



**National
Trust**

Hardwick Consultancy Office,
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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 - Proposed Housing and Mixed-Use Site Allocations Consultation - Sites SKPR-65 and SKPR-278

Introduction

The National Trust welcomes the opportunity to respond to South Kesteven District Council's Regulation 18 Proposed Housing and Mixed-Use Site Allocations Consultation. 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.

Heritage

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

National Trust
Hardwick Hall
Doe Lea
Chesterfield
Derbyshire S44 5QJ
www.nationaltrust.org.uk

Patron: His Majesty The King
Chair: René Olivieri CBE
Director-General: Hilary McGrady
Midlands & East of England Regional Director : Paul Forecast
Registered office: Heelis, Kemble Drive, Swindon, Wiltshire SN2 2NA
Registered charity number 205846

- Grade I Listed Belton House with a number of Listed Buildings and structures associated with the house, among which are the stables and South Lodge (both Grade I) and buildings around the western court and Bellmount Tower (Grade II*). The surrounding 505 hectares of parkland is a Grade I Registered Historic Park and Garden of Special Historic Interest.
- Grade I Listed Grantham House within central Grantham.
- Grade I Listed Woolsthorpe Manor within Woolsthorpe-by-Colsterworth.

The Belton Estate is the National Trust property considered to be most affected by the proposed site allocations. As stated in the Belton House and Park Setting Study and Policy Development document, January 2010, the significance of the views within, into and out of the site forms the basis of the definition of its setting. The character of rural landscape in which the Park is situated is also part of the setting.

The surrounding landscape's contribution to the significance of the park is limited to those areas visible on the key views and visible from the key viewing points. The setting of Belton House is therefore mostly defined as these visible areas that contribute to the significance of the house and park.

Many historically designed views within the park survive today and form part of the character of the park. The backgrounds to these views, visible beyond the park boundary, form the most significant elements of the setting of the house and, with some exceptions consist mostly of the nearby surrounding hills and ridges.

Most of these background views are currently of fields and woodland and help preserve the rural character of the park. The perimeter trees partly block views of the adjacent areas, except to the north of Belton House, and along the southern side of the park to the northwest of Londonthorpe and at the park's southeast corner. The perimeter tree screens and the tree screens beyond the boundaries that contain the key views also form part of the setting of the park.

The raised ground visible from Belton House Roof, Bellmount Tower, above the tree screens and in the significant views from the park is very sensitive to major development, which includes large urban extensions, as such development is likely to adversely affect the significance of the significant views.

In the areas of flat ground between 2km and 5km of the park boundary the views of flat ground would be sensitive to bulky or high major developments. The width of development (regardless of height) in terms of their relationship to the view is also an important issue in terms of impact on the character of the view.

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Landscape Character

The potential allocation sites fall within Landscape Character Areas – Southern Lincolnshire Edge Character Area, Grantham Scarps and Valleys and Kesteven Uplands as identified within the South Kesteven Landscape Character Assessment, January 2007.

Regarding Southern Lincolnshire Edge Character Area and its Landscape Sensitivity, Para 4.75 states;

‘Landscape sensitivity to new employment and residential proposals is likely to be medium to high. Whilst the landscape itself contains relatively few sensitive landscape features, the remote and rural character suggests that large-scale new built development would be inappropriate.’

Regarding the Grantham Scarps and Valleys Character Area and its Landscape Sensitivity, Para 4.131 states;

‘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 low to high, 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.’

Regarding the Kesteven Uplands Character Area and its Landscape Sensitivity, Para 4.32 states;

‘Landscape sensitivity to new employment or residential proposals is likely to be medium to high, because of the high proportion of valuable landscape elements and relatively undisturbed character. The strong landscape pattern including many woodlands could, however, in places be beneficial in new development.’

Heritage and Landscape Impacts

Regarding site proposed allocation at site SKPR-65 - indicative unit numbers up to 3000 including employment generating area of 8ha, given the extent of the site and the potential impacts on the Belton Estate, The National Trust welcomes the decrease in the indicative number of dwellings from 4000 to 3000 dwellings.

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We have concerns that this development site, and proposed site SKPR-278, given the indicative number of dwellings being 3,700 dwellings and 11ha of employment land, may detrimentally affect the significance, character and setting of Belton House and the Registered Park and Garden.

The National Trust believes that the proposed allocation sites would likely be visible from key viewpoints at Belton House and the surrounding parkland and that there are potentially harmful landscape and visual impacts.

Given the extensive scale of the proposed sites, the impression from Belton House and parkland may well be of large-scale urbanisation which would adversely affect their views and setting and the overall character of the landscape.

The potential allocation sites are considered not be appropriate to the character and significant natural, historic and cultural attributes and features of the landscape, within which it is situated, nor contribute to its conservation, enhancement or restoration, contrary to Policy EN1: Landscape Character.

Adjustments for housing density or attempts at screening are considered not to mitigate the impacts of the developments.

Conclusion

The potential allocation sites would therefore appear not comply with the following national and local policies;

National Planning policy

- National Planning Policy Framework Chapter 16; Conserving and enhancing the historic environment.
- Planning Policy Guidance 15; Planning and the Historic Environment.

South Kesteven Local Plan policy

- SP1: Spatial Strategy
- SP2: Settlement Hierarchy
- SP4: Development on the Edge of Settlements
- E2: Strategic Employment Sites
- EN1: Landscape Character
- EN6: The Historic Environment
- GR1: Protecting and Enhancing the Setting of Belton House and Park

Local Plan Supporting Documents

- South Kesteven Landscape Character Assessment (2007)

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- Belton House and Park Setting Study and Policy Development January 2010

The National Trust therefore objects to the proposed allocation sites SKPR-65 and SKPR-278 and would ask that you identify other areas for the proposed housing and employment which would not compromise the setting of the nationally important heritage site.

If you have any questions in relation to this letter, please don't hesitate to contact me.

Yours sincerely,

[Redacted signature]

National Trust, Midlands and East of England

[Redacted contact information]

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