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Dear Shaza

South Kesteven Local Plan Regulation 18 Consultation Response by Barberrry Grantham Limited

Harris Lamb Planning Consultancy (“**HLPC**”) is instructed by Barberrry Grantham Limited (“**Barberrry**”) to submit representations to the South Kesteven District Council Local Plan Regulation 18 consultation and welcome the opportunity to comment at this time. Barberrry is promoting land to the south of Belton Lane as a proposed sustainable urban extension to Grantham. Having reviewed the draft Local Plan we welcome the inclusion of the land south of Belton Lane as a draft allocation under reference SKPR-57 and consider that the site is suitable to accommodate residential development. Whilst we clearly support the inclusion of the land to the south of Belton Lane as a draft allocation we also set out a number of other comments in relation to the draft Plan to assist the Council as it progresses towards the Pre-submission draft version of the Local Plan and the examination of the Local Plan by a Planning Inspector.

To assist the Council we attach a copy of a Vision Document that has been prepared in support of the land at Belton Lane which has been supplemented by further additional work undertaken in the preparation of these representations. Our representations should be read with these objectives in mind and whilst we generally support the content and direction of the draft Plan there are certain areas where we would seek revisions to the Plan to ensure that it is sound.

Vision

Barberrry generally support the vision for South Kesteven with its strong links to the growing economies of Peterborough, Cambridge and London along with its distinctive local character, unique local heritage and environmental and cultural assets which will attract people to live and work in South Kesteven. Specifically, in relation to Grantham in its role as a sub-regional centre we agree that this should be strengthened through significant housing and employment growth. Furthermore, we agree that there should be dignificant residential development to the north and north west of the town. Finally, Barberrry is happy to happy the Council’s commitment to tackling climate change and welcome the updated references in the



Strategic Objectives for the Local Plan

Barberry fully supports the enhancing economic prosperity objectives set out in the Local Plan noting that in order to achieve the delivery of an adequate supply and choice of land for new housing is imperative. Furthermore, Objective 6 highlights the role of Grantham as an important sub-regional centre and the need to focus new housing, employment and other facilities in it.

Policy SD1: The Principles of Sustainable Development in South Kesteven

Barberry generally supports the principles set out in the policy noting the emphasis on mitigating the impacts on climate change and looking at how development can contribute to mitigating the impact on climate change.

Policy SP1: Spatial Strategy

The Plan's spatial strategy covers the period 2021 to 2041. Paragraph 22 of the Framework states that strategic policies should look ahead over a minimum 15 year period from adoption. In light of the fact that the Local Plan is currently only at Regulation 18 stage the Plan would need to go through examination and be adopted by 2026 in order to achieve 15 years from the date of adoption. As such, the Council may need to consider rolling forward the plan period by a further year if there is any delay in adopting the Plan.

Paragraph 61 of the Framework states that to determine the minimum number of homes needs, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The housing need identified in the policy has been calculated using the Standard Method and equates to 14,020 dwellings. The strategy for delivering the housing seeks to focus the majority of growth in and around the sub-regional centre of Grantham and then the 3 market towns with Grantham being the focal point. Barberry supports the spatial strategy of seeking to direct the majority of growth to Grantham. The intention to deliver half of the District's in Grantham is considered sound in light of the relative sustainability of Grantham in comparison to the other settlements within the District. Grantham as a sub-regional centre is the focus for employment, retail and associated facilities and which is well-served by public transport. It is, therefore, wholly appropriate that growth and new development is directed to the most sustainable location within the District. The spatial strategy as set out seeks to roll forward the existing spatial strategy in the adopted Local Plan which was considered sound.

Policy SP2: Settlement Hierarchy

Barberry support the settlement hierarchy identified in policy SP2 stating that Grantham is at the top of the hierarchy and that it is intended to, in its role as a sub-regional centre, attract further development to it. The policy states that new development proposals will be supported on appropriate and deliverable brownfield sites and sustainable greenfield sites (including urban extensions), where development will not compromise the town's nature and character. We return to this point below in respect of our comments on Policy SKPR-57.

Policy H1: Housing Allocations

The proposed housing requirement has been calculated using the Standard Method and sets out a need for 14,020 dwellings which equates to 701dpa. In order to validate the Standard Method assessment a local housing needs assessment has been carried out which confirms the findings of the Standard Method.

The Local Plan proposes a buffer of 20% to the Standard Method housing figure which equates to a total housing supply of 16,824 dwellings. Barberry support the inclusion of a flexibility allowance.

We note the Council have re-assessed existing allocations in the adopted Local Plan in order to re-determine their suitability for continued allocation in the emerging Local Plan. Barberry supports this approach and considers that sites that are roll forward can be confirmed as being deliverable as a result of their updated assessment. Barberry also supports the identification of the additional 23 sites to accommodate a further 2,901 new homes as draft allocations in the Plan to meet the housing requirement.

We note the sites that are identified as draft allocations have been subject to an extensive appraisal process to determine their social, economic and environmental suitability. In carrying out such an exercise the draft allocations have been concluded as available and deliverable and capable of meeting the housing needs across the Plan period. In identifying proposed allocations we note that a further 1,044 dwellings are proposed within Grantham which when added to completions, commitments and adopted Local Plan allocations equates to a total supply in Grantham town of 8,392 dwellings. This equates to 50% of the overall supply. As noted, we agree that the strategy of directing this quantum of the District's housing to the main centre is appropriate.

In light of the appraisal of sites submitted via the Call for Sites Barberry support the inclusion of SKPR-57 land at Belton Lane as a draft allocation within policy H1. We return to the suitability of the site and the proposed site specific policy below.

Policy H2: Affordable Housing Contributions

Barberry are supportive in principle to the requirement to deliver affordable housing on site. The policy states that all developments comprising 10 or more dwellings (or an area of 0.5 hectares or more) should make provision for 27% to 57% depending on the outcome of the whole Plan viability assessment. Clearly, there is a significant difference between 27% and 57% of units to be delivered as affordable housing and Barberry await the findings of the whole Plan viability assessment in order to determine what the appropriate level should be. Barberry reserve the right to comment further on the proposed affordable housing requirement once it is determined in due course.

Barberry do not object in principle to the requirement to provide affordable housing on site and agree that this would be the most appropriate location to deliver affordable housing particularly on sites that are identified as draft allocations. The land at Belton Lane can accommodate a policy compliant level of affordable housing.

Barberry are generally supportive of the requirement to deliver 25% affordable housing through planning obligations as first home and welcome the proposed mix of 60% socially rented / affordable rent / intermediate rent and 40% affordable ownership as the preferred tenure mix for affordable housing.

Policy H4: Meeting All The Housing Needs

Barberry are in general agreement that all new housing development should provide appropriate type and size dwellings to meet the needs of current and future households in the District. Table 4 identifies the indicative mix of homes to be delivered up to 2041. At the current time Barberry do not have an objection to the proposed mix although it is noted that approximately three quarters of dwellings are intended to be 2 or 3 bedroom properties. Whilst this is the overriding need for market housing Barberry contend that there should be a flexible approach to housing mix across all tenures in order to provide choice for future residents and to meet affordable housing needs.

The policy also sets out a requirement that on residential development above 10 dwellings there will be a 10% target for dwellings to be developed as “accessible and adaptable” in line with option standards set out in part M4(2) of the Building Regulations. It is noted that the provision of M4(2) dwellings is to be included under Building Regulations going forward and as such there may be merit in seeking to adapt the policy so that it can refer to the latest Building Regulations requirement than a standalone planning policy. In doing so this would avoid duplication of control and allow the delivery of accessible and adaptable units in line with current Building Regulations.

Policy H3: Self and Custom Build Housing

The policy requires that on sites of 400 or more units at least 2% of the plots will be provided for self and custom build housing. Barberry do not object in principle on the basis that the policy includes a marketing provision and that if after a period of 12 months marketing the units and plots have not been acquired then they can revert to normal market use. Barberry consider this a pragmatic approach which will allow self build units to be constructed if there is a demand for them.

On an administrative point policy H3 appears in the Local Plan after policy H4 and should therefore be re-ordered.

New Policy 4: Biodiversity Opportunity and Delivering Measurable Net Gains

Barberry note that the policy seeks to introduce into the plan a requirement to deliver biodiversity net gain (BNG) as established in law following the enactment of the Environment Act. The Environment Act requires that all development achieves a biodiversity net gain of at least 10%. Whilst the statutory requirement to deliver BNG has only been in place since February 2024 its application in new development is, therefore, still relatively young. We suggest that the policy is kept under review as the Local Plan progresses towards the Pre-submission stage in case there is a requirement or need to refine it in light of how BNG is required/delivered through the development management process.

In the ‘Summary of Proposed Changes’ section the final paragraph notes that the Whole Plan Viability Assessment tests the viability by increasing the biodiversity requirement above 10%. As the Environment Act only requires a 10% net gain we do not agree that there is any basis upon which to require a higher net gain above 10% as is suggested via the whole Plan viability assessment work. This would not be justified.

Policy SB1: Sustainable Buildings

In respect of energy consumption, the policy states that new development should strive to be zero carbon ready through minimising energy use and choice of low carbon energy sources. The use of the word strive is considered to be ambiguous and should be re-worded in order to provide a clearer steer as to what would be required. Notwithstanding the above, new housing development will shortly be required to be built in accordance with the Future Homes Standard that would include measures in relation to energy consumption and water resource use. As such, would the policy be better worded to refer to compliance with the Future Homes Standard or the relevant standard in place at the time of construction.

Policy GR1: Protecting and Enhancing the Setting of Belton House and Park

The draft allocation on the south of Belton Lane (SKPR-57) is located to the north of Grantham town and therefore in the general proximity of Belton House and Park. The site specific policy for SKPR-57 identifies the requirement to consider the impact of the proposed development on Belton House and Park. As a result, Barberry have instructed an initial Heritage

Assessment, which is submitted alongside these representations, that considers the impact of the proposed development on the draft allocation and any impacts that this may have on the setting of the house and garden. These are set out in the accompanying note produced by HCUK and which we will return to when we comment on the site specific policy below.

Policy GR3: Grantham Allocations

Barberry note the inclusion of allocations SKPR-278 (Spittlegate Heath) and SKPR-65 (Prince William of Gloucester Barracks) within the Local Plan. Spittlegate Heath is intended to deliver 1,350 dwellings in the Plan Period and Prince William of Gloucester Barracks is intended to deliver 1,745 dwellings within the Plan period. Barberry do not object in principle to the inclusion of either of these sites as draft allocations in the Plan although it is noted that both sites are currently allocated in the adopted Local Plan but have yet to secure a planning permission or deliver any housing on them. Whilst we understand that work is ongoing on trying to bring them forward they have yet to deliver any new housing and as such we consider it wholly appropriate that the Council identifies a range of other proposed allocations in and around Grantham in order to deliver housing early in the Plan Period. Clearly, the proposed allocation on land to the south of Belton Lane (SKPR-57) being promoted by Barberry is considered a wholly suitable site in order to deliver housing early in the Plan Period.

Turning to the proposed draft allocation of land off Belton Lane, Barberry fully supports the draft allocation and considers that the site is suitable, achievable and deliverable. Accompanying these representations is a copy of a Vision Document that has been prepared to support the promotion of the site and sets out detailed baseline information about the site in respect of highways, flooding and drainage, ecology and heritage matters. Accompanying this is a draft masterplan that provides an initial indication of how the site could be developed and what the quantum of development that could be accommodated within it.

Turning to the specific provisions of policy SKPR-57 we address each of the requirements below.

a) A comprehensive masterplan is required for the entire site

Barberry agree with this requirement and contend that a comprehensive masterplan will be provided for the site that will demonstrate how up to 628 units could be accommodated on the site. The masterplan will be informed by a landscape and contextuality led design response that considers its setting and which will be informed by a range of supporting assessments including landscape and visual appraisal, preliminary ecological assessment, heritage impact assessment, transport assessment and flood risk assessment.

As part of the preparation of the masterplan key design principles will be considered and will include:

A place that responds to the local landscape character, the natural topography, and views - to ensure the development sits sensitively within its setting and maintains a green skyline;

Creates a natural, well-connected extension to the residential area of Gonerby Hill Foot; A strong green buffer to the south-western, northern and north-eastern boundaries – to enhance the green skyline to Gonerby Hill, protect the historic character and setting of Great Gonerby and prevent coalescence, maintain a green frontage to Belton Lane, and soften the hard built form of existing development at Gonerby Hill Foot adjacent to the site;

Development strategically located - to maintain a green ridgeline;

Multi-functional green infrastructure - comprising existing site hedgerows and trees together with significant new native planting, street trees and habitats to create a strong naturalistic landscape framework to the site, integrates protected and new wildlife habitats, provides greatly enhanced biodiversity and contributes to climate change adaptation, flood management and the creation of a healthy place;

Exceptional quality of design - that responds to the local vernacular to create a real sense of place with variations in building types, scale and density to establish interest, identity and defined character areas;

A walkable neighbourhood - with sustainable movement routes (foot and cycle paths) to the facilities in Gonerby Hill Foot and Great Gonerby;

Naturalised, species-rich green spaces - providing places for dog walking, running, cycling, playing, sport, nature walks, relaxation, community social events and food growing;

Embeds the principles of 'Secure-by Design' - where the streets, lanes, footpaths and green spaces are overlooked for good natural surveillance and contribute to a well-connected, safe place;

Co-ordinated SuDS strategy - capitalising on the natural low points to provide multi-functional source and site control features such as permeable paving, storm planters, rain gardens, swales and naturalised attenuation basins - to reduce runoff /flood risk and provide biodiversity, amenity, water quality and cost benefits.

b) The masterplanning and development of the site should have regard for landscape and topography. No development will occur above the 60 metre contour.

In preparing the masterplan for the site full consideration of the topography has been taken into consideration as part of the holistic design approach. In terms of understanding the site levels a full topographical survey has been carried out and it is important to note that the lowest level of the site is 63 metres AOD in the north eastern corner, with levels arising above the northern boundary of the site along Belton Lane up to 70 metres AOD. The land then rises in a south westerly direction up to 99 metres AOD in the south western corner of the site. The draft policy stipulates that no development will occur above the 60 metre contour. As a result, if this were to be implemented then no development would be possible on the site. Clearly, we do not consider that this is what Officers had in mind when drafting the policy. We would like to work with Officers in order to agree something practical that reflects the levels on the ground and has regard to the landscape and visual context within which development would sit.

In terms of limiting the extent of development up to a set contour and our design response to how far development should extend up the slope of the site has been informed by a Landscape and Visual Appraisal and a Heritage Impact Assessment (updated March 2024 and which accompanies these representations).

The Landscape and Visual Appraisal and Heritage Assessment takes into account the appeal decision on land to the north of Longcliffe Road (Grantham) (Appeal Ref: 3173367) which lies directly adjacent to the land at Belton Lane separated by the east coast mainline. The appeal was allowed for development up to 480 dwellings. This is relevant in that consideration was given to the effect of that proposal on the setting and significance of some of the key heritage assets applicable to our site, notably Belton House, Belton House Registered Park and Garden, Belmont Tower and Manthorpe Conservation Area. Whilst no development has commenced on the appeal site as yet the previous Inspector's consideration of it and the impact it will have on adjoining heritage assets is a key consideration.

In addition to the heritage impact work a Landscape and Visual Appraisal was undertaken initially in 2018 in accordance with the GLVIA 3 guidelines. Findings of the LVIA are set out in the accompanying Vision Document. It appraised the landscape character at a national, regional and local level, assessed the topography, drainage, settlement form and pattern and planning policy designations. It also reviewed settlement in and around Grantham that lies above the 70 metre contour line.

The visual appraisal included the generation of a zone of visual influence and panoramic photographs from key publicly accessible viewpoints. This identified that the actual area of publicly accessible land from which the land is likely to be seen from is very limited due to intervening land form, large woodland belts, hedgerows and built form. The area of land with greatest visual exposure and sensitivity, that is most visible to long distance heritage views from Belton Park Tower, is land to the very upper south western corner of the site and the land beyond that which continues rising up to 103 metres AOD to the top of Gonerby Hill.

Appraisal of the 2011 Grantham Townscape Assessment and Landscape Sensitivity and Capacity Study (LSCS)

The LVA also carried out an appraisal of the 2011 Grantham Townscape Assessment and 2011 Landscape Sensitivity and Capacity Study (LSCS) – both of which informed the Grantham Capacity and Limits to Growth Study carried out by AECOM in 2015.

It is important to make clear that the 2011 LSCS was prepared using ‘Topic Paper 6’ published by the Countryside Agency in 2002. ‘Topic Paper 6’ was a discussion document available at the time and provided an overview of thinking about landscape sensitivity and capacity in terms of both the concepts involved and practical techniques being used. It was a discussion paper only and was the subject of much discussion and contention - particularly since the 3rd Edition Guidelines for Landscape and Visual Assessment (GLVIA3) was published in 2013. It was recognised throughout the Landscape profession that Topic Paper 6 was out of date and did not align with GLVIA3.

It has now been superseded by best practice guidance, titled, ‘An Approach to Landscape Sensitivity Assessment’ – to inform spatial planning and land management’, published by Natural England in 2019.

Notwithstanding the methodology used, the LSCS identified the whole site as having high landscape sensitivity and a high landscape value and low capacity for development.

Our LVA identified that the site actually has a variance of visual and landscape sensitivity and capacity for development:

Landscape Sensitivity - In terms of landscape sensitivity we assessed that the site exhibits typical characteristics of the local landscape character but these are not unique or rare, there are no designations attached, and there is real evidence of alteration and degradation such as the hard edge of settlement on the skyline at Gonerby Hill Foot and expansion of modern settlement to the edges of the hill top village Great Gonerby.

It is important to note that the upper brow of the scarp, namely Gonerby Hill, that lies beyond the site boundary, provides an important area of open land separating the two settlements, as too does land north west of this adjacent to Great Gonerby.

We assessed the upper section of the site, and land above and outside the site boundary, as having a high landscape sensitivity, since it provides an important green gap and green skyline. Whereas land to the mid and lower slopes of the site are of a Low to Moderate landscape sensitivity.

Visual Sensitivity - the site has a variance of visual sensitivity. The very upper section of the site and land that lies above and outside the site boundary to the southwest forms part of a local scarp and important green skyline. It is also most visible to long distance heritage views from Belton Park Tower (a heritage vantage to view Belton Park) however this is not a recognisable public viewpoint.

Visibility of the mid section of the site is limited to local public views, and is also viewed in relation to the prominent housing of Gonerby Hill Foot and modern housing on the edges of Great Gonerby.

The mid-southern section, adjacent to Gonerby Hill Foot, screened by the linear plantation, is assessed as having a low visual sensitivity; the mid section as moderate / low sensitivity and the mid-northern section as moderate visual sensitivity.

This gives a range of overall Visual Sensitivity: the very upper slope and land immediately adjacent to Belton Lane is High whilst the mid section is Moderate to low.

Landscape Value - In terms of landscape value there are no statutory designations attached to the site. It is however of local scenic value to the setting of the town and provides amenity value to local users of the public right of way.

Capacity for Development - we assess the very upper slope, and lower area immediately adjacent to Belton Lane as Low Capacity; the southern and mid-slopes as High capacity and the lower slopes as Medium/High capacity..

An Assessment of Settlement over 70m AOD

Grantham Capacity and Limits to Growth Study (CLGS) carried out by AECOM in 2015

The CLGS was fundamentally informed by the 2011 LSCS and it suggested that :

'To preserve the setting of Great Gonerby as a hilltop settlement, and the 'green bowl' around Grantham, development should not extend higher than the 70m AOD contour. This would be in line with the Grantham Townscape Assessment aim of avoiding built development encroaching on the higher scarp slopes, a distinctive feature of Grantham also noted in the South Kesteven Landscape Character Assessment.'

The LVA included an assessment of the local topography and settlement patterns within the Grantham area, and overlaid the settlement areas that lie above the 70m contour to understand how prevalent or not this is.

As Figure 1 below demonstrates a significant amount of settlement around Grantham already lies above the 70m contour:

Grantham - Whilst the central core of Grantham sits in the valley floor, at least a third of the town lies above 70m AOD and includes a significant tranche of housing to the eastern side of town where settlement rises up the scarp to 95m AOD;

Alma Park Industrial Estate - on the eastern edge of town, lies above 70m rising up to 90m AOD;

Harrowby - east of Grantham to the top of the scarp, scattered dwellings and farmsteads lie at approximately 125m AOD;

Londonthorpe Village - North east of Grantham this small hamlet lies between 110-122m AOD;

Gonerby Hill Foot residential area - a prominent area of exposed settlement that leads up the side of the scarp up to circa 100m AOD;

Great Gonerby Village - a prominent hill top village the majority of which lies between 100-110m AOD;

Green Hill - either side of Barrowby Rd a significant extent of housing lies between 70 -95m AOD:

North of Barrowby Road - two strategic housing allocation sites, Poplar Farm East and Rectory Farm. The entirety of Rectory Farm development lies above the 70m contour rising up to 107m

Barrowby Village - a hill village at 90-105m

The above highlights that significant development in and around Grantham already lies above the 70m contour line and from a development restriction perspective is not consistent with existing or recent housing allocations. What is of greater importance is that development proposals for future sites respond to their own individual merits and constraints to ensure a sensitive, visual and contextual, landscape-led approach.

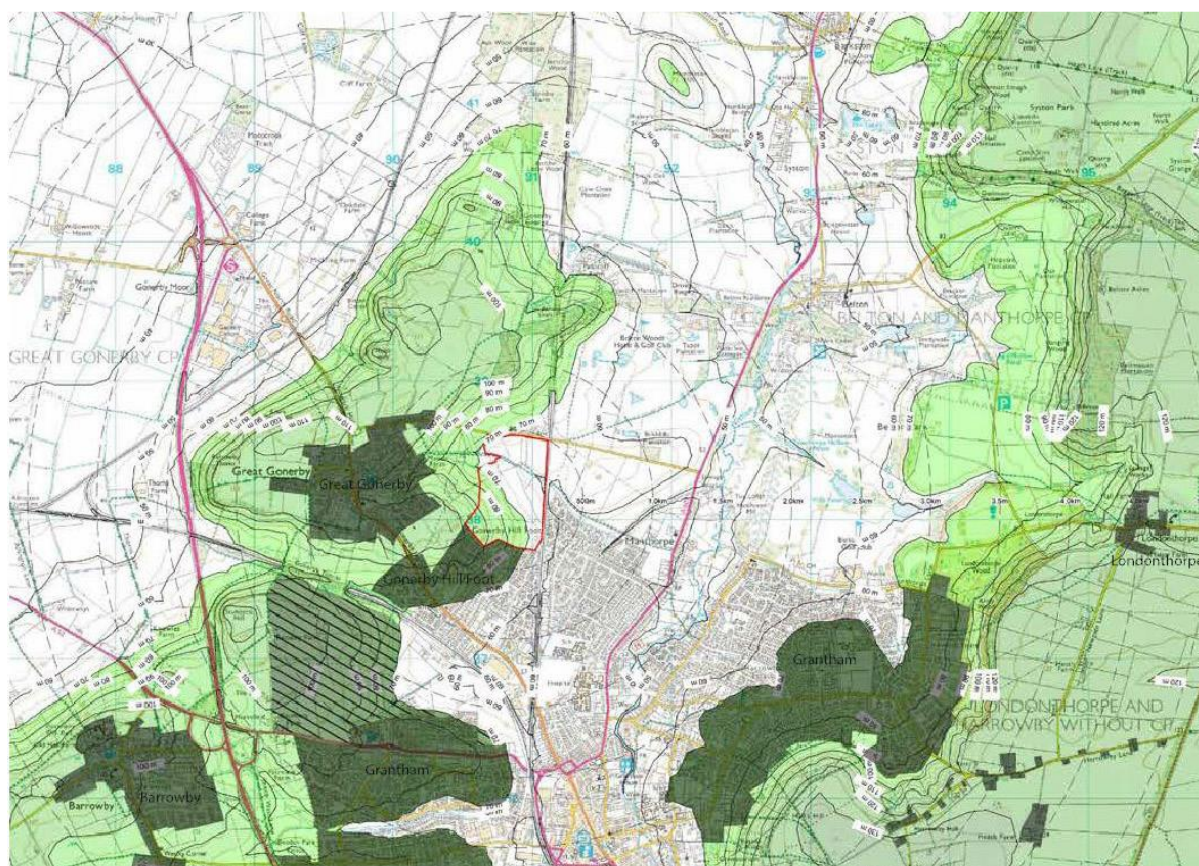


Figure 1 Development in and around Grantham above the 70m contour

c) The development will make provision towards the upgrading of Belton Lane / Newark Hill junction and footway and cycle connections

Barberry's highway consultant has been in contact with the Highway Authority to understand what schemes or proposals it currently has for upgrading the Belton Lane / Newark Hill junction. The feedback from the Highway Authority was that there was no defined scheme for the junction and that further work is still required in order to determine exactly what is required

and how this will be funded. Barberry have no in principle objection to the requirement to contribute to any necessary improvement to the Belton Lane / Newark Hill junction and are happy to work with the Highway Authority in determining what scheme is necessary and how this should be funded. Clearly, any impact arising on the junction would need to be established and where any additional development arising in the wider Grantham area contributes to additional traffic through this junction Barberry contends any contribution should be proportionate to the level of impact that the development is having on it.

In respect of delivering footway and cycle connections through the development and to the wider area Barberry are wholly in agreement with this requirement and the concept masterplan contained within the attached Vision Document contains initial proposals of how and where these links could be provided. Clearly, further work will be undertaken as the masterplan is refined in order to establish where exactly these links will run to and in what format and form they will be delivered. Barberry note the importance to provide a range of accessible options for sustainable travel that will link the site to the wider Grantham area and provide connections to existing shops, services and facilities as well as access into the town centre and public transport infrastructure.

d) *Highway connections should be made from the adjacent development to the south, where possible*

The concept masterplan contained within the Vision Document indicates that at present there are two proposed accesses to the site taken from the existing development to the south. A third emergency access is also shown on to Belton Lane although further discussions with the Highway Authority may upgrade this access to an all movements access instead. Barberry is, therefore, able to accommodate the Council's preferred access solution from the south but also to potentially provide an alternative access directly on to Belton Lane should this be required / desired.

e) *Highway, footway, cycleway connections should be provided throughout the site, connecting it to local schools, community facilities and into the wider town*

Please see comments above in respect of point c) which confirms the footway and cycle connections will be provided within the site in order to link it to existing facilities, services and facilities in the local area but also to the town centre and wider town.

f) *A public right of way runs through the site this should be retained and incorporated into the development of the site, where possible*

Public Right of Way Gran/919/1 runs through the mid section of the site in a west to east direction. This continues beyond the site connecting up to Great Gonerby village to the west and eastward on the other side of the railway line to Gonerby Hill Foot residential area and the appeal site, Land at Northcliffe Road. The concept masterplan identifies the public right of way running through the site and that it will be retained in its current alignment and will be fully integrated into the development. Retaining the public right of way in its current alignment will ensure that the residents of the new development will gain access to the town while existing residents can continue to use it to access the wider countryside.

g) *Suitable noise attenuation will be required along the eastern boundary of the site*

The proximity of the east coast mainline to the eastern boundary of the site will contribute to the noise environment affecting the future residential development. However, due to the size of the site it is possible to plan the development so that acceptable offsets from new dwellings to the railway line can be incorporated within the development thus helping to minimise the impact of noise on future residents. Furthermore, it will be possible to mitigate noise on future residents through the application of suitable glazing within new dwellings and new dwellings

can be orientated in such a way so that external amenity areas are faced away from the railway line and have appropriate boundary treatments. We do not consider that noise will present a constraint to development.

- h) Impact on heritage features will need to be considered, specifically the development should incorporate views towards heritage assets (i.e. Belmont Tower, Belton House Grade I Park and Garden, St Wulfram's Church, St John's Church) and their settings***

Please refer to the Heritage Impact Assessment prepared HCUK Group with regards to a detailed assessment of the impact of the proposed development on heritage features. It concludes that there are no grounds on which to suppose that future housing development on the proposal site will harm the significance of those heritage assets in the vicinity of the site or bring about unacceptable cumulative impacts on them.

- i) The development proposal must take into account the Belton House Park Setting Study in policy GR1***

Again, please refer to the attached Heritage Impact Assessment prepared by HCUK Group. In summary, a review of the Belton House Setting Study, undertaken by Atkins in 2010, along with the Longcliffe Road appeal letter (dated 2nd February 2018), concluded that development to the east of the proposal site would not harm the significant of the Manthorpe Conservation Area and Belton House Registered Park and Garden and its constituent listed buildings, notably Belmont Tower, listed Grade II star. On this basis there are no grounds on which to suppose that future housing development on the land of Belton Lane will harm the significance of those assets or bring about unacceptable cumulative impacts.

- j) There is the potential for archaeological remains on this site and the appropriate pre-commencement investigation should be carried out***

Barberry consider an archaeological desk based assessment will be required as part of any planning application relating to the site. The desk based appraisal will use historic environmental record data, historic mapping and other research to determine the potential for archaeological remains to be identified within the site. Following the preparation of the desk based assessment Barberry agree that it is likely that further intrusive trial trenching would be required in order to determine the archaeological record at the site. Any trial trenching would be undertaken in accordance with an agreed written scheme of investigation and in accordance with the county archaeologist. Barberry do not consider that archaeology would pose a constraint to development.

- k) The site is within or includes a Green Infrastructure Area. Proposals on this site should incorporate the relevant principles of development within Green Infrastructure Areas set out in policy EN3 Green Infrastructure***

Policy EN3 will be fully considered in the development of the master plan, the principles of which already align with our landscape and contextually-led approach. This will include taking full regard of the Green Infrastructure Mapping prepared by the Greater Lincolnshire Nature Partnership and any relevant national evidence such as Natural England's Green Infrastructure Framework.

A comprehensive approach provides multi-functional green and blue infrastructure that establishes a well-connected, naturalistic landscape framework to the development and

contributes towards climate change adaptation, flood management and the creation of healthy places:

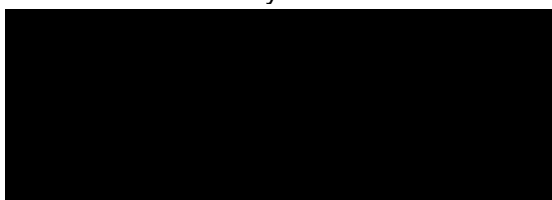
- Green infrastructure / public open spaces strategically located in areas susceptible to constraint i.e. sensitive landscape, ecological, fluvial areas such as existing wildlife corridors, areas prone to flooding, along public rights of way and high points where elevated sections of the site may be open to view and form part of a green / rural horizon;
- Retention of the majority of existing trees and hedgerows which will be bolstered and integrated with significant new native planting, habitats and street trees to establish a well-considered, naturalised mosaic of vegetation to the development - with soft green edges to the perimeter, a coherent series of open spaces and an enhanced green skyline to the upper slopes;
- Integration of protected and new wildlife habitats to ensure greatly enhanced biodiversity and habitats that also provides residents with access to nature on their doorstep;
- Provision of a fully integrated sustainable drainage system (SuDS) that treats surface water runoff as a resource rather than problem to deliver multiple benefits for water quantity, water quality, amenity and biodiversity;
- Provision of existing and new footpath and cycle routes that create linked up, permeable and accessible green routes through the development for walking, dog walking and running, thus promoting sustainable modes of transport and healthy living;
- Provision of a variety of open spaces, with formal and natural play opportunities and recreational sports provision.
- Provision of existing and new footpath and cycle routes that create linked up, permeable and accessible green routes through the development for walking, dog walking and running, thus promoting sustainable modes of transport and healthy living;
- Provision of a variety of open spaces, with formal and natural play opportunities and recreational sports provision that meet the Open Space Requirements of Policy OS1 - Open Space and Recreation.

The provision of new open space on the site will create greater access to the area than that which currently exists on the basis that the site is currently in private ownership and accessible only via a single public right of way. The proposals will include a new network of paths within the site linking the existing development to the south with the open countryside to the north. The site, therefore, has the opportunity to facilitate access to the wider countryside and to allow improved accessibility to it.

Barberry would welcome the opportunity to meet with Officers following the conclusion of the consultation in order to discuss the requirements of policy SKPR-57 and to see whether any amendments to the policy could be made in line with the comments set out above. Barberry are happy to work with the Council in order to achieve a sound Local Plan that includes the allocation of land off Belton Lane.

We trust you take our comments into consideration but should you have any questions about the above or require any further information or clarification then please do not hesitate to contact me.

Yours sincerely



**John Pearce BSc (Hons) MTPL MRTPI
Associate**

[Redacted]

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cc M Cartwright – Barberry

Land at Great Gonerby | Grantham

South Kesteven District Council

Vision Statement



November 2020

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1.1. Our Vision

1. Our vision is to create an attractive, welcoming, high quality housing development that responds to its unique landscape setting and the distinct qualities of the area to create a highly desirable place to live. The proposed development will be framed by its natural setting, utilising the existing topography and landscape character of the site and that of the surrounding area to create a truly distinctive place to live.

Our three key aspirations for the land at Great Gonerby are to:

1. Recognise the benefits of the desirable and sustainable location of the site, including its proximity to shops, services and local facilities;
2. Develop a distinctive place, building on positive elements of the existing built environment, to create a development with a sense of place, identity and character;
3. Create a walk-able safe attractive neighbourhood, incorporating areas of new public open space, recreational facilities and a comprehensive landscape framework that incorporates and enhances the sites natural components and habitats, both visually and ecologically, and provides an integrity and overall green infrastructure that integrates the development into the existing landscape.



Guiding Principles:

- Quality + local character
- Community focussed green spaces
- Walkable, connected neighbourhood
- Healthy living
- Environmental sustainability

2.1. Introduction

This Vision Statement has been prepared for Barberrry Grantham Ltd. (Barberrry) to support the promotion of the land at Great Gonerby, Grantham, as a proposed housing allocation in the South Kesteven Local Plan (2041).

Barberrry control 34.9 hectares of land immediately adjacent to the northern built up edge of Grantham. The site is currently in agricultural use and is bound by Belton Lane to the north, the existing residential community of Gonerby Hill Foot to the south and the East Coast Mainline Railway line to the east. The hilltop settlement of Great Gonerby is located approximately 250 metres to the west.

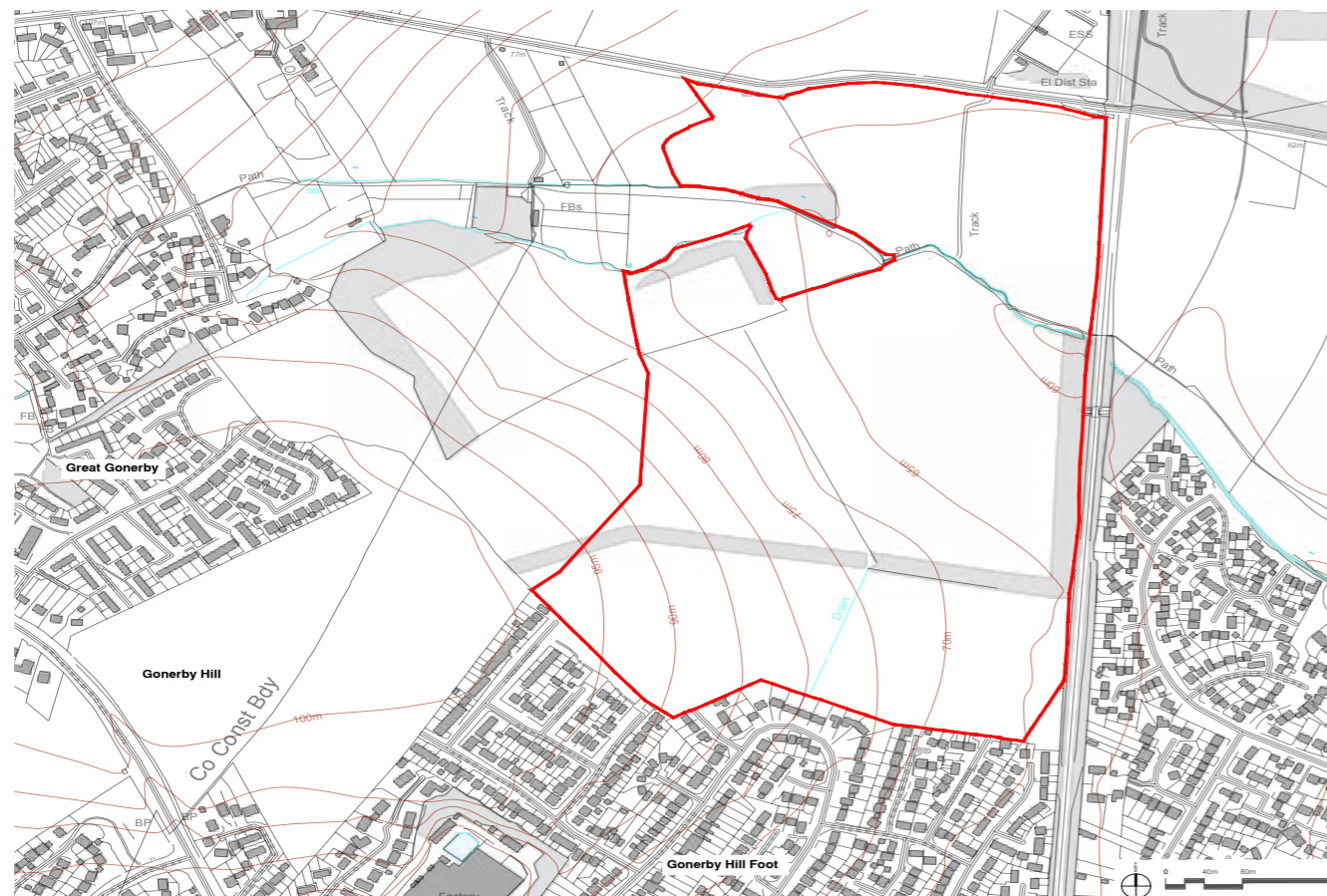


Figure 1: Site Location Plan

2.2. Site Allocation in the Emerging Draft South Kesteven Local Plan

The Council adopted its current Local Plan that covers the period 2011 – 2036 in January 2020. It contained an early review clause that required the Council to commence a review of the Local Plan starting in April 2020. Barberrry welcome the opportunity to engage with the Council at the outset of the Plan making process to help guide the spatial development strategy for the District and to identify the correct, deliverable housing sites such as the land at Great Gonerby, to meet the Council's needs over the Plan Period.

Barberrry actively participated in the preparation of the now adopted Local Plan, promoting the land at Great Gonerby as a proposed residential allocation. Whilst ultimately the site was not required to meet the development needs of the District over the current Plan Period, the requirement for the Council to undertake an early review of its Plan and changes in how housing need is calculated by way of use of the standard method, leads Barberrry to conclude that there will be an ongoing need for further large scale, sustainable housing sites within and around the edge of Grantham in the emerging Plan.

In light of the above, Barberrry would like to take the opportunity to re-present the land at Great Gonerby to the Council for its consideration as a possible residential allocation in the Local Plan. Barberrry have previously instructed baseline assessment work at the site that demonstrated that the proposed housing site is free from any significant technical, physical or emerging environmental constraints that would prevent its development and that is developable, and capable of delivering new housing within the early part of the Plan Period without the need for significant new infrastructure. The site is therefore available, achievable and suitable for residential development, to help meet the growth requirements of Grantham and the wider area over the forthcoming Plan Period.

Since production of the earlier version of this Vision Statement in 2018, Barberrry have subsequently instructed the various baseline assessments to be revisited in order to confirm whether they remain as previously or whether there have been any changes that need to be accounted for. We set out an update of these drafted where applicable later in the document.

2.3. Suitability of the Site

The site in our view remains suitable for residential development and should be included as a housing allocation in the emerging Draft Local Plan. The site is considered to be in conformity with the Council's spatial development strategy that currently seeks to direct approximately 50% of the District's housing to Grantham, whilst its sustainability credentials and ability to deliver housing and supporting infrastructure in the early part of the Plan Period both weigh heavily in favour of the site.

The site provides the opportunity to deliver:

- Circa 450 new homes across a range of house types and tenures, including affordable housing;
- New public open space providing areas of blue and green infrastructure;
- New formal areas of sports pitches and associated infrastructure;
- Significant new landscape areas and planting to enhance biodiversity and the local landscape character and to assimilate the development into its surroundings;
- New vehicular access points into the site from Beaumont Close, Applewood Drive and Belton Lane;
- Creation of pedestrian and cycle links to existing development to the south and under the railway to the proposed new development to the east.



3.1. The South Kesteven Adopted Local Plan

The Council adopted the South Kesteven Local Plan (2011 – 2036) in January 2020. The Plan had gone through Examination in late spring 2019 having been submitted for Examination in January 2019. The submission of the Plan in January 2019 meant that it was to be examined in accordance with the transitional arrangements for Local Plan Examinations that were set out in paragraph 214 of the National Planning Policy Framework that had been published in July 2018. The transitional arrangements set out in paragraph 214 of the 2018 Framework meant that Plans submitted for Examination by the 24th January 2019 would be examined against the policies of the original Framework published in 2012.

The principal benefit to the Council of submitting its Plan for Examination when it did, meant that the Council were not required to calculate its housing need by application of the standard method, which had been introduced in the 2018 Framework, and that it was able to proceed on the basis of the objectively assessed housing need that had been derived through the production of the Council's SHMA. The upshot that this had was the OAN housing requirement was 15,625 dwellings or 625 dpa whilst the standard method figure was 783 dpa or 19,575 dwellings over the Plan Period. The OAN figure was the housing requirement that was subsequently examined during the Local Plan Examination notwithstanding that it was just under 4,000 dwellings less than what the standard method was indicating.

During the Examination, Barberry presented a case that the housing requirement should be increased so that it more accurately reflected the actual level of need identified by the standard method, although this was not supported by the Inspector. The Inspector did support a relatively modest increase in the housing requirement of 25dpa to adjust for market signals, although even with this increase the housing requirement was still significantly lower than the standard method figure.

Notwithstanding the small increase in the housing requirement, the Inspector recommended that the Council commence an early review of the Local Plan, stating that this should start in April 2020, barely three months after its adoption.

3.2. Review of the Local Plan

The Council have now commenced a review of the Local Plan and have published an Issues and Options Document for Consultation. The report to Cabinet seeking approval to go out to consultation identified as a key issue the likely housing requirement that will need to be provided in the Local Plan Review on the basis that the assessed need will be based on the Government's standard method for calculating Local Housing Need. The standard method sets out a minimum housing requirement of 754 dwellings per annum, compared to the adopted Local Plan figure of 650 dwellings per annum.

As a result there is a need to identify sufficient additional allocations to accommodate approximately 3,000 dwellings.

Furthermore, the Government have recently concluded consultation on further revisions to the standard method. Under the consultation proposals, the figure for South Kesteven using the proposed revised methodology would see a minimum housing requirement of 839 dpa.

3.3. Call for Sites

The Council have also issued a Call for Sites, to which Barberry have also submitted details of the land at Great Gonerby.

We understand that the Council's programme for advancing the Local Plan review is:

- Issues and Options – Autumn 2020
- Call for Sites – Autumn 2020
- Draft Local Plan – spring 2022
- Pre-Submission Draft – April/May 2023
- Examination – Early 2024
- Adoption – late 2024/early 2025



4.1. Site Location

The site is located immediately to the north of the existing built up edge of Grantham. It lies adjacent to Gonerby Hill Foot, a residential suburb of Grantham, characterised by two storey detached and semi detached houses set in generous plots with off road parking.

Immediately to the east of the site is the Manthorpe site, which has been granted planning permission at appeal (APP/E2530/W/17/3173367) for 480 dwellings.

Further to the east is Belton Estate, a Grade 1 listed House, Parkland and Gardens owned by the National Trust, whilst to the north east is Belton Woods Golf Course.

4.2. Access to the Local Services and Facilities

The site has good access to a range of services and facilities that are in the local vicinity which are identified on Figure 2 : Local Facilities Plan overleaf. The range of local services include a convenience store and primary school located on Gonerby Road within a 12 minute walk (0.9km) to the south of the site and a further primary school in the residential area east of the site on Northcliffe Road, within a 10 minute walk (0.8km). The village of Great Gonerby, immediately to the west of the site, also provides a range of local services including a shop, post office and primary school.

The site is approximately 2.5km from Grantham Town Centre. Grantham is the largest settlement in the District and is also a sub-regional centre. Accordingly, it is well served by existing retail and service facilities in the town centre, whilst also providing employment opportunities and administrative functions. Grantham has a range of schools, medical facilities including a hospital with an A+E Department, along with social and leisure facilities.

Grantham is on the East Coast Mainline railway providing quick and convenient links to the north and south, with a number of established employment areas within the town and on the outskirts. The town has been successful in attracting a variety of employers and occupiers and serves an important function in meeting the needs of its residents as well as those in the wider area.

The site is, therefore, well located to existing services and facilities and is clearly a sustainable location for additional development.

4.3. Extent of Land in Barberry's Control

The land in Barberry's control extends to 34.9 hectares (86.23 acres) and is currently in agricultural use. It is bound by Belton Lane to the north, the East Coast Railway line to the east, Gonerby Hill Foot residential area to the south and the western boundary is delineated in part by hedgerow field boundaries.

The site relates well to the existing built up area of Grantham and is considered a logical location for additional development.

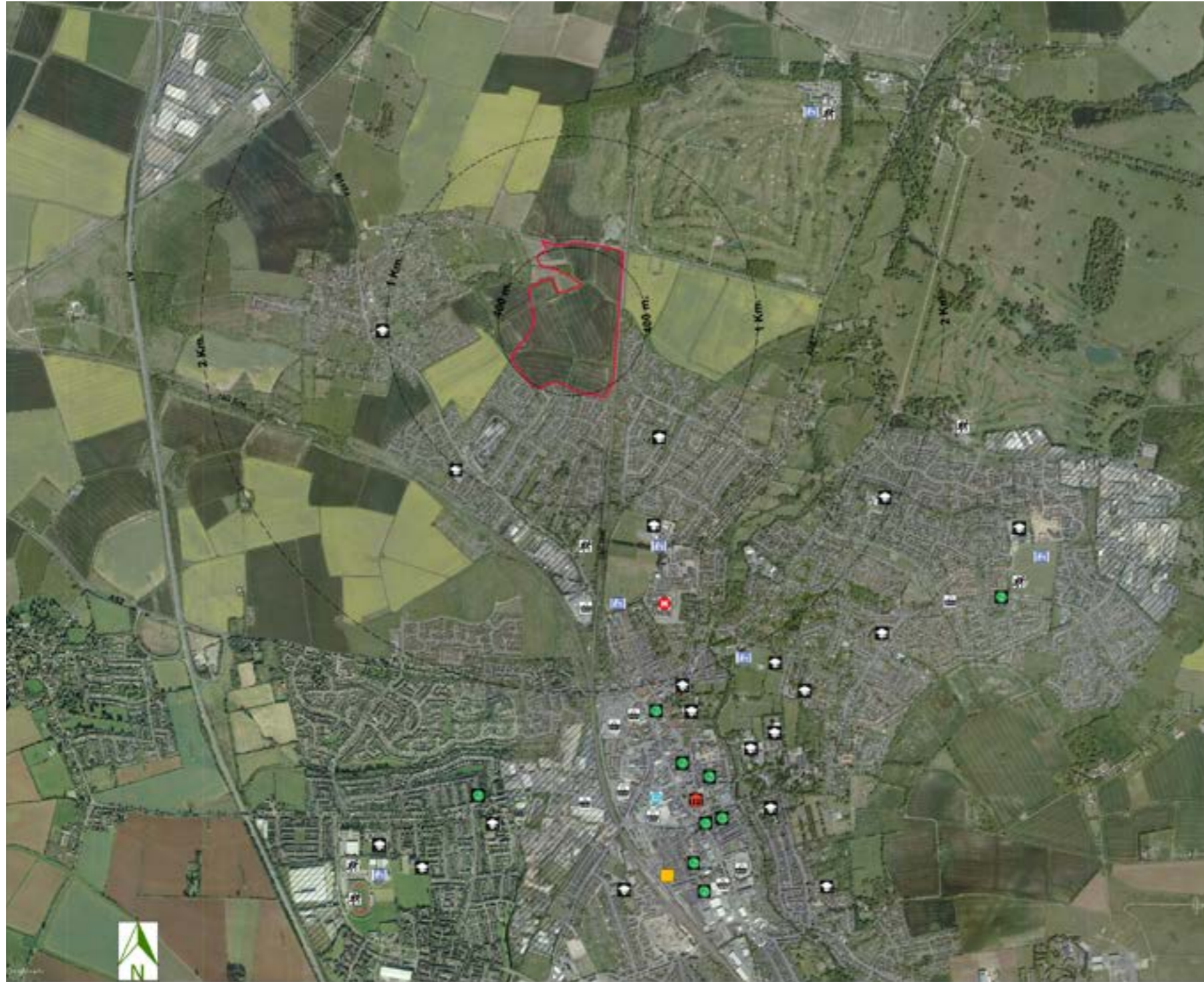
4.4. Key Features of the Site

The site comprises medium large arable fields that are relatively featureless enclosed by a mix of native hedgerows, some defunct, some with some hedgerow trees, linear plantations and a small amount of native woodland.

Boundary treatment to the north along Belton Lane comprises a low managed hedgerow interspersed with occasional trees. Metal fencing runs along the north-eastern boundary adjacent to the railway line with a 20m wide plantation along its south-east boundary. The southern boundary is defined by the rear and side gardens of houses on Gonerby Hill Foot that back onto the site. The western boundary is partly defined by existing treed hedgerows.

The site is relatively flat on its north and eastern extent closest to the railway, which provides a strong boundary along the whole of the eastern section of the site. The site gently rises in a south westwards direction up to the prominent scarp and hill top village of Great Gonerby.

Two public footpaths run through the site. Public Right of Way (PRoW) GtGo/4/2 runs from Easthorpe Road to Belton Lane through the northern part of the site and PRoW GtGo/8/1 runs from the centre of the site, eastwards through a tunnel under the railway line towards Manthorpe in the east.



-  site
-  school / academy / college
-  shopping / retail
-  hospital
-  doctor / dentist
-  leisure centre / facilities / park
-  sports club
-  museum
-  library
-  bus stop
-  Grantham train station
-  main employment areas

Figure 2: Local Facilities Plan

5.1. Landscape and Visual Appraisal

A Landscape and Visual Appraisal (LVA) has been undertaken in accordance with published guidance. It has identified key constraints and opportunities afforded to the site and puts forward recommendations for strategic landscape-led/place-making design principles to enable the successful and sensitive masterplanning of the site.

The appraisal comprised a desk-top study of baseline information, combined with a series of site surveys to assess the visual context of the site including main views in and out of the site, visual linkage with adjacent land use and heritage features, the general extent of its visual envelope and the context of the existing housing within the general environment.

The local topography was assessed identifying key skyline/horizon features, ridge lines and low points. Existing trees/woodland and hedgerows were plotted and an assessment made of their quality and amenity value to the site as either a design feature/landmark, if it provided screening benefit, was a horizon feature or has the potential as a visual constraint to define space.

5.2. Regional Landscape Character

The site lies within the National Character Area Profile: 48 Trent+ Belvoir Vales and also lies closely adjacent to, and is influenced by, NCA Profile: 47 Southern Lincolnshire Edge.

The key characteristics of the Trent and Belvoir Vales NCA include: gently undulating and low-lying landform in the main, with low ridges dividing shallow, broad river valleys, vales and flood plains; Agriculture being the dominant land use; Extensive use of red bricks and pantiles in the 19th century contributing to the consistent character of traditional architecture within villages and farmsteads across the area; and, a predominantly rural and sparsely settled area with small villages and dispersed farms linked by quiet lanes, contrasting with the busy market towns of Newark and Grantham.

The key characteristics of the Southern Lincolnshire Edge NCA include elevated arable escarpments with a distinct cliff running north-south along the western boundary, providing far-reaching views over the Trent and Belvoir Vales NCA; productive loamy soils on the limestone plateau, giving rise to a large scale open landscape of arable cultivation with large, regular fields and few boundaries of tightly cut hedgerows or rubble limestone walls; country estates such as Belton Park on lower ground; and, long, straight roads and tracks, often with wide verges, including Ermine Street, which follows the route of a key Roman north-south route.

5.3. Local Landscape Character

The site is identified in South Kesteven's Landscape Character Assessment as lying within the Grantham Scarps and Valleys Character Area.

This is a complex character area influenced by topography, landscape and human influences. Topography is one of the most important physical influences. The higher land to the south east is situated on limestone and occurs to the east and north at Great Gonerby and towards Barrowby. Across other areas of land the topography is less dramatic, but it rises towards the A1 and Great Gonerby. The surrounding higher land characterises Grantham and has undoubtedly shaped the form of the town today.

Built development is described as 'generally avoided' on the higher land to maintain a rural feel to the higher land and contain the urban influence on the wider landscape. However Gonerby is noted as a 'hill top' village and rapid development during the 20th century onwards has seen the expansion of development on higher land around Grantham and more recently at Gonerby Hill Foot which has been developed on land at over 100m.

The landscape is generally small/medium scale, with areas of particular sensitivity including historic Belton Park and the wooded and parkland slopes to the east of the town. Belton House and Parkland provides an attractive edge to the town, and, owned by the National Trust, is a fine example of a neo-Caroline Country House. Belton estate village contains some fine stone built houses and cottages of a character consistent with Belton House. The village and immediate surroundings are a high quality environment where it is important to retain the existing character.

5.4. Settlement over 70m AOD in Grantham

The LVA identifies other developments within and around Grantham that are located at 70 metres AOD or above and includes settlements both east and west of Grantham. The assessment highlights that significant existing development lies above the 70m contour line, and from a development restriction perspective, this is not consistent with existing or recent housing allocations.

Figure 5, prepared for the LVA in 2018, shows settlement above the 70m contour line. Existing settlement is shown in dark grey; allocated strategic housing shown in hatched grey. Whilst the central core of Grantham sits in the valley associated with its historic core, at least a third of the town lies above the 70m contour line.



Figure 3: Typical View of NCA 48: Trent and Belvoir Valleys + Grantham Scarp and Valleys Character Area

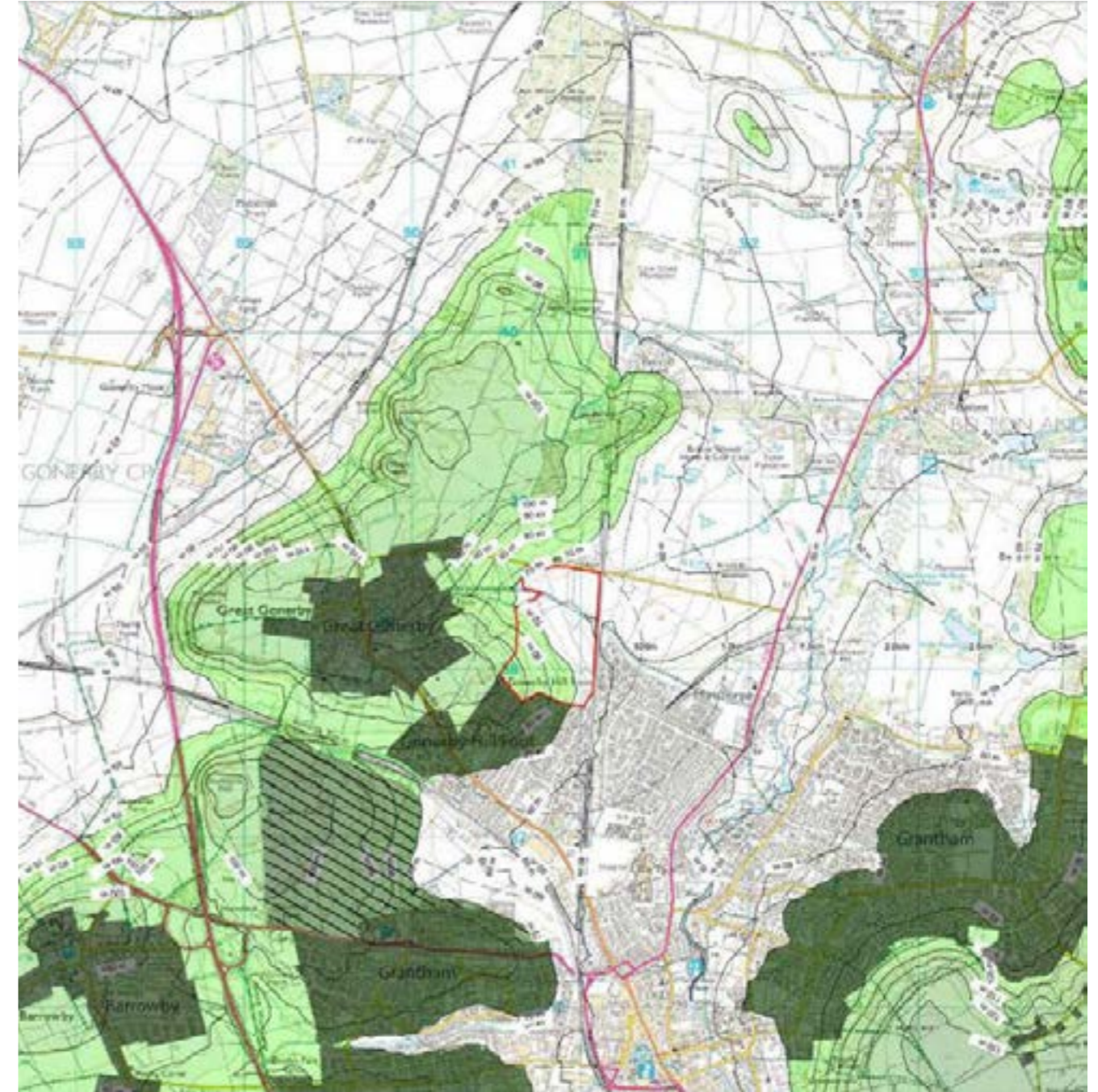


Figure 4: Settlement in Grantham above 70m AOD

5.5. Visual Baseline and Assessment

A Zone of Theoretical Visibility was mapped to act as a visual baseline, which was refined to determine the Zone of Visual Influence (ZVI), or the areas from which the development is likely to be visible from. Principal public viewpoints were identified around the site and wider area and include views from the public highway, public rights of way and views from nearby heritage assets including Belton Estate, the roof of Belton House, Belmont Tower and the estate villages of Manthorpe and Great Gonerby.

5.6. Site Visibility

The ZVI identified that the visual envelope and actual area of publicly accessible land from which the development is likely to be seen is quite limited due to intervening landform, large woodland belts, hedgerows and built form. The nature of the local tree/hedgerow cover and linear plantations on site are also effective screening elements. The area of land with the greatest visual sensitivity and which is most visible to long distance heritage views is land to the very upper area of the site, and land outside the site's western boundary which forms the upper section of Gonerby Hill.

5.7. Landscape Sensitivity

South Kesteven assessed the landscape sensitivity of the site and surrounding area in the Grantham Townscape Assessment (2011) and Landscape Sensitivity and Capacity Study (LSCS, 2013). Both documents informed the Grantham Capacity and Limits to Growth Study carried out by AECOM in 2015 which stated:

'To preserve the setting of Great Gonerby as a hilltop settlement, and the 'green bowl' around Grantham, development should not extend higher than the 70m AOD contour. This would be in line with the Grantham Townscape Assessment aim of avoiding built development encroaching on the higher scarp slopes, a distinctive feature of Grantham also noted in the South Kesteven Landscape Character Assessment. Development here could also benefit from additional screen planting to soften the development edge.'

It is important to make clear from the outset that the LSCS, carried out in 2013, was prepared using outdated and quite contentious 'Topic Paper 6' published by the Countryside Agency in 2002. This was a discussion paper only that has been the subject of much discussion within the Landscape Institute for many years. It has recently been superseded by best practice guidance, based upon GLVIA3 methodology, and is titled, 'An Approach to Landscape Sensitivity Assessment' by Natural England 2019.

Notwithstanding the methodology used to assess the site's sensitivity and capacity, the LSCS identified the site as having high landscape sensitivity based upon the fact its landscape character is typical of the Grantham Scarps and Valleys LCA. The site is also considered to be highly sensitive in landscape and settlement character terms, where development is thought would have a negative effect on landscape character, settlement form and maintaining the separate identities of Grantham and Great Gonerby.

The LSCS concluded in respect of landscape capacity of the site that an overall High Landscape Sensitivity and High Landscape Value provide an overall assessment of Low Capacity to accommodate development. Development on steep slopes would be contrary to the general form of development in Grantham which tends to be on the lower lying valley slopes, however, the area closest to existing housing development in Gonerby Hill Foot has slightly lower landscape sensitivity and thus slightly higher capacity to accommodate residential development. Development in this location, although lying within the setting of Belton House and Park, would lie outside the boundary of sensitive views of the Park from the Belton Lane approach road.

5.8. Review of the 2013 Sensitivity and Capacity Assessment

As part of the work undertaken in preparing the Vision Document, we have undertaken a review of the LSCS and assess that the site has a variance of visual and landscape sensitivity.

Landscape Sensitivity

In terms of landscape sensitivity the site exhibits typical characteristics of the landscape character, but these are not unique or rare and there is real evidence of alteration and degradation such as the hard edge of settlement on the skyline at Gonerby Hill Foot and expansion of modern settlement to the edges of the hill top village Great Gonerby. The upper brow of the scarp, namely Gonerby Hill, beyond the site boundary, provides an important area of open land separating the two settlements, as too does land north west of this adjacent to Great Gonerby.

We assess the upper section of the site, and land above and outside the site boundary, as having a high landscape sensitivity, since it provides an important green gap and skyline, whereas land to the mid and lower slopes of the site are of a Low to Moderate sensitivity.

Visual Sensitivity

Visually the site has a variance of sensitivity. The upper section of the site and land that lies above and outside the site forms part of a local scarp and important green skyline, however the open land which is most visible to long distance heritage views from Belton Park is land predominantly that lies above and outside the site boundary to the west, with only the upper mid section of the site making a modest contribution. As such, the upper section of the site is assessed as having a high visual sensitivity. As too does the lower area of the site adjacent to Belton Lane which provides rural characteristics to the key approach to Belton Park.

Visibility of the mid section of the site is limited to local public views only, and is also viewed in relation to the prominent housing of Gonerby Hill Foot and modern housing on the edges of Great Gonerby. The mid-southern section, adjacent to Gonerby Hill Foot, and screened by the linear plantation is assessed as having a low visual sensitivity; the mid section as having a moderate / low sensitivity and the mid-northern section, as moderate visual sensitivity. This gives a range of overall Landscape Sensitivity. The upper and lower slopes are High whilst the mid section is Moderate to low.

Landscape Value

In terms of landscape value there are no statutory designations attached to the site. It is however, of local scenic value to the setting of the town and provides amenity value to local users of the public right of way.

Capacity for Development

The visually sensitive upper section of the site, when looked at in greater detail, is land above the 90m contour in the southern section of the site and land above 85m in the mid and northern section of the site. To maintain this upper section of the site as green when taking into account the typical height of 2-storey development being 7.5m high, restricts development up to the 82.5m contour line in the southern section of the site and 77.5m in the mid and northern section of the site.

Based on the above, in terms of capacity to accommodate development, we assess the upper slopes, and lower area adjacent to Belton Lane as Low Capacity; the southern section as High capacity; the lower mid slopes as Moderate to High capacity; the upper mid slopes as Moderate capacity and the northern section as Moderate to Low capacity.

This sensitivity and capacity analysis has fundamentally informed the proposed concept masterplan and gradation of density across the site.

5.9. Manthorpe Appeal February 2018

The inspectors findings of the Manthorpe Appeal in 2018 are helpful in that they provide a useful summary of the significance of views from some of the heritage assets relevant to the present case. This has been dealt with in detail in Chapter 9 - Heritage, however it is useful to highlight certain comments with respect to views of the wider landscape from Belton Park Registered Park and Garden (RPG) where the site forms a very partial element of hugely panoramic views.

The inspector was helpful in confirming that views from Belmont Tower as a 'prospect tower' is an important viewing point of the RPG and listed Belton House within its wider context, but that the wider landscape is not necessarily integral to understanding the formal gardens within the RPG;

'Put another way, the landscape is there by default , rather than having been formally managed in a way to specifically contribute as a 'borrowed landscape'.

He confirmed that it is important to appreciate that the modern landscape outside the RPG, as well as providing treed and green hilltops, also includes elements of Grantham and Great Gonerby, wind turbines and a nearby warehouse facility;

'It is important to recognise that this setting has changed since Belton House and Belmont Tower were built and the formal areas of the RPG were laid out. For example, the character of the wider area has altered, with Grantham slowly expanding to the north, and small pockets of built development in all directions as seen from Belmont Tower; including wind turbines, garden centres and light industrial

buildings. It is against this backdrop that the proposal should be considered and not the context when the heritage assets were first constructed.'

5.10. Summary

The LVA was undertaken in accordance with published guidance, and identifies key constraints and opportunities afforded to the site. These are set out in Chapter 10. It has made recommendations on the strategic landscape and visual mitigation measures that should be embedded into the design principles to inform the successful and sensitive masterplanning of the site. These are set out in Chapter 11.

The appraisal comprised a desk-top study of baseline information, combined with a series of site surveys to assess the visual context of the site including main views in and out of the site, visual linkages with adjacent land use and heritage features, the general extent of its visual envelope and the context of the existing housing within the general environment. In respect of landscape sensitivity and capacity to accommodate development, the assessment concludes that the site has a variance of sensitivity with a low capacity on the upper and lower slopes to accommodate development and moderate to high capacity on the mid slopes. An assessment of key views of the site from the surrounding area has been undertaken, which has identified key opportunities and constraints along with suggested mitigation measures that have been incorporated within the concept masterplan, in order to integrate the proposed development into the surrounding landscape setting.



Figure 5: Settlement at Gonerby Hill Foot and linear plantation within the site.

6.1. Introduction

In light of the advice from Officers, and to support the ongoing promotion of the site, an assessment of baseline highway conditions in the vicinity of the site has been undertaken. The assessment has looked at the surrounding highway network in terms of existing roads and road infrastructure that would be used to gain access to the site. In addition, an assessment of local walking and cycling opportunities has been undertaken along with identifying existing public transport services running in the vicinity of the site and its accessibility to local facilities.

A high level assessment of trip generation and distribution has also been undertaken in order to ascertain the likely impact of the proposed development on the network and whether, or not, this is likely to be significant.

6.2. Surrounding Transport Network

The northern edge of the site borders Belton Lane, a single carriageway road approximately 5m in width and subject to the national speed limit.

Belton Lane heads west and links to the B1174 providing access to the A1. Heading east, Belton Lane links to the A607 which heads south into the centre of Grantham and north towards Sleaford.

To the south, the site borders a residential development with several cul-de-sacs extending to the edge of the site. Beaumont Drive is approximately 5m in width with 2m footways on both sides, see Figure 6. Vernon Avenue measures around 5m in width with 1.8-2m footways on both sides, see Figure 7. Applewood Drive is approximately 5.5m wide with footways on both sides around 2m in width narrowing in places to around 1.3m. These residential roads head south and link to B1174 Gonerby Road via Hazelwood Drive, Stephenson Avenue and Cliffe Road. All of the residential roads nearby benefit from street lighting.

6.3. Walking and Cycling

All of the adjacent roads benefit from well-established existing pedestrian footways. Dropped kerbs and tactile paving are provided at the main pedestrian desire lines.

A signalised pedestrian crossing point is provided on Gonerby Road to the north west of Cliffe Road adjacent to Gonerby Hill Foot primary school.

Gonerby Road provides an off-road cycle facility and is a local route linking Great Gonerby with Grantham. National Cycle Route 15 is located to the east of the site and continues south linking Grantham to Nottingham. The route also links with the National Cycle Route 64 to the south west.

C	Route	Frequency		
		Mon-Fri	Sat	Sun
14	Gonerby Moor – Grantham	Hourly	No Service	No Service
24	Newark - Grantham	2 Hourly	2 Hourly	No Service
Interconnect 1	Lincoln - Grantham	Hourly	Hourly	2 Hourly

6.4. Bus and Rail Services

The nearest bus stop is located approximately 100m from the southern site boundary on Cliffe Road; the no.14 and no.24 bus services stop at this location. Further bus stops are located on Gonerby Road providing access to other bus services. A summary of the bus services is provided in the table adjacent. School services also operate along the Gonerby Road including the 22, 22a, 22b, 23 and X22.

Grantham Railway Station is located 3.2km from the site in the centre of the town. Bus service 1 operates to and from the station. The station has a number of facilities including waiting rooms, toilets, wheelchair access, bicycle parking and car parking. The services are summarised below.

Destination	Frequency	Journey Time
London Kings Cross	12-40mins	1hour 12 mins
Norwich	1 hour	2 hours
Newark North Gate	1 hour	14 mins
Skegness	1 hour	1 hour 30 mins
Leeds	1 hour	1 hour 10 mins
Nottingham	15-45 mins	37 mins
Liverpool Lime Street	1 hour	3 hours 30 mins
Manchester Piccadilly	1 hour	2 hours 30 mins



Figure 6: End of Beaumont Drive



Figure 7: End of Vernon Drive

6.5. Local Facilities

The site is well located to a range of existing shops, services and facilities. Great Gonerby village and Grantham Town Centre have a range of services and facilities and these are summarised below by education, retail, leisure, healthcare and employment.

The nearest primary school to the site is Gonerby Hill Foot located on the B1174 Gonerby Road approximately 1km from the site. Saint Sebastian's Church of England is located 2km west of the site on the B1174 Gonerby Road.

Gonerby Hill Groceries is located approximately 1km from the site translating into walking/ cycling time of 12 minutes. Great Gonerby village centre is located approximately 2km from the site and has a convenience store, post office and public house.

In terms of healthcare provision, Vine House Surgery is located 2.7km south of the site in the centre of Grantham. The closest hospital to the site offering A&E services is Grantham and District Hospital located 3.0km southeast to the site.

Grantham Meres Leisure Centre is located to the south west of Grantham Town Centre and is approximately 5km from the site.

There are a variety of employment opportunities within Grantham. The centre serves numerous high street shops, independent retailers, public houses, banks, eateries, pharmacies and more.

There are additional opportunities for employment, such as South Parade Business Park approximately 3.4km south east of the site, Triangle Park Industrial Estate 4km north west and Ama Park Industrial Estate 5km west.

6.6. Road Safety

Personal Injury Collisions (PICs) within the vicinity of the site for the most recent five-year period have been reviewed using crashmap.co.uk. The study area included the residential roads at the southern site boundary and a section of Gonerby Road. A total of 11 PICs occurred, of which all were classed as slight in severity. No clusters of accidents are identified and no collisions occurred within the vicinity of the potential site access points.

6.7. Proposed Access Strategy

The emerging concept masterplan has identified the site could accommodate approximately 450 dwellings. This would require at least 2 points of access which can be delivered via an extension of Beaumont Close and Applewood Drive to the south of the site. These roads are more than adequate in their current form to serve the site. There is also the potential for an additional access onto Belton Lane to the north.

6.8. Trip Generation and Distribution

To assess the potential traffic movements from the development, the TRICS database was interrogated for residential sites.

To understand the direction that the future residents of the site would travel to work the 2011 census journey to work data has been interrogated. Generally the level of traffic will disperse across the network and whilst there are some known areas of congestion in the area, the development of the site is not expected to have any "severe" traffic impacts that cannot be mitigated.

6.9. Lincolnshire Transport Model

An initial assessment of the development's impact has been tested in the Lincolnshire Transport Model. The model includes a future year of 2031 and covers the urban area of Grantham and the surrounding areas in detail, including the B1174 Gonerby Road north to the A1, Belton Lane and the A607 Manthorpe Road. The model includes committed developments and highway schemes including the Grantham Southern Relief Road.

The impact of 500 dwellings on the site has been tested within the model. The percentage change in traffic has been identified at a number of key local junctions.

If necessary, and following further discussions with the Local Highway Authority a detailed assessment of these junctions can be undertaken at the time of an application to determine whether any site specific highway mitigation is required, however, in the context of the Local Plan promotion, no specific issues are highlighted by the modelling.

6.10. Summary

The site is in a sustainable location, with excellent links to the existing adjacent residential areas and the local facilities on offer. Furthermore, the existing public transport offer would provide significant opportunities to reduce the need to travel by car for future residents.

The site is well located in terms of its proximity to local bus routes with regular facilities to Grantham and Lincoln, education facilities and local centre, thus reducing the need to travel by private car.

Safe and appropriate access for all modes can be delivered via the extension of Applewood Drive and Beaumont Drive, and potentially via Belton Lane. The traffic impact of the site has been assessed further through LCC's transport modelling work. At the appropriate time, discussion will be undertaken on a junction specific basis with the County, however in the context of the Local Plan promotion, no specific issues are highlighted by the modelling.



Figure 8: Streets designed as pedestrian and cycle friendly places



Figure 9: Clear street hierarchy to aid wayfinding and ensure a memorable place

7.1. Flood Risk

The risk of flooding on site has been assessed by looking at major sources of flooding and considering their potential impact on future development. These sources include flows from watercourses (such as rivers and streams), groundwater surcharging, canals, reservoir failure and surface water runoff.

Of the sources analysed, only surface water (pluvial flows) will need to be considered in further detail for the proposed development, which can readily be mitigated by on-site drainage and attenuation measures. This will need to be considered in further detail for the proposed development. Figure 5 shows the extents of the surface water flood risk throughout the site. The site is shown to be at low, or no significant risk of flooding from all other sources.

In order to mitigate the risk posed by surface water flooding to the proposed development site, it is recommended that built development should be located outside of these flood risk areas. Initial assessment, supported by walkover survey and observations suggests that the risk represented in the surface water flood maps may be highly precautionary and overestimate the actual extent of flood risk from the site.

Specifically, the site benefits from a large brick culvert over the main watercourse (flowing west to east through the site), which is not allowed for within the high level mapping. This culvert passes under the railway line and would likely allow surface water to drain away, potentially significantly reducing the predicted extents of the surface water flooding. Hydraulic modelling of this watercourse would be undertaken to establish more representative extents of surface water flooding, taking the culvert into account, in support of a formal planning application.

7.2. Managing Flood Risk

In order to mitigate the risk posed by surface water flooding to the proposed development site, it is recommended that built development should be located outside of these flood risk areas. Initial assessment, supported by walkover survey and observations suggests that the risk represented in the surface water flood maps may be highly precautionary and overestimate the actual extent of flood risk from the site.

Specifically, the site benefits from a large brick culvert over the main watercourse (flowing west to east through the site), which is not allowed for within the high level mapping. This culvert passes under the railway line and would likely allow surface water to drain away, potentially significantly reducing the predicted extents of the surface water flooding. Hydraulic modelling of this watercourse would be undertaken to establish more representative extents of surface water flooding, taking the culvert into account, in support of a formal planning application.

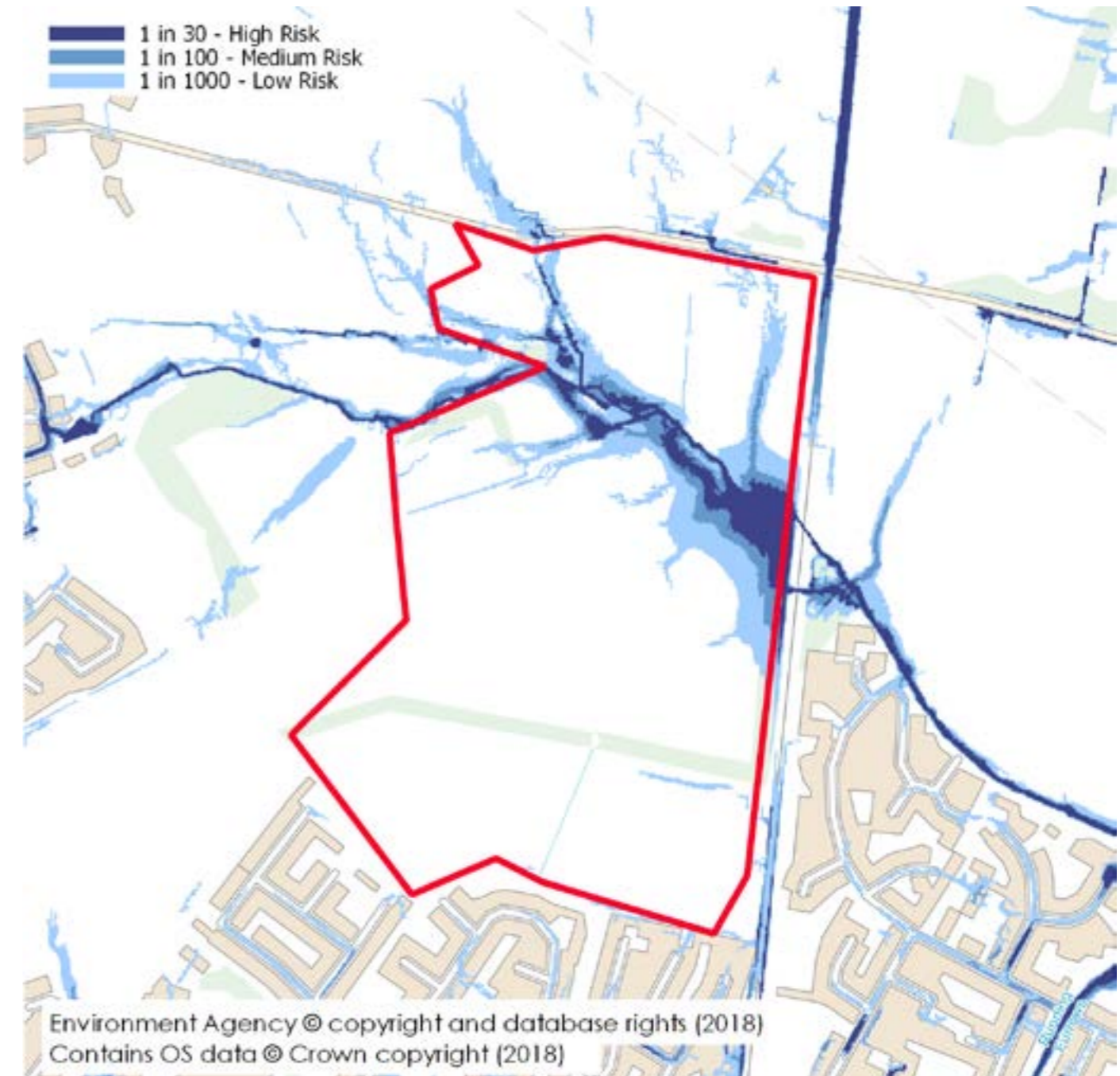


Figure 10: Surface Water Flood Risk (Source : Environment Agency)

7.3. Drainage

To manage the surface water run-off generated through increasing the impermeable area of the site, a preliminary surface water drainage appraisal has been undertaken to indicate the potential size and locations of the required drainage features.

These drainage features include detention basins to slow the discharge rate of water from the site and swales to convey water through the site and controlling discharge from the site to the existing small watercourse at greenfield equivalent rates. Such features are known as sustainable drainage systems (SuDS) and, as well as providing control on flow rates and volumes, also provide water treatment, amenity and biodiversity enhancements to the site and surrounding area. An indicative preliminary strategy is shown on the concept masterplan in Chapter 11.

Preliminary calculations indicate that the site would be best drained as a series of connected detention basins, calculated to be a total of circa 10,830m² on plan. The supporting assessment will need to be undertaken in greater detail to support a formal planning application on the site, but represent a sensible and robust allowance at this stage to demonstrate deliverability.

To mimic the current natural drainage regime, the existing ditches and land drains throughout the site are to be maintained wherever possible and improved wherever necessary. The development will discharge surface water run-off to the unnamed ordinary watercourse which passes through the site. In adherence with the relevant policy and guidance, the surface water discharge from the site will be restricted to the 'greenfield' rate to mimic the natural run-off rate pre-development and to ensure that the development does not increase flood risk elsewhere.



Figure 11: Existing brook and culvert beneath the railway line



Figure 12: Precedent images of biodiverse SuDS features - detention pond; street rain garden + swale

8.1. Phase 1 Habitat Survey

A Phase 1 Habitat Survey has been undertaken by BSG Ecology between 2014 and 2015 and again by Ecus Ltd in 2018, which included consultation of the Lincolnshire Records Centre for protected or notable species within 2 kilometres of the site and to identify statutory designated sites within 10 kilometres of the site.

This assessment was updated by Harris Lamb Property Consultants Ecology Team in October 2020 and included a resubmission data request to Lincolnshire Ecological Records Centre. The update survey found no significant changes since the 2014/2015 and 2018 assessments with the exception of the presence of a few plants of the invasive non native species Himalayan balsam *Impatiens glandulifera*, as well as suggestion for some additional protected species survey which were originally screened out for the 2018 assessment. A summary of the key findings of the initial 2014/2015, 2018 assessments and updated 2020 survey are detailed below.

A total of 11 statutory designated sites comprising a National Nature Reserve (NNR) and Sites of Special Scientific Interest (SSSI) have been identified, the closest of which is located 3.6 km from the site.

The site is comprised of arable fields, semi-improved grassland, improved grassland, woodland and hedgerows and scattered trees and a shallow unnamed brook/field drain which enters into the River Witham downstream outside of the site boundary. All habitats on site are considered to be important for nature conservation up to the site or local level.

No notable protected plant species were identified on site. However, the invasive non-native plant Himalayan balsam was identified in a few locations alongside the brook. An invasive species management plan would be required to prevent the spread of this invasive species.

The site has been assessed for the likely presence of protected or notable species. In respect of amphibians, there are no ponds on site, albeit that there is a pond located 220 metres to the north, where great crested newts have been recorded. The woodland and hedgerows within the site have some potential to support great crested newts during their terrestrial phase, but the wider site is considered to be largely suboptimal due to the dominance of arable land and there is an abundance of higher quality habitats immediately surrounding the potential breeding ponds off-site. As such, the site is not considered to be of importance to great crested newts at greater than the site level.

No badger setts were recorded during the Phase 1 walkover, but the woodland blocks and hedgerow bases have some potential to support badger setts. Badger activity signs were limited, but included potential badger trails leading between and through fields located towards the north of the site. The habitats provide suitable foraging opportunities and badgers could cross the site as part of a wider territory.

Given the habitats present on and adjacent, the Site is likely to be of importance to roosting and foraging bats and further survey will be necessary.

In relation to birds, the woodland blocks and hedgerows have potential to provide nesting and foraging opportunities for a range of common and passerine bird species associated with arable land use. Ground nesting and foraging birds associated with arable habitats recorded on site during the survey comprised grey partridge. Other species have potential to also use the arable fields and breeding bird surveys are recommended.

The railway corridor provides a connectivity link from/to the wider landscape and the semi-improved grassland fields and hedgerow bases have suitability to support basking and foraging reptiles and therefore, further survey will be required.

The brook that runs through the site has some, albeit low potential to support aquatic species including white-clawed crayfish *Austropotamobius pallipes*, otter *Lutra lutra* and water vole *Arvicola amphibius*. Further survey would be required for these species to determine presence absence.

8.2. Recommendations For Ecological Mitigation + Enhancement

Initial recommendations for mitigation and enhancement are identified and include:

- Retain and buffer the woodland areas containing the highest density of mature trees and highest bat roost potential;
- Enhance retained woodland through further tree planting and woodland management;
- Retain semi-improved grassland habitat and create species-rich grassland to ensure that there is no net loss of this habitat type, which can also be used as multi-functional green space;
- Maintain the hedgerow network on site as far as feasible to retain connectivity links. Species-rich hedgerow planting is encouraged within the green space layout;
- New native shrub planting along the northern portion of the eastern boundary in order to enhance the wildlife corridor link;
- Maximising new native shrub planting or hedgerow planting along the western boundary to enhance connectivity around the site;
- Installation of bat and bird boxes in new buildings and on retained mature trees;

- Creation of hedgehog gaps in fence panel bases;
- Artificial lighting to be minimised near retained woodland blocks/hedgerows or green space acting as wildlife corridors;
- There is potential for creation of wetland habitat that is of benefit to wildlife if Sustainable Drainage System (SuDS) ponds are required within the scheme to help maximise the ecological potential.
- Enhance the brook that runs through the site within an ecological management plan.
- An invasive species management plan should be adopted to prevent the spread of Himalayan balsam.



Figure 13: Field hedgerow and native vegetation following the course of the brook.



Figure 14: Existing native tree plantation

9.1. Baseline Heritage Assessment

A Baseline Heritage Assessment (HA) has been undertaken which identifies the principal heritage assets in the vicinity of the site and assesses their significance, including the contribution made by their setting.

This updates and supersedes an earlier HA prepared in 2018, taking into account the full implications of the Inspectors decisions on the Manthorpe Appeal site.

9.2. Heritage Assets

The site is located between the villages of Great Gonerby (to the west) and Manthorpe (to the east). Both villages contain conservation areas and a number of grade II listed buildings, and the grade I listed St Sebastian's church in Great Gonerby is approximately 900m from the centre of the proposal site. The grade I listed Belton House is located 2.6km east of the proposal site, and is the focal point of a grade I registered park and garden, with a further 11 buildings and structures listed at grade I or II*, and 34 at grade II within the park or the immediate vicinity.

No part of the proposal site contains part of a conservation area, registered park or garden or listed building.

9.3. Heritage Significance

The heritage significance of some of the assets is described in the decision letter relating to the Manthorpe appeal, and this has been relied on for the purposes of the assessment. The letter also comments on the setting of the assets, and this too, is relevant to the present case. There is no question that the proposal site is, at least in an abstract sense, within the setting of the heritage assets addressed in then Manthorpe appeal, and within the setting of Great Gonerby Conservation Area (although not mentioned at length in the letter) and the assets contained therein.

9.4. Manthorpe Appeal February 2018

Belton House

The Appeal is helpful in that it provides a useful summary of the significance of some of the heritage assets relevant to the present case. Paragraph 13 of the decision letter summarises the setting and significance of Belton House (listed grade I and largely built 1685-1688 for Sir John Brownlow by William Stanton) as follows:

"The significance of Belton House derives from it representing an example of a high status, late 17th century H-plan country house located within a context of an RPG that is a palimpsest of landscape design, retaining features from the late seventeenth century, and more formal gardens of the 19th century..."

Belmont Tower

The decision letter then turns in paragraphs 14 to 16 to the setting and significance of Belmont Tower, listed grade II* and constructed in phases c.1750-c.1780 at the eastern end of an avenue from which to view Belton House:

"The significance of the Belmont Tower stems from factors such as it being a:

'prospect tower' from which to view the RPG and listed Belton House within its wider context. For example, from the foot of the tower one is able to see local landmarks such as the church towers of St Sebastian's (Great Gonerby) and St Wulfrum (Grantham). During my site inspection I was able to see that the hill top location of the tower provides a wide vista towards the west, south and north.

Within this panorama it was not only possible to see the wider landscape, which includes elements of Grantham and Great Gonerby, but also see wind turbines to the north-west with a small warehouse facility to the foreground in that direction. It was also possible to see the canopies of trees that form part of the South Avenue leading from Belton House to the junction of Belton/Londonthorpe Lanes and the avenue leading from Belton House to Belmont Tower.

I have been directed to the concept of 'borrowed landscape' and that the land to the west of the RPG acts as a rural hinterland to the more formally landscaped grounds of the RPG. Historic England indicates that 'The panoramic views include the built up area of Grantham, a rural buffer of agricultural fields to the north of Grantham, which stretches from the parkland to the horizon (in which the development site lies), then Great Gonerby with more formal plantations seen below it - with the wide rural landscape to the north. The panorama largely comprises of a rural landscape with simply an urban edge to the south.'"

At this point in the assessment (paragraph 17) the Inspector then drew a distinction between the RPG and the wider landscape, as follows:

"Borrowed landscape or 'scenery' is a concept typically associated with gardens of the Far East. In those cases it can be features visible beyond the garden itself, which add to its atmosphere or experience. In this case, I am not convinced that the wider landscape is necessarily integral to understanding the formal gardens within the RPG. It does, nonetheless, contribute to the distinction between the RPG and the wider landscape. Put another way, the landscape is there by default, rather than having been formally managed in a way to specifically contribute as a 'borrowed landscape'. Nevertheless, I broadly agree with the comments of Historic England on this point; and it is these factors which contribute to the significance of the heritage asset of Belmont Tower."

The above extracts are helpful in confirming that Belmont Tower is an important viewing point, but that it is important to appreciate that the modern landscape outside the RPG is very different from the designed landscape within the RPG. It is to be expected that the wider landscape will change, and that it is not fossilised in the 18th century.

Manthorpe Conservation Area

The final asset on which the Appeal assists is Manthorpe Conservation Area, with specific reference to the Church of St John the Evangelist

(1847-1848, listed grade II), in paragraph 18 of the decision letter:

“The Church of St John the Evangelist sits within a fairly rural situation, with a nearby farm and open fields visible from the church grounds. The significance of the Church is that it contains architectural and historic interest, with links to the settlement of Manthorpe which is considered to be an ‘estate village’ and part of the Belton Estate. It is from this, and the character and appearance of the Manthorpe settlement that the significance of both the Manthorpe Conservation Area and Church partially derives.”

Great Gonerby Conservation Area

The Appeal did not deal in any detail with heritage assets in Great Gonerby Conservation Area, to the west, but this too contains a number of listed buildings, including the Church of St Sebastian, c.1200, listed grade I. The Council’s appraisal of the conservation area confirms that, like Manthorpe, it was one of a number of villages that formed part of the Belton House estate. It is essentially agricultural in origin, with vernacular characteristics. Great Gonerby is on elevated land to the west of the proposal site, separated from it by suburban development extending to Easthorpe Road and Woffindin Close.

9.5. Spatial Relationships to the Heritage Assets

The closest edge of Belton House RPG lies to the north-east of the site at a distance of about 1.4km. Great Gonerby is to the west of the site and Manthorpe is to the east. The land associated with the Manthorpe appeal lies to the east of the railway line, as illustrated in Figure 15. The Assessment considers the relationship of the site to the key heritage assets listed above and the potential effects of the proposed development upon them.

9.6. Assessment of Effects on Heritage Assets

Effects on Belmont Tower

Belmont Tower lies towards the east side of Belton House RPG, about 3.7km from the eastern side of the proposal site. Architecturally, the tower addresses a long avenue that leads towards Belton House, in a north-westerly direction, angled away from the proposal site. The entirety of the Manthorpe Appeal site lies between Belmont Tower and the proposal site. Given that the Inspector considered that the scheme before him would preserve the significance of Belmont Tower, without harm (paragraphs 30 and 34 of the decision letter) it is difficult to see how housing development on the proposal site, at a greater distance, could cause harm. The absence of any harm in the case of the Manthorpe appeal makes it unlikely that there could be any cumulative impact of any significance.



Figure 15: This satellite image illustrates, indicatively, the spatial relationship between the proposal site (red), the appeal site (orange), Belton House RPG (green, with the positions of Belton House and Belmont Tower shown), and the two conservation areas (white).

Effects on Belton House RPG

Belton House RPG contains a number of listed buildings, including Belton House itself, which (like the park) is designated at grade I. As was specifically the case with Belmont Tower, the Inspector found that there would be no harm to the significance of the RPG or its constituent listed buildings in respect of the change within the setting of the assets. For similar reasons to those described above, housing development on the proposal site is unlikely to have any effect on the significance of the RPG or its associated assets.

Effect on Manthorpe Conservation Area

Manthorpe Conservation Area lies to the east of the proposal site, and it is separated from it by the entirety of the Manthorpe Appeal site. Given that the Inspector concluded (in paragraphs 30 and 34) that the scheme before him would not harm the significance of Manthorpe Conservation Area or any of the listed buildings within it (notably the church) it is difficult to see how housing development on the proposal site, at a greater distance, could cause harm. For similar reasons to the circumstances described above in relation to Belmont Tower and Belton House RPG, there would be no cumulative impacts and no reason to point to a reduction in the heritage significance of the asset.

Effect on Great Gonerby Conservation Area

Great Gonerby Conservation Area lies to the west of the proposal site, focused on High Street, which runs from north to south, and Green Street, which runs at right angles to the west. Only two small pockets of the conservation area extend to the east of High Street, one of which is at the southern end of the conservation area, around the Church of St Sebastian (listed grade I), and the other of which is a rectangular block of older buildings north of Marratts Lane. There is a modern suburb to the east of this block, consisting of Covill Close, Manor Drive, and Easthorpe Road. This suburb does not contribute to the setting or significance of the conservation area, and it separates the older part of the village from its former agricultural surroundings. There are no views outward to the east of any note.

There are longer views to the east from the church and churchyard of St Sebastian, at the southern end of the conservation area. These views include the green space that is the churchyard itself, and the informal area of green space beyond. Roughly speaking, what can be seen is a green pocket extending about 200m east of the church, beyond which are the houses in Merrick Close and Cox's Walk. This suburban development continues in Holden Way, Swadales Close and Woffindin Close, with Goodman Close and Lord Drive to the north-east.

Suburban development on the east side of Great Gonerby has long since severed the connection between the village and its wider surroundings. There are no visual connections of note extending into the land to the east, and the proposal site lies too far away for housing development to have any further effect on the significance of the conservation area.

9.7. Summary of Effects

While the site lies notionally within the settings of the heritage assets described above, at least in an abstract or historical sense, it is visually separated from those assets in a number of respects.

In the case of Great Gonerby there is already modern suburban housing along the east of the village, so that further development will not reduce the significance of the conservation area.

In the cases of Belton House RPG and Manthorpe Conservation Area, both of which lie to the east of the proposal site, the appeal has established that housing development, at a closer distance than the site, will not affect the significance of those assets. No listed buildings will be less significant as a result, including Belmont Tower, a grade II* structure from which the RPG is intended to be seen and enjoyed.

The Appeal letter, dated 2 February 2018, concluded that development to the east of the proposal site would not harm the significance of the other assets described in this assessment, namely Manthorpe Conservation Area, and Belton House RPG and its constituent listed buildings, notably Belmont Tower, listed grade II*. On this basis there are no grounds on which to suppose that future housing development on the proposal site will harm the significance those assets, or bring about unacceptable cumulative impacts.

In light of the number of heritage assets that are located in the vicinity of the site, the Assessment concludes that these do not represent a constraint to development. Specifically, limiting development up to the 85m AOD contour would ensure that there would be neutral effect upon the setting of Belton Park and the designated assets within it. There would be no adverse impact on the setting of either the Great Gonerby or Manthorpe Conservation Areas.



Figure 16: Manthorpe Conservation Area



Figure 17: Manthorpe Conservation Area



Figure 18: Great Gonerby Conservation Area



Figure 19: Great Gonerby Conservation Area

10.1. Primary Constraints and Opportunities

The primary constraints and opportunities of the site and its wider setting are highlighted on Figures 20 and 21. These are based on the initial baseline studies and assessments that have been undertaken and are summarised below:

10.2. Constraints

Landscape Character

Grantham Scarp and Valleys Landscape Character Area. There is the perception of Grantham being set in a 'Green Bowl' of hills and it is important to maintain the green skyline.

Vegetation + Ecology

Lines of plantation woodland provide good screening but rectilinear in form and have no variation in density and age structure. Areas of naturalised woodland provide good containment and biodiversity. Some hedgerows are thin and defunct and field and site boundaries are generally weak.

Bird nesting and foraging habitats. Breeding Bird surveys recommended.

Potential badger, bat roosting and foraging reptile habitats.

Drainage

Flood zone area to existing stream and lower area of the site and potential undersized culvert beneath the railway.

Access / Public Footpaths

Two public rights of way run through the mid section of the site and provide connectivity between Great Gonerby and Gonerby Hill Foot. There is a noticeable lack of public open space in this area of Grantham. This is evidenced by the many permissive footpaths following field boundaries in the site, used by dog walkers and runners.

Topography

There is a relatively flat frontage to the north and eastern section of the site. Levels at Belton Lane are at 64m AOD. Levels rise gently in a south westerly direction up to 97m AOD on the southern boundary. Levels continue to rise beyond the site up to Gonerby Hill 100m. Levels continue to rise along the scarp up to 113m AOD at Great Gonerby.

Heritage Setting + Views

Visibility of the site is quite limited due to intervening landform, large woodland belts, hedgerows and built form. Most views are localised. Partial long distance views from Belmont Tower and Belton House roof, of the upper southern and eastern area of the site, that form an important green skyline.

The rural characteristics of Belton Lane contribute to the heritage approach to Belton Park. Key views of St. Wuulfrum, St. Sebastian and Manthorpe Church spires from the site.

Settlement

Stark built form of houses rising up the upper slope of Gonerby Hill Foot is a skyline visual detractor to near and distant views.

Maintaining settlement separation between Great Gonerby and Grantham is important.

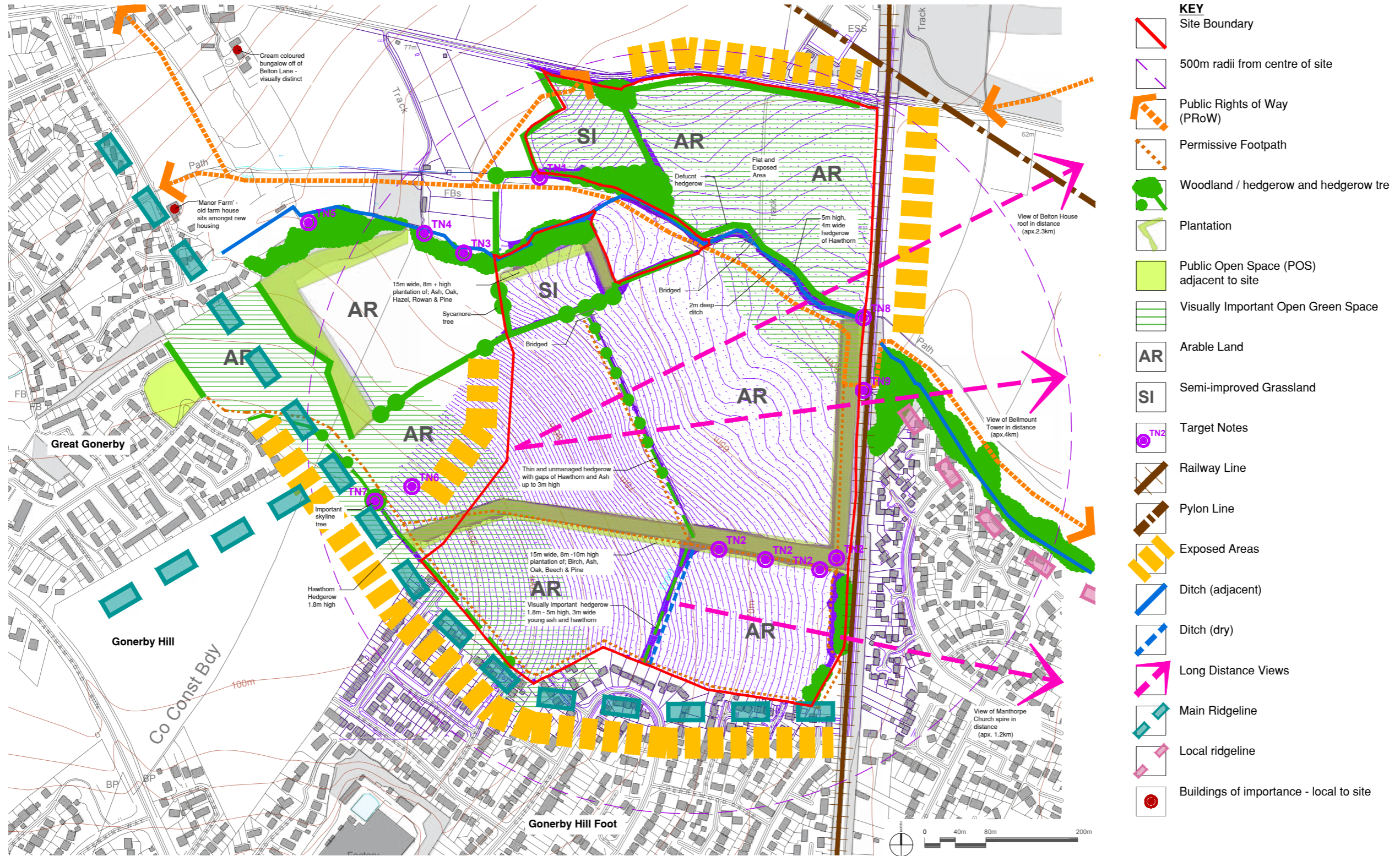


Figure 20: Constraints Plan

10.3. Opportunities

Landscape Character

Green infrastructure to enhance the character and qualities of the landscape character type. Retain the green gap between Great Gonerby and Grantham. Maintain a green skyline.

Vegetation, Ecology + Drainage

Retain the important hedgerows and trees and integrate into a well-considered green infrastructure and green open space framework.

Green Infrastructure to be multi-functional for enhanced habitats/ biodiversity, sustainable drainage (SuDS), existing and new footpath and cycle routes and open space, play and recreational provision.

Provide a naturalised treed mosaic to the development and soft green edge to the perimeters. Enhanced green skyline with additional naturalised tree planting to the upper slopes. This also provides betterment to screen / soften the harsh built skyline of houses on the adjoining Gonerby Hill Foot development.

Public Footpaths and cycleways

Create linked up, accessible and permeable green routes through the development. Enhance access to natural green space, natural play and recreation for new and existing neighbouring residents.

Maintain rural characteristics to existing and new public footpaths/cycleways.

Maintain and enhance connectivity between Manthorpe and Great Gonerby.

Topography

Protect upper slope to retain a green skyline. There is a limited amount of flat land in Grantham - consider use of the flat areas of land closest to Belton Lane as potential sports pitch provision.

Heritage setting + Views

Frame views in and out of the surrounding countryside, heritage features and church spires. Protect the setting of Great Gonerby Conservation Area.

Settlement

Create a defined neighbourhood identity promoting sustainable living and place-making - taking cues from the high quality vernacular of the nearby estate villages.

Highest density development to be focused in the south/eastern section of the site. Low and Medium density development to the western section of the site.



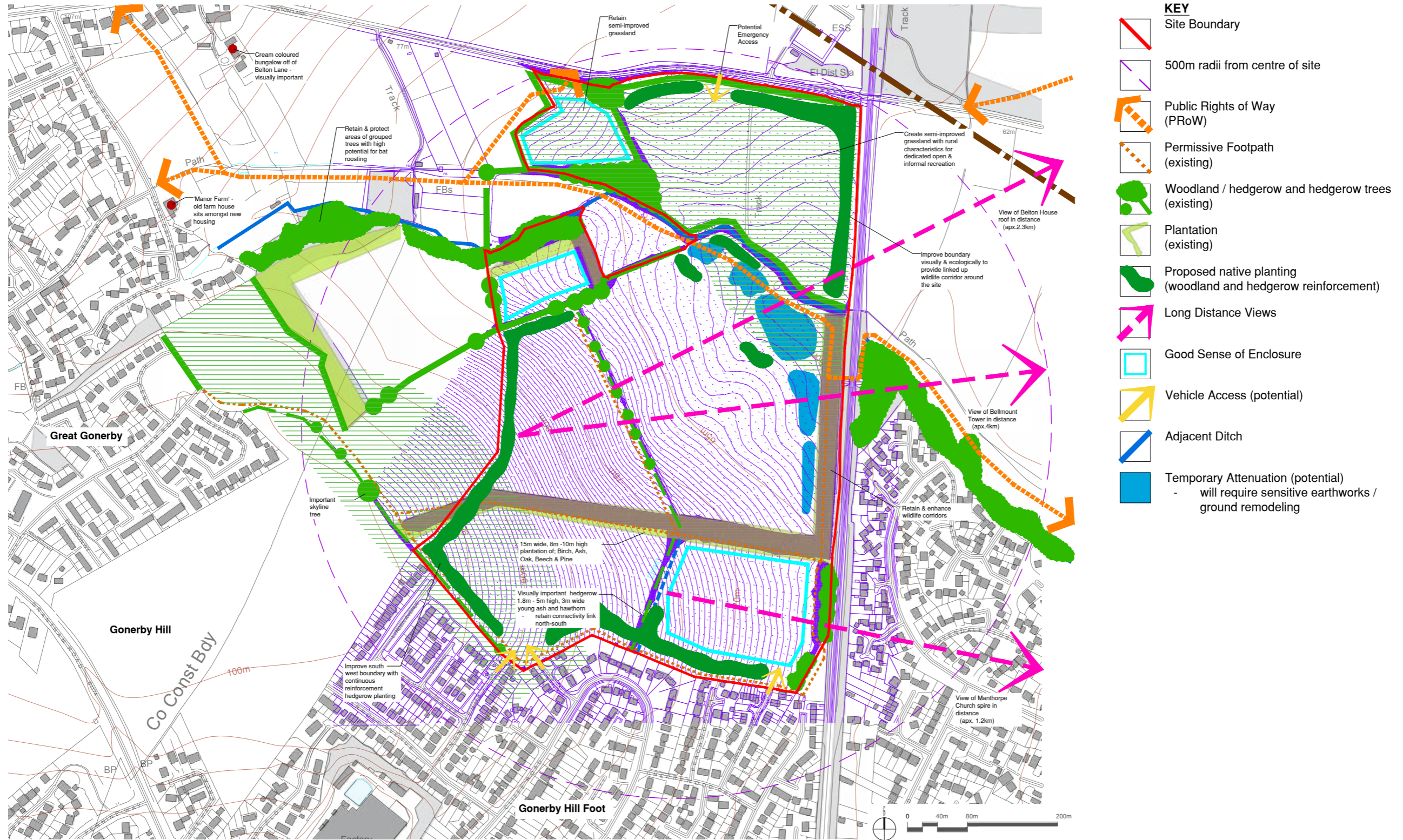


Figure 21: Opportunities Plan

11.1. Design Approach

Our design approach has been landscape and place-making led from the outset, underpinned by an analysis of the site's constraints and opportunities.

The production of the LVA has informed an early understanding of the landscape character and visual amenity of both the site and its context and will be an important working tool in guiding the design of the development.

By viewing the site in landscape terms it becomes possible to gain a much wider understanding of its challenges, its special character and the opportunities it offers. It also ensures that mitigation is embedded in an iterative way, influencing the approach to siting and design to minimise possible landscape, drainage and flooding, ecological and visual effects early on in the design process.

After considering the primary constraints and opportunities effecting the site, a concept masterplan has been prepared that indicates how the site could be laid out and ultimately brought forward for development.

11.2. Design Principles

A fundamental principle will be the establishment of a landscape framework within which a high quality residential neighbourhood can be located. This landscape framework will respond to the site's natural components and extend and link them visually and ecologically to create an integrity and overall structure to the development.

Key consideration will be given to:

- The natural topography of the site and retaining a green skyline;
- The existing trees and hedgerows which are real assets to the site and establish an immediate sense of maturity and heritage. The majority will be retained and bolstered to form an integral part of the landscape framework;
- Additional native infrastructure planting to provide a strong, leafy boundary to the site; screen existing harsh housing on the skyline;
- Integrate defined spatial zones for development; provide effective visual screening and treed mosaic to soften the proposed built form; and establish a connected network of open spaces;
- Establishing a residential development with a real sense of place and character;
- Development strategically located to mid slopes up to 83m AOD in the southern section and 77m AOD in the mid / northern section of the site to maintain an open green skyline and retain a naturalised frontage to Belton Lane.
- Public open spaces located in areas susceptible to constraint i.e. sensitive landscape/ ecological/fluvial areas such as existing wildlife corridors, areas prone to flooding, along public rights of way and high points where elevated sections of the site may be open to view and form part of a green / rural horizon;
- Retaining key views and visual connections to the adjacent countryside and heritage assets;
- Designing a high quality, safe environment with a clear definition between public and private spaces, where streets and green spaces are overlooked with good natural surveillance;
- Protecting and enhancing wildlife habitats and integrating comprehensive sustainable drainage systems (SuDS);
- A permeable and accessible place ensuring ease of movement and connectivity;

11.3. Key features of the masterplan

- Distinct sense of place, character and identity taking influence from the local estate village vernacular
- Fully integrated green infrastructure landscape framework to areas of landscape, visual, fluvial or ecological sensitivity
- Main access from Gonerby Hill Foot residential area and tree lined avenue off Belton Lane
- Generous green public open space provision for informal and formal recreation
- Retained and enhanced green skyline to the site's upper slope
- Planted southern boundary to screen existing hard line of housing on the skyline at Gonerby Hill Foot
- New infrastructure planting to north and north-eastern boundaries to provide containment and screen the railway line
- Linear plantations softened, thinned and pierced - to improve visual appearance, woodland structure biodiversity value and permeability through the site
- Existing hedgerows bolstered to improve character, condition and biodiversity
- Northern section of the site to be dedicated naturalised open space to reinforce the rural interface with Belton Lane as an important heritage approach to Belton Park with informal and formal play
- Integrated SuDS scheme - flood attenuation to lower mid section of site with connected conveyancing swales and street rain gardens
- Higher density development to visually contained south and eastern areas of the site
- Medium density to mid slopes
- Low density discrete parcel to northern side of site



Figure 22: Concept Masterplan

12.1. Conclusion

This Vision Document has been prepared to support the ongoing promotion of land at Great Gonerby, Grantham. The site is proposed as a housing site in the emerging South Kesteven Local Plan (2021 – 2041) and it is considered suitable to be developed for housing to meet the needs of the District over the Plan Period.

Grantham as the largest and most sustainable settlement in the District is to be the focus for growth, including the provision of new housing.

The changes brought about through the introduction of the standard method and its application in calculating housing need indicate that the Council will need to identify in the region of an additional 3,000 dwellings over and above those sites that are currently allocated in the adopted Local Plan. The land at Great Gonerby is promoted as a suitable and sustainable housing site that can help meet the future development needs of the District over the Plan Period. Due to its size and accessibility to existing facilities and infrastructure, the site could come forward for development early in the Plan Period as it is not dependent on significant new infrastructure having to be implemented. Furthermore, development here will meet the needs of a different housing market within the town.

To support the proposed allocation of the site in the emerging Plan, Barberry have previously instructed and recently sought and an update to a range of baseline surveys and studies undertaken at the site. These included landscape and visual and highway and transportation matters, along with flooding and drainage, ecology and heritage matters.

The work undertaken has helped identify potential opportunities to arise through the development of the site, but also those constraints that will need to be addressed. By taking a landscape-led approach to the masterplanning of the site, a concept masterplan has been prepared and is set out above.

12.2. Range of Benefits

The land at Great Gonerby will deliver a range of benefits including:

- The opportunity to deliver circa. 450 dwellings across a variety of house types and tenures
- Creation of high quality residential environment within a well-considered and generous landscape framework that looks to reflect the local character and topography
- Being highly accessible to existing shops, services and facilities, including those in Grantham Town Centre
- Creation of a cohesive and vibrant residential community
- Creation of new areas of public open space for informal and formal recreation
- Being accessible to local public transport services, providing the opportunity to travel by non-car modes.

The site will deliver new sustainable development that will meet the housing needs of the District over the Plan Period. The site is available, suitable and deliverable and Barberry remain committed to bringing it forward for development.



Connectivity between wild places - enabling both wildlife and people to move through the landscape, and for natural processes to operate effectively.

Real, measurable gains for wildlife, as all new developments make a demonstrable, positive contribution to nature's recovery.

Improved health, wellbeing and quality of life for people living and working nearby.

Effective water management, pollution and climate control provided by green spaces and water courses, sustainable urban drainage, green roofs, trees, woodlands, wetlands and other natural features.

Easy access to high quality, wildlife-rich, natural green space for everyone, providing daily opportunities to experience wildlife.





Heritage Assessment

Land at Great
Gonerby, Grantham

March 2024 | Project Ref 3417B





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- App. 2 GPA3 Assessment: Historic England’s Guidance on Setting**

1. Introduction

- 1.1** This Heritage Assessment has been prepared by HCUK Group (formerly Heritage Collective) for Barberry Grantham Limited. It updates and supersedes work previously undertaken in 2018 by HCUK Group (a Baseline Heritage Assessment), and in 2020 (a high-level Heritage Assessment) relating to a proposed housing allocation on land roughly equidistant between the Great Gonerby Conservation Area to the west, and Manthorpe Conservation Area to the east, near Grantham. Belton House, which is a registered park and garden (RPG), lies to the north-east. The proposal site lies within the planning jurisdiction of South Kesteven District Council.
- 1.2** On 2 February 2018 an appeal decision was issued (APP/E2530/W/17/3173367) in respect of land to the north of Longcliffe Road, Grantham, Lincolnshire (referred to below as the Longcliffe Road Appeal). This appeal, which was in relation to a sustainable urban extension of Grantham, up to 480 dwellings, was allowed. It is relevant in that consideration was given to the effect of the proposal on the setting and significance of some of the heritage assets applicable to the present case, notably Belton House (listed grade I), Belton House park and garden (registered grade I), Belmont Tower (listed grade II*), Manthorpe Conservation Area, and St John the Evangelist Church, Manthorpe (listed grade II). The appeal decision was issued around the same time as the completion of the Baseline Heritage Assessment, and its full implications were not taken into account in that document. The present assessment updates the position in that regard, taking into account the opportunity to reflect on the decision. This assessment also takes into consideration other relevant information that has been brought to light/become relevant since 2020 and 2024.
- 1.3** This high-level assessment draws on desk-based research, including work previously undertaken, list descriptions, Belton House Setting Study by Atkins (2010), the Longcliffe Road appeal decision (2018), and observations made during site visits in both 2018 and, most recently, 2024. Together, this has helped to inform the professional judgements on significance and impacts presented herein.

- 1.4** It is worth noting that at the time of visiting the Site in February 2024 both Belton House and Belmont Tower were closed to the public. However, both of these assets had been previously visited in 2018 and views taken from the Belmont Tower and the roof of Belton House looking towards the proposed development site were included within the setting study prepared by Atkins (referred to previously). There is nothing to suggest that those views have changed to any notable extent since 2010.
- 1.5** Dr Jonathan Edis, the consultant who prepared the 2018 assessment, has over three decades of continuous experience of advising on change affecting the historic environment. The consultant responsible for this iteration of the assessment, Lucy Smith, has almost two decades of experience. Both Jonathan and Lucy are Board Directors/co-owners of HCUK Group and full members of the IHBC.

2. Relevant Planning Policy Framework

- 2.1** There have been no significant changes to national heritage policy since the Baseline Heritage Assessment of 2018, but there have been some subtle changes in guidance, and an important case in the Courts relating to the setting of heritage assets, mentioned below. This is also relevant when taking into consideration the Belton House and Park Setting Study (2010) prepared by Atkins (referred to in more detail further on).
- 2.2** The decision maker is required by section 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 to have special regard to the desirability of preserving a listed building and its setting when exercising planning functions. The decision maker must give considerable importance and weight to the desirability of preserving the significance of the listed building, and there is a strong presumption against the grant of permission for development that would harm its heritage significance.¹
- 2.3** There is a broadly similar duty arising from section 72(1) of the Act in respect of planning decisions relating to development within conservation areas. No part of the proposal site is within a conservation area, so section 72(1) is not strictly triggered, but a high priority should be given to the conservation of the two nearby conservation areas, nevertheless.
- 2.4** For the purposes of this Assessment, preservation equates to an absence of harm.² Harm is defined in paragraph 84 of Historic England's Conservation Principles as change which erodes the significance of a heritage asset.³
- 2.5** The significance of a heritage asset is defined in the National Planning Policy Framework (NPPF) as being made up of four main constituents: architectural interest, historical interest, archaeological interest and artistic interest. The

¹ Barnwell Manor Wind Energy Limited v East Northamptonshire District Council and others [2014] EWCA Civ 137. This principle has recently been confirmed, albeit in a lower court, in R (Wyeth-Price) v Guildford Borough Council.

² South Lakeland v SSE [1992] 2 AC 141.

³ Conservation Principles, 2008, paragraph 84.

assessments of heritage significance and impact are normally made with primary reference to the four main elements of significance identified in the NPPF.

2.6 The setting of a heritage asset can contribute to its significance. Setting is defined in the NPPF as follows:

The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

2.7 Historic England has produced guidance on development affecting the setting of heritage assets in The Setting of Heritage Assets (second edition, December 2017), better known as GPA3. The guidance encourages the use of a stepped approach to the assessment of effects on setting and significance, namely (1) the identification of the relevant assets, (2) a statement explaining the significance of those assets, and the contribution made by setting, (3) an assessment of the impact of the proposed development on the setting and significance of the assets, and (4) consideration of mitigation in those cases where there will be harm to significance.

2.8 The NPPF requires the impact on the significance of a designated heritage asset⁴ to be considered in terms of either “substantial harm” or “less than substantial harm” as described within paragraphs 207 and 208 of that document. National Planning Practice Guidance (NPPG) makes it clear that substantial harm is a high test, and case law describes substantial harm in terms of an effect that would vitiate or drain away much of the significance of a heritage asset.⁵ The Scale of Harm is tabulated at Appendix 1.

2.9 Paragraphs 207 and 208 of the NPPF refer to two different balancing exercises in which harm to significance, if any, is to be balanced with public benefit.⁶

⁴ The seven categories of designated heritage assets are World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Park and Gardens, Registered Battlefield and Conservation Areas, designated under the relevant legislation.

⁵ Bedford Borough Council v SSCLG and Nuon UK Limited [2013] EWHC 4344 (Admin).

⁶ The balancing exercise was the subject of discussion in City and Country Bramshill v CC SLG and others [2021] EWCA, Civ 320.

- Paragraph 18a-020-20190723 of National Planning Practice Guidance (NPPG) online makes it clear that some heritage-specific benefits can be public benefits.
- Paragraph 18a-018-20190723 of the same NPPG makes it clear that it is important to be explicit about the category of harm (that is, whether paragraph 207 or 208 of the NPPF applies, if at all), and the extent of harm, when dealing with decisions affecting designated heritage assets, as follows:

Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.

2.10 Paragraphs 205 and 206 of the NPPF state that great weight should be given to the conservation of a designated heritage asset when considering applications that affect its significance, irrespective of how substantial or otherwise that harm might be.

2.11 Paragraph 209 of the NPPF refers to the approach to be taken towards non-designated heritage assets as follows:

The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

2.12 Paragraph 209 of the NPPF will become relevant in the event that the local planning authority identifies any such assets in the vicinity of the proposal site. There is at present no particular reason to suppose that this is likely.

2.13 One of the overarching objectives of sustainable development, as expressed in paragraph 8 of the NPPF, is mitigating and adapting to climate change, including moving to a low carbon economy. Historic England has a Climate Change Strategy, and has published Mitigation, Adaptation and Energy Measures. More specifically, Historic England has published a Heritage and Climate Change Carbon Reduction Plan (March 2022). These and similar strategies run in parallel with heritage-specific methodologies relating to the assessment of significance, and the effect of change on significance.

3. Relevant Heritage Assets

Overview

- 3.1** This chapter of the assessment examines the main heritage assets likely to be subject to changes within their settings if the proposal site is developed, including listed buildings, conservation areas, and the registered park and garden (RPG) at Belton House.
- 3.2** The heritage significance of some of the assets is described within the decision letter relating to the Longcliffe Road appeal (APP/E2530/W/17/3173367), and this is relied on for the purposes of this assessment. The letter also comments on the setting of the assets, and this too is relevant to the present case.
- 3.3** In addition to the above, the Belton House Setting Study prepared by Atkins in 2010 has also been taken into consideration, albeit that document was prepared some 14 years ago. There is no question that the proposal site is, at least in an abstract sense, within the setting of the heritage assets addressed in the Longcliffe Road appeal, and within the setting of Great Gonerby Conservation Area (not mentioned at length in the appeal decision letter) and the assets contained herein.

The Longcliffe Road Appeal, February 2018

- 3.4** The Longcliffe Road Appeal is helpful in that it provides a helpful summary of the significance of some of the heritage assets relevant to the present case. Paragraph 13 of the decision letter summarises the setting and significance of Belton House (listed grade I and largely built 1685-1688 for Sir John Brownlow by William Stanton) as follows:

The significance of Belton House derives from it representing an example of a high status, late 17th century H-plan country house located within a context of an RPG that is a palimpsest of landscape design, retaining features from the late seventeenth century, and more formal gardens of the 19th century...

3.5

The decision letter then turns, in paragraph 14 to 16, to the setting and significance of Belmont Tower⁷, listed grade II* and constructed in phases c. 1750-c.1780 at the eastern end of an avenue from which to view Belton House.

The significance of Belmont Tower stems from factors such as it being a "prospect tower" from which to view the RPG and listed Belton house within its wider context. For example, from the foot of the tower one is able to see local landmarks such as the church towers of St Sebastian's (Great Gonerby) and St Wulfrum (Grantham). During my site inspection I was able to see that the hilltop location of the tower provides a wide vista towards the west, south and north.

Within this panorama it was not only possible to see the wider landscape, which includes elements of Grantham and Great Gonerby, but also see wind turbines to the north-west with a small warehouse facility to the foreground in that direction. It was also possible to see the canopies of trees that form part of the South Avenue leading from Belton House to the junction of Belton/Londonthorpe Lanes and the avenue leading from Belton House to Belmont Tower.

I have been directed to the concept of "borrowed landscape" and that the land to the west of the RPG acts as a rural hinterland to the more formally landscaped grounds of the RPG. Historic England indicates that "The panoramic views include the built up area of Grantham, a rural buffer of agricultural fields to the north of Grantham, which stretches from the parkland to the horizon (in which the development site lies), then Great Gonerby with more formal plantations seen below it - with the wide rural landscape to the north. The panorama largely comprises of a rural landscape with simply an urban edge to the south."

3.6

At this point in the assessment (paragraph 17) the Inspector then drew a distinction between the RPG and the wider landscape, as follows:

Borrowed landscape or 'scenery' is a concept typically associated with gardens of the Far East. In those cases it can be features visible beyond the garden itself, which add to its atmosphere or experience. In this case, I am not convinced that the wider landscape is necessarily integral to understanding the formal gardens within the RPG. It does, nonetheless, contribute to the distinction between the

⁷ The National Trust refer to the tower as "Bellmount Tower." However, for consistency, "Belmont Tower" has been used within this Assessment given that this is the spelling used in official list description and appeal letter relating to Longcliffe Road.

RPG and the wider landscape. Put another way, the landscape is there by default, rather than having been formally managed in a way to specifically contribute as a 'borrowed landscape'. Nevertheless, I broadly agree with the comments of Historic England on this point; and it is these factors which contribute to the significance of the heritage asset of Belmont Tower.

3.7 The above extracts are helpful in confirming that Belmont Tower is an important viewing point, but that it is important to appreciate that the modern landscape outside the RPG is very different from the designated landscape within the RPG. It is to be expected that the wider landscape will change, and that it is not fossilised in the 18th century.

3.8 The final asset on which the Longcliffe Road Appeal assists is Manthorpe Conservation Area, with specific reference to the Church of St John the Evangelist (1847-1848, listed grade II), in paragraph 18 of the decision letter.

The Church of St John the Evangelist sits within a fairly rural situation, with a nearby farm and open fields visible from the church grounds. The significance of the Church is that it contains architectural and historic interest, with links to the settlement of Manthorpe which is considered to be an "estate village" and part of the Belton Estate. It is from this, and the character and appearance of the Manthorpe settlement that the significance of both the Manthorpe Conservation Area and Church partially derives."

3.9 The Longcliffe Road appeal did not deal in any detail with heritage assets in Great Gonerby Conservation Area, to the west, but this too contains a number of listed buildings, including the Church of St Sebastian, c. 1200, listed grade I. The Council's appraisal of the conservation area confirms that, like Manthorpe, it was one of a number of villages that formed part of the Belton House estate. It is essentially agricultural in origin, with vernacular characteristics. Great Gonerby is on elevated land to the west of the proposals site, separated from it by suburban development extending to Easthorpe Road and Woffindin Close.

Belton House Setting Study - Atkins 2010

3.10 The Atkins setting study was undertaken in 2010, prior to the publication of Historic England's guidance on the Setting of Heritage Assets (first edition 2015 - latest

edition 2017) and prior to the Barnwell Manor decision⁸. However, the Atkins document does provide a thorough assessment of the setting of Belton House and the associated RPG albeit the language and methodology adopted within that assessment is not the same as would be applied undertaking that assessment today.

3.11 It is clear that despite the amount of time that has passed since the production of that setting study the baseline remains fundamentally unchanged leaving the assessment within that document relevant.

3.12 The Atkins document makes reference to the “significance of Belton’s setting” but rephrasing that to read “the value of Belton’s setting to its significance” may be a better way to understand it in the context of current assessment terminology. There are also a number of references to “significant views” and again, this could potentially read better now as “key views” or “important views.” These are minor points of relevance as our understanding of setting and the contribution it makes to significance has evolved since 2010.

3.13 The setting study goes on to consider key views as they would have been defined at different points in history starting with the 17th-18th century and moving through to the late 19th century. It goes on to summarise the potential impact of small-scale, medium sized and major development on views out from various locations within the RPG and from listed buildings. In this instance the most relevant of those, for consideration here, is views out from Belmont Tower looking west towards Belton House and views from the roof at Belton House. These views are referred to as “Element 2: Urban development visible from Belton House Roof, Bellmount [sic] Tower...”

3.14 In each case the conclusions were as follows:

- Small-scale development: *“Urban development is most widely visible in the historically significant views within the Park from Bellmount Tower [sic]. From other significant views within the Park, no additional urban development is visible.*

⁸ Barnwell Manor Wind Energy Ltd v E.Northants DC, English Heritage, National Trust & SSCLG [2014] EWCA Civ 137

The significant views are not sensitive to small scale development within the boundaries of current urban development.”

- Medium sized development: *“The significant views are not sensitive to medium sized scale development within the boundaries of current urban development, unless they are of excessive height in relation to their local context e.g. isolated tall buildings...”*
- Major development: *“The significant views are not sensitive to major development within the boundaries of current urban development, unless this is of excessive height or of a design which uses highly visible materials or highly visible lighting that would be prominent in the significant views from within the park.”*
- Tall buildings: *“The views over the urban area of Grantham, within the key views from Belton House and Bellmount Tower, are sensitive to tall buildings/structures, where they would appear above and outside the limits of the urban area in the significant views, or where they appear too close to Manthorpe Church in the views.”*

3.15 The final conclusion of that study summarises the following:

The urban areas visible from Belton House roof, Bellmount Tower viewing gallery, and from the significant assessed views from within the park are not sensitive to small scale development within the boundaries of the current urban area. They would only be sensitive to medium scale and major development, where this is of excessive height and would be prominent in the significant views. The significant views of urban areas would be sensitive to tall structures where they would appear above and outside the urban area in the views and where they would appear too close to Manthorpe church spire.

3.16 The assessment and conclusions presented within the Atkins study are, therefore, broadly in line with the views expressed by the Inspector within the Longcliffe Road appeal letter and although there are slight differences in methodology and terminology the assessment is still sound and has been relied on in this Assessment, bolstered by observations made on a visit to Belton House and RPG in February 2024 by the author and further to consideration again current guidance within Historic England’s GPA3, included at Appendix 2.

Spatial relationships

- 3.17** The proposal site is broadly rectangular in shape, with an irregular long western side. On the east side it is bounded by the mainline railway between Grantham and Newark, on the north by Belton Lane, on the south by a modern housing estate, and on the west by hedgerows and fields. Central Grantham lies about 2km to the south, but the suburbs merge with Gonerby Hill Foot and extend as far as the southern edge of the proposal site itself. The closest edge of Belton House RPG lies to the north-east at a distance of about 1.4km. Great Gonerby is to the west of the proposal site and Manthorpe is to the east. The land associated with the Longcliffe Road appeal lies to the east of the railway line, as illustrated below (Figure 1).
- 3.18** It is worth noting the position of the Longcliffe Road appeal site, immediately to the east of the proposed development site, north-west of Manthorpe and to the south-west of Belton House and RPG. The Longcliffe Road appeal site effectively sits between the RPG and the proposal site and at the time of writing (February 2024) the appeal site remains undeveloped.

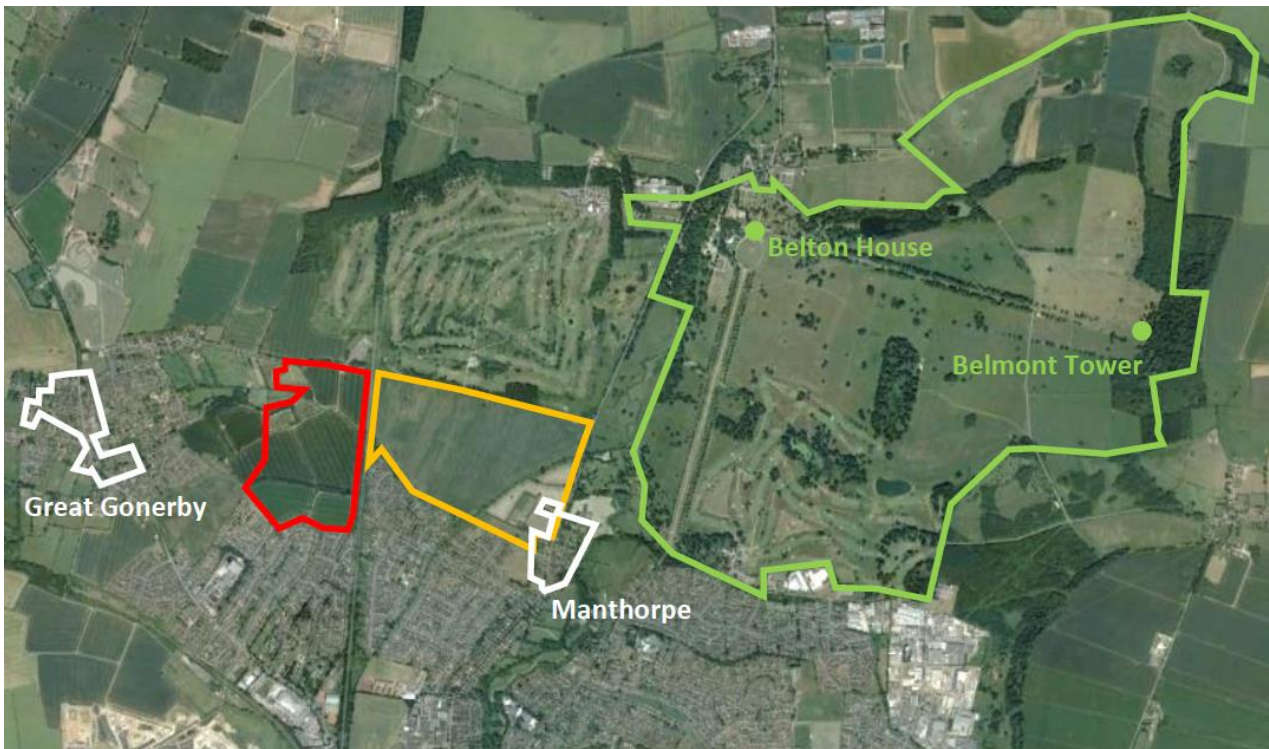


Fig. 1: This satellite image illustrates, indicatively, the spatial relationship between the proposal site (red), the Longcliffe Road appeal site (orange), Belton House RPG (green, with the positions of Belton House and Belmont Tower shown), and the two conservation areas (white).

4. Anticipated Effects

Introduction

4.1 This chapter of the assessment anticipates the effects of the proposed housing development in broad terms, taking into account material from the Longcliffe Road appeal and updated further to a review of the 2010 Atkins setting study of Belton House, the special disposition of the heritage assets noted at Figure 1 and observations made further to a site visit in February 2024 by the author of this assessment. The effects discussed in this chapter relate to change within the setting of the heritage assets, and the possibility that change may bring about harm to the significance of the asset in question.

Effect on Belmont Tower

4.2 Belmont Tower lies towards the east side of Belton House RPG, about 3.7km from the eastern side of the proposal site. Architecturally, the tower addresses a long avenue that leads towards Belton House, in a north-westerly direction, angled away from the proposal site. The entirety of the Longcliffe Road appeal site lies between Belmont Tower and the proposal site and there will be an effect. The viewpoints prepared by LDA design for the Longcliffe Road application (2018) have been reviewed and include a view looking south-west from the top of the tower and from the roof of Belton House where both the appeal site and the proposed development site are visible. However, the Inspector in the Longcliffe Road appeal considered that the scheme before him would preserve the significance of Belmont Tower, without harm (paragraphs 30 and 34 of the decision letter) so it is difficult to see how housing development on the proposal site, at a greater distance, beyond the Longcliffe Road site could cause harm. The absence of any harm in the case of the Longcliffe Road appeal makes it unlikely that there could be any cumulative impact of any significance.

Effect on Belton House RPG

4.3 Belton House RPG contains a number of listed buildings, including Belton House itself, which (like the park) is designated at grade I. As was specifically the case

with Belmont Tower, the Inspector in the Longcliffe Road appeal found that there would be no harm to the significance of the RPG or its constituent listed buildings in respect of the change within the setting of the assets.

4.4 The Longcliffe Road appeal site and the proposed development site are both visible from the southern avenue/drive within the RPG when looking south-west from the point marked on the plan below. Both schemes when complete will have an effect on this view but this is a small element of a much wider and expansive view and is essentially incidental and transient. During the winter months tree cover is reduced and visibility will be slightly increased but during the summer, when trees are in full leaf, this particular view will all but disappear.

4.5 For similar reasons to those described above in connection with Belmont Tower, housing development on the proposal site is unlikely to have any effect on the significance of the RPG or its associated assets. Figure 1 (previously) shows the spatial relationships, and the considerable distances involved.



Fig. 2: Top – Photograph taken by the author from the avenue running south from Belton House, looking towards the Longcliffe Road appeal site and beyond to the proposed development site. Bottom – view location marked on a Google Map screen capture (yellow dot).

Effect on Manthorpe Conservation Area

4.6 Manthorpe Conservation Area lies to the east of the proposal site, and it is separated from it by the entirety of the Longcliffe Road appeal site. Given that the Inspector in the Longcliffe Road appeal concluded (in paragraphs 30 and 34) that the scheme before him would not harm the significance of Manthorpe Conservation Area or any of the listed buildings within it (notably the church) it is difficult to see how housing development on the proposal site, at a greater distance, could cause harm. The proposal site does not materially contribute to the significance of the conservation area of the listed buildings within it and for similar reasons to the circumstances described above in relation to Belmont Tower and Belton House RPG, there would be no cumulative impacts and no reason to point to a reduction in the heritage significance of the asset.

Effect on Great Gonerby Conservation Area

4.7 Great Gonerby Conservation Area lies to the west of the proposal site, focused on High Street, which runs from north to south, and Green Street, which runs at right angles to the west. Only two small pockets of the conservation area extend to the east of High Street, one of which is at the southern end of the conservation area, around the Church of St Sebastian (listed grade I), and the other of which is a rectangular block of older buildings north of Marratts Lane. There is a modern suburb to the east of this block, consisting of Covill Close, Manor Drive, and Easthorpe Road. This suburb does not contribute to the setting or significance of the conservation area, and it separates the older part of the village from its former agricultural surroundings. There are no views outward to the east of any note.

4.8 There are longer views to the east from the church and churchyard of St Sebastian, at the southern end of the conservation area. These views include the green space that is the churchyard itself, and the informal area of green space beyond. Roughly speaking, what can be seen is a green pocket extending about 200m east of the church, beyond which are the houses in Merrick Close and Cox's Walk. This suburban development continues in Holden Way, Swadales Close and Woffindin Close, with Goodman Close and Lord Drive to the north-east. These roads do not contribute to the setting or significance of the conservation area, and they separate the older part of the village from its former agricultural surroundings. There are no

long views outward to the east from the vicinity of the church towards the proposal site.

- 4.9** Suburban development on the east side of Great Gonerby has long since severed the connection between the village and its wider surroundings. There are no visual connections of note extending into the land to the east, and the proposal site lies too far away for housing development to have any further effect on the significance of the conservation area.

Summary of Effects

- 4.10** While the proposal site lies notionally within the settings of the heritage assets described above, at least in an abstract or historical sense, it is visually separated from those assets in a number of respects. In the case of Great Gonerby there is already modern suburban housing along the east of the village, so that further development will not reduce the significance of the conservation area.
- 4.11** In the cases of Belton House RPG and Manthorpe Conservation Area, both of which lie to the east of the proposal site, the Longcliffe Road appeal has established that housing development, at a closer distance than the proposal site, will not affect the significance of those assets. No listed buildings will be less significant as a result, including Belmont Tower, a grade II* structure from which the RPG is intended to be seen and enjoyed.
- 4.12** In summary, there are no grounds on which to suppose that housing development on the proposal site will harm the significance of any heritage assets, or have an unacceptable cumulative effect.

5. Conclusion

- 5.1** This assessment updates and supersedes earlier assessment work undertaken by HCUK Group (then Heritage Collective) completed in 2018 and 2020 relating to a proposed housing allocation on land roughly equidistant between Great Gonerby Conservation Area to the west, and Manthorpe Conservation Area to the east, near Grantham. Belton House, which is a grade I registered park and garden (RPG), lies to the north-east.
- 5.2** Great Gonerby stands on high ground, with modern suburban housing fringing its eastern side. The setting of the conservation area has already been changed here, and there will be no further loss of significance as a result of future housing development on the proposal site. Eastward views from the Church of St Sebastian (listed grade I) are already contained and foreshortened by the suburban development in Merrick Close and Cox's Walk.
- 5.3** A review of the Belton House Setting Study, undertaken by Atkins in 2010, along with the Longcliffe Road appeal letter, dated 2 February 2018, which concluded that development to the east of the proposal site would not harm the significance of the other assets described in this assessment, namely Manthorpe Conservation Area, and Belton House RPG and its constituent listed buildings, notably Belmont Tower, listed grade II*. On this basis there are no grounds on which to suppose that future housing development on the proposal site will harm the significance those assets or bring about unacceptable cumulative impacts.
- 5.4** The findings and conclusion set out in previous Heritage Assessment (2018) remain unchanged. There will be preservation for the Council's purposes under Section 66(1) of the Act and paragraph 208 of the NPPF will not be engaged.

Appendix 1

Scale of Harm (HCUK, 2019)

The table below has been developed by HCUK Group (2019) based on current national policy and guidance. It is intended as simple and effect way to better define harm and the implications of that finding on heritage significance. It reflects the need to be clear about the categories of harm, and the extent of harm within those categories, to designated heritage assets (NPPF, paragraphs 207 and 208, and guidance on NPPG).⁹

Scale of Harm	
Total Loss	Total removal of the significance of the designated heritage asset.
Substantial Harm	Serious harm that would drain away or vitiate the significance of the designated heritage asset
Less than Substantial Harm	High level harm that could be serious, but not so serious as to vitiate or drain away the significance of the designated heritage asset.
	Medium level harm, not necessarily serious to the significance of the designated heritage asset, but enough to be described as significant, noticeable, or material.
	Low level harm that does not seriously affect the significance of the designated heritage asset.

HCUK, 2019

⁹ See NPPG 2019: "Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated." Paragraph 018 Reference ID: 18a-018-20190723.

Appendix 2

GPA3 Assessment: Historic England's guidance on setting

In assessing the effect of the proposals on the setting and significance of the designated heritage assets discussed within this document Atkins setting study (2010) for Belton House has been reviewed and relied on. However, that document is outdated in terms of terminology and methodology so it is considered prudent to also reassess the impact of the proposals against current guidance provided within GPA3 in order to understand how the following factors may or may not take effect, with particular reference to the considerations in Steps 2 and 3 of GPA3. The following analysis seeks to highlight the main relevant considerations.

Assessment Table 1

<i>Relevant Considerations</i>	Belmont Tower, grade II*
<i>Proximity of the development to the asset</i>	Approximately 4.4km from the tower to the centre of the proposed development site to the west.
<i>Proximity in relation to topography and watercourses</i>	Gently undulating land between the tower and the proposed development site. The tower is on high ground to the east with expansive long-range views over the surrounding farmland. The proposed development site is also on land that gently rises up to the west towards Great Gonerby.
<i>Position of development in relation to key views</i>	The proposed development site is visible in one element over a much wider 360-degree view from the top of the tower, over 4km away.
<i>Orientation of the development</i>	Please refer to supporting documentation.
<i>Prominence, dominance and conspicuousness</i>	The proposed development site is visible from long-range views from the top of the tower but at over 4km away to the west will not be prominent, dominant or conspicuous.
<i>Competition with or distraction from the asset</i>	None anticipated.

<i>Dimensions, scale, massing, proportions</i>	Please refer to supporting documentation. The proposed development site will be occupied by residential development of a domestic scale.
<i>Visual permeability</i>	Please refer to supporting documentation.
<i>Materials and design</i>	As above.
<i>Diurnal or seasonal change</i>	The intervisibility between the site and the tower will vary over the course of the year, become less apparent during summer months.
<i>Change to built surroundings and spaces</i>	Yes, insofar as currently undeveloped farmland will be developed with housing.
<i>Change to skyline, silhouette</i>	As above.
<i>Change to general character</i>	As above.

Assessment Table 2

Relevant Considerations	Belton House (grade I) and RPG (grade I)
<i>Proximity of the development to the asset</i>	Approximately 2.4 – 3.0km from the centre of the RPG to the centre of the proposed development site to the west.
<i>Proximity in relation to topography and watercourses</i>	The landscape surrounding the house is gently undulating to the east and west, rising up to the tower (east) and to the proposed development site in the east.
<i>Position of development in relation to key views</i>	No visible at ground level. Views towards the proposed development site will be possible from the roof of Belton House in the same way as they are from Belmont Tower (discussed above). However, this is not a “designed” view or a view that people get on a frequent basis.
<i>Orientation of the development</i>	As previously – see Assessment Table 1
<i>Prominence, dominance and conspicuousness</i>	As previously – see Assessment Table 1
<i>Competition with or distraction from the asset</i>	None.

<i>Dimensions, scale, massing, proportions</i>	As previously – see Assessment Table 1
<i>Visual permeability</i>	As previously – see Assessment Table 1
<i>Materials and design</i>	As previously – see Assessment Table 1
<i>Diurnal or seasonal change</i>	As previously – see Assessment Table 1
<i>Change to built surroundings and spaces</i>	As previously – see Assessment Table 1
<i>Change to skyline, silhouette</i>	As previously – see Assessment Table 1
<i>Change to general character</i>	As previously – see Assessment Table 1

Assessment Table 3

Relevant Considerations

Manthorpe Conservation Area

<i>Proximity of the development to the asset</i>	Approximately 1.8km from the centre of the proposed development site to the centre of the conservation area to the south-east.
<i>Proximity in relation to topography and watercourses</i>	Slightly lower lying land along the road through the Manthorpe Conservation Area with the field gently rising up to the east and west beyond roadside.
<i>Position of development in relation to key views</i>	The proposed development site will not feature in any key views into or out from the conservation area.
<i>Orientation of the development</i>	As previously – see Assessment Table 1
<i>Prominence, dominance and conspicuousness</i>	As previously – see Assessment Table 1
<i>Competition with or distraction from the asset</i>	None.
<i>Dimensions, scale, massing, proportions</i>	As previously – see Assessment Table 1
<i>Visual permeability</i>	As previously – see Assessment Table 1

<i>Materials and design</i>	As previously – see Assessment Table 1
<i>Diurnal or seasonal change</i>	As previously – see Assessment Table 1
<i>Change to built surroundings and spaces</i>	As previously. A change on the proposed development site will appear as an extension to the existing built-up settlement to the south-east and east of Great Gonerby. This is within the wider rural setting of the Manthorpe Conservation Area to the southwest but will not result in a reduced ability to appreciate its special interest and will not be apparent from within the conservation area itself.
<i>Change to skyline, silhouette</i>	As previously – see Assessment Table 1
<i>Change to general character</i>	As previously – see Assessment Table 1

Assessment Table 3

Relevant Considerations

Great Gonerby Conservation Area

<i>Proximity of the development to the asset</i>	Approximately 1.1km from the centre of the conservation area to the centre of the proposed development site to the east.
<i>Proximity in relation to topography and watercourses</i>	The newer elements of Great Gonerby to the east of the historic/older parts that make up the conservation area sit between the proposed development site and the conservation area.
<i>Position of development in relation to key views</i>	The proposed development site is not within any key views into or out from the conservation area.
<i>Orientation of the development</i>	As previously – see Assessment Table 1
<i>Prominence, dominance and conspicuousness</i>	The proposed development site is not and will not be visible.
<i>Competition with or distraction from the asset</i>	None.
<i>Dimensions, scale, massing, proportions</i>	As previously – see Assessment Table 1
<i>Visual permeability</i>	As previously – see Assessment Table 1

<i>Materials and design</i>	As previously – see Assessment Table 1
<i>Diurnal or seasonal change</i>	N/A
<i>Change to built surroundings and spaces</i>	As previously – see Assessment Table 1
<i>Change to skyline, silhouette</i>	No appreciable change apparent from within the conservation area.
<i>Change to general character</i>	As previously – see Assessment Table 1