

Your ref:
Our ref: 480 40 MB

22 April 2024

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

Dear Sirs

**SOUTH KESTEVEN LOCAL PLAN
REGULATION 18 CONSULTATION 2024
FORMER GRANTHAM CHURCH HIGH SCHOOL (SKPR-62), QUEENSWAY,
GRANTHAM**

Thank you for the opportunity to provide representations on the Regulation 18 Draft version of the Local Plan for South Kesteven.

We represent Lincolnshire County Council, the owner of the land at the former Grantham Church High School, Queensway, Grantham, which is allocated as site reference SKPR-62 for residential development under policy H1. In total the site is expected to deliver 76 dwellings at a density of 30 dwellings per hectare, although the capacity is reduced to take account of the challenging shape of the site. This fact should be highlighted in the Local Plan text setting out the requirements for the site. Any new proposal for the allocation will be expected to integrate with the surrounding built environment, including the ongoing development of the former school building for 40 dwellings under Reserved Matters approval S22/1928, and by providing links to the Green Lane Cycle way to the north.

We confirm the landowner supports the principle of development and will make the land available for development.

There are, however, comments on both the Site Assessment/Sustainability Appraisal process and the Grantham Residential Allocations Development Principles on page 144 of the Local Plan.

On the site assessment a few areas of concerns are raised, which in reality should be discounted. These are:

- Agricultural Land Classification – both assessments indicate the land is Grade 3 Agricultural Land. The Regional Maps for agricultural land, however, pre-date the wider development of Grantham, including the delivery of the Grantham Church School. In reality, the land should be classified as "Land Predominantly in Urban Use". The site is surrounded by urban development and the amount of land is not such that it can be used for agricultural purposes. New Policy 2 appears to require a soil survey to be undertaken for sites involving 1ha of Best and Most Versatile Agricultural Land. No such requirements should be enforced for the redevelopment of a former school site in Grantham.



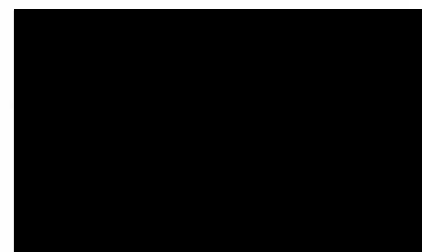
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- Surface water drainage – The site appears to be subject to some surface water flooding, and any development proposal would incorporate a new positive drainage system that would address any issues, which are due to the need to renew the current land drainage infrastructure.

The Local Plan policy includes a number of statements relating to development of the site which need to be carefully considered.

Principles A, B and C request the provision of links, including pedestrian, to the wider areas of housing, the green way to the north and the open space to the south. Access to the Green Way is not an issue and would support the provision of pedestrian access from the ongoing development of 40 dwellings on the site of the former school buildings (as required by the part implemented planning permission for that site). Public access to the south is slightly more problematic because much of that area is leased to Harrowby Town Football Club and used for both training and playing of competitive football matches. As such, public access would not normally be supported. Connections to the wider area are also subject to certain challenges. Most of the land allocated is backed onto by domestic gardens, and as a result there is little opportunity for providing public access. The ongoing development of 40 dwellings may provide the potential for some access, as that development requires the option for delivering a link to the Green Way. New links could potentially be made eastwards to Portmarnock Way or Woodbrook, but again there is private land that would need to be crossed and providing new access points may be outside of the power of the site developers to deliver. We note the use of the words “where possible” in relation to provision of these links, but would suggest replacing the word “where” with “If” to give greater flexibility and to reflect the fact land ownership may limit the opportunities to provide new access points.

Principle E indicates the site is within/includes an area of “Green Infrastructure”, despite being a cleared site of a former school.

It is not clear how areas of Green Infrastructure have been identified or defined. A Biodiversity Opportunity and Green Infrastructure Map has been published with the Local Plan, but the derivation of the plan is not provided. Nor has any consultation taken place with the landowners on the production of that plan. On investigating the map, it seems areas of Green Infrastructure do not include developed areas, and, as such, SKPR-62 should not be designated in this way. The site was the grounds of the former school, which was closed after being declared surplus. As such, the grounds, like the school were deemed redundant. The site is fenced off and secure and is not available for use by the general public.

It is not reasonable to overlay an existing allocation with a restrictive designation without providing a robust justification.



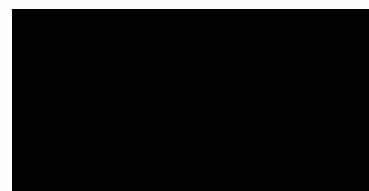
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Principle E should be removed as it is redundant after the Biodiversity Net gain Regulations came into force in February 2024. The development would be expected to contribute Open Space and the reference to the green infrastructure area does not add any clarity.

We **Support** the allocation of SKPR-62 but **Object** to the detailed comments set out above. The landowner would welcome the opportunity to discuss any of these matters in more detail, to allow for a mutual understanding of the issues involved.

Please contact the office should you have any questions.

Yours faithfully



Michael Braithwaite MRTPI

