

RYEDALE SITES LOCAL PLAN – MATTER 3

**PROPOSED HOUSING SITE OPTION REF. 116 – LAND AT MIDDLETON ROAD,
PICKERING**

BARRATT HOMES & DAVID WILSON HOMES

REPRESENTOR ID: 1064

INTRODUCTION

- 1.1 We write on behalf of our client Barratt Homes and David Wilson Homes (BDW) to provide further information in respect of the deliverability of their land interest at Middleton Road, Pickering, which we propose to be considered as a potential housing land allocation within the emerging Ryedale Plan Local Plan Sites Document.
- 1.2 The site was previously identified as a potential housing site allocation in the Local Plan Sites Consultation Document, published in October 2015. However, it has not been retained as a proposed housing allocation in the latest consultation document.
- 1.3 It is our considered opinion that the site can deliver a comprehensive development of market and affordable housing alongside a number of community benefits to meet the needs and aspirations of the local area over the plan period.
- 1.4 The development proposals are situated in a suitable and highly sustainable location in respect of existing settlement form and there are no technical or environmental (built and natural) constraints that would preclude the development of the site.
- 1.5 There are concerns associated with the deliverability of a number of the existing housing commitments which RDC are relying on to meet the District's identified market and affordable housing requirements.
- 1.6 It is our view that our client's Middleton Road, Pickering site should be allocated in order to meet the housing land supply and housing needs deficit created by the anticipated reduced level of housing which will be delivered from existing housing commitments.

EXISTING RESIDENTIAL COMMITMENTS – POLICY SD1

3.1 - What is the rationale for including existing commitments in Policy SD1? What is the justification for including the sites in Policy SD1 as opposed to allocating them?

- 2.1 This question is directed to Ryedale District Council (RDC) and accordingly we do not wish to comment at this stage.

3.2 How did the Council decide which residential commitments to include in Policy SD1? Are the sites shown on the Policies map as existing residential commitments up-to-date?

- 2.2 This question is directed to Ryedale District Council (RDC) and accordingly we do not wish to comment at this stage.

3.3 If a planning permission expires, is it still allocated for residential development for the remainder of the plan period?

- 2.3 Our clear position on this is that the site would not be allocated for development. If the permission is allowed to expire by the landowner, promoter or developer then the site cannot be considered deliverable for residential development. Likely on account of availability or achievability matters.
- 2.4 The landowner, promoter or developer usually have 3 years post permission to commence development following the granting of a full application, 3 years post permission to submit a reserved matters application following the granting of an outline application, or 2 years post permission to commence development following the approval of reserved matters.
- 2.5 Furthermore, the landowner, promoter or developer would have had the same period of time to seek to extend the timescales associated with the development of a site.
- 2.6 Consequently, where permissions have lapsed this is robust evidence to demonstrate the site is simply not deliverable.
- 2.7 In such circumstances, the site should be removed from RDC's housing land supply figures and should be replaced by truly deliverable residential development sites.

3.4 How would the Council assess a proposal for a revised or alternative development?

- 2.8 In such circumstances any new planning application submitted on such sites should be assessed against up to date and relevant local and national planning policy at that time.
- 2.9 However, given the implications associated with the ability of RDC to meet their identified market and affordable housing requirements, we believe that clear evidence should be submitted to the Council to demonstrate that the previous deliverability concerns could be overcome.
- 2.10 With particular regard to affordable housing delivery, the Council's 2016 Strategic Housing Market Assessment identifies a need to deliver 78 affordable homes a year across the District. However, the Council's latest Annual Monitoring Report identifies a persistent undersupply of affordable housing over a 4-year period when measured against this requirement. Evidence of which is provided in the table below taken from Page 30 of the Council's latest Annual Monitoring Report: -

| Year | Affordable Homes Completed & Available with RSL | Affordable Homes completed |
|---------|---|----------------------------|
| 2016/17 | 54 | 47 |
| 2015/16 | 30 | 53 |
| 2014/15 | 67 | 47 |
| 2013/14 | 40 | 60 |

- 2.11 It is therefore imperative that where existing commitments lapse, these should be replaced with truly deliverable residential development sites that can meet the identified market and affordable housing needs of the District.

3.5 Are all of the sites developable within the Plan period?

- 2.12 The Sites Local Plan includes two existing Gladman Developments planning consents located in Kirkbymoorside and Sherburn. Sites which have benefited from planning permission for some time and which show no signs of being developed at the point of writing this statement.

- 2.13 Land at Westfields, New Road/Kirkdale Lane, Kirkbymoorside was granted outline planning approval (Ref.13/01314/MOUT) for the following development on the 13th February 2014: -
- “Development of up to 225no. (Use Class C3) residential dwellings, the provision of expansion land to Kirkbymoorside Community Primary School (Use Class D1), landscape, open space, highway improvement works and associated works (site area 11.6ha)”.***
- 2.14 A reserved matters planning application was submitted to RDC in November 2017. However, the reserved matters planning application has been submitted by Gladman Developments and not a recognised housebuilder which confirms the longstanding concerns over the deliverability of this site.
- 2.15 Though we do not wish to speculate, we presume that the reserved matters application has been submitted to ensure that Gladman Development’s interest in the site does not legally lapse. As we know of no other schemes in the country where they themselves have delivered the homes which they have obtained outline planning approval for.
- 2.16 In any event, this will result in further delays to the delivery of new homes at the site. Firstly, due to the fact that should the application be approved it is still likely that another housing developer will need to apply for their own reserved matters approval to deliver their own preferred house types and housing mix. This would result in at least a further 6-month delay, but more realistically a delay of a further year to enable land negotiations to take place between Gladman Developments and the prospective housebuilder.
- 2.17 Whilst the risk that the site will never come forward for development is real, due to the delays associated with the site’s delivery identified above, there is also a case to be made that the whole of the development will not be delivered before the end of the Ryedale Local Plan Strategy plan period of 2027. Due to the site’s size, there would be one development/selling outlet delivering new homes at the site. It is therefore anticipated that the development will deliver a yield of at least 35 homes per annum, which would mean that subject to the delays to commencement of development identified above, the site would still have remaining dwelling capacity beyond 2027.
- 2.18 For the avoidance of any doubt, on account of the site’s planning and development history, we are of the clear view that there are substantial questions marks associated with whether the site will be delivered at all.
- 2.19 The same can also be said for the Gladman Developments site located at Manor Farm, High Street, Sherburn. The site was granted outline planning approval (Ref.14/01207/MOUT) by RDC for the following development on the 3rd November 2015: -
- “Demolition of 1 no. existing cow shed, erection of up to 73 no. residential dwellings (including up to 35% affordable housing), structural planting and landscaping, informal public open space, children’s play area, surface water attenuation, a vehicular access point from Sked Dale road and associated ancillary works (site area 3.16ha).”***
- 2.20 At the point of writing this statement no reserved matters application have been submitted to RDC in respect of the development. Nearly three years since the approval of the outline planning application. Whilst the outline planning application wont lapse until November 2018, the planning history of the site again raises serious question marks over the deliverability of the site. Indeed, we are not aware of any housebuilders who are actively seeking to deliver homes from the site.

- 2.21 It is anticipated that the application will have lapsed before the conclusion of the examination of the Ryedale Sites Local Plan. Accordingly, there are serious doubts associated with the delivery of 73 homes from the site.
- 2.22 The combined number of homes from the two sites equates to **298 homes** that RDC have included within their current housing delivery calculations, which we believe are unlikely to come forward.
- 2.23 Should, as currently envisaged, these sites not come forward for development then we are of the view that RDC should seek to allocate sites that are demonstrably more capable of delivery of housing in sustainable locations within the District in their place. Including BDW's site at Middleton Road, Pickering which could deliver 120 of the 298 homes within the next 5 years.
- 2.24 Relying on existing committed developments that do not provide certainty of delivery will result in the loss of the socio-economic benefits associated with the delivery of these homes, including the provision of **105 affordable homes**, which as identified in our response to Question 3.4 above, are of course in great need and demand in the District.
- 2.25 Furthermore, given that new planning applications would need to be submitted for the delivery of the reallocated 298 homes, this would mean that the Council would benefit from substantial Community Infrastructure Levy payments associated with the delivery of the new housing sites.
- 2.26 We believe the above evidence provides further justification for RDC to allocate BDW's site interest at Middleton Road, Pickering.

DELIVERABILITY OF BDW'S MIDDLETON ROAD, PICKERING SITE

- 3.1 For completeness, we consider it prudent to provide the Inspector with further information to confirm the deliverability of BDW's Middleton Road, Pickering site, a site which we believe should be allocated to deliver the identified shortfall of homes associated with the non-delivery of the two sites discussed in our answer to Question 3.5 above.
- 3.2 The Middleton Road, Pickering site covers 6.54 hectares and is located adjacent to the existing settlement area of Pickering. The site contains private agricultural fields and is bordered by existing hedgerow landscape features. The site is bound to the east by existing residential development, to the north and west by open fields and to the south by Middleton Road.
- 3.3 The Council's previous site assessment outlined within the 2015 consultation document identified that the site had the potential to deliver 117 homes and that: -
- “This site performs reasonably well through the SSM, but there are some sensitivities concerning the site. At its western extent a single strip field is part of the site submission. The field is part of a strip field complex, and its loss cannot be mitigated, and as such the developable area would be reduced. The development will not contribute to coalescence with Middleton directly, but development will be moving the edge of the town to the west, but landscaping could create a better edge to the town than which currently exists and soften its appearance. The site is also in the Ground Source Protection Zone 1, which means the use of Sustainable Drainage Systems will require careful consideration.”***
- 3.4 From a review of the latest consultation document it is clear that the site was not carried forward as a proposed housing allocation on account of the Council only needing to select two of the previously identified four potential housing sites to deliver the remaining housing

numbers prescribed to Pickering in the Ryedale Local Plan Strategy document. We provide a comparison of our client's site against the preferred housing allocation at Malton Road, Pickering (Ref. SD6) below.

- 3.5 As identified previously by the Council, BDW's Middleton Road, Pickering site is located within a sustainable location, with good access to local services and facilities, along with good public transport links. The site lies adjacent to the existing urbanised area of Pickering and its inclusion would only serve to reinforce the settlement's existing urban boundary.
- 3.6 With regards to access to services, Manual for Streets published in 2007 highlights that walking offers the greatest potential to replace short car trips, particularly those under 2km. The site is located approximately 1km to the west of Pickering town centre which contains a range of services and facilities, including a number of schools, supermarkets, doctors' surgeries and shops. The site is also located within walking distance of the existing employment area located at Westgate Carr Road, Pickering.
- 3.7 The site is well related to the road network and is accessible to public transport. There are a number of bus stops located in Middleton Road provide access to Pickering Town Centre and Helmsley. Connections to Malton and Whitby can be accessed via Pickering Town Centre.
- 3.8 With regards to the proposed development of the site, it is considered that the following key characteristics could be delivered at the site: -
- A size, layout and configuration capable of supporting a sustainable housing scheme of up to 120 homes providing the ability to meet a range of housing needs including market housing, affordable homes and bungalows.
 - The delivery of enhanced boundary landscaping in order to provide long term permanence to the settlement's boundary and alleviating any concerns associated with coalescence between Pickering and Middleton.
 - The delivery of a landscape and green infrastructure led development to enhance this important gateway to Pickering.
 - The delivery of a substantial areas of on-site public open space, located and designed to ensure that the site integrates with the wider open countryside surrounding the site.
 - The creation of SuDS features and to deliver robust drainage solutions, whilst helping to enhance the site's biodiversity value and reduce the visual impact of development.
 - In terms of design, the housing fronting onto Middleton Road will be designed to enable the existing townscape character to be maintained.
 - From a highways point of view, the following matters have been considered: -
 - The provision of vehicular access from Middleton Road is considered to be safe and acceptable in respect of the number of proposed homes to be delivered at the site;
 - Middleton Road appears to be partly 30mph (to the east) and partly 40mph (to the west) at the moment, the development would propose to reduce the speed limit to 30mph across the full frontage of the site in order to tie-in with the extension to the urban limits of the Town.
 - The subsequent visibility splay requirements should be circa 2.4m x 43m (based on a 30mph design speed), which appears to be comfortably achievable in both directions from a number of possible access positions (as the road is relatively straight).
 - Crook Lane to the west appears to be adopted highway, and therefore may also provide an emergency access route.
 - There may be some off-site mitigation to consider on the A170, but that shouldn't affect the formation of an access junction(s).

- 3.9 On account of the above, we consider that the proposed development of the site could achieve a high standard of design that protects and enhances the local area’s setting and character.
- 3.10 The evidence provided within this representation identifies that the Middleton Road, Pickering site would meet RDC’s site selection methodology criteria proposed to assess the appropriateness of housing sites. However, as identified above, the only reason that the site has been rejected as a housing allocation is associated with RDC believing that there are two more preferable housing land allocations available in Pickering.
- 3.11 Overall, we believe that the site can be considered a logical extension to the settlement area of Pickering, with the site having the potential to be designed in a manner which will enable it to be largely enclosed on all sides.
- 3.12 The site’s sustainable location and position within an identified growth area in the District combine to make the land a suitable housing allocation site.
- 3.13 We believe that the site can be considered as a ***Deliverable*** residential development site on account of: -
- ***Suitability*** - The site is located in a suitable location for residential development now and a sustainable development can be delivered at the site with pedestrian and cycle access to existing services, facilities and public transport. A suitable access can be provided from existing highways and there are no technical constraints (including drainage) which would preclude the development of the site for residential use.
 - ***Availability*** - The site is available for development now. The site is available for residential development as there are no legal or ownership constraints as BDW, a national housebuilder, have an interest in the site and by virtue of this and previous submissions are expressing an intention to develop the site for residential use.
 - ***Achievability*** - A viable housing development can be delivered on the site within the next 5 years. BDW are seeking to develop the site for residential use. Prior to the progression of development sites, they undertake a thorough marketing and economic viability assessment for each site, including an assessment of any site specific abnormal costs. The site is considered to be achievable for residential development now as there is a realistic prospect that the site can deliver new homes within the next 5 years.
- 3.14 The site can be considered a deliverable residential development site and its release would deliver substantial economic benefits in the form of new employment opportunities, expenditure from new residents in the local area and through the delivery of significant Community Infrastructure Levy payments. These benefits are identified in the table below: -

| Direct Impacts | Indirect Impacts | Wider Economic Effects |
|--|--|---|
| Capital Expenditure of £14.45m. | 54 Construction Jobs Per Annum of Build Programme. | Meeting the identified housing needs of Pickering and the wider Ryedale District area. |
| 39 Construction Jobs Per Annum of Build Programme. | New Homes Bonus of £1.1m & £183,600 additional Council Tax receipts per annum. | Supporting mixed communities by providing a variety of house types on-site, including the delivery of affordable housing. |

| | | |
|--|--|---|
| £19m GVA of Direct Employment over 4-year build period | New Retail and Leisure Expenditure of £2.83m each year, creating 17 new jobs and a first occupation retail expenditure of £660k. | Delivery of substantial financial contributions towards improvements to local facilities (including schools) through a Community Infrastructure Levy payment. |
|--|--|---|

- 3.15 Subject to the site’s allocation for residential use through the examination process, it is envisaged that a planning application could be prepared and submitted to RDC by spring 2019.
- 3.16 Taking into account the proposed submission date it is currently envisaged that first dwelling completions on the site will take place in the monitoring year 2019/20. Other than the delivery of the site’s initial access infrastructure there are no other major infrastructure works that need to take place prior to the commencement of delivery of new homes on the site. Accordingly, the development will commence within a year of the submission of the planning application.
- 3.17 Due to the site’s size, there would be one development/selling outlet delivering new homes at the site. It is therefore anticipated that the development will deliver a yield of at least 35 homes per annum. The table below provides the site’s cumulative dwelling delivery projection per annum.

| Year | No. of Homes Cumulatively |
|-----------|---------------------------|
| 2019/2020 | 20 |
| 2020/2021 | 55 |
| 2021/2022 | 90 |
| 2022/2023 | 120 |

- 3.18 Affordable housing and identified areas of public open space and landscape planting will be delivered commensurate with the progression of the development and made available for use at an agreed point with the Council.
- 3.19 The development proposals can therefore deliver significant benefits to Pickering within the first five-year period of the Local Plan, alongside making a significant contribution to the Council’s ongoing 5-year housing land supply requirements.
- 3.20 BDW’s Middleton Road, Pickering proposals will create a sustainable, high quality and accessible development which will provide significant social and economic benefits to Pickering and the wider Ryedale area.
- 3.21 The site can deliver a comprehensive development of market and affordable housing, alongside a number of community benefits to meet the needs and aspirations of the local area over the plan period.
- 3.22 Accordingly, it is our view that the site should be identified as a housing allocation in order to contribute to the potential shortfall of homes on account of deliverability concerns associated with the two existing residential commitments discussed in our response to Question 3.5 above.