
Central Lincolnshire Local Plan: Matters, Issues and Questions Consultation: Matter 4 – Site Allocations Process and Methodology

On behalf of Beal Developments Ltd

November 2022

**Central Lincolnshire Local Plan:
Matter, Issues and Questions Consultation:
Matter 4 – Site Allocations Process and Methodology**

On behalf of Beal Developments Ltd

Project Ref:	33148/A5/P7/GP/SO	33148/A5/P7/GP/SO
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Date:	November 2022	November 2022
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Ref: 33148/A5/P7/GP/SO
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Date: November 2022

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1.0 INTRODUCTION

- 1.1 This Matters, Issues and Questions (MIQ) consultation response is made on behalf of Beal Developments Ltd (hereafter 'Beal') regarding Matter 7 for the Examination of the Central Lincolnshire Local Plan.
- 1.2 Beal has several land interests across Central Lincolnshire. This statement is made specifically regarding land off Prebend Lane, Welton, West Lindsey as shown in **Appendix 1** (the 'Site'). The Site is allocated in the adopted plan as shown on the policies map and under policy LP52, site reference CL1491.
- 1.3 Beal has long-term interests on land at Prebend Lane, Welton where they have previously secured outline and reserved matters permissions. Currently, 278 dwellings are being built out. Whilst the original outline permission lapsed for the remaining 72 specialist retirement units to come forward, a full application has now been submitted under ref: 145636.
- 1.4 The 278 dwellings granted permission to Beal are currently under construction and being occupied by residents. However, land within the wider redline was safeguarded for more housing to come forward in the future. The safeguarded land is capable of delivering c.100 more dwellings.

2.0 MATTERS, ISSUES AND QUESTIONS RESPONSE

Issue 1: Site Allocation Methodology

Q4: Where allocations from the current Central Lincolnshire Local Plan had not been completed, what process did the Committee take? Were they automatically carried forward into the Local Plan Review, or, were they subject to the same analysis as proposed new sites? In answering this question it would be useful for the Committee to provide a list of the existing Local Plan allocation carried forward and include an update on their delivery.

- 2.1 It is not clear how the Committee has taken sites previously allocated forward. However, in the case of WL/WELT/011 which is currently being built out by Beal Homes, it is clear that the methodology has not included the opportunity to review the Site, and its capacity to accept more housing.
- 2.2 In reviewing the 'Residential Allocations Evidence Report -2022: Appendix 3 – West Lindsey – Part 2 the WL/WELT/011 site is reviewed on pages 343 onward. The summary of the Regulation 18 consultation acknowledges that Beal had put forward additional capacity on the Site. However, the Committee has only rolled forward just the capacity of the permission being built out, without explanation.
- 2.3 Of the dwellings Beal has constructed, approximately 100 are now occupied.

Issue 2: General Development Requirements

Q1: Is it clear to decision-makers, developers and local communities what is required where allocations have no specific requirements?

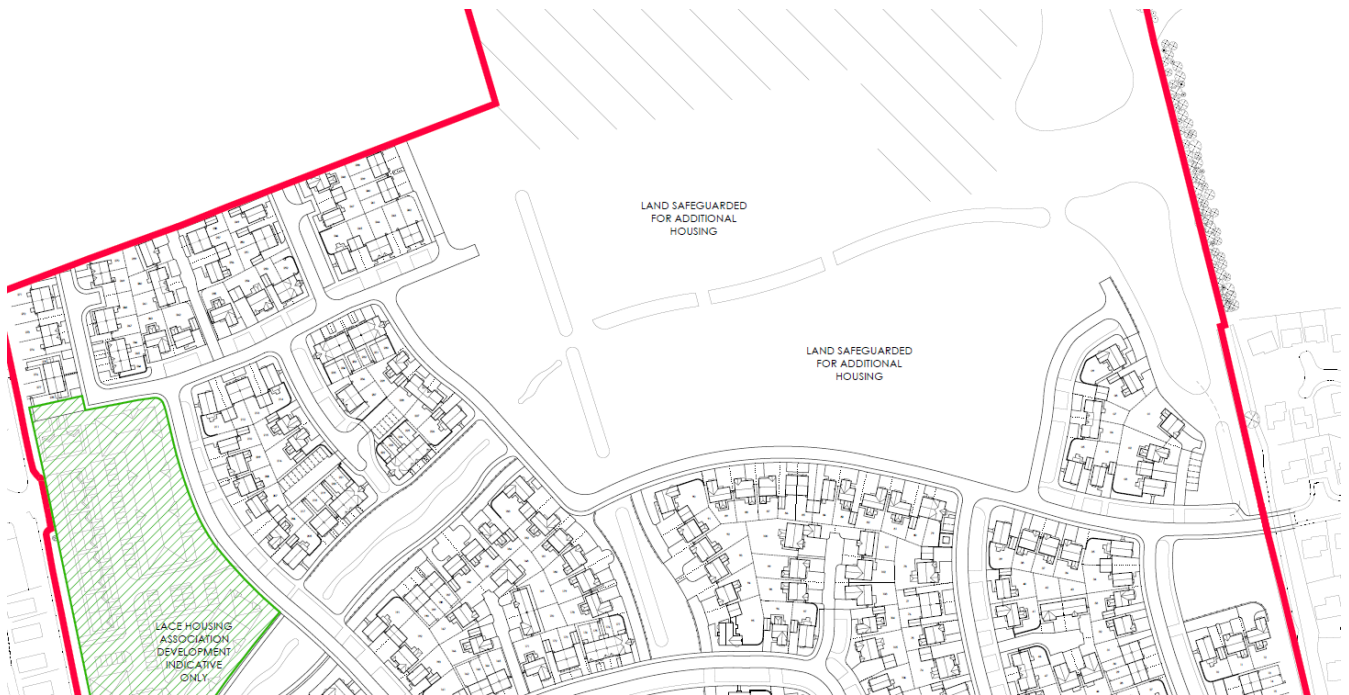
- 2.4 Policy S80: Larger Villages contains the allocation wording for WL/WELT/011 and the allocation spatially is shown on the emerging policies map. An extract is shown below:

WL/WELT/011	Land to East of Prebend Lane, Welton	28.69	Under construction	288 (261 remaining)	2025
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- 2.5 However, we believe that the absence of specific requirements and an unclear approach to potential dwelling numbers on the Site, means that all the above parties will struggle

the fully appreciate how development on land previously safeguarded for housing in the future should be handled.

- 2.6 The land shown as safeguarded (app ref: 135006) is shown in **Appendix 2** and an extract provided below.



- 2.7 It is Beal's intention to submit a full application for a further c.100 dwellings on the safeguarded land shown in **Appendix 2** early next year.
- 2.8 We recommend that a clearly worded policy is provided in the emerging Local Plan that allows the decision-maker to understand that the Site capacity is approximately 450 dwellings as opposed to 350, or 288 as shown in the current wording.
- 2.9 The Council's response in document STA020 states:

"288 dwellings has been used as it is understood that a number of the properties to be built will not be C3 use and that 288 dwellings (including 10 specialist retirement units) will be delivered on the site. The figure provided in the Local Plan is indicative only and, as such, any proposals on the site based on a design led approach may result in more or fewer dwellings being delivered, including potentially through delivery on land safeguarded within the site for housing."

- 2.10 We have a concern with this position due to the proposed wording of Policy S4. Whilst we acknowledge that the policy as worded allows for allocated sites in large villages such as Welton to deliver 10 or more dwellings, the inconsistency between the policy map designation, the number of dwellings shown in emerging policy S80 and the number of dwellings possible due to the safeguarded land may lead a decision-maker to incorrectly engage Policy S4 on any application for an additional 10 or more houses on the WL/WELT/011 site.
- 2.11 We recommend the site policy wording to be updated to provide clarity to the decision-maker and developer. We raised this in previous representations (Regulation 18 and 19 (**Appendix 3**)). An example is shown below:

Ref	Site Name/Address	Site Area	Indicative dwellings during the plan period	Site Specific Requirements
WL/WELT/011	Land East of Prebend Lane	28.69ha	450 (350 of which has benefitted from outline permission) (to include specialist retirement units)	The additional c.100 homes should respond positively and be designed comprehensively with the rest of the allocation benefitting from planning permission.

- 2.12 We believe the proposed changes would ensure a sound policy that is clear to decision-makers how it is applied should new housing be proposed. Furthermore, the completion of this wider development area makes more spatial sense than the allocation of some other sites in Welton.
- 2.13 As such, amending the policy text for WL/WELT/011 to allow the safeguarded land to come forward, with clear wording (such as above) for it to be planned positively alongside the rest of the site under construction is considered appropriate.

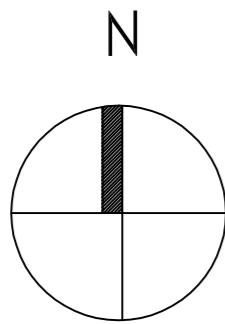
3.0 SUMMARY AND CONCLUSIONS

- 3.1 These representations have been prepared on behalf of Beal Developments Ltd in response to the Matters, Issues and Questions consultation as part of the Examination of the emerging Central Lincolnshire Local Plan.
- 3.2 It is unclear how the Committee has made the decision to bring forward previously allocated sites from the adopted plan. Further, why they have not considered the opportunities to increase the delivery of dwellings within those sites, where these opportunities have been presented through previous consultation responses (see **Appendix 3**).
- 3.3 It is our view that it is important to maintain clear allocations for sites with planning permission or under construction, particularly WL/WELT/011 which has land which was previously safeguarded for housing, and can deliver another c.100 dwellings in a more logical manner than some other Welton allocations.
- 3.4 In the absence of clear wording for WL/WELT/011 it leaves room for ambiguity in applying policy S80, and may direct decision-makers to other policies such as S4 which we have concerns regarding, as addressed in other Matters Statements.
- 3.5 Furthermore, the current draft wording of Policy S4 would preclude the safeguarded land coming forward in the future as Welton is a large village and the future application would be for greater than 10 dwellings.
- 3.6 As such, we propose that the Council should retain and reword the allocation text for WL/WELT/011 to make clear it can delivery overall 450 units including the retirement units.
- 3.7 Further, the access for WL/WELT/007 may in the future come through the WL/WELT/011 site, however it will need to account for the additional c.100 dwellings to come forward.

APPENDIX 1

Land off Prebend Lane, Welton – Location Plan

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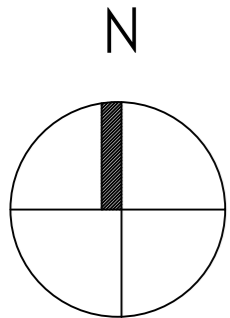
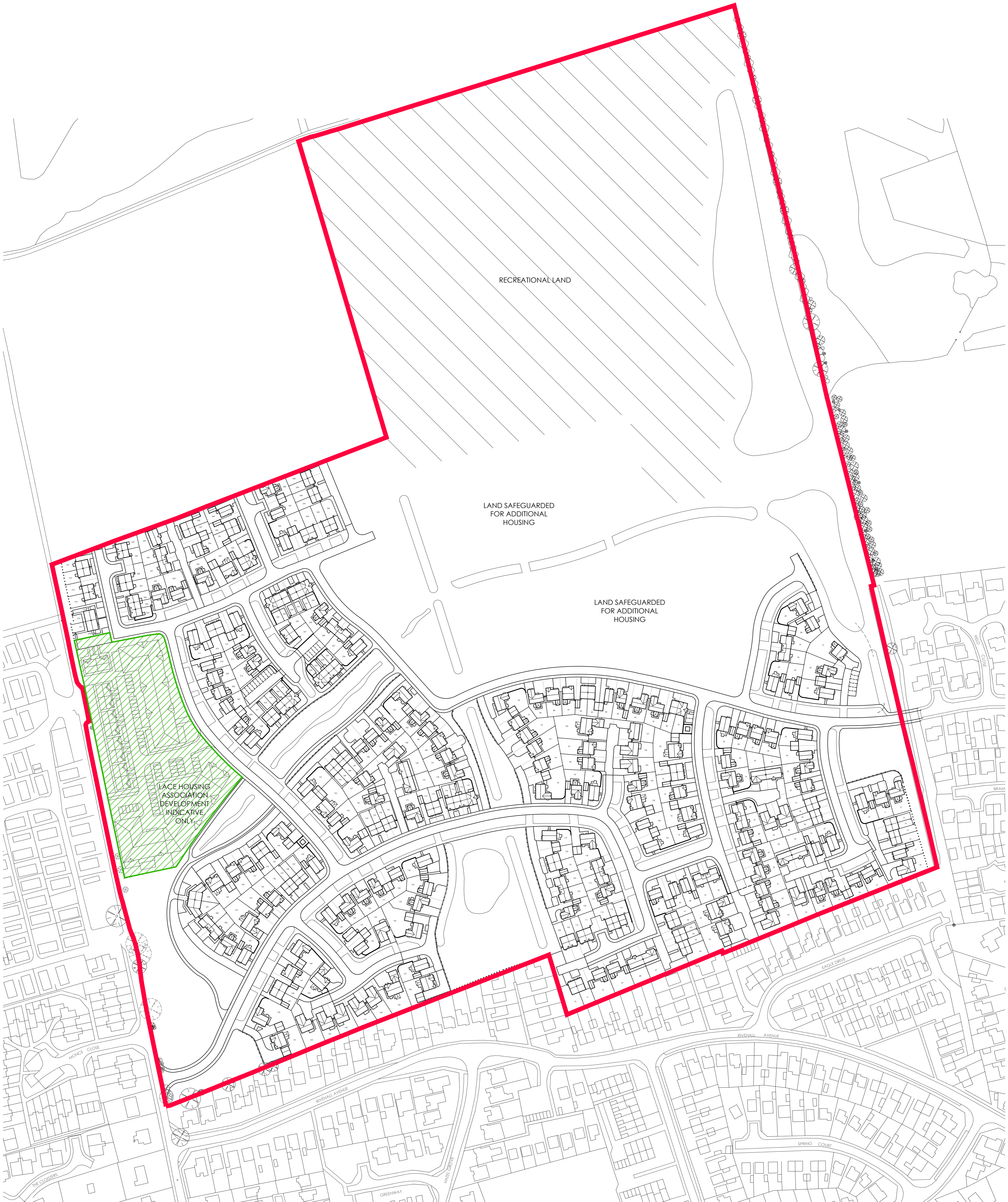
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APPENDIX 2

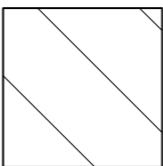
Land off Prebend Lane, Welton – Reserved Matters Block Plan

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(USE CLASS C2)
UP TO 3 STOREYS
UP TO 8931 SQ/M GEA

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L	ROAD WIDTHS INCREASED TO MINIMUM 5 METRES	27/07/18	MJE
K	RESIDENTIAL CARE HOME SQ/M GEA ADDED	11/05/18	JB
J	RED LINE SITE BOUNDARY ADDED	12/04/18	JB
H	LACE HOUSING DEVELOPMENT ADDED	06/04/18	MJE
G	PLOT NUMBERING AMENDED	23/02/18	MJE
F	LAYOUT AMENDED	25/01/18	MJE
E	plots 01, 202, 210 & 212, 166-171 revised	05/06/17	JB
D	parking bays adjacent to plot 100 omitted	16/03/17	JW
C	plots 18-99 revised	09/03/17	JB
B	divide in swale added for driveway access to plots 007, 008 & 010	20/09/16	JW
A	general amendment to area shown as recreation land	15/09/16	JW

Rev	Revision note	Date	Drawn by
1	PROPOSED RESIDENTIAL DEVELOPMENT AT LAND OFF PREBEND LANE, WELTON FOR BEAL HOMES		
	Drawn by	Checked	Date
	JW		AUG 2016
	Proposed Site Plan	Dwg No	Scale
		J0832 (08) 002	1:1250 @ A1
		Rev	M

APPENDIX 3

Regulation 19 Representations

Central Lincolnshire Local Plan Regulation 19 Consultation Representations

Land off Prebend Lane, Welton
On behalf of Beal Developments Limited

May 2022

**Central Lincolnshire Local Plan
Regulation 19 Consultation Representations
Land off Prebend Lane, Welton**

On behalf of Beal Developments Limited

Project Ref:	33148/A5/P4/GP/MS	33148/A5/P4/GP/MS
Status:	Draft	Final
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Date:	May 2022	May 2022
Prepared by:	GP	GP
Checked by:	GP	GP
Authorised by:	GW	GW

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Ref: 33148/A5/P4/GP/MS
File Ref: 33148.P4.Reg 19 (Welton)
Date: May 2022

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- 1.0 Introduction
- 2.0 Planning History
- 3.0 Representations to the Regulation 19 Consultation
- 4.0 Summary and Conclusion

APPENDICES

- Appendix 1: Land off Prebend Lane, Welton – Location Plan
- Appendix 2: Land off Prebend Lane, Welton – Reserved Matters Block Plan

1.0 INTRODUCTION

- 1.1 These representations are made on behalf of Beal Developments Ltd (hereafter 'Beal') to the Central Lincolnshire Local Plan Review Regulation 19 consultation which closes 09 May 2022.
- 1.2 Beal has several land interests across Central Lincolnshire including land at Welton, Dunholme and Scotter. These representations focus solely on their land interests at Welton, West Lindsey as shown in **Appendix 1**.
- 1.3 Beal has long-term interests on land at Prebend Lane, Welton where they have previously secured outline and reserved matters permissions. Currently 278 dwellings are being built out whilst a full application for the specialist retirement units will be coming forward in due course.
- 1.4 The Site is currently under construction and dwellings have already started to be occupied by residents.

2.0 PLANNING HISTORY

2.1 The Site's pertinent planning history is contained in the below table:

Application Ref	Development Description	Decision
131681	Outline application for residential development of up to 350 dwellings, including specialist retirement housing, with means of access to be considered.	Approved subject to conditions
135006	Application for approval of reserved matters of appearance, landscaping, layout and scale, for residential development of 278no. dwellings (comprising 263 open market dwellings and 15 affordable dwellings); and approval of reserved matters of scale only for 72 specialist retirement units, following outline planning permission 131681 granted 04 September 2015.	Approved subject to conditions

2.2 The above applications have been subject to non-material amendments and S73 applications to alter the permissions. However, these do not fundamentally impact on the development approved and relate primarily to minor condition alterations and layout changes.

2.3 The Site is allocated in the adopted Central Lincolnshire Local Plan under reference CL1491 for 350 dwellings. The adopted Welton Neighbourhood Plan acknowledges the above planning history.

3.0 REPRESENTATIONS TO THE REGULATION 19 CONSULTATION

The Local Plan Vision

- 3.1 Whilst we believe that the vision presented in the Local Plan is generally acceptable, we believe that the wording needs to be amended to state 'Central Lincolnshire will grow by a minimum of 29,150 homes'. We consider that this change is required for soundness, to ensure that sufficient housing is delivered to effectively meet identified needs and support economic growth across Central Lincolnshire.
- 3.2 Setting the 29,150 as a minimum figure is consistent with Planning Practice Guidance (PPG) which emphasises that the standard method provides:

'a minimum starting point in determining the number of homes needed in an area. It does not predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.

...

There may, occasionally, be situations where previous levels of housing delivery in an area, or previous assessments of need are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests.' (PPG; paragraph reference 2a-010-20190220)

- 3.3 Furthermore, the Government White Paper on Levelling Up is likely to drive economic growth across Lincolnshire over the plan period. It is, therefore, prudent to plan for a minimum if the economic growth drives further demand for housing need across Central Lincolnshire.

Policy S1: The Spatial Strategy and Settlement Hierarchy

- 3.4 We broadly support the spatial strategy and settlement hierarchy as articulated in Policy S1. In our view, having regard to this strategy, development should continue to be focused within the Lincoln Urban Area, Main Towns, Market Towns and Large Villages where accessibility to services and facilities is greater compared to smaller settlements within the plan area. Welton is identified as a 'Large Village'. As such, the Local Plan through the allocation of suitable and deliverable sites, should continue to support housing growth.

Policy S2: Growth Levels and Distribution

- 3.5 We support the clarity provided in the updates to this policy which make it clearer that the 23,320 dwellings is a baseline figure and that the plan does allow for up to 29,150 dwellings over the plan period. As highlighted above we consider this approach is consistent with the PPG.
- 3.6 Given the changes expected through the levelling up agenda it would be prudent to make clear that the 1,325 dwellings per annum (the higher end of the range) would be a starting point. Particularly as it also supports greater choice and affordability.
- 3.7 Setting 1,325 dwellings per annum as the minimum is consistent with the need for homes to support economic growth across the plan area as shown in the Economic Needs Assessment (2020).

Policy S4: Housing Developments in or Adjacent to Villages

- 3.8 We support the amendments to this policy when compared to the regulation 18 version.

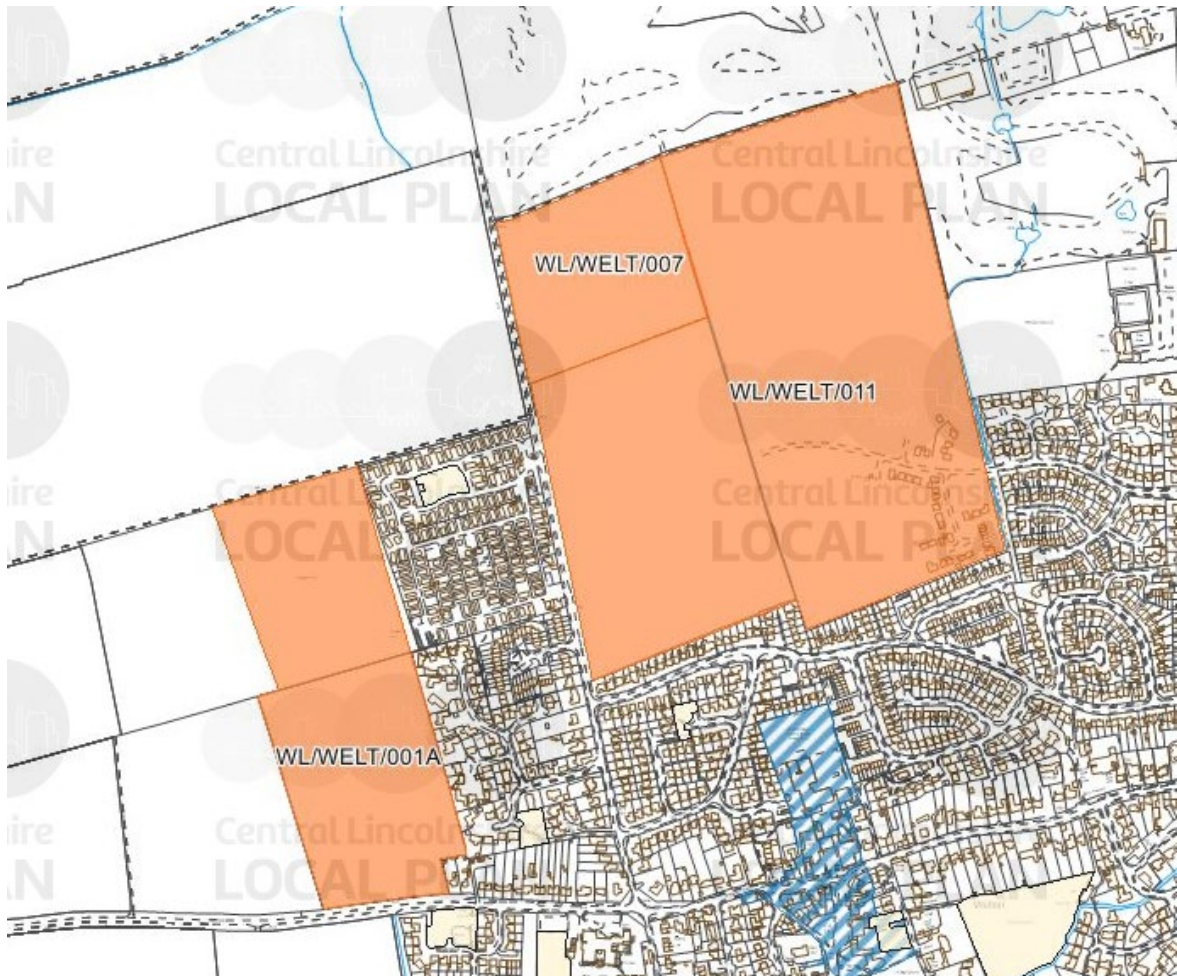
Policy S80: Housing Sites in Large Villages - Welton

- 3.9 The land east of Prebend Lane, Welton is split into two different allocations. These are:
- WL/WELT/007, and
 - WL/WELT/011.
- 3.10 **WL/WELT/007:** is proposed for the allocation of 104 new homes. Beal fully support this position and believe it represents a sensible extension of the village and of the development currently under construction by them.

- 3.11 **WL/WELT/011:** is noted as currently being under construction. However, it is unclear how the Council has arrived at 288 dwellings overall. The original outline planning permission (ref: 131681) allowed the principle of 350 dwellings including specialist retirement units. The red line for this application is included within **Appendix 1**. Subsequently, Beal submitted a reserved matters application for 278 dwellings, whilst also applying for scale of the 72 specialist retirement units (ref: 135006).
- 3.12 Beal is currently building out the 278 dwellings at the moment and a full application will be coming forward shortly for the specialist retirement units on the site.
- 3.13 Our concern with the allocation as presented now is that it is unclear how a decision maker should apply the policy should the following come forward:
- Applications for specialist retirement units on land previously identified for such uses, and
 - Open market and affordable dwellings come forward for land identified through application 135006 as being safeguarded for housing.
- 3.14 **Appendix 2** contains an approved site layout drawing from application 135006 which articulates the relationship between the safeguarded land, specialist retirement units, dwellings currently under construction and the recreation land to the north. This is also shown below:



- 3.15 It is our view that it would be illogical to not allocate and develop this safeguarded land as it forms a clear extension of land already under construction, it can be comprehensively designed into the development and would provide much better access to the recreation land to the north. Furthermore, leaving the land previously identified for the specialist retirement units undeveloped for such uses would also be illogical and a poor use of land which is available and deliverable for development.
- 3.16 Both of the scenarios above would result in housing delivery above the 288 quoted within the policy, yet both parts of the wider site are covered by the policy designation as shown on the proposed policies map (see below).



- 3.17 It is therefore unclear how a decision maker would apply the policy in the future to housing over and above the 288 quoted. It is our view that it would be more prudent for the Council to allocate amend the dwellings over the plan period to c.450 to cover the safeguarded land and the specialist retirement units.
- 3.18 We propose the below amendment to the policy to assist future development for further housing (amends in bold):

Ref	Site Name/Address	Site Area	Indicative dwellings during the plan period	Site Specific Requirements
WL/WELT/011	Land East of Prebend Lane	28.69ha	450 (350 of which benefit from an extant permission) (to include	The additional homes should respond positively and be designed comprehensively

			specialist retirement units)	with the rest of the allocation benefitting from planning permission.
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- 3.19 We believe the proposed changes would ensure a sound policy that is clear to decision makers how it is applied should new housing be proposed.

4.0 SUMMARY AND CONCLUSION

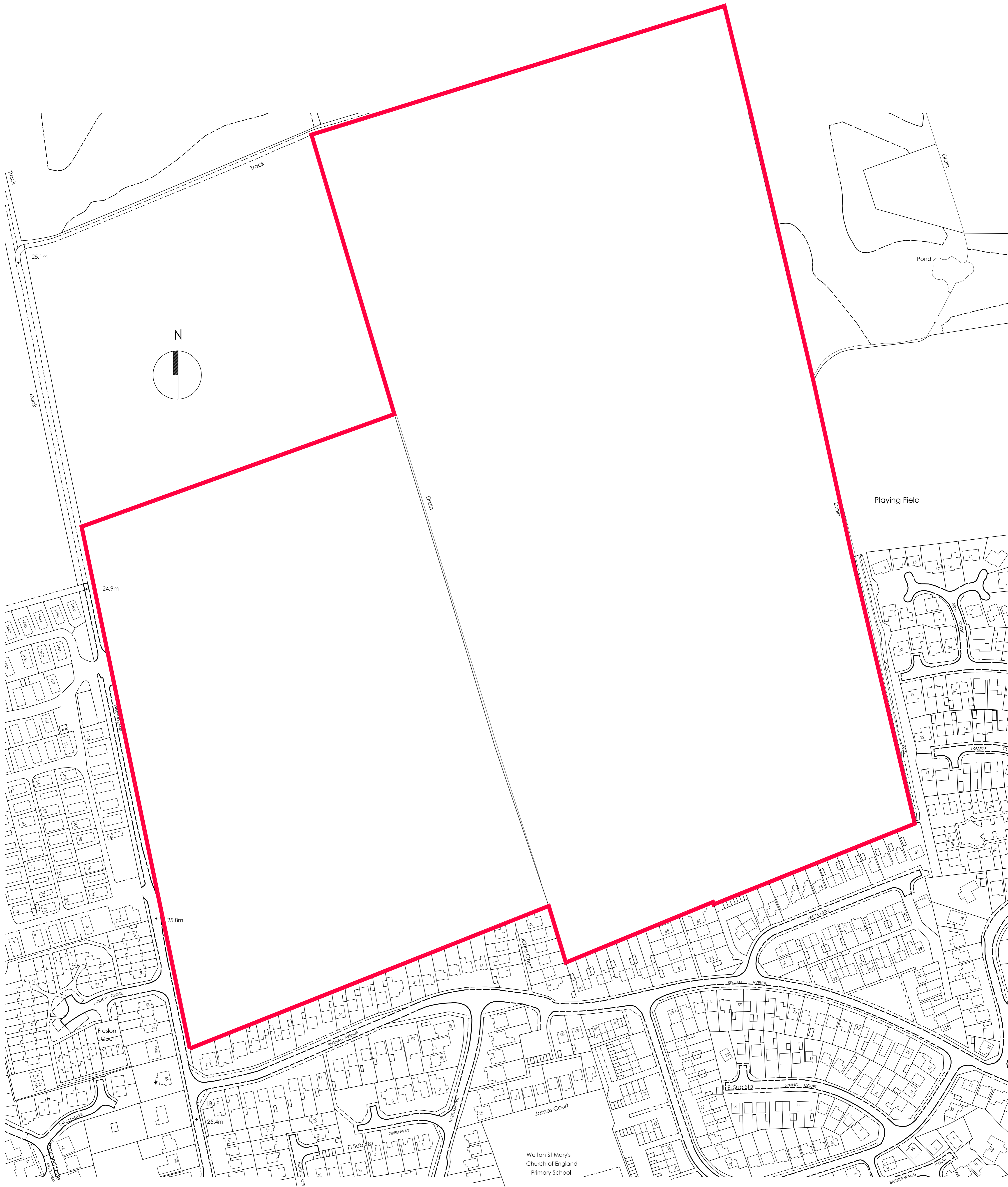
- 4.1 These representations have been prepared on behalf of Beal Development Ltd in response to the Central Lincolnshire Regulation 19 consultation.
- 4.2 Whilst we are supportive of the spatial strategy presented by the Council, we believe that the Plan should not plan for a range of dwellings. Rather, the upper target of 1,325 dwellings per annum should be chosen as a minimum housing target. This would ensure the economic growth which has been identified across the Council area, but also support the national target of significantly boosting housing delivery.
- 4.3 Whilst the continued allocation of WL/WELT/011, the area identified also covers safeguarded land for housing previously identified by Beal and the area which previously benefited from planning permission for the specialist retirement units. We believe that the policy should be updated to reflect the overall capacity of the Site which is covered in the draft allocation to allow for approximately 450 homes rather than the now identified 288.
- 4.4 Beal reserve their right to appear at Examination in Public on this point should the allocation not be amended to clearly articulate the capacity of the Site, to aid decision makers in the future.

APPENDIX 1

**Land off Prebend Lane,
Welton – Location Plan**

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REV	REVISION NOTE	DATE	DRAWN BY
1	DEVELOPMENT LAND OFF PREBEND LANE WELTON		
JB		JANUARY 2014	SCALE 1:1250 @ A1
	SITE LOCATION PLAN	DWG NO. J0832 - 10	REV.

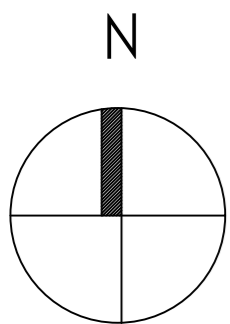
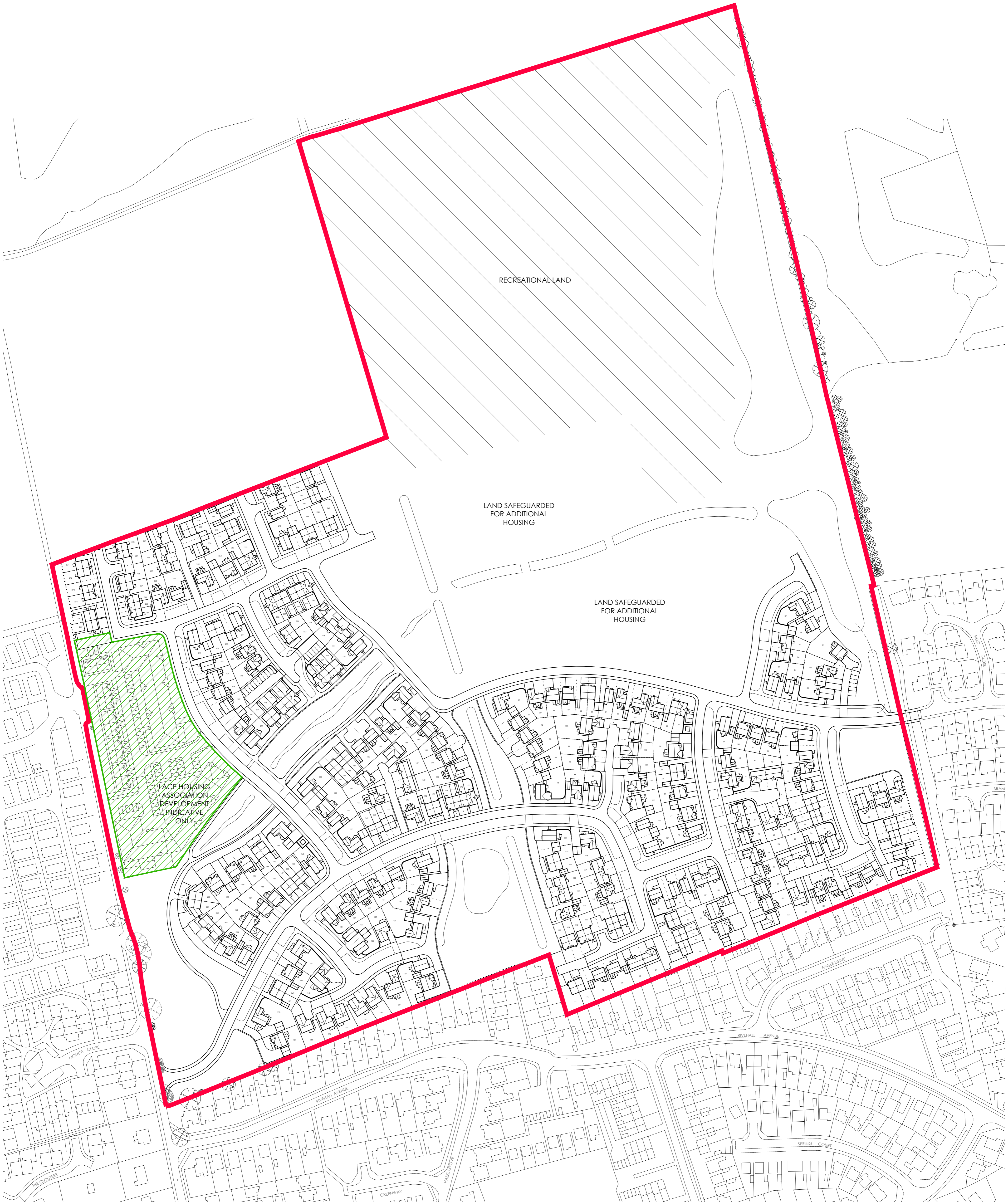
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APPENDIX 2

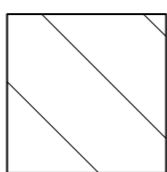
**Land off Prebend Lane,
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UP TO 8931 SQ/M GEA

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	Proposed Site Plan	Dwg No	Scale
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		Rev	M

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