

**Joint Submission by Graham Nicholls, Chris Thomas and Brian Wadsworth (Ryland Residents' Group) to the Planning Inspector's examination of Central Lincolnshire Local Plan.**

We strongly support the removal of site WL/WELT/008A from the local plan, as requested by the committee. To avoid repetition we have consolidated our individual representations into this joint response. Our concerns relating to WL/WELT/008A are also supported by the Ryland Residents' Group (names can be provided upon request) and more widely across the local community, as evidenced by the 80+ objections made to the local planning authority regarding a recent outline planning application for this site.

## **Matter 1 – Legal Compliance**

### *Issue 2 – Public Consultation*

Q4. How did the Committee reach different groups within the community to inform people about the Local Plan, such as the elderly or residents in smaller, rural villages?

Response – We are not in a position to comment on the effectiveness of the public consultation process across the Central Lincolnshire area as a whole, nor are we qualified to assess its compliance with specific legal requirements.

However, we do say that as a matter of fact the process was ineffective in the Welton area. There was no direct communication to local residents or community groups from the CLLP team. Neither did we hear from the local planning authority (WLDC) or Welton Parish Council (WPC). Local residents were unaware of the consultation opportunity and timing, let alone the substance of the draft CLLP and its potential impacts on our area.

Having witnessed land surveying activity on site (WL/WELT/008A) shortly before the end of 2021 (weeks after the public consultation closed), enquiries were made by local residents in January 2022 to the three elected District Councillors for Dunholme and Welton. None were aware of the CLLP proposals. Neither were WLDC planning officials of whom enquiries were also made.

On 20<sup>th</sup> February 2022 local residents wrote to the three West Lindsey District Councillors sitting on the Joint Planning Committee overseeing preparation of the CLLP, drawing attention to the failure of the local public consultation process. We requested that our submission objecting to the inclusion of WL/WELT/008A in the plan be formally accepted and considered before the Joint Planning Committee endorsed the consultation draft. No reply was received. The committee met as scheduled on 28<sup>th</sup> February and agreed the draft, retaining WL/WELT/008A as a future development site.

The ineffectiveness of the consultation process in our area meant that local concerns about WL/WELT/008A were not registered at the appropriate time and issues relating to the site were not publicly debated. The only response made to the CLLP team during the consultation process came from the landowner and his agents, creating an impression of public acceptance which was highly misleading. (An outline planning application for the site hastily submitted by the landowner in April 2022 attracted over eighty objections from local residents, WPC, Welton GP surgery and community groups, resulting in unanimous rejection by WLDC's planning committee in May.)

Local residents and community groups interests are directly impacted by site allocations made in the CLLP. Planning officers at WLDC have confirmed to us in writing that the inclusion of a site in the adopted plan effectively determines the principle of development. Local people must have a proper opportunity to register their concerns and flag up relevant factual issues relating to proposed future developments. Given the failure of public consultation in the Welton area it is vital that our representations regarding WL/WELT/008A made in this submission – especially but not exclusively in relation to Matter 7 Issue 4 – should be properly considered at this final stage of the plan development process.

### *Issue 3 – Sustainability Appraisal*

Q8. Are the conclusions in the various iterations of the SA accurate and robust? For example, what are the reasons for the different scores (and outcomes) between sites WL/WELT/008 and WL/WELT/008A?

Response – The sustainability appraisals (SA) for WL/WELT/008 and WL/WELT/008A are not robust. The information in SA report Appendix 5.3 has numerous inaccuracies. The comments in SA report Appendix 7 are massively different, yet the only difference between the two sites is a minor change to the northern perimeter. In all other aspects they are the same. The significant comments in WL/WELT/008 have been omitted from WL/WELT/008A. Some of the discrepancies are highlighted below.

The comments in the SA Report Appendix 7 and Residential Allocations Evidence Report (RAER) 2022 for site WL/WELT/008 read “The site would extend the existing built footprint of the village into open countryside to the north. Highways improvements would be required. The SA identified MAJOR NEGATIVE effects in relation to access to service and facilities, employment and education”. The comments about site WL/WELT/008A read “The site has revised boundaries (to those proposed in WL/WELT/008) to better reflect the existing built line of the village to the north.”

SA report Appendix 5.3 states the nearest primary school in Welton is about 1.5km from the site (which is about right) and the GP surgery is 1km away. (The surgery and school are next door to each other. This along with the GP surgery comments impacts the scoring from minor –ve to major -ve). The report states the bus stop is 770m from the site. (It is over 800m away from the site, impacting the score from minor –ve to major –ve). The report states William Farr school is 2km (which is about right) and the allotments are 1.6km away. (The allotments are further away than the school). The report states the site is 840m away from Welton village centre. (The village centre is next to the GP surgery 1.6km away).

As highlighted in the RAER 2022, highways show a RED for impact on Highway Network and RED for impact on Local Road Network. (This would put the sustainable travel mode to major –ve.) We strongly endorse this assessment, for reasons set out in our response under Matter 7, and additionally support the committee’s request to remove WL/WELT/008A from the plan because detailed issues relating to the proposed access point onto Eastfield Lane have not been satisfactorily resolved by the landowner/developer.

The concept of sustainability mandates that new developments in open countryside should be regarded as a last resort, after all potential alternatives have been exhausted and then only if the case is compelling. MMSC16 states that the removal of site WL/WELT/008 will have no effect on the deliverability of the local plan. Furthermore, there is the firm prospect of substantial additional housing development at RAF Scampton (Matter 1 Issue 3 Q6 AND MATTER 6 ISSUE 8 Q2) within a relatively short timescale, a site which is barely three miles to the West of Welton. This strongly reinforces the conclusion that WL/WELT/008A is not needed to meet the local housing requirements. Leaving this site allocation in the plan would make the plan unsound.

### **Matter 3 – Spatial Strategy and Distribution of Development**

#### *Issue 3 – Distribution of Development – Policies S2 and S28*

Q4. How was the amount of growth determined between settlements in the same tier, for example between Large Villages?

Q5. Is the distribution of growth consistent with paragraph 105 of the Framework, which states that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes?

Q6. Are there are instances where the distribution of growth is significantly out of proportion with the size of a settlement or its role and function in the hierarchy?

Response – The amount of growth in Welton is disproportionate to other large villages. From the data supplied at April 2018 the growth within Welton will be almost 50%. This is significantly higher than the vast majority of other villages. An example is Cherry Willingham, which is of a similar size to Welton, with greater facilities, is closer to Lincoln and with better access, but has negligible new site allocations in the 2022 plan. Its overall growth is significantly less at just over 30%.

WL/WELT/008A is clearly NOT a sustainable location. It relies wholly on car travel (even to local services) and offers no easily accessible choice of transport modes.

As proposed in MMSC16, removal of site WL/WELT/008A, would reduce the disproportionate burden of growth in Welton, without impacting the deliverability of the local plan.

## **Matter 7 – Housing Sites**

### *Issue 4 – Large Villages – Policy S80*

#### WL/WELT/008A – Land North of 77 Eastfield Lane, Welton

Q40. What is the justification for the scale of residential development proposed through new allocations at Welton? Is the cumulative scale of development proportionate to the size of the village and services on offer?

Q48. How does the proposed site area relate to the existing allocation in the adopted Local Plan in this part of the village?

Q49. What is the justification for the proposed phasing of the site?

Q50. What is the justification for the primary access being taken from Eastfield Lane? Is a safe access achievable and how have effects on the highways network and safety been considered?

Q51. What is the justification for suggested modification MMSC16? Why is this necessary for soundness?

Response - We strongly support the Committee's recommendation to remove site allocation WL/WELT/008A from the plan under MMSC16.

The landowner's agents have confirmed that access to the west is unfeasible on roads and traffic grounds and the viability of the site therefore relies wholly on access to the east (away from the village) via Eastfield Lane, which is an historic farm access track not designed to modern highways standards. The landowner's comments in Regulation 19 clearly state that their road assessment of Eastfield Lane has been based on no modifications to widen the road nor have they examined the viability of trying to do this. As such the assessment is invalid and access unachievable. Apart from the issues identified by Lincolnshire County Council Highways Department, regarding access to site, they also identified in RAER 2022, a RED for impact on Highway Network and RED for impact on Local Road Network, further supporting the committee's recommendation to remove this site allocation.

- The concerns registered by Lincolnshire County Council's Highways Department regarding the wider impacts on the highway and local road networks are fully justified. Specific issues include the following:
- The proposed access point from WL/WELT008A sits at a blind 90° corner where there have been numerous accidents. As recently as 5<sup>th</sup> October 2022 a delivery van ended up in the ditch bordering the western side of the lane at this location.
- Eastfield Lane has substandard paved carriageway width with no road markings and dangerous abrupt edges to either side, bordered by soft soil verges, farm drainage ditches and hedgerows. The road is unlit with no signage or speed limitations. Passing clearance for motor vehicles is marginal along most of the roadway between Welton and the A46 and there are pinch points with marginal

clearances along the westbound section within the old settlement of Ryland towards the junction with Dunholme Road.

- Sight lines along Eastfield Lane are compromised by bends between the proposed access point and the A46, by the two 90° blind corners at the access point and immediately south at the edge of the existing village, and by driveways of existing residential properties opening onto the westbound section through the village with restricted visibility.
- Pedestrian and vulnerable road user safety is put at risk by the substandard carriageway width and interrupted sight lines along the eastbound section towards the A46 and by narrow and poorly maintained footpaths within the village heading westbound. The footpath is on one side of Eastfield Lane only and is discontinuous, forcing pedestrians to cross the road from one side to the other. There is no provision for cyclists.
- The junction from Eastfield Lane onto the A46 at Welton Hill features high vehicle passing speeds with limited sight lines to bends located to the south and north. There are no merge or refuge lanes for vehicles turning onto the A46 from Eastfield Lane or for vehicles turning onto Eastfield Lane from the A46.
- The junction from the western end of Eastfield Lane onto Ryland Road is seriously substandard and hazardous. Vehicles turning right into Eastfield Lane from Ryland Road cut across approaching traffic at a blind corner and the sight lines along Eastfield Lane itself are restricted.
- Road, junction and footpath improvements to address these concerns could not be justified on cost grounds and for the most part are not feasible, owing to land availability, existing development footprint and physical constraints.

The poor location of WL/WELT008A at the eastern extremity of the village, combined with remote site access and inadequate or non-existent provision for vulnerable road users, would mandate near 100% car dependency for any housing development at this site. Such development would trigger a substantial, permanent increase in motorised traffic (including heavy construction and service vehicles) on a substandard local road network which cannot safely accommodate it. On transport and traffic grounds alone WL/WELT008A is not a viable site for future housing development and the Committee is right to conclude that this site should be removed from the plan for soundness.

It has also been identified in MMSC16 that “this site allocation is not necessary to meet the overall housing requirements of the plan”.

The scale of development in Welton and Dunholme (due to the many shared services) has a significant impact on the infrastructure, local services and facilities that support the community with miniscule benefit to employment and no improvement to social/recreational activity, which are almost all based in Lincoln.

Using Lincolnshire County Council formula for school places, the developments across Welton and Dunholme alone would require over 500 more school places in the local secondary and primary schools.

The GP surgery has stated publicly that they cannot cope with the increase in demand for their services, irrespective of the S106 money that is available from it. (A copy of GP surgery statement is available if required). Within the last fortnight a planning application has been submitted to WLDC for 62 extra care homes alongside 10 bungalows, which will inevitably mean additional demand on health care and high level support and will stretch services even further.

Welton Parish Council confirmed the lack of opportunity to develop retail business and the negative impact upon the village of Welton in their response.

Eastfield Lane is prone to flooding and the road traffic for site WL/WELT/008A will need to pass along this road. In heavy rain, residents on the south side of Eastfield Lane experience "water" backing up their drains and toilets. The proposed site will exacerbate this situation. This is not considered in Anglian Water's response.

Although RAF Scampton has its own policy, the implications of the potential scale of development at RAF Scampton and its physical proximity to Welton reinforce the committee's view that WL/WELT/008A being surplus to requirements.

The allocation of site WL/WELT/008A (which is 5.82 hectare of best and most versatile land) is in contradiction to policy S67. It has been identified in MMSC16 that "this site allocation is not necessary to meet the overall housing requirements of the plan". Thus the need for this proposed development is not required. Leaving the allocation in the local plan when it is not required would make the plan unsound.

Without repeating the responses made in Matter 1, issue 3 and Matter 3, issue 3. The responses made in those sections are also relevant in this section.

## **Matter 16 – Natural Environment**

### **Issue 5 – Best and Most Versatile Agricultural Land – Policy S67**

Q1. Is Policy S67 positively prepared, justified, effective and consistent with national policy, in particular paragraph 174 of the Framework?

Response – The allocation of site WL/WELT/008A (which is 5.82 hectare of best and most versatile land) is in contradiction to policy S67. It has been identified in MMSC16 that “this site allocation is not necessary to meet the overall housing requirements of the plan”. Thus the need for this proposed development is not required. Leaving the allocation in when it is not required would make the plan unsound.