

DRAFT CONSULTATION ON LOCAL PLAN REVIEW – REGULATION 18

Table of Contents

DRAFT CONSULTATION ON LOCAL PLAN REVIEW – REGULATION 18	1
QUESTIONS AND FEEDBACK ON THE DRAFT CONSULTATION ON LOCAL PLAN REVIEW – REGULATION 18	1
Engagement and Transparency in the Planning Process	2
Housing Need and Allocation	2
Overallocation Concern	2
Strategic Growth Focus	3
Specific Site Allocations	3
Sustainability and Climate Change	3
Environmental Conservation and Biodiversity:	4
Flooding	5
Anglian Water - SPA Water Pipeline Project	5
Habitat	6
Safety	6
Quarrying Impacts and Geological Concerns	6
Consequential Loss	7
Social Considerations and Housing Dynamics	7
Respect for Existing Residents	7
Infrastructure and Services	7
Traffic and Transportation	8
Alternative Sites and Needs Assessment	9
Data and Studies Request	9
Policy Alignment	10
Community Feedback	10

QUESTIONS AND FEEDBACK ON THE DRAFT CONSULTATION ON LOCAL PLAN REVIEW – REGULATION 18

Particularly SKPR-71

I am writing to express my serious concerns regarding the proposed allocation for development on the farming field adjacent to; Barleyfield, Wheatfield, Westfield Way, Stowe Road & Dickens Close in Langtoft. I have found the process to submit feedback to be extremely complex and not user-friendly, which raises concerns about accessibility and a fair representation in our community's planning process. I also wish to draw attention to the involvement of some councillors in various local planning projects that have sparked significant debate within our community, notably the decisions regarding the 2023 Teal Way project. These instances have prompted me to question the impartiality and decision-making process in our local planning system.

Given these circumstances, I urge all involved councillors to reassess the proposed development on the farming field by Barleyfield, Langtoft. This situation presents an opportunity to demonstrate commitment to transparency, community engagement, and sustainable planning. I believe that by taking a step back to reevaluate this proposal, we can work together towards a decision that aligns more closely with the long-term interests and well-being of our community.

Engagement and Transparency in the Planning Process

We demand that the planning process for the proposed development be conducted with the highest levels of engagement and transparency. This includes a comprehensive public consultation phase, where community feedback is actively sought, listened to, and incorporated into planning decisions. We insist on the publication of detailed plans and assessments related to the development's impact on local infrastructure and services, ensuring that all stakeholders have access to information and a meaningful opportunity to contribute to the discussion.

Housing Need and Allocation

This Regulation 18 is a proposed new version of the 2036 plan proposed an Objectively Assessed Need of 12,300 new dwellings from 2011 to 2036. The 2040 plan calculates housing need using the government's standard method, with a minimum Local Plan requirement of now 14,600 dwellings for the period 2021 to 2041. This represents a strategic shift in planning to address current housing needs based on updated methodologies and projections.

Q: Is it possible to see the updated methodologies and growth projections for this region?

Discrepancy: The Local Plan outlines a significant increase in housing requirements across South Kesteven, with a notable shift from the 2036 plan to the 2040 plan.

Q: For Langtoft, how does this increased allocation consider the village's existing infrastructure and services. Is there evidence that Langtoft's infrastructure (roads, healthcare, schools) can support the influx of new residents without compromising on quality of service or life?

Overallocation Concern

Specifically, the allocation for new developments like the one proposed on the highest grade farming field adjacent to Barleyfield, Langtoft, might exceed what is sustainable for the village's infrastructure and environment.

Q: I request detailed assessments or data showing how these allocations were determined to be sustainable for Langtoft and how infrastructure upgrades will be managed and funded. If this request is denied, I would like a meaningful evidential statement as to why.

Strategic Growth Focus

Both plans emphasise sustainable growth with a focus on Grantham as a key area for significant housing and employment growth. The 2040 plan continues this strategy but with updated allocations and an extended planning horizon to 2041.

Q: based on this timeframe have all sites previously allocated been fully assessed to prevent new site allocations becoming a requirement?

Specific Site Allocations

The 2040 plan introduces new site allocations not explicitly listed in the 2036 plan. These allocations obviously reflect a comprehensive approach to meeting housing needs, providing a variety of site types and sizes to ensure delivery and market choice. Specific new or continued focus sites you include:

1. Spitalgate Heath - Garden Village (SKPR-278): 3,700 dwellings
2. Rectory Farm (Phase 2 and Phase 3) and Prince William of Gloucester Barracks: Significant dwelling allocations focused on creating sustainable urban extensions.
3. Stamford, Bourne, and The Deepings: Targeted growth to support these market towns in fulfilling local housing and economic needs.
4. Larger Village Allocations: Reflecting a strategic approach to accommodating growth in a way that supports the role and sustainability of these communities within the district.

Q: Langtoft has already had unplanned development. If sites such as the Stowe Road development have been undertaken, have these sites been allocated in the numbers? For example for site SKPR-71 a development of 55 dwellings, 41 have already been completed literally opposite this site on Stowe Road. As the site was unallocated in the previous plan (due to other sites having priority) can this site now be dismissed and 14 homes either reduced or the dwelling allocated elsewhere, especially given an over provision?

Sustainability and Climate Change

The 2040 plan places a stronger emphasis on climate change mitigation and adaptation strategies. It includes policies aimed at promoting energy-efficient buildings, renewable energy generation, and reducing carbon emissions, aligning with the district's Climate Action Strategy and national targets for net-zero carbon emissions by 2050.

Q: Given the focus on sustainability & mitigating climate change, the site proposed SKPR-71 is recorded as the highest grade agricultural land. How does this support these goals?

There is a discrepancy in the Local Plan as it emphasises the importance of sustainability and climate change mitigation, including the promotion of energy-efficient buildings and renewable energy.

The proposed site at SKPR-71 clearly boasts Grade 2 agricultural land, representing the pinnacle of quality and versatility for farming purposes. Its heritage of agricultural use spans across generations, reflecting its intrinsic value to the local community. Grade 2 land is valued for its fertility, drainage, and suitability for a wide range of crops, making it essential for sustaining agricultural productivity. Despite previous rejections of development proposals for this field, its status remains unchanged, emphasising its significance in agricultural preservation.

Q: Can you evidence how developing Grade 2 agricultural land aligns with these objectives, especially when such land is crucial for local food production and biodiversity.

Q: How does converting high-quality agricultural land for housing in Langtoft align with the district's sustainability and climate change objectives? Where are the compensatory sustainability measures or green spaces in the new development to mitigate this loss?

Q: Should any alteration be considered for the field's longstanding farming function, it must unequivocally prioritise maintaining its green, open expanse. Preserving it as a thriving natural habitat would serve as a vital counterbalance to the environmental impact inflicted by adjacent construction and quarrying activities. Has a survey around this been undertaken?

Environmental Conservation and Biodiversity:

The site encompasses a Green Infrastructure Area, yet recent policy enhancements and amendments have not been transparently communicated. The pressing need to protect and enhance the local ecosystem, habitats, and historical land features has been acknowledged in Council reports. These documents outline existing constraints related to biodiversity, heritage, and soil integrity, yet the detailed assessment for this specific site seems to be omitted from public sustainability appraisals.

Moreover, inaccuracies in the current technical documentation overlook key environmental features such as nearby deciduous woodlands and habitats critical for local wildlife, which have already suffered partial destruction. The classification of the landscape and the agricultural grade of the land have been misleadingly represented, not to mention the outdated flood risk status that disregards recent severe flooding incidents.

After breaking from the existing plan and approving Teal Way there is a clear and justifiable overallocation concern:

Q: Given Langtoft's existing character and the proposed site's environmental value, has the scale of new housing development has been tailored to minimise environmental impact.

Q: How does the development plan ensure the preservation of biodiversity, especially considering Langtoft's existing green spaces and agricultural land?

Q: How will the development meet the actual needs of Langtoft's current and future residents? Is there a risk that new housing will remain unoccupied like that in Teal Way or that it will not meet the affordable housing needs of the local population?

Q: Does this align with the enhanced focus on climate change and the environment?

Natural England/DEFRA has categorised the area as falling within an Impact Risk Zone due to its proximity to sensitive natural sites. The proposed development is flagged as incompatible with residential expansion, especially of the scale proposed, due to potential detrimental impacts on local biodiversity, including protected species such as Great Crested Newts and bats. The water pipeline has already disrupted the geese migration pattern and mating season.

Q: Based on these risks is this site appropriate given the extent of building opposite that has not been counted in this proposal?

Flooding

The historical narrative of limited river flooding within our vicinity has undergone a dramatic shift in recent years, escalating concerns about future exacerbations. The once-perceived lower flood risk attributed to the proposed site now demands reassessment, especially in light of the devastating floods experienced during Winter 2023/24, culminating in the destructive force of Storm Henk.

Q: Should development plans be suspended - Urgent suspension of all development plans is warranted until a comprehensive flood risk review is conducted, accompanied by substantial improvements in protective measures. This precautionary measure is imperative as the spectre of climate change looms, threatening to perpetuate the catastrophic flooding events witnessed in our area.

Anglian Water - SPA Water Pipeline Project

The SPA Water Pipeline Project by Stowe Road has faced significant challenges, notably impacting the surrounding environment and the local community. Anglian Water's management of the SPA water pipeline has resulted in extensive landscape damage and ongoing surface water flooding, creating a visually displeasing and potentially hazardous situation close to residential areas. Images captured on February 23rd, 2024, looking northeast from Stowe Road towards Dickens Close, vividly illustrate the proximity of standing water to homes, a consequence still evident seven weeks after Storm Henk.

Anglian Water's oversight in planning and implementing the project has been evident, with flood-prone areas left without proper drainage. This mismanagement calls into question the previous classification of the area as low-risk for flooding. The project, initially budgeted at £400 million, is now anticipated to cost three times as much, with completion nowhere in sight. Comparisons are being drawn to the HS2 project, indicating a crisis within Anglian Water's senior management and a direct impact on the local residents.

The project has not only flooded the area but also led to the removal of a mature line of trees opposite the Dickens Close entrance, an act that has significantly altered the character of the area. This removal, which has substantially affected the landscape and nearby farming fields, is seen as detrimental and could have been avoided.

Furthermore, the local wastewater treatment facilities, also managed by Anglian Water, are operating at full capacity and cannot support additional waste from any proposed new development. With Anglian Water's focus currently on addressing the financial and environmental fallout from the SPA project, investments in wastewater infrastructure are unlikely to be prioritised.

This situation necessitates urgent council investigation into the SPA project's handling and the plans for wastewater infrastructure enhancement. Highlighting these concerns aims to ensure accountability and prevent any future claims of unawareness regarding the project's adverse impacts on the surrounding community and the environment.

Habitat

Moreover, the proposed site serves as a vital habitat, boasting intricate pathways, watercourses, and a neighbouring equestrian centre. The potential disruption to these delicate ecosystems, coupled with the strain on existing drainage systems due to surface water runoff from construction activities, underscores the need for meticulous consideration.

Q: Has this been considered? In addition to the looming flood risk posed by existing and planned quarry operations, the perilous flood zones that besieged our locality in 2023/2024 paint a stark reality. The repeated breaches of our local flood defences, resulting in widespread closures of critical infrastructure such as Waterside Garden Centre, Kate's Bridge, and the Stowe Road/King Street junction, underscore the severity of the situation. King Street is often closed in the Winter in its entirety. The recent perilous proximity of the lakes opposite SKPR-71 to flooding our homes underscores the imminent danger. And that's after heritage trees have been taken down, trees that would absorb flood water. Flood water has already built up close to flooding us until abating.

It is widely acknowledged (by the MET Office in this exact area) that future flood events will only exacerbate, rendering the immediate area of SKPR-71 unsuitable for further development. The inevitability of displacement and heightened flood risk, compounded by the already elevated water table, necessitates a firm stance against additional development.

Q: Do you recognise and acknowledge this risk?

Safety

It is incumbent upon the Council and its Committees to acknowledge this certainty and bear responsibility for safeguarding existing homes from peril. Any insistence on advancing housing targets in such an unsuitable locale, jeopardising existing residences, should and would be met with severe legal repercussions.

Quarrying Impacts and Geological Concerns

Q: Do you believe this allocation is appropriate given the quarried areas opposite?

The vicinity of Barleyfield is already suffering from the effects of existing and planned quarry operations, which pose significant risks to the groundwater levels and quality, potentially

exacerbating flood risks and environmental damage. The Council's reports acknowledge the area's sensitive status due to its proximity to sites of special scientific interest, emphasising the inappropriateness of this residential development.

Consequential Loss

Q: Have the council considered that individuals may also seek compensation for consequential loss resulting from the council's actions or decisions. This would include financial losses incurred as a result of a decline in property value, or additional expenses incurred due to the council's actions. I for example have invested over £80,000 in my property based on the 2036 plan. These investments would not have been made if dwellings were present.

Social Considerations and Housing Dynamics

The recent addition of 41 homes opposite Dickens Close has already stretched local resources thin and sparked public outcry, highlighting the lack of demand for further housing in this already overburdened area. This development has already greatly affected the trust of the village in the local authority. The development has not only currently failed to integrate well with the community but also remains largely unoccupied, casting doubt on the necessity and viability of additional housing projects in this locale.

Respect for Existing Residents

The development would drastically alter the landscape and living conditions for current residents particularly the 27 properties directly bordering the area, impacting all property values, privacy, and quality of life. The area's unique character and appeal, deeply valued by its inhabitants, would be irrevocably compromised.

Q: has consideration and impact been given to this?

Infrastructure and Services

The 2040 plan underscores the importance of aligning growth with infrastructure improvements, including transport, digital infrastructure, and community facilities, to support sustainable development and enhance the quality of life for residents.

The key difference lies in the updated strategic objectives, housing needs assessment using the government's standard method, and a more pronounced focus on climate change mitigation and adaptation in the 2040 plan. Given that this reflects an evolution in planning priorities to address contemporary challenges, ensuring that development is sustainable, supports economic growth, and enhances community well-being while respecting environmental constraints.

The Langtoft to A15 junction is a known danger spot along a red route. Currently and especially during peak times it is proven to be a dangerous and troublesome junction to join the A15 from. The traffic backs up through the village regularly. The other end of the village exits onto King Street, another recognised dangerous road, now exacerbated by the imminent gravel extraction works and increased HGV traffic.

The proposed development in Langtoft raises significant concerns regarding infrastructure and services, particularly when considering the existing strain on healthcare, exemplified by The Deepings Surgery's oversubscription. The problematic Langtoft to A15 junction, known for its congestion and safety risks, alongside increased traffic on King Street due to gravel extraction works, further complicates the situation.

These issues underscore the necessity for a cautious approach to development in small village settings, prioritising essential infrastructure upgrades to ensure it supports sustainable growth without compromising residents' safety and quality of life.

Q: Has this been considered?

Q: What infrastructure improvements will be put in place?

Q: How will this strategic objective meet the demands of the increased population?

Q: Given the high volume of development in the Deepings and that all schools are over subscribed (the failing Deepings School being the exception), the lack of capacity in the over subscribed doctors surgery and no NHS dentists available within 20 miles.

Traffic and Transportation

In opposition to the proposed development in Langtoft, it's crucial to address the significant concerns regarding traffic and transportation, particularly on the A15, a matter that profoundly impacts the safety and quality of life for the residents. The A15, a critical trunk road connecting Bourne and Market Deeping, has been highlighted as treacherous by the local community, policing and the parish Council, prompting urgent calls for improvement.

A 2019 petition initiated by Trish Garratt, a former Langtoft parish councillor, underscores the community's growing anxiety over traffic safety. Accruing approximately nearly 2,000 local signatures, the petition's goal was to present a strong case to Lincolnshire County Council. This initiative stems from a collective concern about the drastic increase in traffic volumes over recent years, attributed largely to new housing developments such as Elsea Park in Bourne. The resulting traffic congestion has escalated the risk associated with crossing the A15, either on foot or by vehicle, to perilous levels.

The A15's current state, where the interval between passing vehicles is barely over one second during peak times, creates a scenario where crossing the road without the aid of pedestrian crossings is exceedingly dangerous, if not outright impossible. The community has witnessed numerous serious accidents, with many reporting close calls and instances of vehicles blatantly ignoring red lights at crossings. These circumstances bring into sharp focus the real threat to pedestrians, especially the children commuting to school by bus, underscoring an imminent need for enhanced road safety measures.

The community's apprehension is not unfounded, given past incidents where quick reflexes barely averted tragedy. Such near misses accentuate the critical need for proactive steps to prevent a fatality on the A15. The proposed garage development on the A15 at Market Deeping has increased the traffic volume, further elevating the risk of accidents. Asserting that most accidents stem from "driver error" does not absolve the responsibility to ensure road safety. The current traffic volume not only increases the likelihood of driver errors but also magnifies

their consequences. The plea from Langtoft's residents and the broader community is clear: immediate action is required to safeguard lives against the backdrop of rising traffic demands.

I believe there is a discrepancy, If the Local Plan aims to improve sustainability and reduce carbon emissions, increasing the housing stock significantly without corresponding enhancements in public transportation or infrastructure could counteract these goals.

Q: How will the proposed development in Langtoft accommodate increased traffic, and what measures are in place to ensure safety and accessibility?

Q: In light of these concerns, will you reconsider the proposed development in Langtoft. Introducing additional housing will inevitably lead to a further surge in traffic, intensifying the existing problems on the A15 and potentially overwhelming local infrastructure. The new Teal Way development has already had an impact with 30+ more cars now leaving the estate at peak times. It is imperative that the Council, in concert with LCC Highways, rigorously assesses the impact of further development on traffic volume and road safety, prioritising the well-being of Langtoft's residents and all who travel its roads.

Alternative Sites and Needs Assessment

The plans identify specific sites based on a comprehensive assessment of needs, sustainability criteria, and strategic objectives. If Langtoft was not included in the plan from 2 years ago, it suggests that the assessment did not prioritise it over the other chosen locations. Justifying a new development would require demonstrating why Langtoft should now be considered over or in addition to these selected sites, based on changes in needs, capacity, or strategic priorities not previously identified. Especially given the recent unplanned development in another unallocated site.

Q: A question arises regarding the Teal Way development on Stowe Road, how was this able to go ahead when it was not in any plan? It questions the validity and relevance of such plans if estates can just be built anyway. We rely on the transparency of our authorities.

In summary, a proposal for development in Langtoft would need to be rigorously evaluated against these criteria and the strategic visions outlined in both the 2036 and 2040 plans. This comparison suggests that additional work would definitely be needed, expansive work from the public purse, to align any new development with the established planning framework, policy objectives, and especially community expectations.

Data and Studies Request

Q: Can you provide specific studies or data that informed the housing allocation decisions for Langtoft, especially regarding infrastructure capacity and environmental impact assessments.

Q: If this data is available have you highlighted any gaps in data or areas where the assumptions made may not reflect the village's reality?

Policy Alignment

Q: How does the proposed development align with the Local Plan's policies on sustainable growth, environmental conservation, and infrastructure development. Specifically, how do these policies apply to Langtoft, and where might there be discrepancies between policy objectives and proposed development outcomes? Please include the data you used for the current out of plan development that has now been completed.

Community Feedback

I will reiterate and emphasise the importance of community engagement in the planning process. The way in which we have to appeal and feed back in this proposal is extremely complex.

Q: How will the community's feedback be incorporated into the final allocation decisions, and what mechanisms are in place for ongoing community input?

Katherine & Antony Swindell