

EDMOND HARCOURT

LAND • PLANNING STRATEGY
INFRASTRUCTURE • DEVELOPMENT

Land to the south of Belton Lane

Great Gonerby, Grantham, Lincolnshire

Representations on behalf of

The Thompson Trust and The Beddows Trust (The Landowners)

to

Representations to the South Kesteven Local Plan Review
(Draft Plan – Regulation 18)

April 2024

Date: 25th April 2024

Ref: EHL/JTE/TP/Belton Lane Grantham/Rep

Representations to the Regulation 18 Issues and Options Consultation: SKDC

On behalf of the Thompson Trust and the Beddows Trust

Land south of Belton Lane, Great Gonerby

Introduction

- 1.1 Edmond Harcourt Limited (“EHL”) is instructed by Trustees of the Thompson Trust and the Beddows Trust, respectively (“the Landowners”) to prepare and submit representations to the South Kesteven Local Plan Review (“LPR”) Draft Plan Consultation and to put forward for consideration, to meet the housing needs of the South Kesteven to 2041, land south of Belton Lane, Great Gonerby (“the Site”) as an allocation for residential development.
- 1.2 The Site is shown edged red on Plan 1. The land immediately to the east of the Site is a proposed allocation – SKPR-57 – in the LPR and forms part of the Sub Regional Centre of Grantham as considered in the Points of the Compass Appraisal.
- 1.3 These representations have been produced by EHL on behalf of the landowners to provide a response to the LPR Draft Plan (“LPR”) consultation published by South Kesteven District Council (the local planning authority) for comment, as well as key documents of the LPR’s evidence base. Within this representation, we comment on the soundness and legal compliance of the LPR and the content thereof.
- 1.4 It is recognised in terms of the LPR that substantial changes to the Local Plan adopted in January 2020 are not proposed and as such a focus on revisions relate to updating housing need and planning for housing growth to 2041 (and beyond) to meet those identified needs. As such these representations also comment on the Local Housing Needs Assessment evidence-based document prepared by AECOM and published in February 2024 together with the Settlement Hierarchy Assessment also produced by AECOM and dated February 2024,
- 1.5 Overall, we consider that the LPR if amended to reflect:
 - a) an increase in the level of housing requirement to 2041 as set out in these representations, and
 - b) To allocation of the Site for residential development either as a stand-alone allocation (SKPR 57A) or as part of a comprehensive allocation comprised within the proposed allocated site SPKR-57

would result in respect of the level of growth it would then plan for to 2041, together with the strategy for distributing that growth and its proposed residential allocations would be both sound and legally compliant.

Vision and Objectives of the LPR

- 1.6 We broadly support the Vision for the Local Plan Review (LPR) to 2041, which seeks to maximise the potential of the District through, amongst other things, supporting growing the economy, the delivery of appropriate forms of sustainable growth with the aim of providing a high quality of life for residents, and supporting good quality jobs.
- 1.7 We also support the Vision that outside the four main towns new development will be focused primarily on those villages where there are good levels of service and facilities, with larger villages continuing to provide the necessary day-to-day services, noting that Great Gonerby has a close relationship due to its close proximity to Grantham.
- 1.8 Those objectives are underpinned by the LPRs Strategic Objectives. In this regard, we support the need to create the right balance between housing and jobs, in particular to ensure that these are focused in areas that are or can be made sustainable and are accessible.
- 1.9 As with proposed allocation SKPR-57, the Site is well located in relation to major employment proposals at Gonerby Moor proposed in the LPR and so new housing development proposed at the Site would be consistent with the relevant Strategic Objectives being well located for employees to have easy access to local jobs through sustainable travel options. The significance of the A1 in this location is also of relevance to helping to achieve the Strategic Objectives of the LPR.
- 1.10As such, we support the identification and vision for the Site forming part of the Grantham Sub Regional Centre location, identified as a suitable location for allocating future growth for new housing sites in the South Kesteven Points of the Compass Appraisal (within identified area GRA4), which forms part of the LPR Evidence base. The constraints covered through the Points of the Compass Appraisal of locations is thorough and consistent for the settlements considered within the settlement hierarchy comprising: Sub Regional Centre, Market Towns and Larger Villages.
- 1.11We support the identification of Plan Objective 2 which seeks to develop a strong, successful and sustainable economy that provides a wide range of employment opportunities for local people. We would, however, recommend the deletion of the phase “a sufficient number” because clearly, if the LPR is to achieve the District’s wider economic aspirations, it must deliver a number of jobs over the minimum required. Plan Objective 2 should also refer to developing the District’s established key industries and capitalising on established regional specialisms, drawing on the Greater Lincolnshire Local Industrial Strategy.

1.12 We broadly support Plan Objective 3, which aims to broaden and diversify the employment base by ensuring an adequate and appropriate supply of land and premises and increasing inward investment. We would again, however, recommend that the phraseology is re-considered, as providing merely “adequate and appropriate” supply of land and premises is unlikely to achieve aspirational and transformational economic growth to underpin the improvement of the local economy.

1.13 We strongly support Plan Objectives 5 and 6, which seeks to facilitate and enhance sustainable communities so as to provide a long-term basis for the planning of South Kesteven, which also includes enhancing the role and function of, inter alia, the identified Larger Villages.

1.14 We also broadly support Strategic Objectives 8 (accessibility for all employment, community, leisure and cultural activities); Objective 9 (Providing an adequate supply and choice of land for, inter alia, new housing through the LPR period to 2041); Objective 10 (Residential development includes a mix and range of housing types suitable for a variety of needs); Objective 11 (Support for new community and other infrastructure arising from new development is delivered by on and off-site contributions); Objective 12 (Protection and enhancement of the natural, historic, cultural and blue/green infrastructure and the built environment through good design promoting local distinctiveness, integrating with its setting and securing community safety). In respect of this objective we considered it would be worth of mention to include that developments must achieve a minimum of 10% bio-diversity in accordance with current legislation now in force; Objective 13 (new developments to address the impacts of climate change); Objective 14 (promoting prudent use of finite natural resources and positive use of renewable resources through the design, location and layout of development and optimising the use of existing infrastructure, wherever possible); Objective 15 (minimising pollution).

1.15 As such, broad support is given to Policy SD1 (The Principles of Sustainable Development in South Kesteven) and its reasoned justification.

Spatial Strategy – Policy SP 1

1.16 We comment below Policy SP1 and its supporting evidence base, in so far as it sets out the proposed quantity and distribution of housing growth over the plan period.

1.17 We set out below the overall national policy context, relevant to these representations.

National Planning Policies and Guidance

- 1.18 The NPPF confirms at paragraph 1 that 'locally prepared plans can provide for sufficient housing and other development in a sustainable manner'; and that 'Preparing and maintaining up-to-date plans should be seen as a priority in meeting this objective'. Accordingly, paragraph 15 of the NPPF confirms that the planning system should continue to be genuinely plan-led.
- 1.19 The presumption in favour of sustainable development applies to plan making and says that plans should positively seek opportunities to meet the development needs of their area, and that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas (paragraph 11).
- 1.20 Plans should be prepared positively, with the objective of contributing to the achievement of sustainable development and be shaped by early, proportionate and effective engagement between plan-makers and, inter alia local people and businesses. They should also contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals (paragraph 16).
- 1.21 Paragraph 17 of the NPPF sets out that the development plan must include strategic policies to address each local planning authority's priorities for development and use of land in its area.
- 1.22 Paragraph 20 says that strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for housing (including affordable housing), employment, retail, leisure, other commercial development and community facilities (including education).
- 1.23 Paragraph 22 goes on to say that strategic policies should look ahead over a minimum 15-year period from adoption and larger scale developments form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.
- 1.24 Paragraph 23 of the NPPF says that strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area.
- 1.25 Paragraph 31 says that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.

1.26 Paragraph 32 recognises the legal requirement for local plans to be informed throughout their preparation by a sustainability appraisal demonstrating how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). It highlights that significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.

1.27 Plans should set out the contributions expected from development, including the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for health). This should not undermine the deliverability of the plan (paragraph 34).

1.28 For a plan to be adopted it must pass an examination and be found to be 'sound'. Paragraph 35 identifies that plans are 'sound' if they are:

a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

1.29 Paragraph 60 of the NPPF says that to support the *Government's objective of significantly boosting the supply of homes*, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed. The overall aim should be to meet as much of the areas identified housing need as possible, including with an appropriate mix of housing types for the local community.

1.30 Paragraph 61 of the NPPF says that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the Standard Method in national planning guidance – unless exceptional circumstances justify an alternative approach. The outcome of the standard method is an advisory starting point for establishing a housing requirement for an area and there may be exceptional circumstances, which justify an alternative approach to assessing housing need – in which case the alternative approach should also reflect current and future demographic trends and market signals.

- 1.31 Paragraph 63 confirms that within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies, which now include older people, including those who require retirement housing, housing-with-care and care homes.
- 1.32 Paragraph 67 of the NPPF says that strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. *The housing requirement may be higher than the identified housing need if it, inter alia, reflects growth ambitions linked to economic development or infrastructure investment.* Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.
- 1.33 Paragraph 74 of the NPPF says that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way.
- 1.34 Paragraph 74 says that the supply of larger numbers of new homes can often best be achieved through planning for larger scale development, such as significant extensions to existing towns which are well located and designed and supported by the necessary infrastructure and facilities (including genuine choice of transport modes) and developed in a sustainable way. In so doing consideration should be given to opportunities for the area's economic potential and scope for net environmental gains'; ensuring the proposals will support a sustainable community through sufficient access to services and employment opportunities; set clear expectations regarding design quality and places and how this can be maintained. Through inter alia master plans and design codes to secure a variety of well-designed beautiful homes to meet the needs of different groups in the community; and making realistic assessments of likely delivery rates and lead-in times of larger development. Paragraph 231 of the NPPF importantly advises 'The Government will continue to explore with individual areas the potential for planning freedoms, for example where it would facilitate an increase in the amount of housing that can be delivered'.
- 1.35 Paragraph 75 recognises that Strategic policies should include a trajectory illustrating the expected rate of housing over the plan period. The deliverable land supply should be monitored against the Local Planning Authorities housing requirement.

1.36 Importantly, paragraph 85 opines that planning policies (and decisions) should help create conditions where businesses can invest, expand and adapt. Significant weight (our emphasis) should be placed on the need to support economic growth and productivity, taking into account local business needs and wider opportunities for development. The approach should allow each area to build upon its strengths, counter any weaknesses and address the challenges of the future.

1.37 Paragraph 88 recognises that in rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs; and provide the social, recreational and cultural facilities and services the community needs, planning policies should take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.

1.38 Paragraph 90 emphasises that planning policies should support the role of town centres play at the heart of local communities and thereby recognise that residential development often plays an important role in ensuring the vitality of such towns and encourage residential development on appropriate sites.

1.39 Paragraphs 96 to 104 confirms that planning policies should aim to achieve healthy, inclusive and safe places and beautiful buildings, which promote social interaction, are safe and accessible and enable and support healthy lifestyles including provision of safe and accessible high quality green infrastructure and open space, rights of way, allotments and layouts that encourage walking and cycling) .

1.40 Paragraph 109 of the NPPF sets out that the planning system should actively manage patterns of growth and significant development should be focused on locations which are or can be made sustainable through limiting the need to travel and offering a genuine choice of transport modes.

1.41 Paragraph 110 of the NPPF sets out that planning policies should support an appropriate mix of uses across the area to minimise the number and length of journeys needed for employment and other activities.

1.42 Overall, the national policy context for plan making is clear in that:

- the plan must set out an overall strategy for the pattern of development that makes sufficient provision for housing to meet the needs of South Kesteven as well as any needs that cannot be met within neighbouring areas;
- the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned.
- Plan for and allocate sufficient sites to deliver the strategic priorities of the area;

- a sufficient amount and variety of land can come forward where it is needed;
- be positive, aspirational and be responsive to changes in local circumstances;
- strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations;
- identify a sufficient supply and mix of sites, including small and medium sized sites and larger scale development, such as new settlements or significant extensions to existing villages and towns;
- recognise the intrinsic character and beauty of the countryside and protect valued landscapes.
- Local planning authorities should work proactively and positively with promoters, delivery partners and statutory bodies to plan for required public service facilities.

Spatial Strategy and Settlement Hierarchy

1.43 We support the overall strategy of the LPR, namely, to deliver sustainable growth, including new housing, to facilitate growth on the local economy and to support local residents as set out in Policy SP1.

1.44 Similarly, we strongly support the broad spatial strategy focusing sustainable new housing development on Grantham as a Sub Regional centre, the Market Towns (Bourne, Stamford and The Deepings) and Larger Villages (identified in Policy SP2) and shown on the Key Diagram (Figure 5).

1.45 We strongly support Grantham being identified as the Sub Regional Centre to ensure Grantham continues to function effectively in that role for the District and the wider region and is a focus for new housing development in the LPR.

1.46 Both the Site and proposed housing allocation SKPR-5, which it adjoins, forms part of the Grantham Sub Regional Centre

1.47 In particular, this location now virtually adjoins the main town of Grantham, which has extended towards Great Gonerby. The location has excellent access the significant level of services, facilities and employment opportunities together with easy access to the Midland Main line train services at Grantham Station. It is also a short distance from access to the A1.

1.48 Axiomatically, we strongly support the Settlement Hierarchy as set out in Policy SP2 of the LPR.

1.49 We also support new Policy 1: Rural Exception Schemes, to assist in bringing sites forward to meet demonstrable local need for affordable housing. In particular we

welcome within that proposed Policy recognition that market housing may come forward alongside affordable housing, subject to the criteria set out in the proposed policy.

Meeting Housing Needs

The Local Housing Needs Assessment (published February 2024) (“LHNA”):

- 1.50 Preparation of the LPR has been underpinned by an LHNA dated September 2023 and published in February 2024 and prepared by AECOM.
- 1.51 The LHNA has divided the district into two sub-areas, District North and District South, which reflect the relationships with the Lincolnshire Housing Market Area (HMA) to the north and neighbouring districts in respect of the former and the Peterborough HMA to the south albeit the boundaries between the two are loosely drawn.
- 1.52 The LHNA also considers the Grantham Urban Area (“GUA”) for comparison with the other sub-areas. The GUA represents a unique role as a local centre for those living in the District North.
- 1.53 To calculate an identified housing need, SKDC has used the latest affordability ratios (September 2022, published March 2023) and the calculation has produced an identified need of 701 additional homes per annum (this is not a housing requirement figure but a minimum local housing need figure. The latter is a task for SKDC through this emerging LPR taking into account other material planning considerations.
- 1.54 What can be seen from the LHNA is that SKDC has a growing population, recording via the Census 2021 a 7.2% population increase since the Census 2011, which is above the national average of 6.6%, noting that the population of 65+ has expanded by 30% since 2011 with a projected increase in 65+ households in the district of 87.8% between 2011 and 2041 (compared with 29.7% in 2011).
- 1.55 In addition, there is a critical under provision of affordable housing set against the estimated need for affordable homes per annum, which equates to an estimated 402 homes per annum. This figure comprises circa 88 affordable homes for rent and circa 341 homes for household who need affordable home ownership (i.e. in the private rented sector but would prefer their own home but are unable to afford to buy in the open market).
- 1.56 The LHNA states that the *“current number of households on the waiting list for affordable rented housing in South Kesteven is 1,376, but the average for the years between 2016/17 and 2020/21 is higher at 2,123”*. Importantly in this context the LHMA acknowledges that *“...the supply of affordable housing is likely to be lower than the need identified”*.

- 1.57 In terms of specialist housing for older people the LHNA confirms that 34% of South Kesteven's population profile in the 2021 Census aged 65+. By 2040 the LHNA advised that ONS projections suggest that the proportion of the population aged 75+ will increase from 11% (2021 Census) to 18% in South Kesteven, with presently 72% of that age group are estimated to live in the main stream housing stock.
- 1.58 Furthermore, the LHNA estimates a suggested need for between 3,923 – 4,053 specialist homes for older people over the plan period. As the NPPF advises the need or demand for these homes within the overall need for housing and is not additional to the need for homes identified through the standard method.
- 1.59 Similarly, there is a significant gap in the existing supply of 'Extra Care' or 'Housing with Care' or 'Close Care Housing'. The LHNA advises that the projected demand for Extra Care forms of specialist housing is estimated at 28% and 45% of projected demand over the period to 2041.
- 1.60 In meeting housing needs, in terms of size mix of new homes the LHNA suggests placing greater emphasis on greater provision of smaller family-sized homes (2-3 bedrooms) to meet the challenges of changing demographic needs.
- 1.61 The approach of SKDC, through the LPR is welcomed in terms of evaluating and addressing local housing needs in line with extant national policy and planning guidance, thereby seeking to strike a balance in meeting the diverse; but the evidence base demonstrates the proposed supply of new homes in the LPR does not meet objectively assessed demand in the LHNA. The shortfalls are already critical and a failure in the LPR to address these shortfalls will merely cumulatively exacerbate the shortfall year on year that needs to be addressed to ensure sufficient housing is allocated to meet all needs are forecast to arise during the Plan period.
- 1.62 Highly relevant in this regard is Paragraph 63 of the NPPF, which confirms that *within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies, which now include older people, including those who require retirement housing, housing-with-care and care homes. (our emphasis)*
- 1.63 It is noted that two of the housing allocations – SKPR-278 (Spittlegate Heath) and SKPR-65 (Prince William of Gloucester Barracks) seek to deliver 1,350 and 1,735 homes respectively by 2041. These are large sustainable urban extensions and evidence of the delivery of such developments suggests that it takes 8-10 years from allocation to first completion. There is therefore a degree of unfounded optimism that these two sites will deliver 3,095 dwellings by 2041.
- 1.64 All of these matters give rise to exceptional circumstances that suggest the housing need in the LPR between 2021-2041 of 14, 020 (701 dwellings per annum), which

accords with the Standard Method is too low to deliver the necessary supply to meet the demands of the District during the Plan Period for new homes.

- 1.65 Accordingly, in this context Paragraph 61 of the NPPF provides that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need, conducted using the Standard Method in national planning guidance – unless exceptional circumstances justify an alternative approach. *The outcome of the standard method is an advisory starting point for establishing a housing requirement for an area and there may be exceptional circumstances, which justify an alternative approach to assessing housing need – in which case the alternative approach should also reflect current and future demographic trends and market signals (our emphasis).* Furthermore, Paragraph 63 similarly confirms that *within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies, which now include older people, including those who require retirement housing, housing-with-care and care homes.*
- 1.66 In further support of the above, the Planning Practice Guidance (PPG) makes clear that the LHNA is only a starting point. The Standard Method does not produce a housing requirement and there are instances where it may be appropriate for the housing requirement to be greater than the LHN.
- 1.67 The Standard Method does not predict the impact of future government policies, changing economic circumstances or other factors might have on demographic behaviour. Additionally, growth strategies that are likely to be deliverable, strategic infrastructure improvements and requirements to accommodate unmet needs from neighbouring areas may also indicate a housing requirement greater than the minimum LHNA figure.
- 1.68 Similarly, the Planning Policy Guidance advises that upward adjustment to the LHNA may also be considered in situations where previous levels of delivery in an area, or previous assessments of need (such as recently produced Strategic Housing Market Assessments) are significantly greater than the outcome from the Standard Method. Local planning authorities should also consider through their evidence base whether the overall housing requirement will deliver sufficient new homes to meet identified needs for affordable housing arising over the plan period. These matters are considered further in more detail below.
- 1.69 The National Planning Policy Guidance (18th December 2023) ('NPPF') confirms in paragraph 61 that in determining "... *the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard method...The outcome of the standard method is an advisory starting-point for establishing a housing requirement for an area.*" Accordingly, the use of the Standard method is not mandatory on a Council. In this regard the list of specific groups for which housing need has to be established is

expanded in the NPPF to incorporate those who require retirement housing, housing with care and care homes.

1.70 The need to meet affordable housing is also a key requirement to meeting the housing needs of an area and one which could give rise to the Council considering specific increases to the percentage ratio of affordable housing provision on specific strategic allocations to enable longstanding unmet and urgent affordable housing needs in the area to be accelerated. This could include, as stated in paragraph 66(d) a significant percentage (%) requirement on a site or possibly 'exclusively' for affordable housing on a proposed site. Such housing provision could also include homes for first time buyers or discount market housing schemes.

1.71 This should be read in conjunction with paragraph 1 of the NPPF, which provides that preparing and maintaining up-to-date plans should be seen as a priority in meeting the objective of providing 'sufficient' housing and other development in a sustainable manner. In paragraph 60 in supporting the Government's objective 'of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the need of groups with specific housing requirements are addressed'. Accordingly, this new overall aim is 'to meet as much of a local authority's identified housing need as possible'.

1.72 The evidence base is very clear that a higher figure than the LHNA should be adopted as the housing requirement, based on data across a range of factors and from a range of sources.

1.73 In our view, it is perfectly reasonable (and we would urge the Council to adopt in the Regulation 19 Local Plan) for the Council to adopt a figure in excess of the Standard Method/LHNA – we propose 780 dwellings per annum, If this is not rectified then the Local Plan once adopted will be unsound for want of justification given that its housing requirement is out of step with the evidence base.

1.74 We consider that the minimum LHN figure set out in paragraph 3.19 above will be insufficient to meet the housing needs of the District to 2041. In the light of the continuing growth pressures in the District taken together with the affordable housing needs addressed below we consider that SKDC should consider that over the proposed LPR plan period 2021-2041, a LHN for South Kesteven of between circa 780 net additional dwellings per year or circa 15,600 dwellings.

The Site proposed for allocation in Policy H1: Housing Allocations of the LPR – land south of Belton Lane, Great Gonerby ("the Site")

1.75 In order to assist on meeting SKDC's housing requirement, we would propose that consideration is given to the allocation of Site, land south of Belton Lane, Great Gonerby for residential development in emerging Policy H1: Housing Allocations in the LPR either as a stand-alone allocation for up to 100 dwellings or as a proposed

addition to the residential allocation in Policy H1: Housing Allocations SKPR-57. SKPR-57 immediately adjoining the Site's eastern boundary and is shown on Plan 2. Details of the assessment of SKPR-57 may be found in the LPR Evidence Base document Site Assessments Report (February 2024).

- 1.76 The Site extends to 3.24 hectares/8 acres. The site is presently within the open countryside but through the proposed allocations in Policy H1, SKDC recognise that residential development needs will not be met without releasing greenfield land on the edge of settlements.
- 1.77 The Site lies in a semi-urban area, approximately 240m away from Great Gonerby. 97% of the Site is currently used for agricultural purposes..
- 1.78 Belton Lane, which leads in the northwest direction towards the Site, is an adopted two-lane road, characterized by a single carriageway with one lane for each direction of travel.
- 1.79 The Site has access onto Belton Lane and is generally flat, with an altitude of 70m above sea level.

Surroundings facilities and services etc

- 1.80 The nearest hospital, Grantham and District Hospital, is located 3km to the southeast. St Sebastians Church of England Primary School, the nearest primary school, is 1.km to the southwest and Cliffdale Primary School, Manthorpe is 3.3km to the southeast. Dudley House School, a non-state primary school, is 4.8km to the southeast. The nearest secondary school is The King's School, 3.7 km to the south, and there is also Kesteven and Grantham Girls School in Grantham 4.3km. The nearest non-state secondary school, The Priory Ruskin Academy, is 3km to the south.
- 1.81 Grantham Bus Station is located 4.6km to the south and the Site is well placed in terms of public transport. Grantham Railway Station is 5.3km to the south. The Site is accessible via the A1, B1174, A52, and A607 roads within 5km of the Site.

Site Constraints and Designations

- 1.82 There are no statutory or non-statutory designated areas or objects, such as sites of special scientific interest, ancient woodlands, ancient monuments, listed buildings or local wildlife or ecological interests of importance on the Site or adjacent to it.
- 1.83 Belton House and its environs lay circa 1km to the east of the Site. Through the allocation of SKPR-57, which is closer to Belton House and its environs, demonstrates that the Site does not give rise to any unacceptable impacts on those heritage assets or any others within 3km of the Site.

1.84 There are no Tree Preservation Orders on the Site.

1.85 There are two on-site public rights of way crossing the Site, which would be accommodated within any residential allocation/development of the Site.

Planning History

1.86 To the best of our knowledge and belief, there is no planning history for the Site.

Planning Policy Context

1.87 The Site for planning policy purposes is presently in 'countryside' and not allocated for any development. However, given that the Site is within the Grantham Sub-Regional Centre and following the assessment of SKPR-57, it can be considered that the Site in planning policy terms to be in a suitable and sustainable location for residential development.

1.88 The Site shares many of the characteristics of SKPR-57, which when assessed by SKDC in the Draft Local Plan Site Assessment Report (February 2024). SKPR-57 found that SKPR-57 was:

"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 footways and cycleway connections into the wider town. Any impact of local heritage assets and settings can be appropriately mitigated".

1.89 Axiomatically, those findings above apply equally to the Site. The principle of residential development in this location is acceptable and that key any impacts arising from the proposed residential development are capable of being satisfactorily mitigated.

1.90 The Site could yield/deliver circa 100 dwellings (depending on the density of housing per hectare). In terms of deliverability the Site could become available for development in the short term (0-5 years) and be build out in the medium term (5-10 years).

1.91 **Flood Risk and Drainage** - The site is in Flood Zone 1 and as such the Site is not at risk of flood. Matters of drainage (Foul and Surface Water) would be considered in detail as the Site progressed through the planning process.

1.92 **Highways** - Whilst the residential allocation of the Site would, as with SKPR-57 – give rise to 'moderate' impacts on the local highway network it is noted in respect of SKPR-57 that Lincolnshire County Council, as highway authority, have indicated that access at Belton Lane is acceptable in principle subject to a Transport Impact Assessment being undertaken. It is envisaged that the junctions at Belton Lane and Newark Hill/A607 would require junction upgrades and footway/cycleway

connections required along Belton Lane to Great Gonerby and consideration given to residential development to the south.

- 1.93 **Landscape** - Similarly, in landscape character and sensitivity terms, as with SKPR-57, the Site is able to mitigate any impacts arising from residential development through appropriate structural landscaping and associated bio-diversity net gain initiatives to provide a new soft edge, enabling the character and appearance of the area to be in overall terms enhanced.
- 1.94 **Minerals** - It is not considered that the Site has any adverse implications in respect of Minerals.
- 1.95 **Agricultural Land Quality** - The land is Grade 3 agricultural land quality and as such has no implications for Grade 1 or 2 agricultural land (best and most versatile land).
- 1.96 **Green Infrastructure and BNG** -The Site would bring forward significant Green Infrastructure as well as recreational opportunities, retain the public rights of way and be able to deliver bio-diversity net gain in accord with current legislative requirements under the Environment Act.
- 1.97 **Heritage and Ecology** - Key statutory bodies like the Environment Agency and Natural England have not raised objections to the development of the SKPR-57 and accordingly, as stated earlier it is considered that ecological interests, heritage and conservation interests and settings can be appropriately mitigated through the residential proposals for the Site.
- 1.98 **Summary** - Overall, there are no technical or other planning reasons to preclude the Site being allocated for residential development alongside SKPR-57 in the emerging LPR. Although the site itself does not have a previous SHLAA/HELAA/SHELAA assessment or designation, its proximity to SKPR-57 suggests that it would be a natural extension to that proposed residential allocation or to stand alongside it as a separate residential development.
- 1.99 As with SKPR-57 key policy considerations include necessary infrastructure enhancements, emphasizing the importance of connectivity, which would benefit a new residential area. The site's flat terrain and lack of historical buildings or protected natural habitats present fewer obstacles to residential development.
- 1.100 The growth of Grantham northwards is not only evidenced in this location by the Grantham Sub-Regional Centre designation and the proposed SKPR-57 allocation, but it should be noted that to the east of the Midland Main Line railway residential development is approved extending the current northern edge of Manthorpe to Belton Lane.
- 1.101 Accordingly, the location and principle of development is, we submit, acceptable in relation to the Site and there are no technical or other objections that

preclude residential development being delivered on the Site, either as a stand-alone site or as part of a comprehensive development with SKPR-57. As illustratively shown on Plan 3. The Site is available, achievable, developable and can commence to deliver housing in the short term in an acknowledged sustainable location within the Sub Regional Centre of Grantham.

Edmond Harcourt Limited

[Redacted signature block]

25th April 2024

Plan 1 – The Thompson Trust and The Beddows Trust land south of Belton Lane, Great Gonerby



Plan 2 – Proposed Residential Allocation (SKPR-57) South of Belton Lane, Great Gonerby



Plan 3

