

Ms T Coggon
Planning Dept.
North Lincolnshire Council
Civic Centre
Ashby Road
Scunthorpe
DN16 1AB



4th October 2021

Dear Ms Coggon

PA/2021/610 - Outline planning permission for a development of 38 dwellings, one small-scale retail unit, public open space incorporating new green infrastructure, SUD's features, outdoor classroom, and biodiversity enhancements with details of means of access and layout submitted for consideration (scale, appearance and landscaping to be reserved for subsequent consideration)
AMENDEMENTS: REMOVAL OF OUTDOOR CLASSROOM STRUCTURE, REMOVAL OF FOOTPATH LINK TO VILLAGE HALL, JUSTIFICATION OF DEMAND FOR A VILLAGE SHOP, AMENDED DESIGN BRIEF AND AMENDED OUTDOOR LEARNING BRIEF - At land at south of High Street and west of Swallow Lane, Wootton.

KVA Planning Consultancy has been commissioned to draft a second letter of objection to the above proposal by Lincolnshire Estates Ltd. on behalf of the Northern Lincolnshire Local Group of CPRE 'The Countryside Charity', to be submitted to North Lincolnshire Council. The previous response by the charity was dated 9th May 2020.

The Northern Lincolnshire local group of CPRE ('CPRENL') continues to object to this proposal which is not in conformity with local or national planning policies, on the following grounds:

1. The proposed application is sited outside the adopted (and proposed) development limits and within the open countryside;
2. The loss of grade 1 agricultural land; and
3. Lack of Local Needs Affordable Housing provision.

Despite the amended information CPRENL consider that the grounds for objection as set out above and in our previous response are still relevant. CPRENL believe that there are clear reasons set out within planning policy (local and national) that provide clear reasons to refuse the proposals and as such, the adverse impacts of the proposal outweigh the benefits in terms of additional house building, to a

significant and demonstrable degree and consider that the proposal should be refused. This response should be read alongside our previous response of May 2020.

In accordance with section 38 (6) of the Planning and Compulsory Purchase Act (2004) the application should be determined against the statutory Development Plan unless material considerations suggest otherwise. The National Planning Policy Framework ('NPPF') (July 2021) is a material consideration which should be taken into account when determining the proposal.

The Council are in the process of preparing a new single Local Plan which will replace the existing Development Plan documents once adopted. They published their preferred options for consultation between February and March 2020 to which CPRENL provided comments. In accordance with the NPPF, however, it is at too early a stage in its production and no weight can be attributed to it as yet, however, it does give a good indication in the direction of proposed policy.

Fundamentally, the proposal is contrary to the adopted local plan and the emerging local plan which the Council has chosen not to redraw the Development Limits of Wootton or to allocate the proposed site as a potential housing allocation. It is understood that the Council's strategic planning department has outlined that the proposal is indeed contrary to the adopted plan and listed all of the development plan policies to which it would not be in conformity with.

Wootton is a small rural settlement and with the proposed level of development in the emerging Local Plan would be at risk of overdevelopment and becoming unsustainable in terms of current service provision should this proposal for 38 new dwellings be approved. Despite the fact the applicant has provided information in relation to the proposed small retail unit, this is based on assumptions and cannot be guaranteed as deliverable at this stage as marketing has not (understandably) begun. Therefore, limited weight should be attached to this 'benefit' in the planning balance. However, the cumulative proposed development for Wootton in the emerging plan, in addition to that subject to this application would demand a higher level of service provision than that proposed by the applicant with the retail unit, in terms of school places, health care, public transport and open space.

Policy CS3 confirms that development proposed outside (future) defined development limits '*will be restricted to those for the essential functioning of the countryside*'. This proposal does not meet this definition. The application is for 38 new dwellings in the open countryside in Wootton. This does not fall within the list of permitted development set out in the policy which is confined to those essential to the operation of the countryside or to provide affordable housing to meet a proven local need. With the amended details, the applicant does not appear to have provided any evidence of local needs housing. Therefore, the proposal is clearly not in conformity with these policies. The applicant confirms an indicative mix of the proposed new dwellings for the site. Of the 38 new dwellings, 34 will be market housing (including 4 lifetime homes/over 55 accommodation) and 4 self-build plots. A further 4 will be affordable units. The site is clearly not being pursued as a rural exception site (which may include an element of market housing to ensure viability) and as such remains contrary to planning policy.

As the Council are now able to demonstrate a 5.64-year housing land supply (August 2021) there is

simply no need for this development to be approved in a location out with the adopted Development Limits in order to provide flexibility in delivering new housing. As such the tilted balance in the NPPF does is not triggered and full weight should be given to those policies in the adopted development plan. This will also ensure compliance with the proposed spatial strategy set out by the Council's Strategic Development Team.

Furthermore, the NPPF seeks to protect the best and most versatile agricultural land at paragraph 170. The site consists of Grade 1 agricultural land which is described as 'excellent' in the Agricultural Land Classification Guide published by Natural England (2010). As CPRENL do not consider the site to be a sustainable location, further supported by the fact that the Council have not sought to allocate development there or redraw Development Limits, it is not thought necessary to lose 2.61Ha of Grade 1 agricultural land.

In summary, when undertaking the planning balance for this proposal, the Council is now in a position to demonstrate over and above the required five-year housing land supply and as such additional large sites outside the development limit and within the open countryside should not be approved when contrary to the adopted development plan.

For the reasons highlighted above, CPRENL wish to maintain their objection to these proposals. CPRENL would wish to be kept informed of any further amendments or submissions made regarding this application.

Yours sincerely,

Katie Atkinson, MRTPI

Director

KVA Planning Consultancy

On behalf of David Rose, Chairman of CPRE Northern Lincolnshire CPRE



The countryside charity
Northern Lincolnshire