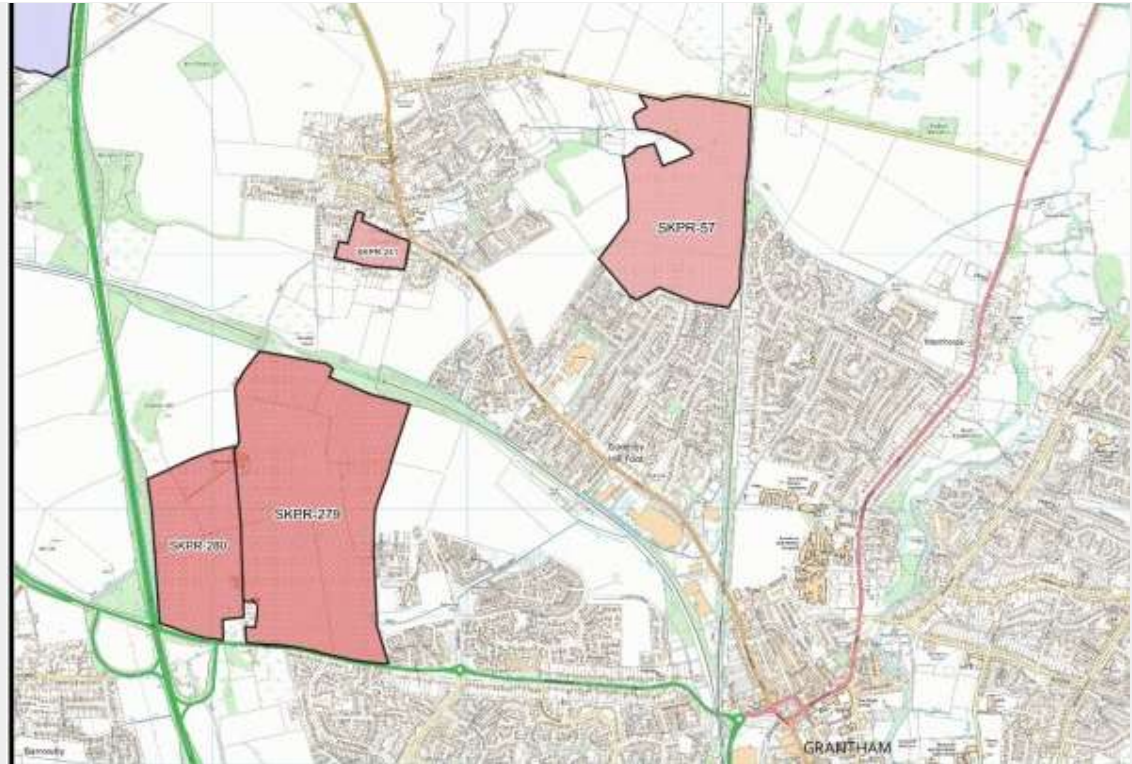
The following development principles accompany this allocation:

- A comprehensive masterplan is required for the entire site.
- The masterplanning and development of the site should have regard for landscape and topography. No development will occur above the 60m contour.
- The development will make provision towards the upgrading of Belton Lane/Newark Hill junction and footway and cycle connections.
- Highway connections should be made from the adjacent development to the south, where possible.
- Highway, footway, cycleway connections should be provided throughout the site connecting it to local schools, community facilities and into the wider town.
- A public right of way runs through the site this should be retained and incorporated into the development of the site, where possible.
- Suitable noise attenuation will be required along the eastern boundary of the site.
- Impact on heritage features will need to be considered, specifically the development should incorporate views towards heritage assets (i.e., Bellmount Tower, Belton House Grade I Park and Garden, St Wulfram's Church, St Johns Church) and their settings.
- The development proposal must take into account the Belton House Park Setting Study in Policy GR1.

- There is the potential for archaeological remains on this site and the appropriate pre-commencement investigations should be carried out.
- This site is within or includes a Green Infrastructure Area. Proposals on this site should incorporate the relevant principles for development within Green Infrastructure Areas set out in Policy EN3 Green Infrastructure.

### Response to SKPR-57 Land off Belton Lane

- *“No development will occur above the 60m contour” – a large proportion of the land is ABOVE the 60m contour. This is a major flaw in the allocation of this site as it is not only above the 60m contour but visible from Belton House itself. It also cuts in to the visible skyline which is against recommendations. NOTE: Due to SKDC planning oversight , the 60 metre requirement is a mistake they made within the local plan. SKDC have made no attempt to inform residents of this gross incompetency.*
- *The provision towards the upgrading of the Belton Lane/Newark Hill junction will be extremely expensive. Something that a 628 home development will not be affordable. Hence, this allocation will be unachievable. This junction will require a very large sum of money to cover the engineering costs.*
- *Highways connections from the South would mean interlinking the northern Belton Lane road with the Gonerby Hill Foot estate creating a major north-south rat run for traffic from the A607. This is not sustainable and would be a traffic disaster for the estate and Grantham as a whole.*
- *Impact on heritage features are important. Not only is this site visible from Belton House it will hugely impact the approach to the parkland removing the visitors impression that Belton House is situated in a rural environment. Not only is this site visible from the house but very much from the Belmont Tower.*
- *The view from the grade 1 listed St Wulfram’s will also be impacted as well as the important feel that Grantham is within a green bowl of surrounding hillside.*



*The wider context for North Grantham must also be taken in to account.*

*Including the Rectory, Priory and Allison Homes developments, this area has already over 3,000 new homes being developed with little regard for highways infrastructure. In particular the Belton Lane road itself is facing the possible build of over 1,600 homes accessing using Belton Lane. The road contains a 7.5 Tonne restricted bridge and various pinch points. No pedestrian walkways.*

*The cost to replace the bridge would be £millions and arguably not achievable.*

- The impact on Grantham town centre would be great. With increased traffic at both Manthorpe Road and North Parade. More congestion, more pollution.*
- The design and layout of Gonerby Hill Foot estate would mean use of this for access creates small residential side roads being converted into busy access roads, when they are already condensed, blocked and hard to navigate.*

## ID2: Transport and Strategic Transport Infrastructure

<https://southkesteven.oc2.uk/document/1/291#d296>

South Kesteven District Council and its delivery partners will support and promote an efficient and safe transport network which offers a range of transport choices for the movement of people and goods reduces the need to travel by car and encourages use of alternatives, such as walking, cycling, and public transport.

New development will be required to contribute to transport improvements in line with appropriate evidence, including the Infrastructure Delivery Schedule, the Local Transport Plan and local transport strategies.

All new developments should demonstrate that they have applied the following principles:

- a) Are located where travel can be minimised;
- b) the use of sustainable transport modes maximised;
- c) Reduce additional travel demand through the use of measures such as travel planning, safe and convenient public transport, dedicated walking and cycling links and cycle storage/parking links and integration with existing infrastructure;
- d) Seek to generate or support the level of demand required to improve, introduce or maintain public transport services, such as rail and bus services;
- e) Do not severely impact on the safety and movement of traffic on the highway network or that any such impacts can be mitigated through appropriate improvements, including the provision of new or improved highway infrastructure; and
- f) Ensure that transport is accessible to all. This should include appropriate provision for vehicle, powered two wheeler and cycle parking for residents, visitors, employees, customers, deliveries and for people with impaired mobility.

Compliance with the criteria of this policy should be demonstrated through the provision of a transport Statement/Assessment and/or a travel plan as appropriate.

*Response to ID2: Transport and Strategic Transport Infrastructure*

*Point a) says located where travel can be minimized. Site allocation SKPR-57 is some distance from the town centre and will involve vehicular use. The vast majority of the residents would not be prepared to walk or travel from that distance away. The allocated site is not built within Grantham's boundaries, but is a rural allocation some distance from local facilities and the town centre.*

*Point e) "Do not severely impact on the safety and movement of traffic on the highway network... provision of new or improved highway infrastructure".*

*Lincolnshire County Council Highways has already stated in the site assessment survey that this "Overall mitigation required probably too great for site". It is inconceivable that planners would ignore such a clear signal from LCC that this site is not appropriate, and the infrastructure required would be too great an ask.*



# EVIDENCE BASE

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Comments in regards to the SKDC draft local plan evidence base

## EVIDENCE BASE

1. Sustainability Appraisal
2. Habitats Regulation Assessment
3. Site Assessment



## 1. SUSTAINABILITY APPRAISAL

6.21 Three residential sites (SKPR-57; SKPR-74; SKPR-242) overlap with an area of Biodiversity Action Plan (BAP) priority habitat or other designated habitat. Development at any of these sites should seek to retain and enhance habitats on site and may require mitigation (such as buffer zones) to minimise the potential for negative effects.

### SKPR-57

Site Name Land at Great Gonerby, Grantham

Site Area (ha) 34.9

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Assessed Site
  Surrounding Site

200 0 200 400 600 800 1,000 m

AIR QUALITY	
Air Quality Management Area (AQMA)	Distance: 1787m - South Kesteven District Council No 6 % Overlap with Site Boundary (if any):
BIODIVERSITY AND GEODIVERSITY	
Internationally Protected Site	Distance: The nearest internationally protected site is more than 15km away % Overlap with Site Boundary (if any):
Site of Special Scientific Interest (SSSI)	Distance: 4014m - Allington Meadows % Overlap with Site Boundary (if any):
Local Geological Site	Distance: 5991m - Little Ponton Quarry % Overlap with Site Boundary (if any):
Regionally Important Geological Site	Distance: 7488m - Harlaxton No 4 (Hungerton) Quarry % Overlap with Site Boundary (if any):
Local Wildlife Site	Distance: 1312m - Belton Park and Golf Course % Overlap with Site Boundary (if any):
Local Nature Reserve	Distance: The nearest LNR is more than 15km away % Overlap with Site Boundary (if any):
Ancient Woodland	Distance: 4507m - Minnetts Wood % Overlap with Site Boundary (if any):
Priority Habitat	Distance: 172m - Deciduous woodland % Overlap with Site Boundary (if any): Deciduous woodland (3% Overlap)
HISTORIC ENVIRONMENT	
Grade I Listed Building	Distance: 1074m - Church Of St Sebastian No. of Grade I Listed Buildings within Site Boundary (if any): 0
Grade II* Listed Building	Distance: 1572m - The Mill No. of Grade II* Listed Buildings within Site Boundary (if any): 0
Grade II Listed Building	Distance: 707m - Manor Farm No. of Grade II Listed Buildings within Site Boundary (if any): 0
Scheduled Monument	Distance: 2289m - Grantham market cross

**Note: Local Wildlife Site.. the Golf Course and Belton Park are BOTH pay for places!!!!**

Conservation Area	Distance: 980m - Great Gonerby Conservation Area % Overlap with Site Boundary (if any):
Registered Park and Garden	Distance: 1562m - Belton House % Overlap with Site Boundary (if any):
<b>LANDSCAPE</b>	
Tree Preservation Order (TPO)	Distance: 338m - TPO-401 No. of TPO's within Site Boundary (if any): 0
Flood Zone 2	Distance: 1288 % Overlap with Site Boundary (if any):
Flood Zone 3	Distance: 1298 % Overlap with Site Boundary (if any):
<b>LAND, SOIL, AND WATER RESOURCES</b>	
Agricultural Land Classification – Grade I	% Overlap with Site Boundary (if any); No Overlap with Grade 1 Agricultural Land
Agricultural Land Classification – Grade II	% Overlap with Site Boundary (if any); No Overlap with Grade 2 Agricultural Land
Agricultural Land Classification – Grade III	% Overlap with Site Boundary (if any); 100% - Overlap with Grade 3 Agricultural Land
Mineral Safeguarding Area	% Overlap with Site Boundary (if any):
Mineral Consultation Area	% Overlap with Site Boundary (if any):
River	Distance: 1387m % Overlap with Site Boundary (if any):
Source Protection Zone	% Overlap with Site Boundary (if any); No overlap with Source Protection Zones
<b>COMMUNITY WELLBEING</b>	
Employment Site	Distance: 4385m - SKLP323 % Overlap with Site Boundary (if any):
Primary Service - Shop	Distance: 965m No. of Shops within Site Boundary (if any): 0
Primary Service – Primary School	Distance: 795m No. of Primary Schools within Site Boundary (if any): 0
Primary Service – Secondary School/College	Distance: 1222m No. of Secondary Schools/Colleges within Site Boundary (if any): 0
Primary Service – Surgery	Distance: 1477m No. of Surgeries within Site Boundary (if any): 0
Town Centre	Distance: 2035m - Grantham Town Centre % Overlap with Site Boundary (if any):
Open Space	Distance: 399m - Lyndon/Vernon Ave % Overlap with Site Boundary (if any): 0
<b>TRANSPORTATION</b>	
Bus Route	Distance: 880m
Bus Stop	Distance: 382m No. of Bus Stops within Site Boundary (if any): 0
Train Station	Distance: 3034m No. of Train Stations within Site Boundary (if any): 0
Public Right of Way (PROW)	Distance: 193m - East of Great Gonerby to Manthorpe SK93 NW

**Notes:**

\* Distances from sites to constraints have been calculated from a single point at the centre of each site boundary

\*\* % Overlaps and Point Counts have been generated using the full extent of the site boundary of each site

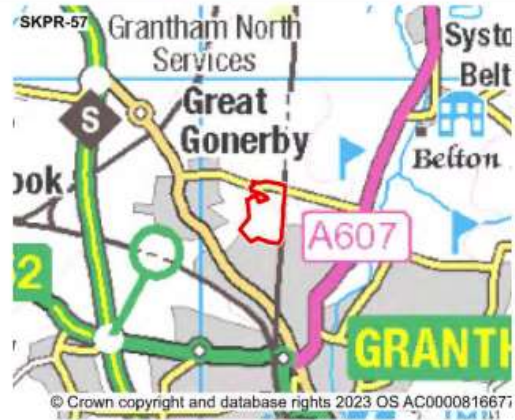
\*\*\* In cases where % Overlap is 0 this means the constraint is **adjacent** to the site. Sites with no overlaps will be left blank

## **2. Habitats Regulation Assessment**

SKPR-57 – Land off Belton Lane The policy sets out that: - 628 dwellings are anticipated to be delivered on the site during the Plan period. The rest of the policy is development management criteria. No likely significant effects. The policy allocates 628 dwellings to this site in Grantham. While this will lead to an increase in the local population, likely significant effects can be excluded on the basis of evidence presented in Chapter 5. Therefore, there are no linking impact pathways and site allocation SKPR-57 can be screened out from Appropriate Assessment.

### 3. Site Assessment

Ref: <b>SKPR-57</b>	Parish: Grantham	Proposed Use: Residential	Preferred Site: <b>Yes</b>
Location: Land off Belton Lane, Great Gonerby, NG31 8NB		Land Type: Greenfield	Site Size: 34.9



#### Major Constraints

Constraint	Assessment
Settlement Hierarchy	Grantham
Site Deliverability Timetable	Medium Term (5-10 years)
Located / Overlap with a Flood Zone	No
% of Overlap with Flood Zone 2	N/A
% of Overlap with Flood Zone 3	N/A
Statutory consultee comment on Flood Risk (Environment Agency)	No comment from Environment Agency
Surface Water Flood Risk	Yes
Proximity to closest Designated Site (SAC, SPA, SSSI)	0km - 5km
Statutory consultee comment on Designated Site (SAC, SPA, SSSI)	No comment from Natural England
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	Major
Statutory comments on Highway Network (Lincolnshire County Council)	Access at Belton Lane acceptable in principle subject to TA. Traffic impact at junctions on Belton Lane with Newark Hill and A607 likely to need significant junction upgrades. Footway/cycleway connections needed to be provided along Belton Lane to Great Gonerby (around 1km). Site should also provide footway/cycleway connections to residential to south. Overall mitigation required probably too great for site.
Does the site have suitable access	Yes
Site Affected by Minerals and Waste Policy	No
Minerals and Waste Policy Code	N/A
Statutory consultee comment on Minerals and Waste	No comment from Lincolnshire County Council

Ref: **SKPR-57** Parish: Grantham Proposed Use: Residential Preferred Site: **Yes**

## Other Constraints

Proximity to Local Wildlife Sites	1 - 1.75km
Proximity to Local or Regional Geological Sites	0.1km+
Statutory consultee comment on Local Wildlife Site (Greater Lincolnshire Nature Partnership)	No comment from Greater Lincolnshire Nature Partnership
Proximity to Shops	0.5 - 2km
Proximity to public transport	0.25 - 1km
Proximity to medical services	0 - 1.5km
Proximity to Primary School	0 - 1km+
Proximity to Secondary School	0 - 2km+
Proximity to Employment Site	3 - 10km
Proximity to Conservation Area	0.4 - 1km
Listed Building (includes Grade 2* Grade 2 and Grade 1)	0.5 - 1km
Proximity to Schedule Ancient Monuments	1.5km+
Proximity to Registered Park or Garden	0 - 2km
Proximity to Ancient Woodland	3km+
TPO tree on Site	No
Distance from Public Right of Way	0 - 0.2km
Distance from Local Nature Reserve (LNR)	10+ km
Overlap with Agricultural Grade 1	No
Percentage of Overlap with Agricultural Grade 1	N/A
Overlap with Agricultural Grade 2	No
Percentage of Overlap with Agricultural Grade 2	N/A
Overlap with Agricultural Grade 3	Yes
Percentage of Overlap with Agricultural Grade 3	100%
Contaminated Land on Site	No
Air Quality Management Area	0 - 3km
Biodiversity Ecological network - High Quality	No
Biodiversity Ecological network - Opportunity for management	No
Biodiversity Ecological network - Opportunity for creation	No
Green Infrastructure Opportunities – High Quality Green Infrastructure	No
Green Infrastructure Opportunities – Opportunities to Manage Green Infrastructure	Yes

## Main Findings

Site offers a suitable location for housing development, within the 'Sub Regional Centre' of Grantham. Development will enable upgrades to the Belton Lane/Newark Hill junction and will offer footway and cycleways connections into the wider town. Any Impact on local heritage assets and settings can be appropriately mitigated.

# Landscape Character Assessment

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Comments in regards to the SKDC draft local plan landscape character assessment

## South Kesteven Landscape Character Assessment

<https://www.southkesteven.gov.uk/sites/default/files/2023-11/Landscape%20Character%20Assessment%202007.pdf>

### **GRANTHAM SCARPS AND VALLEYS CHARACTER AREA**

#### Landscape Character

4.115 The landscape character varies around the town, with the physical and human influences. In general the character is defined by the residential and industrial development in Grantham following the base of the valleys with rising ground beyond.

4.116 Built development on the rising ground is generally avoided, which gives the town an enclosed character.

4.117 In some of the older parts of town, such as at Somerby Hill, relatively low density housing with mature gardens gives a wooded feel to the valley bottom, with more open arable land in the higher slopes.

4.118 Some more recent higher density development, such as at Gonerby Hill Foot, provides a stark edge to the town, and the housing contrasts with the countryside beyond.

4.119 In general, however, keeping the development to the lower slopes has maintained a rural feel to the higher land, and has contained the urban influence on the wider landscape. 4.120 The parkland at Belton House and Belton Country Club is also distinctive, and a positive influence on the surrounding landscape character

#### **Landscape Sensitivity**

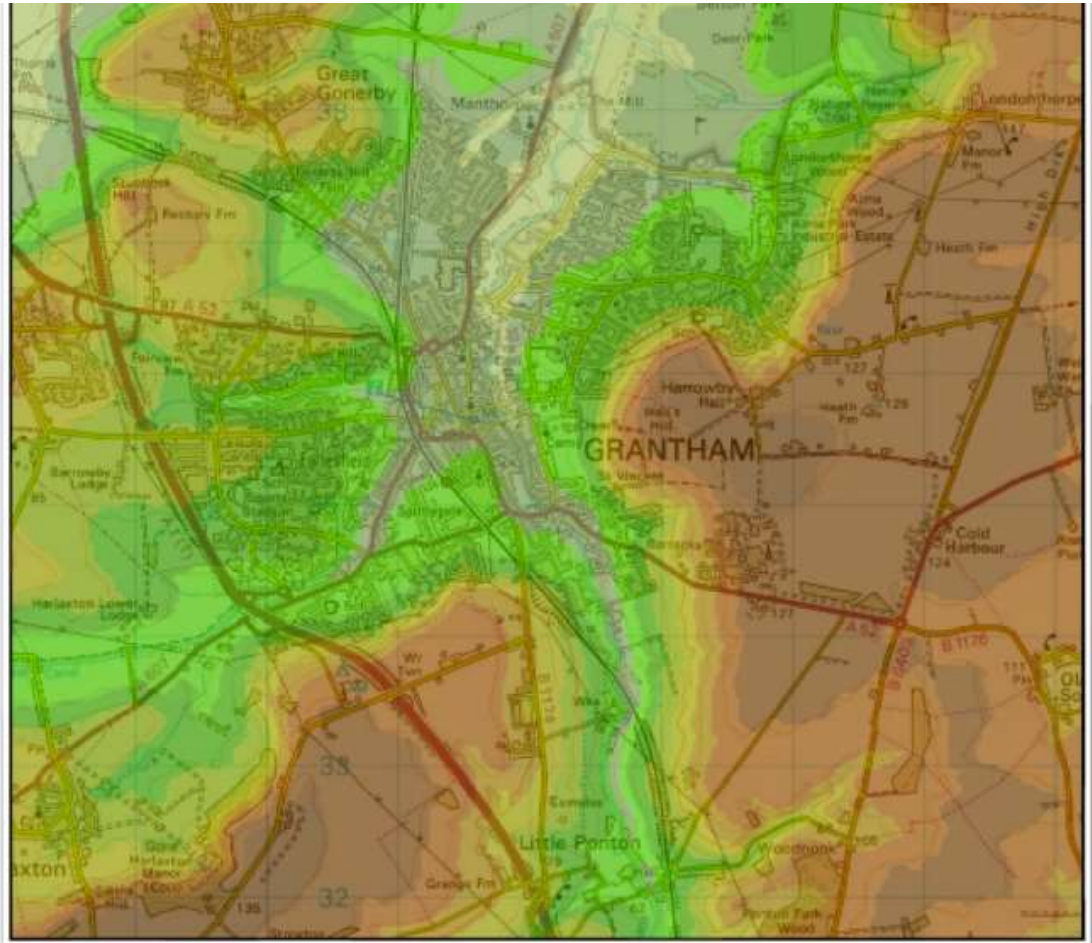
4.131 The Grantham Scarps and Valleys character area is a complex area influenced by the surrounding character areas, and depending on the topography, landscape and human influences. The landscape is generally small in scale, and areas of particular sensitivity includes the historic Belton Park and the wooded and parkland slopes to the east of the town. There are some areas closer to the edge of town, containing little of intrinsic landscape interest, that would offer the scope for development. New development and associated landscape planting could soften some of the existing hard urban edges to the town. Other areas are of medium sensitivity because of the landscape elements, visibility or general character. These areas may offer some scope for development if sensitively designed and mitigated. **The plan at Figure 17 shows area of sensitivity to new employment and residential purposes. Sensitivity would range from to , depending on the nature of the site, and the scale and type of the development proposal. In general terms new development should avoid the higher valley slopes, and should not establish new built development on the skyline.**

4.133 The Landscape Management Objectives for Grantham Scarps and Valleys include;

- Protect and enhance woodlands and parklands.
- Protect and manage field boundaries and hedgerow trees.
- Protect and enhance watercourses.
- Soften harsh urban edges by new woodland planting.
- Avoid built development encroaching on the higher scarp slopes, or 'skylining'.
- Use new development, and associated structural landscape, to soften existing harsh urban edges.
- Maintain a varied urban edge with fringes of countryside extending into the town.
- Consider opportunities for enhanced access to the countryside around the edge of town.
- Protect gaps between Grantham and adjacent villages.
- Where existing development occurs on higher ground such as at Gonerby Hill Foot, consider tree planting proposals to soften the roofscapes on the skyline.

**\* NOTE: many of the Landscape Management Objectives above are being ignored.**





KEY

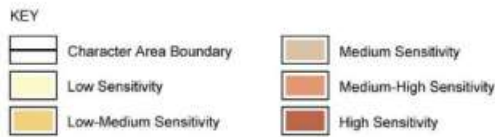
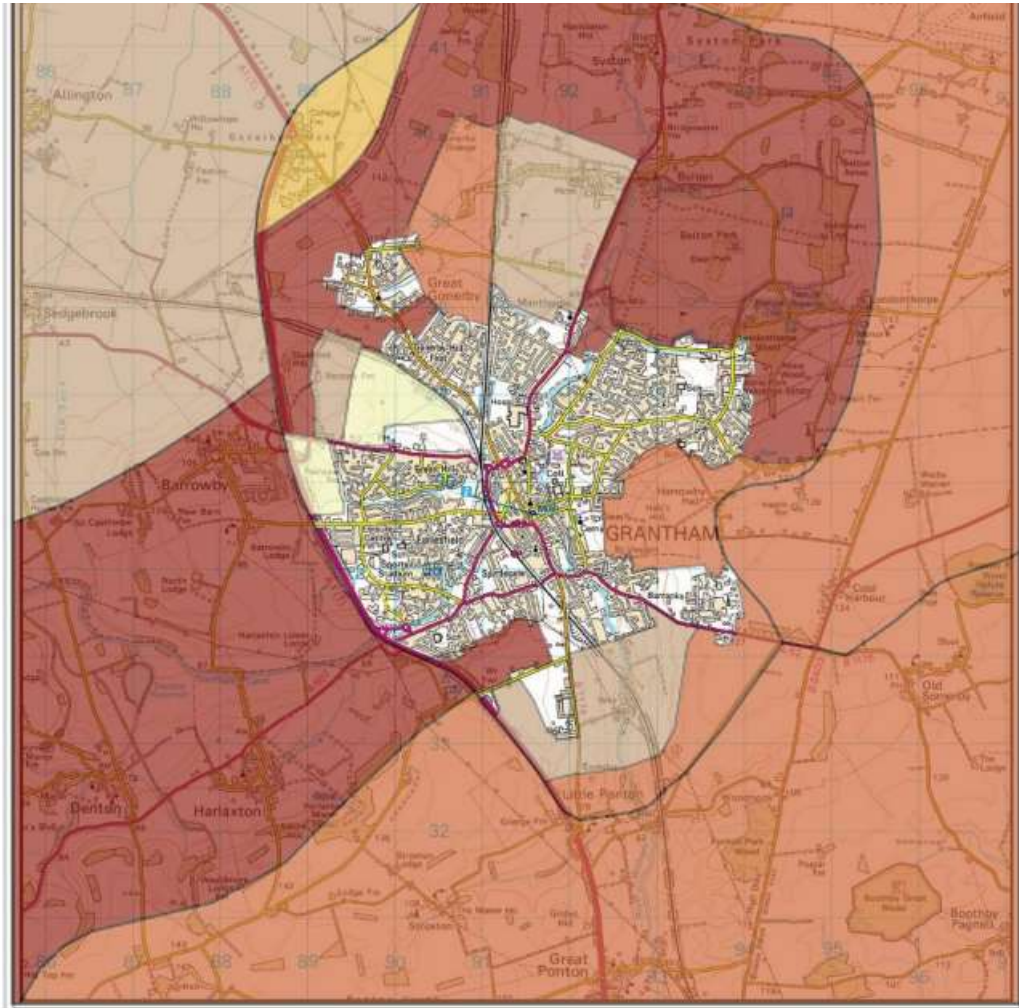


South Kesteven Landscape  
Character Assessment

**TOPOGRAPHY  
AROUND GRANTHAM**

**Figure 15**

July 2006



South Kesteven Landscape Character Assessment

**LANDSCAPE SENSITIVITY FOR EMPLOYMENT AND RESIDENTIAL DEVELOPMENT AROUND GRANTHAM**

**Figure 17**

September 2006

4.174 Landscape Sensitivity to different types of development would vary from character area to character area. The plans at Figures 16 and 17 summarise the sensitivity across the district to residential and employment land development. The plans are based on the potential of the landscape to accommodate new development because of the established character, visibility and type and distribution of landscape elements. A more detailed plan for the area around Grantham is shown at Figure 17. The justification for the sensitivity of the different character areas is contained within the text for each character area.

# Draft Local Plan – F.A.Q.

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Comments in regards to the SKDC draft local plan Frequently Asked Questions  
as taken from the SKDC consultation website

### My community has or is currently preparing a Neighbourhood Plan will this Local Plan affect it?



Neighbourhood planning is part of a Government initiative to devolve decision-making down to local communities, so they have a greater say in issues that affect them. Neighbourhood plans are a statutory plan, which can include general planning policies for the development and use of land in an area, and they can allocate sites for development.

Made Neighbourhood Plans and those which are approved before the Local Plan is in place will continue to carry full weight in decision making. However, where a Neighbourhood Plan conflicts with the Local Plan, the most recently adopted plan will take precedence – whether that is the Local Plan or a Neighbourhood Plan.

Where a community is preparing a neighbourhood plans it needs to be consistent with national planning policy as well as the Council's latest adopted plan. Once the new Local Plan is adopted, there will be scope for neighbourhood plans to be reviewed to reflect our new strategic priorities for the District.

The Council provides support to communities producing a Neighbourhood Plan and more information on Neighbourhood Plans is available on our website. - <https://www.southkesteven.gov.uk/planning-building-control/planning-policy-local-plans/neighbourhood-plans>

**This is a clear disadvantage to Grantham where the communities do not have either a Town or Parish Council, enabling them to put together such a plan. This leaves the townsfolk at a disadvantage and unable to shape the future of their area.**

### What happens to my comments on the draft Local Plan?



We will review and take account of all the comments submitted in helping to inform our approach to the Pre-Submission Local Plan. We will prepare a Consultation Statement detailing comments received and the Council's response, including how the consultation comments will be taken into account as the next version of the plan is prepared.

Taking into account consultation comments received on the Draft Local Plan and any further evidence produced, changes will be made to the emerging Local Plan, as appropriate and published through the next stage of Local Plan consultation: Regulation 19 Pre-Submission Local Plan, in accordance with the Local Development Scheme.

### How do you choose which sites will get built on?



In order to find sites which are suitable for housing and employment development, we have to consider what effect a development would have on the environment, the economy as well as social issues such as whether a site will provide affordable housing, open space or require new schools to be provided. Sites with the most positive social and economic impacts and the lowest environmental impacts are those which are shortlisted.

We also need to consider whether sites are genuinely available for development, and when a development might happen (for example in a year or over 10 years time).

### What about all the extra travel and traffic that will be generated by new development?



Congestion on the local transport network is a significant local issue. We understand that there is a big risk that the unprecedented increase in the number of homes and jobs that we are likely to see in the District could make this worse.

The Local Plan expects that new development is designed to minimise the need to travel in the first place and to promote non-car methods of transport in the first instance, including improving and creating walking and cycling routes, and provision of new public transport.

Development will be carefully controlled to ensure that the necessary infrastructure is provided. This is most likely to be possible when larger numbers of homes are being built together, as these infrastructure requirements can be planned and delivered as part of the overall development.

We are currently preparing an Infrastructure Delivery Plan (IDP). This will include an assessment of the current provision within the area. The IDP will make certain that infrastructure requirements are fully considered in preparing the Local Plan. It will also ensure all the necessary infrastructure providers are involved in the Plan making process.

### What is a Local Plan?



Local Plans are used to assess and decide on planning applications. They set out where and how development takes place through a series of policies and maps. The policies guide whether planning applications are considered acceptable or not. They aren't just about where new homes should go, but also the communities we live in, how we can look after the environment around us, how we get around, and making sure we have the access to the facilities and services we need.

South Kesteven District already has a [Local Plan adopted in January 2020](#).

The Local Plan, together with adopted neighbourhood plans, make up the "statutory development plan" for the District.

# Conclusion

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Document conclusion

This document contains information relating to the draft local plan site allocation SKPR-57 – land off Belton Lane.

It is clear from our research, based on local knowledge as well as in-depth research and discussions with related organizations, that the inclusion of SKPR-57 in the local plan is illogical.

SKPR-57 is not sustainable, highly expensive to a potential developer, damaging to Belton House NT, damaging to the residents of Gonerby Hill Foot and so on.

It is an extremely poor choice and should be removed from the next version of the local plan.

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