

LCC REFERENCE: PL/0135/22

DEVELOPMENT: TO CONSTRUCT A HYDROCARBON WELLSITE, WITH THE DRILLING OF ONE VERTICAL APPRAISAL WELL AND UP TO SEVEN HORIZONTAL DEVELOPMENT WELLS AND ANCILLARY DEVELOPMENT

Glentworth Parish Council **OBJECT** to this application and request that the County Council reject the proposal. Our specific reasons for the objection are set out below but to help the Planning Committee understand these issues we would urge you to defer a decision and conduct a site visit to Glentworth to understand the context of the points raised in this objection. Our principle reasons for the objection are the scale and nature of the development will have a severely negative impact on the village and community of Glentworth, on residents mental and physical well-being and will be detrimental to the environment. We have set out our objections in more detail below.

Planning Policy Considerations

- The proposal contradicts LP18 of the Central Lincolnshire Local Plan as it will have a detrimental impact on the amenity of residents.
- The adopted Glentworth Neighbourhood Plan vision statement states ‘Glentworth will continue to be a peaceful rural village, an enjoyable place to live with a thriving, safe community. Glentworth Parish will protect the highly valued features of the natural environment, such as green spaces and the open landscape, preserving the village atmosphere and character for future generations. The proposal will have serious implications on this outlook.
- The Central Lincolnshire Green Infrastructure Study (November 2011) identifies Lincoln Edge North, running across the Parish of Glentworth adjacent to the village, as a Strategic Green Access Link. Moreover, LP13 of the CLLP aims to deliver a network of walking and cycling routes, and supports the maintenance and improvement of existing infrastructure.
- The Lincolnshire Minerals and Waste Local plan, Policy DM2: Climate Change ‘Identify locations which reduce distances travelled by HGVs in the supply of minerals and the treatment of waste, unless other environmental/sustainability and, for minerals, geological considerations override this aim’.

This proposal clearly does not satisfy this policy.

- The Lincolnshire Minerals and Waste Local plan, Policy DM3: Quality of Life and Amenity of the Plan seeks to control the impacts of development on the local environment and communities. Policy DM3 requires minerals development proposals to demonstrate that it does not generate unacceptable adverse impacts to occupants of nearby dwellings and other sensitive receptors arising from: noise, dust, vibration, odour, litter, emissions, the migration of contamination, illumination, visual intrusion, run off to protected waters, and traffic. Where unacceptable impacts are identified which cannot be addressed through appropriate mitigation measures planning permission will be refused.

This proposal will clearly have a dramatic impact on the local environment and dwellings.

- The Lincolnshire Minerals and Waste Local plan, Policy DM1 7.18 states ‘Transport is a significant source of carbon emissions by minerals and waste developments due to the distance travelled by HGVs in supplying minerals and transporting waste. The County Council will therefore encourage the use of alternative modes to road-based transport (see Policy DM13); seek locations for future minerals developments near to the markets that they serve; encourage proposals for waste developments to locate as near as possible to main centres of population; and promote good practice in transport related matters to reduce vehicle miles’.

The proposed vehicle movements challenge whether this policy will be met.

- The Lincolnshire Minerals and Waste Local plan, Policy DM13 ‘Proposals for minerals and waste development should seek to minimise road-based transport and seek to maximise where possible the use of the most sustainable transport option’.
- The Lincolnshire Minerals and Waste Local plan, Policy DM14 states that planning permission will be granted for minerals and waste development involving transport by road where: the highway network is of, or will be made up to, and appropriate standard for use by the traffic generated by the development; arrangements for site access and the traffic generated by the development would not have an unacceptable impact on highway safety, free flow of traffic, residential amenity or the environment; and a suitable travel plan is in place.

The road network proposed for use is clearly inadequate for the volumes and type of traffic.

Village Life

The adopted Glentworth Neighbourhood Plan vision statement states ‘Glentworth will continue to be a peaceful rural village, an enjoyable place to live with a thriving, safe community. Glentworth Parish will protect the highly valued features of the natural environment, such as green spaces and the open landscape, preserving the village atmosphere and character for future generations’.

Glentworth is a peaceful, rural, cliffside village of around 120 households. It is sited within an Area of Great Landscape Value. In general, residents live in the village to enjoy and have access to the quiet countryside and being remote from the ‘hustle and bustle’ of town life and traffic. Many residents enjoy walking, cycling and horse riding on the quiet roads, footpaths and bridleways. In fact, one of the most popular dog walks is a circular route along Northlands Road and back to the village on Kexby Road. Some residents have moved to the village for the peace and quiet the countryside offers to help with the mental health issues of family members. The IGas proposal would have an adverse impact on the local area and community for the following reasons.

1. Vehicle movements

The number of vehicle movements by HGVs through Glentworth (Kexby Road) is limited to 2 per day currently and these are, in the most part, servicing the 2 existing IGas wells to the South and West of the village. The proposed initial construction phase will see a massive increase in HGV flows on Kexby Road and Northlands Road (up to 100, avg 70 - 07:00 - 19:00 Mon - Fri, 07:00 - 13:00 Sat). This would then be extended in phases 2 and 3 to 24 hours / day, 7 days / week. Whilst the proposed new site is remote from the centre of the village, the proposed vehicle route to it will have a significant detrimental impact.

17 inhabited dwellings line Kexby Road in Glentworth with many others directly adjacent to the north. The increase in HGV and other traffic flows past the homes between these times will dramatically impact the residents' lives in terms of noise, vibration, pollution and road safety. The noise of existing HGV movements can already be heard throughout this quiet village, an increase to a peak of 100 per day will be considerably worse. In addition, those homeowners on Kexby Road who have limited or no off-road parking rely on the road to park their vehicles and/or will need to reverse their vehicles from their drives to access the carriageway (pic 8 & 9) will now find this an extremely dangerous manoeuvre.

The area adjacent to the junction of Kexby Road and Chapel Lane is used as a school bus pick-up and drop off, with children living in the village then walking from the bus stops to their homes. The additional HGV movements will create a particular hazard for those children.

A well-used footpath and bridleway (GLTW 88/1) connecting Glentworth and Fillingham is accessed to the South of Kexby Road, opposite the junction with Church Street (pic 10). Residents must cross Kexby Road to access this. With parked cars already on Kexby Road (pic 8) it will become a very dangerous process to access the footpath with additional HGV's and traffic flows.

Kexby Road narrows as you leave the village area into a single-track road (pics 1,2, 3 & 4). This is currently navigable with low flows of traffic but with an increased number of HGVs it will be very dangerous. The proposed passing areas would not be adequate in terms of depth and onward vision for HGVs and other vehicles to pass each other. The impact on dog walkers, horse riders and cyclists using the road would be a significant concern. Although there are lengths of footpath within the village along Kexby Road, these end at the edge of the village and pedestrians, cyclists, horse riders, etc have to walk in the carriageway. The volume of additional HGV movements will make this extremely hazardous; this is particularly relevant in the context of the existing uses for the stretch of road to the junction with Northlands Road (see below).

It is also worth considering that Kexby Road is used as an access to the B1398 by residents of other settlements nearby (e.g. Upton, Kexby, etc). The existing traffic along this route is not limited to that generated by the residents of the village.

Northlands Road is a single-track road (pic 5, 6 & 7) which connects Kexby Road with the village and has very little vehicular use. Northlands Road is even narrower than Kexby Road. It is a very popular road for walkers, dog walkers, riders and cyclists. This road and its current uses are an amenity for residents of the village, bearing in mind there are few other spaces or facilities for residents.

It is worth highlighting here that the part of the road close to the existing oil well is already in a very poor state due to damaged caused HGV use (pic 7). It is almost unimaginable to have 100 HGV movements on this already very inadequate road.

2. Hours of operation and impact

Moving on from the number of HGV movements, the Parish Council is concerned about the proposed hours of operation for both HGV movements and the actual development. The current proposal is for operation between 7am and 7pm, at the commencement, with reduced hours of operation on Saturday mornings. Later phases of development will mean 24/7 working and whilst the peak HGV movements are projected to be lower during those periods, there will be continued disruption for residents with noise and light pollution from the site.

Picture 1



Picture 2



Picture 3



Picture 4



Picture 5 – Northlands Road



Picture 6 – Northlands Road



Picture 7 – Northlands Road access to existing well



Picture 8 Kexby Road – residential



Picture 9 – residential



Picture 10 – Kexby Road – access to footpath GLTW 8/1



Picture 11 – School bus pick up time



Pollution

The HGV movements through the village will generate a significant volume of pollution from exhaust combustion emissions. There is considerable and extensive scientific evidence that living adjacent to roads with a high volume of traffic has a negative impact on air quality and consequently a detrimental impact on the health of people living in that area. It is unclear whether there has been an Environmental Impact Analysis in relation to air pollutants and, if not, no decision on this application should be made until this work has been carried out.

In addition to the issue of vehicle emissions, other airborne pollutants, whether from the HGVs as they pass or blown by the prevailing winds from the construction site will add to the question of air quality and the impact on the physical health of residents. There is no evidence that this has been taken into consideration in the application.

Noise/ Vibration 90dB

A particular concern is the impact of noise and vibration from construction traffic and the works themselves and how this will make a material impact to village life, the enjoyment of living in the village and damage to roads and house foundations.

The Parish Council is aware that the applicant has engaged a consultant to assess noise levels of all activities throughout the whole development period – we have read the report. However, we feel that the assessment of noise impacts is inadequate and fails to properly take into account how this will impact on the mental and physical health of residents. The movement of HGVs and the noise from the construction site will permeate the residential area of the village, not just those properties adjacent to Kexby Road but further. Residents ability to open their windows or sit in the garden in the summer will be seriously affected. In this context it is important that this impact isn't for a short period but as the applicant states the preparation and development of this site will extend over many years.

As with air pollution, noise from the well site during the construction phase will also be very noticeable to residents since the prevailing wind will carry the sound directly to the village. Plant

noise levels will be very noticeable in the village and particularly at Northlands Cottage and Low Farm.

Road surface

The roads in Glentworth have already been dramatically impacted by the current flow of HGVs, to the extent that road surfaces have broken up and also subsided into adjacent drainage ditches. This has become a hazard for road users with some residents reporting damage to their vehicles from unsafe surfaces and potholes. A few years ago, a company near Upton started directing HGVs through Glentworth on Kexby Road to access the B1398 and A15. This caused significant issues with the road surface of Kexby Road causing it to break up and subside. Subsequently, following our complaints, these HGVs were diverted away from the village by the company.

3. Climate crisis

The Parish Council seriously question whether in the context of the Climate Crisis approvals for the extraction of any hydrocarbons should be granted. The Parish Council would specifically point out in this context that the consultation material produced by the applicant is potentially misleading when taken with comments made by the applicant when they met with the Council on 2/11/22. In their information sent to households, the applicant makes reference to the need to 'boost the domestic supply of oil', due to the current energy crisis. However, when the applicant met with the Council they were specifically asked about the use of any oil extracted and said that this wasn't oil for fuel purposes. This development would make no impact on the need for domestic production or on the energy crisis; there is a question whether residents and others were misled by the information issued by the applicant and whether their consultation could be described as flawed.

Whilst we recognise that there is a fuel crisis currently, we question whether drilling for oil or gas should be supported given the climate crisis. The proposal runs contrary to the direction of travel set out at COP26 and the UK Governments own policy. It also appears to be at odds with the Lincolnshire County Council Green Masterplan, which we would remind the Committee states in the introduction:

Climate change is one of the biggest threats to our way of life and to all life on the planet. Human activity has caused harmful greenhouse gases to be released into the atmosphere that can trap heat and make the planet warmer. The rise in global temperatures caused by these gases has already lead to many negative impacts on our planet – such as sea level rise, habitat loss and more extreme weather events.

Given the potential risks to Lincolnshire of flooding caused by rises in sea levels not to mention the negative effects of climate change on agriculture, bearing in mind the scale of food production in the county, it would be perverse to grant consent to a development that would be contrary to the County Council's own stance on the Climate Crisis.

Mitigations

Notwithstanding the Parish Council's strong opposition to this application, we recognise that the Committee may be minded to grant consent to the principle. In the event that is the decision, we would urge the committee to require the applicant to find an alternate routes to the development site that do not pass through the village at all, for example the construction of a new, temporary site access road connecting directly to the A631.

In addition, recognising that even after development the volume of oil generated will mean a significant increase in the number of tanker HGV movements from what would then be 3 well-sites, that the applicant be required to create a pipeline to move the oil to a single collection point away from Glentworth village.

In the event that you grant consent without either of these requirements, we would request that the consent does not allow for operation 07:00 to 19:00 on weekdays and does not permit any weekend working, to provide residents with some respite.

We would also seek conditions attached to the consent that would require:

- Noise, vibration and pollution monitoring devices to be placed at locations in and around the village so that the impacts can be monitored 24/7;
- a commitment that any damage to the road surfaces, edges, verges etc is made safe during the development period and restored properly after the development phase at the applicant's expense;

Conclusions

The Parish Council, supported by many residents, believe that the scale, nature, extent and duration of the development proposed is out of proportion with the impact it will have on the village of Glentworth. The extent of this development with the vehicle movements, pollution, noise impacts, etc would be considered detrimental in an urban or industrial setting and is inappropriate for a small rural community, that will bear the effects of this for many, many years.

All of this would be the case regardless of the nature of the proposed development but the fact that it is for the purpose of extracting hydrocarbons, with the long-term damage to the planet and contrary to the County Council's own statements on climate change, leads us to the conclusion that the only reasonable option is for you to **REFUSE** consent.