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Dear Councillors

OUTLINE PLANNING APPLICATION FOR RESIDENTIAL DEVELOPMENT COMPRISING 55 DWELLINGS INCLUDING 8 AFFORDABLE HOMES, AT THE FORMER BARRACK GARDEN ALLOTMENTS, BEACON LANE

I refer to the above application which was deferred at the committee's meeting on the 23rd April following a very intense debate on the following grounds:

"...for further information/clarification to be obtained in regard to the access and traffic (and for comments from the highway authority), the impact on the conservation area, density and ecology."

Much of this information had already been submitted in response to earlier requests from the Council and their consultees over the 15 month period following the submission of the application in February 2012. Nevertheless, to ensure that members have a clear understanding of the above issues before considering this application, that the applicant provided additional information and illustrations to help members understanding of these key issues.

We had anticipated having sight of the additional ecological information that Cllr Morgan referred to but at the time of writing we are still awaiting that information. We have therefore responded to the points made during the debate as best we can.

Impact on the highway network.

As officers acknowledged, the site has the benefit of planning consent for 43 residential units which was granted at appeal.

The traffic and transportation issues relating to the current consented development were based on a total of 51 residential units. This was to ensure a robust assessment of the likely impact of the development on the surrounding highway network. This number of units was examined at the Inquiry and found to be acceptable by the Inspector in terms of its impact on the highway network.

The revised development comprises of 55 residential units and includes a mixture of private and affordable dwellings. This is an increase of 4 units on what was previously examined at appeal for the current consented development. For the new application a development of up to 65 houses has been considered in the Transport Assessment again in order to provide a robust examination of the effect of the proposals. The table below shows the difference in predicted traffic flows between the 51 units considered at appeal and the 55 units actually proposed in the new application.

	2 Way Trip Rate	51 Units Generations	55 Unit Generation	Increase in Traffic
AM	0.633	33	35	2
PM	0.713	36	39	4

In the morning this is the equivalent of 1 additional vehicular movement per half hour and 1 additional movement every 15 minutes in the PM peak hour. These are well below daily fluctuations in traffic flows and would be indiscernible from existing traffic flows.

As determined at the original Inquiry by the Inspector, the traffic impacts are considered negligible.

We note that the Highway Authority have reiterated their previous comments on the application and confirm that the development is acceptable on highway grounds. They consider the impacts on the highway to be negligible. The Highway Authority also refer to the fact that the site is in a highly sustainable location close to the facilities offered by the town centre as well as being close to local schools and that the applicant will be contributing (via s106) to improvements to the highway network and to bus service improvements.

In respect of the design of the proposed access, which is a significant improvement over the existing allotment access, they confirm that it is in accordance with the guidance in the Manual for Streets and is therefore acceptable. The access and its design is discussed in more detail below.

Impact on the Conservation Area.


Since the application was submitted in February 2012, the Council has designated the area to the west and south of the application site the Grantham St. Anne's Conservation Area. The only part of the site included within the boundary of the Conservation Area is the proposed access. As members will acknowledge, the details of the access are already approved under the original consent and the current proposals do not intend to make any changes to the access. Illustrations of the Conservation Area are provided overleaf.

The development's impact on the nearby heritage assets, including the Conservation Area, has been fully assessed in the various reports and addendums to the reports submitted by the applicant. Should Members require more detailed information we would strongly urge them to read those reports.

Before assessing the impact of the revised development on the Conservation Area, it is important to note that the details relating to the formation of the access road are equivalent to those accompanying the approved consent for the re-development of this site (reference S08/0013). In addition, the remainder of the approved scheme could be implemented in accordance with the approved plans, resulting in a mix of 1 and 2 bed flats and 2, 3, 4 and 5 bed houses with largest dwellings being up to 3.5 storeys in height. In the approved scheme, an access road extended along the edge of the west boundary and dwellings were positioned adjacent to the south boundary.

In the current scheme, the arrangement of the layout has been altered to achieve a lower number of larger plots, which itself has generated the opportunity for a scheme of lower density and larger gardens. In achieving this alternative approach, the development along the west boundary now backs onto the Conservation Area, so that gardens adjoin the playing field and the existing boundary trees are located within gardens rather than alongside an access road. Along the south boundary, the public open space has now been located to adjoining existing trees to the south of the site. Built form has effectively been removed from positions along this boundary.

As can be seen from the illustrations overleaf there is a distinct definition formed by landscaping along the eastern edge of the playing field. This consistent and continuous planting forms a strong visual boundary which contains the qualities referred to in the Conservation Area. Due to the strength of this boundary which protects the openness of the playing field, there is little perception of the activities beyond. In fact, the land beyond the eastern boundary has limited, direct relationship with the playing field. As a result, this boundary forms a logical and justifiable edge to the Conservation Area.



St Ann's Conservation Area




The western boundary of the site is lined by existing, mature hedgerow and tree-planting. This forms a continuous and dense visual screen between the recreation ground and the proposed development.

Views from the Conservation Area across the open ground will therefore be preserved.



The Grade II listed Barrack Square is located to the west of the access into the proposed site, separated from it by the frontage of Beacon Lodge and the mature trees within. As a result of the distance involved and levels of visual separation, the formation of the proposed access would have no impact on the significance of these heritage assets.



The existing access to the site is damp and narrow, and runs within the root and crown spread of the existing trees. The leylandi hedge across the frontage is not a native species and provides an untidy edge to Beacon Lane.

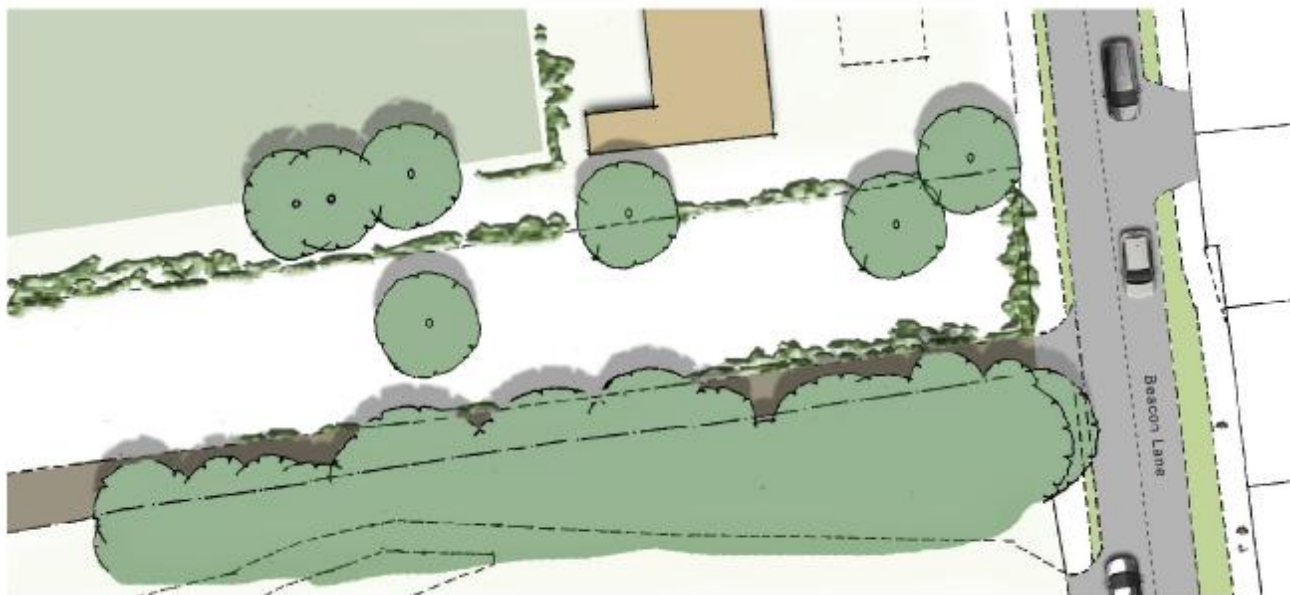
The proposed access will create a safe route for vehicles and pedestrians and has been specifically designed to retain the important trees and to create wide verge areas for new landscaping.



The scheme has been designed with an awareness of the built character of the Beacon Lane context. The selection of materials will take into account the range of local palette and the form and detailing of the proposed dwellings will reflect the prevalent Victorian and Edwardian style.

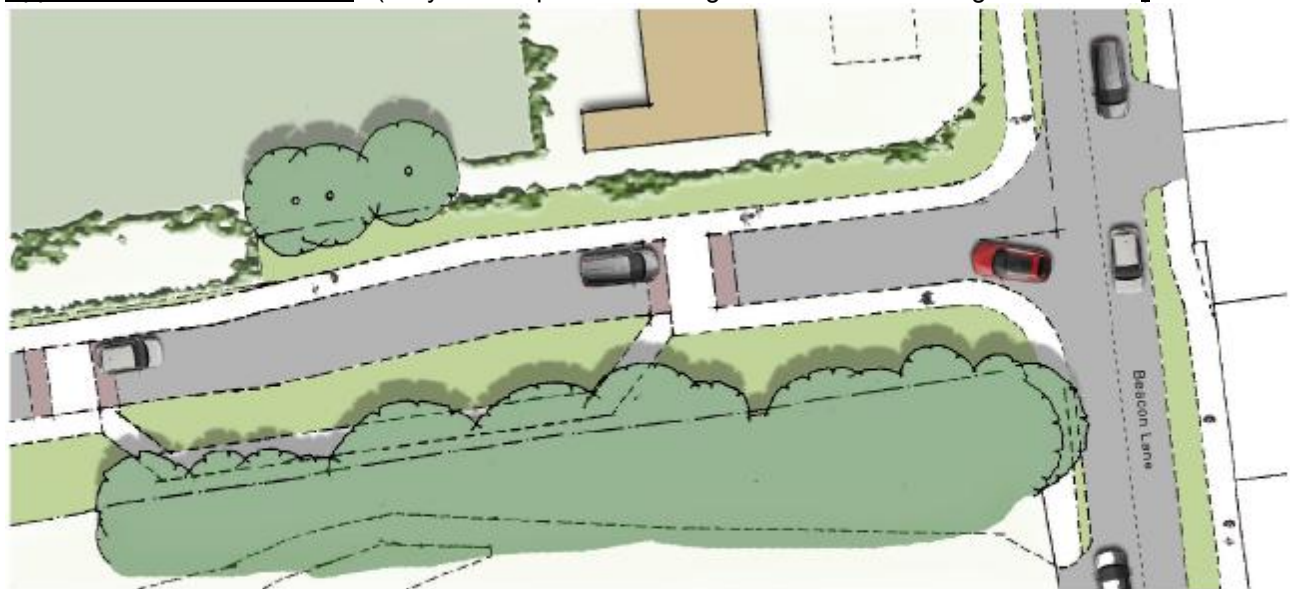
The only other part of the site which relates to the Conservation Area is the access road adjoining Beacon Lane. This part of the site falls within the Conservation Area.

Existing Access to the Former Allotment Site (under the canopy of the existing trees)



During the course of the previously approved application, a solution for the formation of the access road was agreed which took account of the existing trees of merit. As a result, the access road can be formed with limited impact on existing trees and retaining those considered to be of merit through the existing approval.

Approved Access and Details. (Only the footpath runs along the line of the existing access track)



The negotiations relating to the formation of the access road took full account of trees of merit even prior to the designation of the Conservation Area and, as a result, the access could be formed without causing significant harm to the character of this part of Beacon Lane.



View from Beacon Lane - as existing



View from Beacon Lane - as proposed

The remainder of the site cannot be perceived from other locations within the Conservation Area.

The Character Appraisal undertaken by the Council refers to the following in relation to the management of the Conservation Area and future proposals for development:

“Any new development, including additions and replacement buildings should have regard to the historic context in terms of scale, height, form, alignment, style, design, materials and also maintain gaps between buildings that afford views of landmark buildings within and without the area and of the surrounding countryside.”

The currently proposed development adopts a layout which has been designed to respond to the physical characteristics of the site and according to best practice urban design. As a result, and as an improvement on the approved scheme to produce a lower density development, the relationship between the proposed housing and the western boundary of the site is formed by gardens. In order to maintain the existing western boundary and the visual benefits of the existing landscaping, the positioning of gardens along this edge is the most appropriate layout arrangement. Furthermore, by placing gardens adjoining the playing fields, the open space and green character of both can ‘merge’ across the boundary between. As this boundary forms the eastern edge of the Conservation Area, the presence of the gardens creates a soft visual transition.

The built form is set well back from the site boundary and, due to the presence of the existing landscaping; it will cause no demonstrable harm to the character and appearance of the Conservation Area. Whilst it might be possible to detect the presence of the proposed dwellings, their presence would have no impact on the qualities of the open space for which the playing field is included in the Conservation Area.

The dwellings along the western side of the site are proposed to be 2.5 storeys in height, with the top floor accommodation created in the roof space without significant increase in height over the 2 storey units. It is noted that the approved scheme contained buildings of 3.5 storey height, but these are omitted within the current scheme.

The presence of 2.5 storey buildings (in equivalent form and scale to 2 storey buildings) is not inappropriate in this location. The Character Appraisal refers to the variety of built form in the area and also the variety in the scale and status of the Victorian and Edwardian buildings. In the context of an approved scheme containing 3.5 storey development, the presence of 2.5 storey buildings outside the Conservation Area would have no demonstrable harmful effect on its special character or appearance.

Paragraphs 132-134 of the NPPF provide a context for assessing the impact of proposed development on the significance of designated heritage assets and their settings. The structure of the policy defines harm as “substantial harm or total loss” or “less than substantial harm”. A development can also have no harm or a neutral harm.

English Heritage provides specific guidance to assist with in the interpretation of the requirements of Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the policy of Paragraphs 132-134 of the NPPF. In The Setting of Heritage Assets (2011), English Heritage provides a methodology for assessing impacts on settings. It notes the potential for change to occur and for impacts to be defined precisely.

It is our assessment of the proposed development, with experience of applying the methodologies through appeal, that there would be no resultant harm caused to the Conservation Area or its setting and the effect would be neutral.



Existing late 19th century and early 20th century residential development characterizes this part of the town, including Norman Leys in Beacon Lane (top). These buildings utilise a varied palette of materials and have decorative details to enrich their appearance.



Varied external materials and detailing



Proposed streetscene, showing the Victorian-inspired character, proportions and detailing of the units.

Examples of recent developments by Yelcon Homes, demonstrating Victorian character and the high quality of construction and detailing.

Density

Members raised concerns regarding density during the debate which reflected concerns raised by local residents. A response to those issues was sent to officers over a year ago.

The current proposals increase the number of units from 43 units to 55, an increase of 12 units. Notwithstanding the increase in numbers, the overall density of the development is still considered to be low at fewer than 25 units per hectare. This is referred to in the planning statement. We note that the *Grantham Townscape Study* advises that anything below 29 dwellings per hectare is considered to be low density development.

Townscape & Scale

The Townscape Study shows the site to be within Character Area 4 (sub section 4a), *Riverside and Stonebridge*. In terms of grain and density the study comments:

The very low density and plot coverage of the historic development of the southern part of this character area has been much diluted by late 20th century development which is generally much larger footprint buildings covering a large percentage of the plots and heavily compromising the immediate setting of older houses. This has produced a coarse grain of development. The orientation of the original houses on the plots has dictated the pattern and orientation of later buildings and development. New buildings built within the grounds of earlier houses are generally set to regular small to medium sized plots. This is particularly the case to Stonebridge Road.

In respect of scale:

There is much variation across the character area in terms of the scale of built form. Generally the modern buildings to the school and college to the southern section of the character area (CA04a) are much larger and taller than the historic buildings on the site or adjacent to the site (such as the Barracks). These can be up to four storeys and as a result prominent in views from the riverside towards the school and college. To the north buildings are relatively modest with most being single storey and thus not impacting on the predominantly open and expansive character of the fields, paddocks and formal park which make up this part of the character area.

The scale of modern buildings compared with the original houses which still stand within these complexes is unsympathetic and overpowering and it is the modern highly functional buildings which tend to dominate this character area in terms of scale.

The area is therefore characterised by what was very low density development which has now been diluted by late 20th century development with much greater footprints which has compromised the setting of the older buildings. The newer buildings are even greater in scale than the original buildings and tend to dominate the character of the area.

As mentioned in respect above, the maximum height/scale of the proposed development has been reduced from the 3.5 storeys approved under S08/0013/35, down to 2.5 storeys. This will have obvious benefits in terms of the impact on the surrounding areas.

Ecology.

At the Inquiry an objection was put forward by an objector on the grounds that there were a number of protected species on the site. A condition requiring a further ecological survey being undertaken prior to the clearance of the site was attached to the permission by the Inspector. That condition has been discharged and therefore the site can now be cleared.

At Committee Cllr Morgan referred to comments made by a local ecologist that there were protected amphibians on site. Our understanding from speaking to officers following committee was that Cllr Morgan would provide the details of this information shortly after committee to enable the applicants chance to address the points made, but to date no such information has been provided. We are therefore unable to respond to any specific evidence.

The surveys and reports commissioned by the applicants over a number of years have not produced any evidence of protected species on site apart from birds and the use of the site by foraging bats. These surveys were undertaken in 2007 prior to the submission of the original planning application, in 2010 to provide the necessary information to discharge the ecological condition and again in late 2011 in advance of the submission of the current application.

As members are aware, both Natural England, the Government's chief advisors in England in respect of wildlife and protected species and the Lincolnshire Wildlife Trust have been consulted on this application and both agree with the methodology, findings and proposed mitigation of the ecological information submitted by the applicant.

We accept that on the face of it such a site would provide a range of habitats suitable for various species. This is mentioned in the reports submitted and they also explain that the absence of such species could be explained by the fact that the site was intensively grazed by a range of animals including: sheep, goats, geese, ducks and even South American Rheas, which would affect the development of some life stages of animals such as reptiles and other wildlife. Although the site is no longer occupied by this livestock, the site is bounded by domestic gardens and playing fields which make colonisation of the site, post-abandonment, difficult.

Should there be any protected species on site and the evidence to date indicates that the chances are very low in this respect, then the provisions of the Wildlife and Countryside Act provides appropriate protection from harm, injury or killing, even though planning permission has already been granted for the development of the site.

Notwithstanding the results of the surveys, the provision of the above Act and the acceptance of the proposals by Natural England and the Lincolnshire Wildlife Trust, the applicants have agreed that they will carry out a further ecological survey before building works commence.

Conclusions.

This site has an implementable consent which will in some respects have a greater impact on the Conservation Area and the Grantham Townscape than the revised details as that consent had a maximum building height of 3.5 storeys, whereas the revised proposals will have a maximum of 2.5 storeys.

There will be a slight increase in terms of the amount of traffic generated arising from the revised application, but this is considered acceptable by the Highway Authority Lincolnshire County Council. The evidence given at the Inquiry was based upon 51 dwellings and this was accepted by the Inspector who considered that the Council had behaved unreasonably in refusing the application on highway grounds. The revised scheme is for only four more units. The revised Transport Assessment has been based upon a proposal of up to 65 units. Even at this level the Highway Authority confirms the impact will be acceptable.

In terms of ecology the site can be cleared under the provisions of the existing consent. Surveys have been undertaken in 2007, 2010 and 2011 by an appropriately qualified and licensed ecologist whose clients include English Heritage and the Environment Agency. The results of these surveys have been verified by the appropriate consultees such as Natural England.



I trust that everything is in order with the application and I look forward to receiving confirmation from you that the application has been registered in due course. If you have any queries please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, appearing to read "Mark Mann" with a stylized flourish underneath.

Mark Mann
Associate Director (Planning)