



Planning Policy Team  
South Kesteven District Council  
Council Offices  
St. Peter's Hill  
Grantham  
NG31 6PZ

30 July 2025

**Subject: Formal Objection to Proposed Allocation SKPR-318 – Land West of The Drift, Harlaxton**

Dear Sir/Madam,

I am submitting this letter as a formal objection to the proposed housing allocation SKPR-318, Land West of The Drift, Harlaxton, as included in the Regulation 18 Local Plan (2025). My objection is based on substantial evidence of non-compliance with both the National Planning Policy Framework (NPPF) and the emerging Local Plan policies. The proposed allocation poses unacceptable risks and adverse impacts in the following areas:

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### **1. Flood Risk and Surface Water Management – Non-Compliance with NPPF Section 14**

The NPPF (Paragraphs 159–169) requires that development in flood risk areas must demonstrate through a site-specific Flood Risk Assessment that it will not increase flood risk elsewhere, completely and comprehensively mitigate risk of downstream flooding towards Grantham and prove no infringement of Riparian Law.

- The SKPR-318 site is located within a catchment draining towards Allington Meadows SSSI, a sensitive ecological area prone to surface water accumulation.
- The Local Plan document notes that “sufficient evidence will be required to demonstrate that drainage will not significantly impact the designated site” (Regulation 18 Local Plan, p.77–78). This evidence is **absent**, leaving uncertainty over how runoff from 112 additional dwellings will be mitigated.
- Without definitive capacity assessments and mitigation plans, the allocation is contrary to **Local Plan Policy EN5 (Flood Risk and Water Management)** and **NPPF para 167**, which prohibit developments that increase flooding or environmental degradation.

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### **2. Inadequate Sewerage and Foul Water Capacity – Breach of Local Plan Infrastructure Principles**

The Local Plan (Section 1.14–1.17) commits to ensuring “appropriate new and upgraded infrastructure, including sewerage and waste-water treatment, to meet the needs of development.”

- Harlaxton's current sewerage infrastructure is already constrained, with frequent capacity issues reported during periods of high rainfall.
- There is **no identified investment or secured commitment** from Anglian Water to provide treatment works upgrades in line with the anticipated demand of 112 new dwellings.
- This raises a high risk of foul water discharge incidents, contrary to **Policy EN6 (Water Quality)** and **NPPF para 20(d)**, which require strategic policies to deliver infrastructure sustainably.

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### 3. Disproportionate Scale of Development – Conflict with Sustainable Settlement Hierarchy

- Harlaxton is designated as a larger village with limited services and infrastructure. Adding 112 dwellings represents a significant percentage increase in housing stock, disproportionate to local needs and the village's capacity to absorb growth.
- The scale conflicts with **Policy SP4 (Development in Larger Villages)**, which seeks housing allocations proportionate to local facilities and character.
- The proposal risks altering the settlement pattern and rural character, contrary to **NPPF para 130**, which requires developments to be "sympathetic to local character and history."

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### 4. Heritage Impact – Potential Harm to Conservation Area and Setting of Harlaxton Manor

Harlaxton is a historic settlement with a designated Conservation Area and proximity to the nationally significant Harlaxton Manor (Grade I listed).

- The Local Plan (Policy EN1) requires protection of heritage assets and their setting.
- SKPR-318 lies on open countryside west of The Drift, forming part of the **historic approach to the village and wider setting of Harlaxton Manor**.
- The allocation's scale and location would introduce modern built form into a sensitive historic landscape, risking **less than substantial but significant harm**, contrary to **NPPF paragraphs 199–202** and **Policy EN1 (Heritage Assets)**.

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### 5. Highways and Traffic Safety – Insufficient Capacity and Safety Risks

- Access would be via The Drift and the A607, both of which already experience high traffic speeds and congestion at peak times.
- The Drift is narrow, lacks footpaths in sections, and cannot safely accommodate the projected increase in traffic from over 100 new homes.
- The Local Plan (Policy ID2 – Transport and Infrastructure) requires safe and sustainable access. Without confirmed mitigation measures, including road widening, pedestrian safety enhancements, and junction upgrades, the allocation conflicts with **NPPF para 110–111**, which require developments not to create unacceptable highway safety risks.

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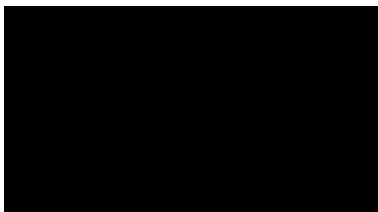
## Conclusion

The proposed allocation SKPR-318 is unsound and should not be carried forward to the Regulation 19 stage of the Local Plan due to:

- Non-compliance with **NPPF Sections 14, 15, 16, and 9** on flooding, infrastructure, heritage, and transport safety;
- Failure to meet **Local Plan Policies EN1, EN5, EN6, SP4, and ID2**;
- The lack of robust evidence on drainage, foul water capacity, and highways mitigation.

I therefore respectfully request that South Kesteven District Council **remove SKPR-318 from the proposed site allocations** or defer its consideration until detailed technical studies can prove no unacceptable harm will result.

Yours faithfully,



e. [REDACTED]  
m. [REDACTED]