

**The Planning Policy Team  
SKDC Council Offices  
The Picture House  
St Catherines Road  
Grantham  
Lincs  
NG31 6TT**

**By SKDC Website and E-mail**

27th August 2025

**Re: Proposed Housing and Mixed-Use Site Allocations SKPR-309  
(SKPR-120 and SKPR-232) Land at the East of Stamford Road**

Dear Sir/Madam,

As existing residents of Colsterworth Village we are aware of the proposed development of land at the east of Stamford Road (SKPR-309 Land at the East of Stamford Road Colsterworth) and would like to make clear our objection to it.

The land highlighted for potential development is not suitable, would negatively impact the village, it's residents, wildlife and risk lives. Importantly, it fails to meet or deliver the 'development principles' set out for its development in the Draft Local Plan (page 201).

Several of us therefore came together last year at the application for SKPR-120, to form an action group; The Colsterworth Collective Action Group to stand firmly against this and any future proposed plans that adversely affect the southern border of Colsterworth. Let us be clear, we recognise the need to build homes, however driven by our passion for this village we will challenge, offer input and commit time to ensure decisions taken are in the best interests of this village and the well-being of its current and future residents. We have set out below high-level concerns and objections for your reference.

## **Objection to Proposed Housing and Mixed-Use Site Allocations SKPR-309 on the grounds of all of the following headings....**

### **Impact on Local Transport & Highways**

We object to planning application SKPR-309 on the grounds that its transport assessment is inadequate, it poses unacceptable risks to highway safety, and it fails to promote sustainable travel patterns within Grantham.

#### **Summary of Objection**

- The submitted Transport Assessment (TA) underestimates vehicle trip generation and fails to account for the cumulative impact of nearby developments up and down the A1 between Grantham, Colsterworth and Stamford
- Proposed access arrangements lack safe visibility splays, endangering pedestrians, cyclists, and drivers.
- There is no credible strategy to encourage walking, cycling, or public transport use, exacerbating car dependency.
- The scheme is inconsistent with National Planning Policy Framework (NPPF) guidance and local transport policies.
- Transport Assessment Flaws
- Predicted peak-hour trip rates are based on outdated TRICS data and underrepresented local travel patterns.
- The TA omits queuing analysis at the nearest junction in and around the A1/B676 Bourne Road, so congestion impacts are unknown.
- No sensitivity testing for future traffic growth or neighbouring sites, undermining robustness.
- Servicing and delivery movements are not properly modelled, risking obstruction on the adjacent public highway.

#### **Highway Safety Concerns**

- Even with proposed new roundabout layout. the proposed access lacks adequate visibility splays onto the B-road, falling below Manual for Streets standards.
- Pedestrian refuge islands and dropped kerbs are omitted, placing walkers at risk when crossing.
- Cyclist routes are neither segregated nor signposted, forcing vulnerable users into fast-moving traffic.
- Absence of swept-path analysis for refuse vehicles could lead to overruns of footways and conflicts with oncoming traffic.

#### **Sustainable Transport and Connectivity**

- No improvements to the nearest bus stops are offered, despite a 500 m walk to the nearest service.
- The Travel Plan is devoid of measurable targets, monitoring mechanisms, or sanctions for non-compliance.
- What is the Electric vehicle charging infrastructure and is limited to the minimum requirement....no provision for future expansion?

### **Policy and Guidance Non-Compliance**

- National Planning Policy Framework requires developments to ‘give priority to pedestrian and cycle movements’ (NPPF #104) and to ‘support reductions in greenhouse gas emissions and congestion’ (NPPF #105).
- South Kesteven Local Plan Policy DE1 expects transport assessments to demonstrate no severe residual cumulative impacts on the highway network.
- Local Transport Strategy aims for a 50% modal share target for walking and cycling by 2030; SKPR-309 makes no meaningful contribution.

### **In Addition...**

The average number of cars per household in East Midlands is 1.23, an increase of 16% since 2003 (NimbleFins, March 2025). This would bring an approximate 381.3 additional vehicles to Colsterworth.

The A607 is estimated to have 17,641 vehicles daily (GOV.UK 2024) which is an increase from 2023 and 2022. This demonstrates that vehicle ownership and flow traffic is increasing on roads that pass through the village.

Colsterworth High Street is already strained with daily flow traffic and residential parking. Several sections around the Family Shopper and Church become impassable with public busses and lorries, in addition during A1 Road closures when traffic is diverted through the village. The High Street cannot be extended or widened and contains several listed buildings.

Furthermore, serious concerns must be raised about additional flow traffic on Stamford Road from the proposed development. Vehicles entering and exiting the proposed development would enter Stamford Road from the non-existing A1 slip road opposite Honey Pot Lane and from the crossroads joining the High Street and Stamford Road to the B676. The crossroads has poor visibility from Stamford Road entering the B676 and from the High Street entering the B676. There is significant increased risk to life by all users. If the allocation was to be approved the increased flow traffic of construction vehicles during the build phase poses considerable risk to pedestrians crossing the B676 and using unpaved sections of the High Street. Serious considerations to improvements in infrastructure for vehicles and pedestrians must be addressed to mitigate this, which is not evidenced in the Infrastructure Delivery Plan (June 25). Currently, until 28<sup>th</sup> September the access to Melton Mowbray is closed at Lag Lane, therefore there is no through traffic and consequently any traffic surveys completed at this time will not include the usual quarry trucks, articulated lorry traffic or commuter traffic from the east travelling via Melton on the A676.

### **Conclusion and Requested Actions**

- For these reasons, we respectfully request that South Kesteven District Council REFUSE application SKPR-309 on transport and highway safety grounds.
- Require a revised Transport Assessment addressing trip rates, cumulative impacts, and robust junction modelling AFTER 28<sup>th</sup> September 2025.
- Insist on safe access design meeting Manual for Streets visibility and pedestrian crossing standards.
- Secure a comprehensive Travel Plan with clear targets, monitoring, and enforcement mechanisms.
- If the Council is minded to approve, we ask that these matters be secured by condition or Section 106 agreement, and that the proposal be referred to Lincolnshire County Council Highways for full technical review and the CCAG is consistently updated on proposals.

## **Impact on the Local Wildlife**

We object to Proposed Housing and Mixed-Use Site Allocations SKPR-309 due to its significant and unmitigated harm to habitats and protected species around Colsterworth.

### **Summary of Key Concerns**

- No up-to-date Ecological Impact Assessment or seasonally appropriate surveys have been completed or published for bats, great crested newts, reptiles, or the vast array of breeding birds on the proposed site.
- Site adjoins a designated Local Wildlife Site and contains hedgerows listed as Habitat of Principal Importance.
- Absence of a Biodiversity Net Gain calculation or meaningful compensation strategy.
- Scheme conflicts with NPPF biodiversity policies, Natural England standing advice, South Kesteven Local Plan Policy EN2, and the Colsterworth Neighbourhood Plan's habitat protections.

### **Local Wildlife Context**

- The application site sits directly opposite Twyford Woods which contains the Butterfly Conservation Reserve.... A comment from the Manager of the reserve *"As the Manager of the local Butterfly Conservation reserves at Twyford Wood, just a few hundred yards from the proposed development I am particularly concerned about the environmental impact"*. Martin Kew.
- In addition to the immediate loss of habitat and threat to biodiversity, the rare species that are found in the woods will lose an essential wildlife corridor. A recent record of sightings included the following species - 256 Marbled White, 72 Ringlet, 13 Meadow Brown, 18 Large Skipper, 6 Small Skipper, 6 Small White, 11 Large White, 6 Green-veined White, 6 Speckled Wood, 2 Small Heath 3 Common Blue, 2 Purple Emperor and 2 Comma. All of which utilise the proposed area amongst their feeding grounds.
- The application site is also known for its diverse bird populations including tawny owls, barn owls, yellowhammers, waxwings, red kites, sparrow hawks, skylarks, bramblings, and feeding grounds for all of the garden birds in the village not to mention the amphibian breeding ponds present on the proposed land. *Yellowhammers* have been reported as nesting in the fields for years and it is fact that Yellowhammers return to the same site, consistently year after year to nest, and further to their recent population decline makes it a UK Birds of Conservation Concern Red List species. The birds of prey use the proposed land as a feeding and hunting ground, you are effectively killing off their natural habitat and destroying their lively hood, you cannot simply expect them to find alternative areas to survive.
- Mature hedgerows are indeed a habitat of principal importance in England under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006, a status often referred to as "priority habitat". This means they are legally recognised for their importance to biodiversity, and their removal is restricted under the Hedgerows Regulations 1997. Therefore, any proposed development affecting mature hedgerows on a site must consider and mitigate potential harm to this valuable ecological resource particularly as they form essential commuting routes for bats and small mammals including hedgehogs.

- The maps on national impact zones are the accepted statutory guidance that local planning authorities must take into account when considering the risk of development for great crested newts. These maps have an AMBER indication, meaning it is a suitable habitat and that great crested newts are likely to be present and breeding within 250 m of the site; a statutory minimum buffer is required to avoid disturbance.
- Pheasant roosting, rearing and shoots are part of our community life and part of our heritage. This breeding and shooting ground would be lost under SKPR-309 therefore destroying our village heritage and people's livelihoods not to mention the loss of habitat for the incumbent pheasant population that resides in this area. They cannot be expected to just get relocated!
- Bat roosts have been recorded in adjacent outbuildings, with flight lines aligned to existing hedgerows that the proposal would truncate.
- Flaws in the Ecological Assessment
- The submitted report dates from 2019 and lacks winter or dusk/dawn bat activity surveys, nor does it include pond surveys during the optimal March–June window for amphibians.
- No reptile survey has been conducted, despite the presence of sunny grassland strips ideal for slow worm and grass snake basking.
- The scheme fails to apply Defra's Biodiversity Metric 3.0 to quantify baseline habitat units and demonstrate a net gain.

#### **Biodiversity Loss and Fragmentation**

- Proposed removal of over 100 m of species-rich hedgerow equates to a loss of more than 0.5 habitat units, critically undermining bird nesting and bat foraging networks.
- Extensive hard surfacing will sever amphibian corridors, increasing road mortality risk for any resident amphibians, great crested newts and/or common toads
- Lighting plans are not evident to meet Bats and Lighting guidelines, risking further disruption to foraging and commuting routes.

#### **Policy and Guidance Conflicts**

- National Planning Policy Framework mandates that developments should “minimise impacts on and provide net gains for biodiversity” (NPPF #174) and refuse permission where significant harm cannot be adequately mitigated (NPPF #180).
- Natural England's standing advice requires LPAs to assess and avoid disturbance to protected species; currently, no robust avoidance or mitigation strategy is presented.
- South Kesteven Local Plan Policy EN2 insists on measurable biodiversity net gain; SKPR-309 offers neither calculation nor meaningful compensation.
- The Colsterworth Neighbourhood Plan identifies Local Wildlife Sites and natural corridors as key assets to be conserved and enhanced.

### **Requested Actions**

- REFUSE application SKPR-309 until a full, seasonally appropriate Ecological Impact Assessment and protected species surveys are carried out.
- Require submission of a Biodiversity Net Gain report using Defra Metric 3.0, demonstrating at least 10% gain.
- Insist on retention of all priority hedgerows with a minimum 10 m buffer and enhancement planting with native species.
- Secure off-site compensation via habitat creation or restoration agreements (e.g., pond refurbishment, wildflower meadow). The current pond refurbishment on the East of Stamford road is insufficient to mitigate this.
- Ensure ecological safeguards through a Section 106 agreement: ecology clerk of works, construction exclusion zones, lighting design to mitigate bat impact, and installation of bat boxes, owl nest sites, and amphibian tunnels.
- Colsterworth's wildlife-rich landscape and statutory protections demand that any development demonstrates robust avoidance, mitigation, and enhancement measures. I urge the Council to uphold its duties under national and local policy by refusing or conditioning SKPR-309 accordingly.

### **Impact on the Biodiversity of the Local Area**

We formally object to Proposed Housing and Mixed-Use Site Allocations SKPR-309 on the basis that the proposals as submitted fail to safeguard local biodiversity and protected species.

### **Failure to Avoid Harm to Protected Species**

The application does not demonstrate adequate consideration of the mitigation hierarchy set out in the National Planning Policy Framework and Natural England's standing advice. There is no clear evidence that the developer first sought to avoid adverse impacts on habitats or species of conservation concern, as required by best practice guidance for local planning authorities when assessing potential harm or disturbance to protected wildlife.

### **Inadequate Biodiversity Net Gain Assessment**

While the Biodiversity Net Gain (BNG) requirement became mandatory for most applications after 12 February 2024, transitional provisions still demand robust ecological assessments and compensatory measures to ensure no net loss of biodiversity. SKPR-309 lacks any quantification of habitat units lost or gained, making it impossible to verify compliance with BNG objectives or to secure at least a 10% uplift in biodiversity value.

### **Absence of Detailed Ecological Surveys**

No up-to-date bat, great crested newt, or breeding bird surveys accompany the planning documents, despite potential habitat features on and adjacent to the site. Without these surveys conducted at the correct season and by qualified ecologists, the local planning authority cannot be satisfied that protected species will not be unlawfully disturbed or that necessary licensing conditions can be met

### **Inadequate Mitigation, Compensation and Management Plans**

The proposals rely solely on generic planting palettes and peripheral buffer strips to demonstrate ecological enhancement. There is no management plan to secure long-term maintenance of new habitats, nor any detailed measures to compensate for the loss of existing mature trees, hedgerows, and wetlands that support principal species. This omission conflicts with standing advice that developers must agree avoidance, mitigation or compensation measures and secure these through conditions or obligations before permission is granted.

### **In Addition....**

Alongside this there is significant open space here along the village's southern boundary. In South Kesteven Open Space, Sports and Recreation Study (Feb 2024) it was noted that "The future population of South Kesteven is projected to be 154,893 by 2041. When compared to the current provision of open space, this increase in population would result in a deficiency in the Amenity Greenspace and Provision for Children and Young People Typologies". One recommendation noted was to "Increase the multi-functionality open spaces where possible, including increasing green travel routes, improving aesthetic, increasing habitat for wildlife and the cultural offering". With the public footpath running through the proposed development site any build here would bring significant loss in habitat and benefits to the local community.

The Sustainability Assessment (July 2025) does not assess the full site for allocation, only the previous allocation site for 70 homes. This must be addressed urgently. Any Environmental/ Sustainability Impact Assessment for this proposed development site must demonstrate how the statutory requirement for 10% BNG will be met within the proposed development site and how open space, and public footpaths will be fully integrated to provide sustainable environmental benefits to the community of Colsterworth.

### **Conclusion and Requested Outcomes**

For these reasons, we respectfully request that Proposed Housing and Mixed-Use Site Allocations SKPR-309 be refused on biodiversity grounds.

- The applicant should submit comprehensive Phase 1 and Phase 2 ecological surveys addressing all relevant protected species.
- A detailed Biodiversity Net Gain calculation is provided, showing how the development will achieve at least a 10% uplift in habitat units.
- A long-term habitat management and monitoring plan is secured by condition or obligation.
- With these absent measures, the development would cause unacceptable harm to local wildlife, contravening both national policy and statutory requirements for protected species and biodiversity net gain.

## **Impact on the Colsterworth Village Amenities**

We formally object to SKPR-309 on the grounds that it will place unsustainable pressure on Colsterworth's very limited village amenities.

Allegedly Colsterworth is considered a LARGE village, this is not the case.... It should be classed as a SMALL village at best due to its size and very limited amenities.

### **Summary of Key Concerns**

The proposal makes no provision for additional school capacity, healthcare services, transport links, retail facilities, or community space, thereby undermining the well-being of existing and future residents.

### **Detailed Grounds of Objection**

#### **Educational Infrastructure**

- Colsterworth C of E Primary School currently operates at full capacity with a waiting list for Reception and Year 1.
- SKPR-309 is expected to generate at least 25 additional primary-aged children without any commitment from the developer to fund new classrooms or a school extension.

#### **Healthcare Services**

- Colsterworth Surgery on Back Lane holds a patient list exceeding its safe clinical capacity, leading to multi-week appointment waits, currently in excess of 3 weeks
- No medical provision (e.g. branch surgery, treatment rooms) is included to accommodate an influx of potentially 600 new patients.

#### **Public Transport and Connectivity**

- The Centrebus bus service (route 28) runs only 6 times each weekday and 7 on a Saturday with no evening or Sunday service, severely limiting access to Grantham secondary schools, shops, and employment.
- The proposal includes no funding for additional buses, service frequency improvements, or new footway links from the site to existing stops, forcing reliance on private cars.

#### **Retail and Local Services**

- The village's 2 convenience stores and single mobile post office service operates at capacity and cannot absorb increased demand. The village is obviously not considered large enough for a stand alone post office.
- There is no allocation for new local shops or community-run retail outlets to prevent service shortfalls.

### **Requested Mitigation and Conditions**

For these reasons, we respectfully request that Proposed Housing and Mixed-Use Site Allocations SKPR-309 be REFUSED unless the developer secures, via a Section 106 agreement:

- Funding for AT LEAST a two-classroom extension at the Primary School, as this is not possible due to location constraints then a new school building should be proposed within the plan, SKPR-309
- Delivery of a GP branch surgery with at least two consulting rooms within the new plan

- Subsidy for an expanded bus service (minimum 10 trips/day, including weekends) and new footway connections
- Creation of a new village shop unit or community-run retail space
- Replacement of public open space and recreational facilities to accommodate the additional 600+ residents
- Impose conditions requiring phased occupation only once each facility is complete and open to the public.
- An additional entrance to facilitate appropriate traffic and emergency vehicles should one get blocked, or in the case of an accident on the A1, the queuing traffic exiting the A1 will block the entrance on/off Bourne Road at the entrance to B676.

### **Impact on Pedestrian Access**

All village amenities, except for the allotments are situated to the north of the proposed residential allocation. Therefore, any access to these amenities would require the crossing of Bourne Road which is a classified road subject to a 30mph speed limit with no weight limit restriction as it provides access from the surrounding villages as well as the adjoining county of Leicestershire to the A1 which is a strategic part of the National Highway major highways infrastructure. By positioning this residential allocation to the south side of the village and to the south of Bourne Road the provision of suitable footway and cycleway connections into the village will again be very problematic. As stated in the development principals accompanying this allocation pedestrian links such as footway and cycleway connections into the village should be incorporated in the development proposals. As there is only one uncontrolled crossing point along the length of Bourne Road near to number 40A what mitigation measures would be imposed on the developer to provide a safe crossing facility and to provide suitable footway and cycleway routes as long sections of Bourne Road have footways less than 2.0m wide and in other sections there is only a footway on one side of the carriageway. The existing cycle route on Bourne Road terminates at number 58 as you enter the village from the A1 and there are no other cycleways along Bourne Road as cyclists are expected to use the main carriageway.

The only other pedestrian access into the village amenities from the proposed residential allocation is the public right of way (PROW) known as the Ropewalk which runs from Bourne Road to Back Lane crossing the public open space off Colster Way. From Bourne Road to Colster Way the PROW is bounded by boundary fences of adjacent properties and is not hard surfaced for part of its length. If this was promoted as a suitable access route the available width between the boundary fences may not provide a sufficient width for the construction of a joint use cycleway / footway.

Whilst the plan [SKPR-309] has not established definitive highway improvements on Bourne Road to provide suitable access and sets out that this requires ‘serious consideration’, the points above clearly highlight that this would not only be a traffic issue, but it would also endanger people’s lives.

The village has significant constraints due to its rich and important history and that of the adjacent settlement Woolsthorpe by Colsterworth that contains the National Trust property Woolsthorpe Manor. Colsterworth High Street is narrow and winding and already a traffic bottle neck and cannot be developed. Back Lane, which provides access to a methodist church, school and doctors surgery is an area of intense use already and provides no opportunities for change.

### **Contraventions to the Colsterworth Neighbourhood Development Plan 2016 – 2026**

This proposed residential allocation would appear to conflict with the existing Colsterworth Neighbourhood Development Plan 2016 – 2026 prepared by Colsterworth Parish Council.

There is reference within Policy SP1 the Core Strategy of this plan states that any new development should be kept within the existing built-up part of the settlement and preference should be given to brown field sites.

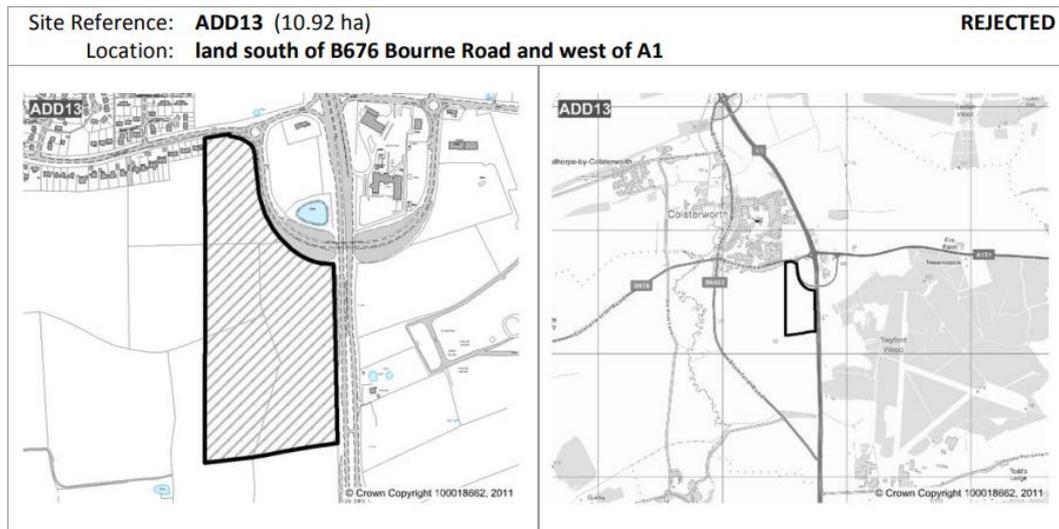
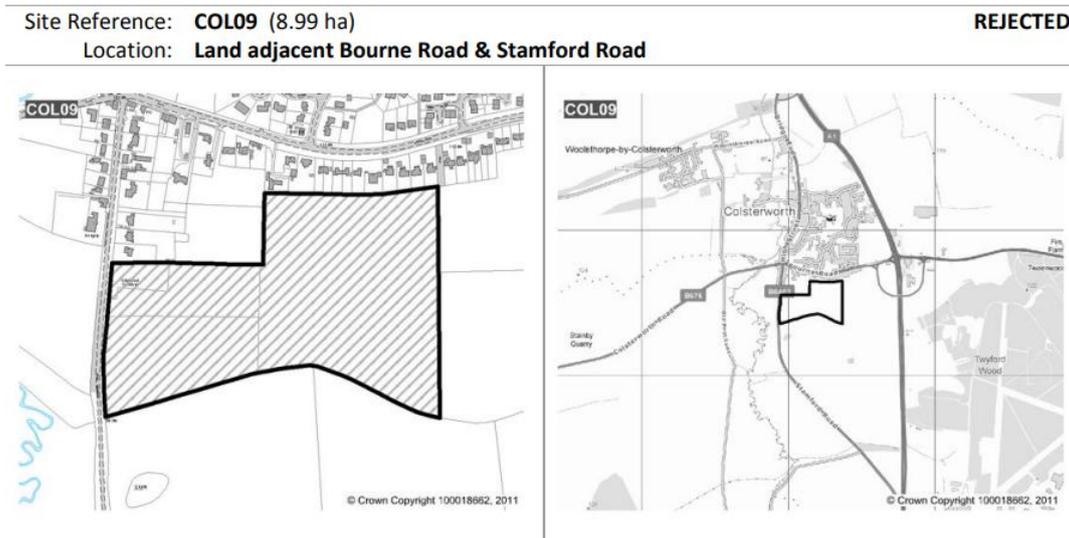
This is further reinforced within Policy SAPH 1 which states that: *“Other than those sites which are allocated, new green field sites on the edges of the towns and villages will not be considered acceptable for housing development. Planning permission will only be granted for small infill (sites of 10 or fewer houses) and redevelopment sites provided that the development:*

- 1) *can be satisfactorily accommodated by:*
  - *the existing local highway network;*
  - *the waste water treatment and sewerage network and;*
  - *the local education and health provision.*
- 2) *will not have a detrimental impact upon the quality of life of adjacent residents and properties.*
- 3) *will not compromise the nature and character of the settlement.*
- 4) *is in accordance with the criteria of Policies EN1, EN2, and EN4 of the Core Strategy.”*

Based on local knowledge, the SKPR-309 allocation does not appear to be able to meet or deliver the ‘development principles’ set out for its development in the Draft Local Plan (page 201). The Colsterworth & District Neighbourhood Plan (2016-2026) supports this view. This is set out in ‘Policy 1 – Residential Development’ and in relation to ‘Important views and Vistas’ Para 7.34 onwards.

Lastly, we would also like to add that this area has consistently been REFUSED planning permission since before 2010, we as the Colsterworth Collective Action Group would like to know what exactly has changed in the last 15+ years that should indicate that anything has changed and why this should YET AGAIN be considered as a suitable site when clearly the planning department rejects it.

Please note.....



In addition, the poorly defined boundaries of the proposed plan risk exposure to continued and further development which would be of even further detriment to the village and its infrastructure and would ultimately create a super village by linking North Witham boundaries with that of Colsterworth. Bridge End, North of former A1 exit / China Moon is available for sale and development. This would provide the opportunity to continue the Bridge End / Woodlands development and be better serviced by transport and amenities. Plans to build c10,000 homes at former RAF base 'Woolfox Depot' south of Colsterworth have been set out with Rutland County Council. Surely a joint approach to this 'garden city' concept with adjoining SKDC land would be a meaningful and achievable long-term commitment to meeting the UK's needs (and that of the local areas) for new housing.

You will appreciate we have very serious concerns and are determined to ensure this process is managed fairly, correctly and transparently.

Members of the Collective have spoken to residents and found that many have not been aware of the plan. We have undertaken our own leaflet campaign to raise awareness however some residents, especially those without internet access, are having problems accessing information and providing responses. The council has not arranged any local meetings to share the draft plan, so we therefore arranged our own meeting to share information and gather more feedback.

This letter sets out our headline objections, so that these are registered before your deadline.

Yours faithfully,

  
**Chairperson**

  
**Secretary**