



**National
Trust**

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17 April 2024

Planning Policy Team

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

Sent by email only: planningpolicy@southkesteven.gov.uk

Dear Sir/Madam

South Kesteven District Council Regulation 18 - Draft Local Plan Consultation

Introduction

The National Trust welcomes the opportunity to respond to South Kesteven District Council's Regulation 18 consultation on the emerging draft Local Plan. Our representations are outlined below which we trust will be considered in the Local Plan process.

The National Trust has a statutory responsibility to protect and care for some of the most beautiful, historically important and environmentally sensitive places in England, Wales and Northern Ireland, for the benefit of the nation. As a consequence, we take an active interest in planning issues, particularly where there may be impacts upon the sites within the National Trust's care.

One of the founding beliefs of the National Trust is that places matter to people. Our statutory core purpose is to promote and protect places of historic interest and natural beauty – for everyone, for ever. Over the last 125 years we have continually sought to ensure that the nation's countryside, heritage and natural environment are protected for the enjoyment of all and for inheritance by future generations.

Across South Kesteven the National Trust's ownership, management, covenants and leases relate to the following properties and land:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

- Grade I Listed Belton House and Registered Historic Park and Garden. Belton House and Park lie on the northeast edge of Grantham.
- Grade I Listed Grantham House within central Grantham.
- Grade I Listed Woolsthorpe Manor within Woolsthorpe-by-Colsterworth.

The National Trust look forward to remaining as stakeholders in the Local Plan process. Also, we would welcome any further engagement with South Kesteven District Council, for example, to help with policy and evidence preparation moving forward.

Representations on the Draft Local Plan

2041 Vision for South Kesteven

The general vision and aspiration for South Kesteven is noted, including positive recognition of the area's character and unique local heritage. Also, acknowledging the wider challenges presented by climate change and the general need for sustainable urban and rural communities.

In relation to Grantham, the vision states 'there will be further significant residential development to the north and north-west of the town.' In acknowledgement of existing northward residential development and proposed allocations, the wording could be softened to the effect of 'further appropriately planned and sustainable residential development.' This is to recognise, amongst other matters, the significance and setting of Belton House and Park which is given policy recognition in other areas of the Local Plan.

Chapter 5 – Climate Change and Energy (inc. Policy RE1: Renewable Energy Generation)

The positive principles of this policy area and greater emphasis on climate change are recognised and welcomed by the National Trust.

It is apparent that relevant policies will be informed by an emerging Climate Change Study commissioned by South Kesteven District Council. This is intended to be supported by further consultation at the Regulation 19 stage of the Local Plan.

Given the importance of climate change as a policy area an additional, and supplementary, consultation on this matter would be considered beneficial. This would allow for full stakeholder review before the narrower parameters of a Regulation 19 consultation. Particularly where the detail of policies may be subject to significant change in the meantime.

H1: Housing Allocations

Whilst it is accepted that Local Plans should be read as a whole, the proposed allocations are not currently supported by policy wording signposting specific, detailed, allocation policies later in the document. This may be helpful to assure an effective thread within the Local Plan.

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It is also noted that wider, minimum requirements for employment allocations, for example in Policy E2: Employment Sites, are included in policy wording. A similar approach could be considered in relation to housing allocations to help assure sustainable and holistic development.

NEW POLICY 4: Biodiversity Opportunity and Delivering Measurable Net Gains

This positive new area of policy is noted, which acts to reinforce locally the relevant requirements for Biodiversity Net Gain.

EN6: The Historic Environment

The introduction of thematic sections for distinct heritage asset types is noted. This supports clarity and allows for an appropriate level of detail. Links back to the National Planning Policy Framework are also helpful here. In relation to this, the draft text relating to public benefit in the context of harm, could align more precisely with national policy wording.

The requirements for Heritage Impact Assessments are noted. Also, the clear reference to heritage asset setting, which contributes to significance, as a criterion in relevant assessments is welcomed.

DE1: Promoting Good Quality Design

The positive principles of this policy are noted, which acts to reinforce the principles of good design across the built environment. This is with an appropriate appreciation of local context, identity and character as guiding principles. It is hoped that this policy area helps support sustainable and holistic development.

Grantham

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

The retention of this policy in the draft Local Plan is supported by the National Trust, noting that no amendments are proposed.

GR3: Grantham Allocations

Whilst comments are offered on some areas of allocation policy wording. The National Trust is currently neither for nor against these specific proposed allocations in principle.

In general, a masterplanned approach to land allocations, which maximises the opportunities for holistic and sustainable development, would be welcomed. Also, to assure that any allocations proximate to properties in the care of the National Trust clearly consider their relevant level of historic significance and related setting.

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SKPR-65 (GR3-H4): Prince William of Gloucester Barracks (Mixed Use Allocation)

It is noted that this strategic mixed-use allocation will come forward through a comprehensive, masterplanned approach. A range of supporting criteria is detailed in policy wording. Northern areas of this proposed allocation may relate to the setting of Belton.

Therefore, in the supporting evidence criteria (i-vi) we request that wording is included, perhaps in relation to criteria iv, to the effect of:

‘Response to the locality’s historic environment and external heritage assets (including Belton House and Registered Park and Garden), incorporating an integrated assessment of their significance and related setting.’

Also, words the effect of:

‘The development proposal must take into account the Belton House Park Setting Study in Policy GR1’.

This aligns with proposed allocation SKPR-57 and allows for full consideration of Belton’s setting at the masterplanning stage. We would also welcome reference to the avoidance of tall buildings, appropriate massing, and the use of landscape buffers (including to the north of the site)/green infrastructure to help break up potential development bulk.

SKPR-268 – Land at Train Station (Mixed Use Allocation)

The requirement for a comprehensive masterplan and consideration of heritage assets is noted.

Given the possibility for buildings of height, including a multistorey car park, further guidance around height parameters and location within the site could be included to help mitigate harm to proximate heritage assets. The position of Grantham House is also considered here.

SKPR-57 – Land off Belton Lane

The requirement for a comprehensive masterplanned approach is noted. This is alongside specific regard for landscape and topography, including consideration of contour arrangements.

This proposed allocation is likely to relate to the setting of Belton. With potential views from the roof of Belton House, Bellmount Tower’s viewing platform and key approaches. In particular, Bellmount Tower offers panoramic views to the west as indicated in Figure 1 below:

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Figure 1: Photo taken from Bellmount Tower's viewing platform, with westward views onto north Grantham.

Criteria (h) is welcomed in principle, clearly accounting for Belton's relevant heritage assets and their setting. However, the criteria states 'specifically the development should incorporate views towards heritage assets.' This requirement is slightly unclear, perhaps not accounting fully for return views. As with suggestions for proposed allocation SKPR-65 (GR3-H4) alternative wording could be used to the effect of:

'Response to the locality's historic environment and external heritage assets (including Bellmount Tower, Belton House and Registered Park and Garden, St Wulfram's Church and St Johns Church), incorporating an integrated assessment of their significance and related setting.'

Criteria (i) is welcomed which states:

'The development proposal must take into account the Belton House Park Setting Study in Policy GR1'.

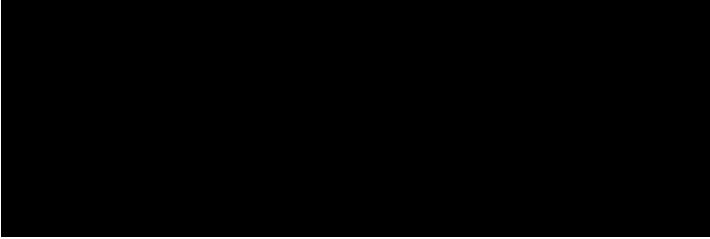
The Belton House and Park Setting Study underlines a possible sensitivity to tall or bulky development in this area, accounting for the long views available. In light of this the document states that relevant development should be no more than two stories in height. Therefore, we request reference in policy wording to a two storey building height limit, appropriate massing, recessive materials and the use of landscape buffers (including to the east of the site)/green infrastructure. This is to help break up potential development bulk and help to mitigate potential long views of the proposed site in relation to Belton.

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Many thanks again for the opportunity to comment on South Kesteven District Council's Regulation 18 consultation on the emerging draft Local Plan. If you have any questions in relation to this letter, please don't hesitate to contact me.

Yours sincerely

Andrew Grayson MRTPI FHEA



Planning Adviser

National Trust, Midlands and East of England

CC. Ian Cooper, General Manager – Belton

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