

Addendum to Report CM1 – S10/0142/EIAOL (North Grantham – Manthorpe)

Residential development for at least 1000 dwellings together with associated development on Land to the north of Grantham (bounded by the East Coast main railway line, by Belton Lane and High Road (A607), Manthorpe), Lincs.

Reasons for and matters covered in the Addendum report

This application is for a large, complex and controversial development. It has attracted a great deal of interest and comment from the public and is the subject of a large numbers of responses from a wide range of other interests, including statutory consultees. The reasons for the long period of consideration by officers before presenting the application to the Development Control Committee are outlined in the main report and the need for this Addendum is referred to in that report. In the Addendum five topics are focussed on, as follows:

Firstly, the Addendum deals with the submission by the applicants of information and views concerning the reasons for objection, by several consultation respondents, to the proposed development on grounds relating to the impact that it would be likely to have on its setting. It also seeks to remedy the fact that the applicants had not taken account of several policy documents relevant to these and related matters. This section of the Addendum summarises the key points addressed by the applicants in the Supplementary Design Report (SDR) and Revised Illustrative Masterplan (RIM) and the responses from various bodies consulted on these documents.

Secondly, the Addendum addresses the reassessments of the likely impacts of the proposal on the physical setting of the site presented in the SDR, which have led to revisions being made to the originally submitted Illustrative Masterplan. The RIM includes an enhanced landscape framework, Green Infrastructure Strategy and some rearrangement/relocation of land use elements, for example the neighbourhood centre and main playing fields area. Some respondents have made comments on this aspect of the new material.

Thirdly, the Addendum includes detailed Reasons for Refusal.

Fourthly, there are two letters submitted on behalf of the applicants attached as Appendix 1 and Appendix 2; one from Colin Buchanan

The Supplementary Design Report (SDR) and Revised Illustrative Masterplan (RIM)

(The full text of these documents are on the SKDC web site; all the other documents referred to the SDR can be accessed either through the SKDC website or others, such as the 'Communities and Local Government' site.)

The applicants state that the SDR and RIM constitute a comprehensive response to certain consultation responses, notably English Heritage, Natural England, The National Trust and SKDC's Conservation Officer. " ... Specifically they have sought to address the evidence base and analytical deficiencies of the material submitted with the Planning Application highlighted by these consultees." The applicants also state that the SDR and RIM are "... principally concerned with the issues of: place making; heritage (notably the setting of Belton House and Parkland and of Manthorpe Conservation Area); landscape and green infrastructure." The Report draws upon information and guidance in the

“Belton House Park Setting Study and Policy Development Study” (BHPS) January 2010 – SKDC and The National Trust), Planning Policy Statement PPS5: “Planning for the Historic Environment” (and the associated “Historic Planning Practice Guide”), Conservation Area Appraisals for the Manthorpe CA and the Belton CA, the Core Strategy for South Kesteven and other relevant documents relating to the historic environment.

In the SDR it is stated that: “... it is crucial to understand the difference between the Application Site and the extent of the proposed developed area within it as reflected in the Masterplan.” It is recognised: “... that in order to render major development in this location acceptable, great care is required in setting the amount and location of the built development and that extensive areas of (landscaped) open space are required both to integrate that development into the inherited landscape (specifically with reference to the local heritage assets and to meet the wider community’s need for open air recreation and leisure.”

The applicants state that though the RIM is ‘illustrative’ (reflecting the need to retain flexibility at the application stage, they: “... remain content to accede to a planning condition formalising the Masterplan as the basis of the subsequent development of the Site, supported by a Development and Design Brief (also secured by a planning condition) prepared in consultation with key stakeholders.”

The SDR goes on to deal with “*An Overview of the Heritage Issues*”; “*Additional Assessed Views*”; “*Landscape Framework/Green Infrastructure Enhancement*”; “*Revised Masterplan*”; “*Conclusion*”. These sections: “... augment the evidence base supporting the proposal and informed the amended Masterplan ... Specific concerns articulated by consultees have been explicitly addressed.”

“An Overview of the Heritage Issues”

“In the light of the consultee responses a full review of the heritage documentation ... has been undertaken and the conditions on the ground have been thoroughly re-examined.”

The applicants state that, though the various historic elements are assessed separately for ease of reference, the approach “... is in fact a fact a holistic one which recognises and accepts that the proposed urban extension is situated in an historical landscape where there are a significant number of heritage assets (undesigned as well as designated), the character and setting of which need to be respected.” They note that most green field development, including the two Sites in Grantham would have an impact on an historic environment; it is accepted as “undeniable” that the proposal would impact on the registered park, but so also “... would the proposed NW Quadrant ...” as stated in the BHPS.” The applicants cite guidance in PPS5 and “Capitalising on Inherited Landscape” (October 2009, an EH/HCA publication) “... to emphasise that the Application should not be rejected out of hand simply because it involves some change, as some of the Application consultees suggest.”

In dealing with the impact on the Conservation Areas, the applicants affirm that there is “... clearly no effect on the Belton CA”. They go on to note that the Manthorpe CA Appraisal “... pays little attention to the designated area’s wider setting...” and makes no reference “... the historic parkland ... “. “It is the considered professional view of the Applicants’ Design Team that ... “the revised proposal “... does not have a significant

impact on the character and appearance of the Manthorpe CA ... “and most certainly does not erode the sense of separation between Manthorpe and Grantham (as suggested by EH). It is acknowledged that the original proposal could impact visually on the open space between Manthorpe Grange and on Manthorpe Grange, St Johns church and Rectory, this has been addressed in the RIM by placing new built development further away, changing its character to lower density detached properties in extensive, well landscaped grounds adding new planting of individual trees and woodland. These measures are intended to enhance the setting of the village setting and ensure a distinct separation between the development and the village in a way that did not happen during past phases of Grantham’s expansion. The northern approaches to the CA would remain generally a rural one, with landscaping measures separating and screening the new development to the west.

The starting point for the SDR assessment of the impact of the proposal on the ‘The Registered Park’, is the wide definition of ‘setting’ adopted in PPS5 (Annex 2 and EH’s ‘Setting of Heritage Assets’). In this context and taking note of the detailed study in the ‘Belton House Park Setting Study and Policy Development Study’ (BHPS), the applicants express surprise at the lack of reference in consultee comments of “... the large visitor car park directly in front of the house, the extensive golf course in the south eastern part of the registered park or the clear views from Belmont Tower and its vicinity towards what ... “ is referred to in the BHPS “... as the ‘nearby hotel’ (Belton Woods Hotel Golf Club. ... This latter is an area of land dominated by a further golf course and series of holiday chalets dotting the slope of the hill up towards the tunnelled railway line to the west. ... Indeed even the [BHPS] is strangely reticent on all these aspects and the impact they have on the Grade I listed house, the registered park and the various other listed structures in the grounds, ... Another significant issue similarly ignored ... is the constant traffic noise from the A607 and the impact that this has on visitors’ appreciation of the western part of the park. ... all have a considerably greater adverse impact on the setting of the registered park than the proposed development. Importantly, though this clearly does not in itself mean that the SUE proposals are acceptable in heritage terms, these are, nevertheless, all material considerations in assessing the marginal impact of the proposed development on the setting of the Park”

“Additional Assessed Views”

A series of photographs, supplementing those already submitted, have been taken for the purposes of the SDR; they “ ... represent explicit *additional* analysis in response to key consultee comments and have been prepared to give greater clarity to the Design Team’s understanding of the specific relevance to the setting ... the development within the inherited landscape. This has, in turn, informed the amended Masterplan.” Necessarily, the views do not take account of enhancements to the landscape framework in the RIM, “... which are explicitly intended to screen, filter out, or reduce the impact of some of these views. Maps/Diagrams are included in the SDR to identify the viewpoints, the extent of visible ground, and features that contain views ...” For each view consideration is given to: “the setting of the proposed development area within the landscape and what parts of it can be perceived, understood and actually seen from Belton Park ...the setting of Belton park and what parts of the proposed development area cab be seen from the Park looking out.” A booklet of minor changes to the annotations for photographs and additional information on maps were submitted for the applicant on 9 December 2010 tom address some criticisms from EH and NT. The assessed views A-J, with short summarised comments are:

- A - Roof of Belton House and from Visitors entrance, looking south: no part of Site visible (note: no part of the Site is visible from the House – see view H).
- B - Belton Park, looking west towards the Site from half way down southern avenue: limited parts of Site visible, but only glimpsed from registered park through foreground mature vegetation.
- C - Base of Belmont Tower, 47 metres higher than Site high point, looking west towards Site: Site central ridge, central hedge (part), half lower field north seen.
- D - Corner of Brickkiln Plantation, Belton Lane, looking east towards Belton Park: representative of transitory serial views travelling along Belton Lane; little seen of Site through few gaps in boundary hedge.
- E - Belton Lane east edge of Great Gonerby, looking east towards Belton Park: again representative of transitory serial views travelling along Belton Lane; central hedge and NW quarter of Site glimpsed from upper part of road; small parts of Park visible.
- F - Great Gonerby, from public footpath 32 metres above Site high point, near south east edge of village, looking west towards Site and Belton Park; central hedge and most of west half of Site seen
- G - Within the Site (near middle/high point), looking west towards Great Gonerby; shows containing scarp and woodland features; housing area to south east...
- H - Within the Site, (near middle) looking east: clear views to St Johns Church, Belmont Tower just visible between containing wooded scarp; lower parts Belton Park not seen.
- I - South of St Johns Church, looking west towards Site, Manthorpe Grange centre of view; shows rural setting, small strip of Site visible below wooded horizon, housing frames view to south, Ryedale Close houses seen in the distance.
- J - East side of High Road at a Park entrance, looking north: strategic view of proposed Site entrance area, framed by mature vegetation, no views through to Belton Park, establishes rural setting north of Manthorpe CA; foreground views into Site (note: area to be landscaped) and above trees to east quarter of Site.

The aims of the assessment of views are: to show that a thorough appraisal has now been carried out and to that the implications for specific ‘setting’ (impact) issues have been considered. “Whilst it remains the considered view of the Applicant’s professional team that ... the mixed use urban extension - would not cause harm to interests of acknowledged importance, including, heritage issues, consideration of the additional analysis *has* informed amendments to the Masterplan so as to mitigate the minimal impact of the development.”

Later in the SDR the issue the likely impact on the Site setting of the proposed new roundabout junction to provide vehicular access to the Site from the A607, but which would also rearrange the A607/Belton Lane junction is dealt with. It is stated that there would be “...an opportunity to rationalise the present clutter of street furniture, including light columns associated with the existing junction. Modern, energy efficient street lamps will significantly reduce light spillage and glare along the A607 corridor, benefitting both Belton Park and Manthorpe Village heritage assets. New planting would be incorporated in the re-alignment of High Road and Belton Lane at the reconfigured roundabout junction, would screen roads, the new junction and development areas in views out of the registered parkland.

“Landscape Framework/Green Infrastructure Enhancement” “Revised Masterplan”
The amendments to the original Masterplan that have resulted in the RIM are:

Substantial woodland planting is added in several places on the Site; whilst providing screening and breaking up views into the Site from the registered parkland, this would also provide opportunities for informal recreation, including attractive additional links in the public footpath network for locals and visitors and habitat enhancements. Key areas of such planting are: along the northern boundary with Belton Lane, forming a strong 'defensible boundary to the setting of Grantham and channelling key views from the registered parkland; along the railway; an extensive block in the northeast corner associated with the principal vehicular access to the Site (an 'off-line' roundabout on a realigned A607) and between the proposed hotel and housing, would further break up views from the registered park to the east

- Relocation of sports/school fields to replace housing from higher parts of the Site, which is visible in long distance views from Belmont Tower. These predominantly open green areas, would display an apparently rural character when seen in long distance views. Within the Site these areas together with, woodland, a SUDS corridor and retention of a significant hedgerow, would form a strong green spine for public use, leading to the Neighbourhood Centre and pedestrian links to outside the Site.
 - To the west, another green SUDS corridor follows a mature hedgerow; this would help Breakup the scale of the development and provide another footpath link.
 - The significant utilisation and enhancement of water courses along the Running Furrows and Gonerby Brook would not only contribute to alleviation of flood risk, but would result in the creation of wet land and associated habitats and a diversity of green infrastructure accessible to and linking with housing areas within and outside the Site.
 - Planting in the proposed open space to the north of St Johns Church, bounded by the Running Furrows would be reinforced – two small woodland blocks and tree groups rather than individual 'parkland' trees. This would screen and soften views across the Site from the A607, would relate to other proposed planting north of Manthorpe Grange and to the north east and would ... develop the sense of place and enhance the setting of the Church and Manthorpe Conservation Area.”
 - Single-storey development between Manthorpe Grange and Ryedale Close; large low-density detached houses, in well landscaped grounds next to Manthorpe Grange; reduced housing numbers by Running Furrows at site entrance to preserve rural setting.
- The RIM would provide a modest reduction in overall unit numbers as follows:
Family Houses - 850; Apartments (over commercial units in Neighbourhood Centre) 20; Dedicated Retirement/Bungalows - 40; CCRC Units - 105; Nursing Home - 60 beds;
Total Units - 1050

It is intended that the “... the informal and natural character of these new landscapes and enhanced habitats ...” would provide the basis for “... a series of Local Nature Reserves ...” that could be locally managed, involving local conservation groups and community. The new 'Green Infrastructure' and footpath/cycle network would constitute a significant improvement to this northern part of Grantham and “... should be contrasted with the existing land use – intensive arable farming – and with the present paucity of wildlife habitats, with the existing shortage of open space ... and with the limited access that the Site currently possesses.” The SDR and the RIM are aimed at addressing the concerns of Natural England that the “... Green Infrastructure elements embodied in the proposal were not clear. This additional material, informed by the work outlined above on impact heritage assets and also an appraisal of the South Kesteven Green Infrastructure Strategy (April 2009) and the consequent Landscape Framework/Green Infrastructure proposals set out in the SDR and illustrated in the RIM are aimed providing that clarity.

“Conclusion”

The format of the ‘Conclusion’ is to respond to recommendations in the ‘Belton House and Park Setting Study’, as to the “way forward” for dealing with applications affecting the setting of Belton Park, to show how “... the revised Masterplan proposals satisfy the overriding issues.” The recommendations are used as headings in the “Conclusion”.

“intrude on key historical and designed views” - It “ has been demonstrated through views taken and analysed in Chapter 3.0 that the proposed development would only have a minor impact on historic views and on the setting of the registered parkland, mainly from higher parts of the ...” [site] “(where views of the existing built-up area of Grantham and of the proposed North West Quadrant development are also available) and that there would be no intervisibility between Belton House and the development. At such locations, where it is visible, the Application Site is relatively remote from the parkland and visually separated by existing trees, revealing narrow strip views within mature landscape structures which will filter or completely screen views of the development.” Locating “... development away from more elevated/visible parts of the Application Site (which will be used mainly for open space or community facilities (e.g. school) and using structural landscaping and complementary building materials will mitigate visual impacts;”.

“degrade the open nature of key views” - the RIM “... takes account of open views within the site and retains these through the open public areas;”

“require the loss of important woodland areas” - “the proposal does not involve removal of woodland areas, rather it involves the creation of extensive new woodland areas comprised of native species as part of a planned and managed landscape enhancement;”.

“breach important ridge lines” - “from the topographic and photographic evidence shows that the development of the Site will not break above important ridge lines already identified for strategically important historic and designed views. ... such that the development will blend rather than intrude upon and dominate the wider setting;”

“visually dominate the setting” - Care “... has been taken through the assessment and design process ...: to locate new built development to minimise its perceived scale and impact; to provide extensive structural planting areas especially on the perimeter of the Site so as to provide visual containment and screening; within the Site to break development areas into smaller cells, contained by planted and landscaped buffer zones that also provide green corridors; and to optimise and enhance the existing natural assets of the Site;”. “The overall effect of the measures adopted will be to severely limit both views of the proposed built development and the ‘consciousness’ of urban development for those in the vicinity of the Site, including those within Belton House and the surrounding registered parkland and within the Manthorpe Conservation Area. Both of these factors will limit the impact of the development on the setting of these heritage assets.”

“significantly degrade the rural character of adjacent areas” – It “... is accepted that an area in rural land use will be replaced by urban development if planning permission were to be granted, but it is accepted that greenfield sites are needed to meet

development requirements. Even allowing for the full development of the two major SUEs provided for in the LDF Core Strategy, a significant number of houses still need to be provided (through the ... Grantham AAP). Moreover, apart from the quality of openness, the Application Site has little to commend it as an area of rural character worthy of protection against loss in its own right. ... the Site displays the typical characteristics of land subject to intensive monoculture ...” The SDR analysis “... shows that the development site makes use of natural topography, new structural planting and landscaping and enhance biodiversity to best effect”; it also shows that the “... rural character of adjacent areas is not degraded, this outcome being achieved mainly through the medium of providing open space in key locations within the Site where the rural character of adjoining land is most sensitive and noticeable and by new planting and landscaping to reinforce the character where it is weakest.”

Summary of material responses from various bodies consulted on the Supplementary Design Report (SDR) and Revised Illustrative Masterplan (RIM)

(Note: Comments that are simply repetitions of previous concerns/objections are not included).

List of respondents (abbreviations of their titles are in brackets)

Great Gonerby PC (GGPC)
Belton & Manthorpe PC (BMPC)
English Heritage (EH)
National Trust (NT)
Natural England (NE)
SKDC Conservation (SKCO)

Historic Setting/Heritage Assets

Pleased “that the applicants have now had regard to documents overlooked in the original submission, the adopted Belton House and Park Setting Study and Policy Development document and both Belton and Manthorpe Conservation Area documents.” Also “...note that regard has been taken of PPS5 and the Draft Guidance on Setting, both published since the application was originally submitted.

Despite the well conceived landscape proposals these cannot obscure that Manthorpe and the green open setting of Belton Park are compromised (GGPC). The amended plans have not addressed the issue of the impact on the environment. (BMPC)

The introduction of PPS5 and the accompanying Practice Guide, along with EH guidance on setting of heritage assets, strengthen the argument against this development. The registered park is now on EH’s Heritage at Risk Register (HAR July 2010) due to the expansion of Grantham to the south, with unresolved Core Strategy issues and a live planning application; the HAR emphasises EH concerns regarding the substantial harm that development could cause to Belton House/Park and its setting. (EH)

Note that the SDR and RIM seek to address representations made on the application regarding impact of the development on the Belton House and Park; The views analysis helps to clarify the intervisibility of the Site and from specific viewpoints. Welcome the additional assessment work and review of current planning guidance and policy and analysis of views that informs RIM. Acknowledge attempt to reduce harm on the historic environment in terms of layout, scale and landscaping. (EH)

“It is noted that at the time [of the the Views Assessment was undertaken for the applicants] the deciduous tree and hedges were still in full leaf. In terms of the inter-visibility between various parts of the Belton Estate (including its approaches and the application site, this is greater between autumn leaf fall and the next year’s spring leaf opening. The Atkins study (BHPS) demonstrates the greater extent of inter-visibility having been based on several visits during the winter months.” Examples are: View C from the viewing tower at Belmont – demonstrating “...that for much of the year there is in fact far greater intervisibility than” suggested in the SDR; similarly for “Views D and E [the SDR] suggests a more limited view for people approaching from Belton Lane from the case for much of the year. In the BHPS along this route “...there are views into much of the Park”, contrastingly sharply with the “very narrow field of view into Belton Park” as suggested for Views D and E in the SDR. (NT)

“The assessment of additional views to those taken into account in the original submission adds to the thoroughness of the visual impact analysis but, as the photographs demonstrate, the assessment only presents the situation when deciduous trees and hedges are in leaf. Views are, of course, subject to seasonal variations and the development would, inevitably, be more readily exposed to view in winter months. “The development would be particularly prominent in views of the registered Historic Park and Garden from some of the assessed vantage points, particularly those from the higher ground to the west.” (SKCO)

The SDR assessment is submitted “...based upon what ground was visible in late summer. Clearly development above ground level will also be visible in other areas, including during the summer months, as its height will result in it being seen above and through the existing tree and hedge cover from various vantage points. Accordingly the assessment of available views of ground level during the summer does not equate to the impact of the proposed development either during the summer or during the period when vegetation is not in full leaf.” (NT)

The views analysis reveal visual impacts, with the development viewed from a number of locations within the park (e.g. Views B and C). There would also be views of the development from the west, e.g. the approach along Belton Lane (View E), a key visitor access route, also from public footpath south east of Great Gonerby (View F). The appreciation and understanding of Belton Park from these viewpoints would be harmed by the proposed development. (EH)

Despite RIM changes, the overall size, scale, layout and landscaping of the proposed development would harm the setting of the registered Belton Park and Garden. Acknowledge housing would be kept away from site high points, most notably by repositioning of open spaces and neighbourhood centre, but Views such as B, C, E and F, suggest that there would be an impact on significant views to and from Belton Park. Also repositioning of housing (e.g. Cell 11) closer to Belton Lane, (View D) suggests that proximity, height, scale and lighting of development here would probably impact on the setting and appreciation of the Park.(EH)

The proposed landscaping itself has the potential to cause damage the setting and impede views of the Park. (EH)

The SDR assesses primarily visual relationships rather than the harder to analyse impact on setting, in terms of factors such as noise, dust, vibration and lighting – but these are important, thus the development would affect the overall character of the locality, bringing urban development closer to the park to the detriment of its setting and significance.(EH)

The SDR refers to the impact of existing development on the setting of the registered park. While a number of developments in the Park surroundings are unsympathetic and have gradually eroded its setting, this does not undermine the Park's significance such that it requires deregistration or downgrading from its Grade 1 status. Do not agree that this existing development has a considerably greater adverse impact than the proposed development would have; rather, the proposal would have a greater adverse impact by virtue of its size, scale, layout and landscaping, which would exacerbate the erosion of the park's setting. (EH)

“Contrary to para. 6.3 of the [SDR] it has not been demonstrated that there would be only minor impacts on historic views and setting – in particular there has been no assessment of relative sensitivities of the application site in the context of Belton and no consideration of the scale and impact of the proposed building masses, e.g. the scale and resultant visibility of the public house element, or of the neighbourhood centre.” (NT)

“Overall it is considered that the latest assessment has failed to consider the full significance of the heritage assets at Belton and as a result has also failed to provide a proportionate response to the (understated) extent of the adverse impacts.” Whilst acknowledging the value of the BHPS, the SDR has not “... achieved the ambition of responding positively to its recommendations and criteria...”(NT)

“The comments [in the SDR] regarding the impacts of other developments and features upon the setting of Belton are noted.” Many are of long standing. “... the car parking at Belton is essential to enable people to visit, appreciate and understand the exceptional heritage resource as well as procure the means to conserve it .. significant steps have been taken this year to reduce the impact of car parking in accordance with planning permission S09/1841/MJNF ...” “it is neither the intention nor the expectation that the setting of Belton will somehow be ‘put back’ to what it was at some historic date; however, where opportunities occur to enhance the setting of Belton these will be pursued.” (NT)

“Mitigation relating to the A607 and its impact on Belton are noted, although the perceived benefits will be significantly reduced as a result of the increased traffic resulting from the proposed development.” (NT) (SKCO)

“The night time urbanising effect of lighting associated with the proposed development, not only from street lighting and the light from buildings within the site but also from lighting associated with the remodelled junction of Belton Lane and the A607, that is very close to the Park.” (SKCO)

In the context of PPS5 “...the impacts of the wider settings of heritage assets are relevant considerations ... whether or not they are open to the public. The fact that large parts of the Belton Estate are open to the public [approaching 250,000 visitors each year] add an extra dimension to the sensitivity of the potential impacts of new developments ...”

The additional analysis seems to indicate that the impact on setting of Manthorpe CA would be less than proposals submitted with the application. Further detail would be needed at Reserved Matters stage, but reduced scale of development in south east corner of Site and added landscaping shown in RIM would probably help limit harm to setting of CA. (EH)

The amendments the RIM make a significant effort to address concerns raised in the original consultation responses. Agree "...with the specialist's conclusion that Belton Conservation Area would not be impacted upon by the proposed development and ... acknowledge the impact on Manthorpe Conservation Area has been lessened by the reduction in the amount of development proposed for the part of the site nearest to the village and an increase in landscaping, albeit indicative at this stage." (SKCO)

If it is decided that the expansion of Grantham's urban area is acceptable in this area, it will be necessary to ensure that screen planting is implemented well in advance of the construction of roads and buildings so as to fulfill its purpose from the outset. (SKCO)

The Natural Environment

Amendments to the RIM and "the improved integration of Green Infrastructure within the development" and the reduced landscape impacts are welcomed and objections to the proposal (as revised) are removed subject to specified conditions. (NE)

Planning Policy

The proposal continues to be contrary to national policy and guidance. PPS5 and the Practice Guide strengthen the concept of 'setting', defined in Annex 2 as "the surroundings in which a heritage asset is experienced. PPS5 Policy HE10.1 states "the greater the negative impact on the significance of heritage assets, the greater the benefits that will be needed to justify approval ". Paras 113 to 117 of the Practice Guide explain that setting is more than just visual aspects, i.e more than just the views to and from Belton House and Park - e.g. it includes spatial associations and historic associations.

PP5 Policy HE9.1 states that there should be a presumption in favour of conserving heritage assets, the more significant the designated asset the stronger the presumption; substantial harm to grade 1 and 11* registered parks and gardens should be wholly exceptional. Policy HE9.2, states that where the application would lead to substantial harm LA's should refuse consent unless substantial public benefits associated with the development outweigh the harm. Paragraph 91 of the PPS Practice Guide, is quoted, which refers to no other reasonable means of the public benefits being available e.g. through a different design or an alternative site. It is argued that the proposal would cause substantial harm to the Grade 1 registered Belton Park, that the public benefits associated with the proposal do not outweigh the harm to Belton Park and the public benefits of providing additional housing in Grantham can be delivered elsewhere. (EH) (SKCO)

Specific attention is drawn to relevant advice in PPS5 (March 2010) at Policies HE6.1, H7.1-HE7.5, HE9.1/9.2/9.4 and HE10. (NT)

The Core Strategy (CS) has been adopted since the application was submitted; the CS is silent regarding the Manthorpe Site and it would be contrary to the very recent up-to-date development plan. (NT) Adoption of SK Core strategy and publication of the Belton House and Park Setting Study are important considerations in assessing the application. (EH)

Expansion of Grantham well catered for with two SUEs, wrong to despoil another area prematurely. (GGPC).

Though the Site is to be included in a range of sites for new housing to be considered in the GAAP; this does not mean that the Site is acceptable as there are constraints to be overcome including the historic environment; with regard to criteria in PPS3 (Housing) the Site is not “suitable”, regardless of whether it or other sites are “available” or “achievable” (EH)

Core Strategy Policy E1 is relevant, whereby “development must be appropriate to the character and significant natural, historic and cultural attributes and features of the landscape within which it is situated, and contribute to its conservation, enhancement and restoration”. According to the criteria of the policy the proposal is contrary to Policy EN1. (EH)

Attention is drawn the references to historic assets,, visual intrusion, light pollution and protection of existing open space (including that important to the character, setting and separation of built-up areas; these “considerations are all directly relevant to the Manthorpe proposals, especially in the context of the impacts upon the designate heritage assets at Belton ... para 4.1.13 makes specific reference to the role of the setting study for Belton House and Park2. (NT)

As stated in the Core Strategy the Belton House and Park Setting Study (BHPS) is a material consideration in determining the application. In the BHPS the setting (in terms of views) of Belton Park is found to be exceptionally sensitive to major development of the Application Site and that the Site is unlikely to be suitable for the proposed form of development (Table 2). (EH)

The site is outside the core strategy plan for South Kesteven District. (GGPC)

The amended plans have not addressed the issues as regards traffic, sewerage or the environment; This level of development should only be considered when traffic is relieved by A1/A52 link road (GGPC).

Outline recommendations of respondents to the consultation on the SDR and RIM

Great Gonerby P.C. maintain their objection to the proposed development
English Heritage recommend that the application be refused based on its impact on the historic environment, particularly the setting of Belton Park. It would cause substantial harm to the setting and significance of Belton Park which should only be allowed in wholly exceptional cases (following Policy HE9.1 of PPS5). We do not believe that the substantial harm is outweighed by substantial public benefits (following Policies HE9.2 and HE10.1 of PPS5) and we believe that the proposed public benefits in terms of

providing additional housing for Grantham can be delivered elsewhere on other sites. The development is also contrary to Policy EN1 of the South Kesteven Core Strategy in terms of its impact on the character and historic environment of the district. recommend that the application.

The NT maintains its objections and remains of the view that the proposed development is contrary to the adopted Development Plan and to national planning policy for the historic environment, both of which have changed since the application was first submitted. Having regard for the significance of the heritage resources at Belton and the impact of the proposals upon them, the applicant has not demonstrated that the development would “deliver substantial public benefits” that outweigh the substantial harm to their significance including the changes to their setting (as per the tests in PPS 5 at Policies HE9.2 and HE10.1).

Natural England are happy to remove their objection subject to specific conditions relating to: A clear explanation of the long term management of each habitat being provided, including likely prescriptions and ownership; demonstration of security of funding in perpetuity for Green Infrastructure; a Method Statement detailing steps to be taken to protect and enhance the Site for protected species, during construction and after completion (including consideration for bats); no site clearance that destroys vegetation to be undertaken during the months March to August (protection of breeding birds. NE reserves its statutory discretion to modify advice in response to any changes related to this consultation.

SKPCO remains of the opinion that the proposal represents an undesirable and unwarranted expansion of urban development into an area where there will be a negative impact on heritage assets of international, national and local importance. It remains the case that there are other sites available for the urban expansion of Grantham in areas of the town where there would be significantly less impact on Belton House and its registered Historic Park and Garden and other designated and undesignated historic assets. The proposal should be resisted for its overall negative impact on the historic environment that would be contrary to central, regional and local government planning policies on the Historic Environment in PPS5, Policy 27 of the East Midlands Regional Plan, Policy EN1 of the Core Strategy of the South Kesteven Local Development Framework and the adopted Belton House and Park Setting Study.

RECOMMENDATION:

That the application be refused

That the development proposed at North Grantham/Manthorpe, the subject of the planning application reference No. S10/0142/EIAOL, be refused for the reasons set out in this Addendum below:

1. The application proposal is considered by the Local Planning Authority to be contrary to National Policy in respect of the advice in planning Policy Guidance Note PPS1 (including Paragraphs 7 and 8), that to deliver sustainable development decisions must be made within a ‘plan-led system, that gives certainty and predictability; with plans being drawn up with

community involvement, to present a shared vision and strategy of how the District should develop to achieve sustainable patterns of development; the Local Authority consider the appropriate means for considering the merits of developing this site is in the light of the evidence base underpinning the Core Strategy for South Kesteven, including Urban capacity Studies, Strategic Land Availability assessments, comparative sustainability appraisals, infrastructure requirements and the current 5 year housing land supply.

2. The Local Planning Authority consider that the application proposal is contrary to the Development Plan, comprising the East Midlands Regional Plan and the Core Strategy for South Kesteven, in particular the proposal is not in accordance with policies on strategic housing growth, in particular Policy *SP1 (Spatial Strategy)*, in which it is stated (*inter alia*): “The majority of all new development should be focused upon Grantham to support and strengthen its role as a Sub-Regional Centre. New development proposals shall be considered on appropriate sustainable and deliverable Brownfield sites and appropriate greenfield sites (including urban extensions), sufficient to ensure the achievement of growth targets. Details of specific sites (including urban extension sites) will be included in a Grantham Area Action Plan. ... In all cases planning permission will only be granted on a less sustainable site where it has been proven that there are no other more sustainable options available or there are other overriding material considerations. All cases will also be subject to all relevant policies within the remainder of the core strategy or other relevant development plan documents. ...”. Furthermore it is considered that there is no overriding strategic policy justification for the Manthorpe site to come forward for development at this time and that the Core Strategy should be given more weight than any other material consideration.
3. It is considered by the Local Planning Authority that the development of the application site would be premature in the context of the fact that the Grantham Area Action Plan DPD is shortly to be consulted upon and is scheduled to be adopted within the next year; in the opinion of the Local Planning Authority, notwithstanding the fact that weight must be given to the guidance in paragraphs 71 and 72 of PPS3: Housing, in respect of a potential marginal shortfall in a 5 year land supply for South Kesteven District (as measured against the housing growth trajectory for Grantham (shown in the Core Strategy page 42)), the approval of a housing site of the scale proposed in this application (in the region of a 1000 dwellings), would undermine to a very significant degree the ability to consider a range of options, whereby the most sustainable sites for new housing development in Grantham can be identified and allocated in the GAAP, to achieve an overall sustainable pattern of development. In this regard the development of the North Grantham/Manthorpe site, is considered to be premature and should be refused.
4. In terms of the criteria for a sustainable urban extension, set out in Policy *H2: Urban Extension Sites (Grantham)*, the Local planning Authority do not consider that the application site is not large enough to provide the full range of infrastructure that should be expected from a SUE. Also it is also judged that the site is not as a good location as the adopted SUEs in terms of sustainability, including in terms of transport issues. The proposed

development would not provide for any employment land, although there will be some job opportunities created through the CCRC, retailing and commercial uses on the site if these aspects of the proposal are brought forward; whilst if a significant element of 'employment land' were to be included in the development of the site, it is considered that there would be a greater likelihood that more would be caused to the local environment than the present proposal, particularly in respect of the likely impact on historic assets.

5. The Local Planning Authority consider that the development of the application site as proposed would be detrimental to the setting, character and appearance of the Grade 1 listed Belton House and Historic Park and Garden and Manthorpe conservation area and its listed buildings and to key views looking in and out of Belton Park and Garden and as such is contrary to policy *EN1 (Protection and Enhancement of Character of District)*: in which it is stated (inter alia) that South Kesteven's Landscape Character Areas are identified on the map [following paragraph 4.1.10]. Development must be appropriate to the character and significant natural, historic and cultural attributes and features of the landscape within which it is situated, and contribute to its conservation, enhancement or restoration. Furthermore, it is considered that the setting of the Grade 1 registered park, would be adversely affected to a significant degree as a result of the development, by reason of the loss of rural character on the approach roads to Belton House, the introduction of the roundabout at the Belton Road junction, and the adverse impact on the present views across and out of the park to the surrounding countryside. Accordingly, the proposal does not comply with relevant planning policies of Development Plan and Regional/National Policy, In particular Policies HE9.1, HE9.2 and HE10.1 of PPS5 and Policies 26 and 27 of the Regional Plan.
6. Notwithstanding the data and proposals submitted by the applicant, it is considered that there are significant shortcomings in some of the analysis and the detail provided and that the mitigating measures proposed are not sufficient. It is therefore considered by the Local Planning Authority that the traffic generated by the proposed development would have an adverse impact on through traffic in Grantham, its approaches and junctions and be a likely source of unacceptable danger to other users of the highway, particularly because of the heavy volumes of traffic.

* * * * *

Appendix 1

Addendum to report CM1Development Control Committee 4th January 2010

Letter from Asset Heritage Consulting on behalf of the applicant - Application Ref. No. S10/0142/EIAOL – Norht Grantham/Manthorpe



specialist independent advisers in the historic built environment

conservation & listed buildings | heritage planning matters | PPS5 advice and assessments | expert witness
listed buildings | conservation management and advice | archaeology | historic interiors | audits | research

Mr C Middleton
South Kesteven District Council
Council Offices
St Peter's Hill
Grantham
NG31 6PZ

16 December 2010

Dear Mr Middleton,

RE: LAND NORTH OF GRANTHAM: PLANNING APPLICATION S10/0142

I am writing to you in response to the comments made by English Heritage (EH) and the National Trust on the above application in their letters to you of 24 November and 6 December respectively.

The first point to make is that both letters were written without the benefit of first seeing the revised Supplementary Design Report, which was sent to EH on 24 November (a copy was also sent to the Trust on 9 December). This is regrettable as the revised version corrects some unfortunate omissions in the photomontages of the views contained in the Supplementary Design Report dated 23 October 2010 and therefore constitutes a much more accurate impression of the effect of the proposed sustainable extension (SUE) on the landscape around Grantham.

To begin with the NT's position, it remains clear that it will continue to object to any development in this area whatever form it takes, however fully it is justified and whatever measures are taken to mitigate its impact. This is evident from one of the concluding bullet points, which states that *'the overall effect of the development will be to replace the rural landscape with an urban development'*.

In fact, as even the quickest glance at the revised masterplan shows, the landscape proposed to be created by the SUE is far from entirely 'urban' in character and form. There are substantial green spaces within the proposed

development area, including all the way along the western side of the A607, along the southern edge of Belton Lane, on the eastern side of the railway line and along the boundary with the undistinguished modern housing development situated directly to the west and south-west of the Manthorpe Conservation Area.

There are also significant areas of green space within the core of the development area, while the few surviving important historic landscape features, such as the Running Furrows stream and hedgebank, are retained and enhanced. All of this will considerably reduce the impact of the proposals on the wider setting of Belton Park and certainly will not cause it undue harm.

To read the NT letter, along with its previous letter of 22 March, one might think that the land to the west of the A607 is currently a rural landscape unchanged since the 18th or 19th century. This is of course not the case, as the 1:2500 and 1:10,560/1:10,000 OS maps from the first edition of the late 19th century through to the present day (all notably absent from the Atkins Setting Study) graphically convey.

These maps are useful evidence for showing the extent to which the landscape of the development area changed considerably during the 20th century, the present large fields being entirely the result of the extensive removal of old field boundaries, a process that intensified in the last 30 years or so.

Indeed, it would not be going too far to say that much of the rural landscape within the development area today is the direct product of modern 'agribusiness' rather than traditional farming methods.

This must, one would think, surely have its own impact on the wider setting of Belton Park, as do the nearby golf courses, holiday chalets and the extensive visitors' car park directly in front of the Grade I listed house. Some of these features may well have been 'inherited' by the Trust when it acquired the Belton Estate but others were not, including of course the car park- actually established by the Trust itself- and which (whatever the need for it) has considerably more impact on the setting of the house and its surroundings than the proposed SUE.

The NT also makes play of the fact that the assessed views are based '*upon what ground was visible in late summer*'. There are two points to make in response to this. The first is that the effect would in fact be much the same in early summer and well into the autumn and the fact that the views show the situation in late summer is simply the result of this being when the exercise was undertaken. Likewise, it should be noted that even in the dead of winter the trees and other vegetation still provide screening in views looking from Belton Park towards the development area.

The second (and more important) point relates to that already made above- in that while it is obviously true that more of the development than just 'ground level' will be visible, the scale of development in terms of overall height and massing will be relatively modest (not even the '*public house element or neighbourhood centre*' will be massively tall buildings- and neither will the school, CCRC or nursing home). What is more, in addition to the substantial green spaces proposed along the boundaries of the site and within the core of the development area, additional spaces between the dwellings, along with those created by roads, gardens etc will provide further horizontal and vertical 'articulation' within the development area.

As EH acknowledges in its letter, '*residential development is kept away from the high points of the site, most notably through the repositioning of playing fields/open space and key buildings such as the nursing home and CCRC*'. Also, these buildings, together with the school and neighbourhood centre, are situated at the less sensitive, southern end of the site. This all means that, as stated above, the environment created by the SUE is most definitely not densely 'urban' in character and form.

EH also acknowledges that both the additional analysis provided in the Supplementary Design Report and the revisions to the masterplan, reducing the scale of development in the site's south-east corner and increasing the amount of landscaping, help to dispel their previous concerns over the impact of the proposals on the setting, character and appearance of the Manthorpe Conservation Area. Significantly, they do not recommend to your Council that impact on the conservation area should form a refusal reason on the application.

Two further fundamental points need to be made. First, the environment created by the SUE will provide a far better northern 'edge' to Grantham than currently exists (here I note that EH's previously expressed concern about a perceived coalescence between Grantham and Manthorpe has been abandoned-presumably in recognition of the observations made at paragraph 2.3.8.2 of the Supplementary Design Report).

This is because the existing extensive modern residential development to the west and south-west of the Manthorpe Conservation Area is of extremely poor design quality and is badly integrated with its surroundings. Certainly, it does not provide a good introduction to the wider Grantham area.

Extending well designed and planned development northwards cannot be seen as establishing a precedent for more development in this direction at a later stage, both Belton Lane and the land occupied by Belton Woods Hotel Golf Club providing a 'natural barrier' to additional growth in this direction, development which would (if it were ever to take place) clearly have an adverse impact on the setting of Belton Park.

Finally, it is certainly not the applicant's claim that the proposed SUE would have no impact at all on the setting of Belton Park- simply that this impact is considered to be acceptable and appropriate (see paragraph 2.4.1 of the Supplementary Design Report).

Moreover, even should your Council consider that harm is caused to the setting of Belton Park, this is not necessarily conclusive, not least because as policies HE9.2 and HE10.1 of PPS 5 both acknowledge, there are cases where harm (even of a 'substantial' nature) can be accepted as a result of '*public benefits that outweigh that harm or loss*'.

There is nothing in these policies (or anywhere in the PPS) to suggest that these benefits need to be heritage related, while the public benefits that would accrue from the proposed SUE have of course been fully set out elsewhere.

I hope you find these comments helpful in preparing your report for committee.

Yours sincerely

Dr Nicholas Doggett, MIFA, IHBC
Director

Email: nicholas.doggett@assetheritage.co.uk
Tel No. 01865-310563

Appendix 2

Addendum to Report CM1Development Control Committee 4th January 2010

Letter from Colin Buchanan and Partners on behalf of the applicant -
Application Ref. No. S10/0142/EIAOL – North Grantham/Manthorpe

16 December 2010

Dear Mr Middleton

Grantham North

I am writing to set out our position with regard to feedback that has been received from Lincolnshire County Council with regard to the transport impact of the proposed development. Other than verbal requests for further information, which we have provided, the only formal responses received to date are letters dated 19th October and 7th December 2010 (the latter received by e-mail).

The first of these include a number of detailed points regarding the modelling of town centre junctions. We have responded to this letter and are seeking to meet with Lincolnshire County Council to try to resolve the outstanding detail of the town centre junction modelling. In the second letter, mention is again made of the town centre junction modelling. It is also stated that ‘no solution has been provided for the deficiencies with both the Belton Lane / B1174 junction and the bridge on Belton Lane, despite this being raised at an early stage in discussion and within the Transport Assessment’. It therefore appears to us that the three areas of contention with regard to the impact of the proposed development are:

- Impact on the town centre traffic network;
- Impact on the capacity of the Belton Lane / B1174 junction; and
- Impact on the bridge on Belton Lane.

CB therefore assume that all other elements of the proposals are acceptable to the Highway Authority and this letter therefore focuses on these three outstanding areas.

Town Centre Traffic Network

The modelling for the town centre network was undertaken separately from the Transport Assessment following a verbal request from LCC. The extent of the assessment was based on the data for critical junctions from the SATURN model that was supplied by LCC’s consultants. The assessment shows that a number of the junctions within the town centre are at or over capacity during the weekday peak hours even without the proposed development in place. The impact of traffic associated with the development proposals is relatively small.

You will be aware that the adopted SKDC LDF Core Strategy provides for significant development in and on the edge of Grantham as part of the Growth Point initiative. The development the subject of the Application is intended to contribute to the minimum development levels provided for in the Core Strategy and is not additional to it. In this context, if development does not occur on the Application Site, provision will need to be made for a similar amount of development in one or more alternative locations in and on the edge of the town, principally under the forthcoming Grantham Area Action Plan, which, you will know, is in preparation by SKDC at the moment. I am sure you would accept that *any* development on the edges of Grantham will impact on the town centre road network, irrespective of its location. In fact development in other parts of Grantham could have more significant impacts as the routes into the town centre from other directions are more congested. This can be seen from the output of the SATURN model that was provided by LCC’s consultants with and without the development at Grantham North. The following table sets out a comparison on the V/C ratios for junctions on the approaches to the town centre with and without the Grantham North development in place.

V/C Ratios on the Routes in and out of Grantham Town Centre

	2018 Do Min		2018 With Dev	
	AM	PM	AM	PM

North Parade	111	104	116	107
Barrowby Road	112	98	114	84
Harlaxton Road	73	90	102	78
London Road	118	107	125	107
Manthorpe Road	93	50 (although the right turn into Belton Lane is over capacity)	114	62 (although the right turn into Belton Lane is over capacity)

V/C ratios of over 100 show that the traffic flow is higher than the capacity of that turning movement. If we look firstly at the AM peak Do Minimum information, it can be seen that Manthorpe Road is one of the few approaches to the town that operates within capacity., with London Road and Barrowby Road being over capacity. The development at Manthorpe would push the Manthorpe Road approach to town over-capacity (up to 114), but would be similar to the London Road and Barrowby Road approaches without any development. The same applies in the evening peak.

From this I would conclude that development in Manthorpe would have no worse an impact than further development in other quadrants of the town and is likely to have less than development that would access the town centre from London Road or Barrowby Road.

A coherent strategy for dealing with the increased traffic as a result of the growth of the town is required, to which developments such as Grantham North could contribute through S106 Agreements. In this context no doubt you would agree that major developments, such as the Application Proposals, are likely to have a greater capacity to contribute to comprehensive integrated transport measures for the Town Centre than would smaller developments and developments, such as on brownfield sites, with high development overheads and it will be easier to secure such contributions. Having examined the SKDC SHLAA it is clear to us that this latter scenario would be the most likely alternative development option in the GAAP. We are keen to discuss this further with LCC and are confident that a strategy for the town centre that will accommodate the growth aspirations of the town can be found.

Belton Lane / B1174 Junction

Table 7.4 of the TA has been reproduced below.

Existing Belton Lane/ Newark Hill Junction - PICADY results summary

	DM				DS1			
	AM		PM		AM		PM	
	RFC	Q	RFC	Q	RFC	Q	RFC	Q
Belton Lane – Left and right turn	0.750	3	0.536	1	0.905	6	0.715	2
High Street – Right turn	0.887	9	0.378	1	0.905	9	0.680	4

This indicates that in the DM scenario (i.e. without the development proposals), the junction would be operating with RFC's over 0.85 in the AM peak. In particular, there is a queue of 9 vehicles on High Street (S) which are waiting to turn right into Belton Lane. With the development proposals, there is a marginal increase in the RFC, with an increase of 3 vehicles in the queue on Belton Lane in the AM peak, and 1 vehicle in the PM peak. The right turn into Belton Lane experiences a queue increase of 3 vehicles in the PM peak.

We State within the TA that we are of the view that these increases are not significant and do not warrant any further improvement to the junction. The letter received on the 7th December was the first indication that this conclusion was not shared by LCC. We consider that the conclusions in the TA are still valid and correct.

Belton Lane Bridge

It has been suggested by LCC that the TA identifies a problem at the bridge on Belton Lane. This is not the case. It is accepted within the review of existing conditions that there are constraints on forward visibility at this bridge and that pedestrian facilities are limited. However, we do not consider that the proposed development will have any significant impact on this bridge. The site access junction has been designed to join Manthorpe Road, therefore encouraging people to use this route. The SATURN model traffic flow output shows the following increase of 30 and 28 two-way vehicle trips on Belton Lane over the bridge as a result of the development proposals. Therefore the increase in traffic across the bridge as a result of development is minimal.

We do not foresee any significant pedestrian demand along Belton Lane arising from the development proposals. There are no significant trip attractors within close proximity to the west of

the site and an alternative public footpath route that passed through the site and across the railway to the south of Belton Lane is available and is more suitable for recreational walking.
In conclusion, CB are of the view that the outstanding concerns of LCC can be addressed with further discussion between CB and LCC.

Yours sincerely

Jenny Baker

Technical Director

jenny.baker@cbuchanan.co.uk

cc **Chris Tidswell**
Brian Thompson

LCC
LCC