

Mrs Jill Thompson
Forward Planning Manager
Forward Planning and Conservation
Ryedale District Council
Ryedale House
Malton
North Yorkshire
YO17 7HH

20th December 2017

Dear Jill,

RYEDALE PLAN – LOCAL PLAN SITES DOCUMENT - PUBLICATION VERSION – PREVIOUSLY PROPOSED HOUSING SITE OPTION REF. 116 – LAND AT MIDDLETON ROAD, PICKERING

We write on behalf of our clients Barratt Homes and David Wilson Homes (DWH) to provide Ryedale District Council (RDC) with 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.

The site was previously identified as a potential housing site allocation in the Local Plan Sites Consultation Document, published in October 2015. It has not been retained as a proposed housing allocation in the latest consultation document.

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.

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.

This letter provides evidence to establish the site's planning, sustainability and deliverability criteria.

PLANNING & SUSTAINABILITY CONTEXT

The 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.

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.”

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.

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.

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 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.

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.

The site is considered to be positioned in a sustainable location.

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).

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.

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.

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.

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.

DELIVERABILITY ASSESSMENT

In accordance with Footnote 11 of Paragraph 47 of the National Planning Policy Framework, 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 submission 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.

Deliverability Conclusion

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.

DELIVERY TIMESCALES

Subject to the Council's allocation of the site for residential use, it is envisaged that a planning application could be prepared and submitted to RDC by summer of 2018.

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.

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 that the Council can use within their housing trajectory.

Year	No. of Homes Cumulatively
2019/2020	35
2020/2021	70
2021/2022	105
2022/2023	120

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.

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.

SITE REF.SD6 – LAND TO THE WEST OF MALTON ROAD, PICKERING

BDW believe that the Middleton Road, Pickering site should be allocated in the place of proposed site SD6 due to the following deliverability concerns associated with the development of the site: -

- The western portion of the site is located in Flood Risk Zone 2 and thus BDW's site at Middleton Road, Pickering is sequentially preferable as it is holistically located in Flood Risk Zone 1.

- The Malton Road site would have a potential adverse impact on the principle gateway to Pickering in visual and landscape terms. Especially if the site's open space and green infrastructure is to be located within the site's western land parcels which are located in Flood Risk Zone 2.
- There could be difficulty locating SuDs features within the Flood Risk Zone 2 areas of the site, resulting in a reduction of the site's dwelling capacity and the need to allocate additional housing sites.
- There are potential cultural heritage concerns associated with views onto the Spire of the Church of St Peter and St Paul which would again potentially result in a reduction of the site's dwelling capacity and the need to allocate additional housing sites.
- At present we know of no direct interest from a housing developer. This would potentially have two impacts in respect of the site's delivery. The first being potential delays to delivery of approximately 18 months associated with the landowner seeking outline planning consent themselves, followed by land negotiations with a housebuilder and the subsequent need for the housebuilder to submit a reserved matters planning application to deliver their own preferred house types and housing mix. More seriously, the lack of developer interest could also be on account of the site not being considered deliverable by housebuilders at this stage.

On account of the above, BDW's Middleton Road, Pickering site therefore represents a more deliverable and sustainable residential development site than RDC's current proposed housing allocation Ref.SD6, Land West of Malton Road, Pickering.

DELIVERABILITY CONCERNS WITH EXISTING RESIDENTIAL COMMITMENTS

Whilst we acknowledge that RDC have sought to allocate additional housing sites to cater for the potential under-delivery of existing housing commitments within the District, the draft Sites Local Plan Document does not identify any concerns associated with the 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 letter.

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)”.

Whilst we are aware of a lack of developer appetite for the proposed development, including undertaking a number of appraisals ourselves for national developers, 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.

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.

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.

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.

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.

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).”

At the point of writing this letter no reserved matters application have been submitted to RDC in respect of the development. Over two 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 have never been contacted by any housebuilders with regards to appraising the site's planning and deliverability potential.

When combined the two sites equate to nearly 300 homes that RDC have included within their current housing delivery calculations. Should, as currently envisaged, these sites not come forward for delivery then we are of the view that their housing capacity should be re-located to other deliverable and sustainable development sites located within the District. Including BDW's site at Middleton Road, Pickering which could deliver 120 of the 300 homes within the next 5 years.

Without doing so the socio-economic benefits associated with the delivery of 300 homes will be lost. Including the provision of up to 105 affordable homes, which are of course in great need and demand in the District. Furthermore, given that new planning applications would need to be submitted for the delivery of the relocated 300 homes, this would mean that the Council would benefit from Community Infrastructure Levy payments associated with the delivery of the new housing sites.

We believe the above evidence provides further justification for RDC to allocate BDW's site interest at Middleton Road, Pickering.

FURTHER TECHNICAL WORK

Initial survey work undertaken by our client in respect of the site's development have not identified any issues that would adversely impact on the site's deliverability.

However, our clients would be willing to undertake further, more detailed, technical assessments as required in order to demonstrate that there are no technical constraints that would preclude the development of the site.

Subject to the site being identified as a draft housing allocation, our client would seek to be in a position to submit a planning application at the site by summer 2018. Accordingly, further detailed technical surveys including highways, drainage, ecology and ground investigation work could be undertaken within the next 6 months.

CONCLUSION

Based on the justification provided above it is considered that 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.

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.

The development proposals are situated in a **suitable** and highly sustainable location and there are no technical or environmental (built and natural) constraints that would preclude the development of the site. The site is **available** now as it is under the control of a national house builder who is actively seeking to secure the site's allocation for residential development. The site can also be considered **achievable** as new homes can be delivered on the site within the next 5 years.

It is our clear view that RDC should identify the Middleton Road, Pickering site as a draft housing allocation within future versions of the Ryedale Local Plan Sites Document in order to contribute to the potential shortfall of homes on account of deliverability concerns associated with Site Ref. SD6, Malton Road, Pickering and the two existing Gladman Development sites located in Kirkbymoorside and Sherburn.

We trust that the information provided will be taken into consideration in the preparation of the Submission Draft Ryedale Sites Local Plan and specifically the Council's decisions in respect of future housing allocations.

Should you need any further information or wish to discuss any of the points made in these representations further, please do not hesitate to contact me.

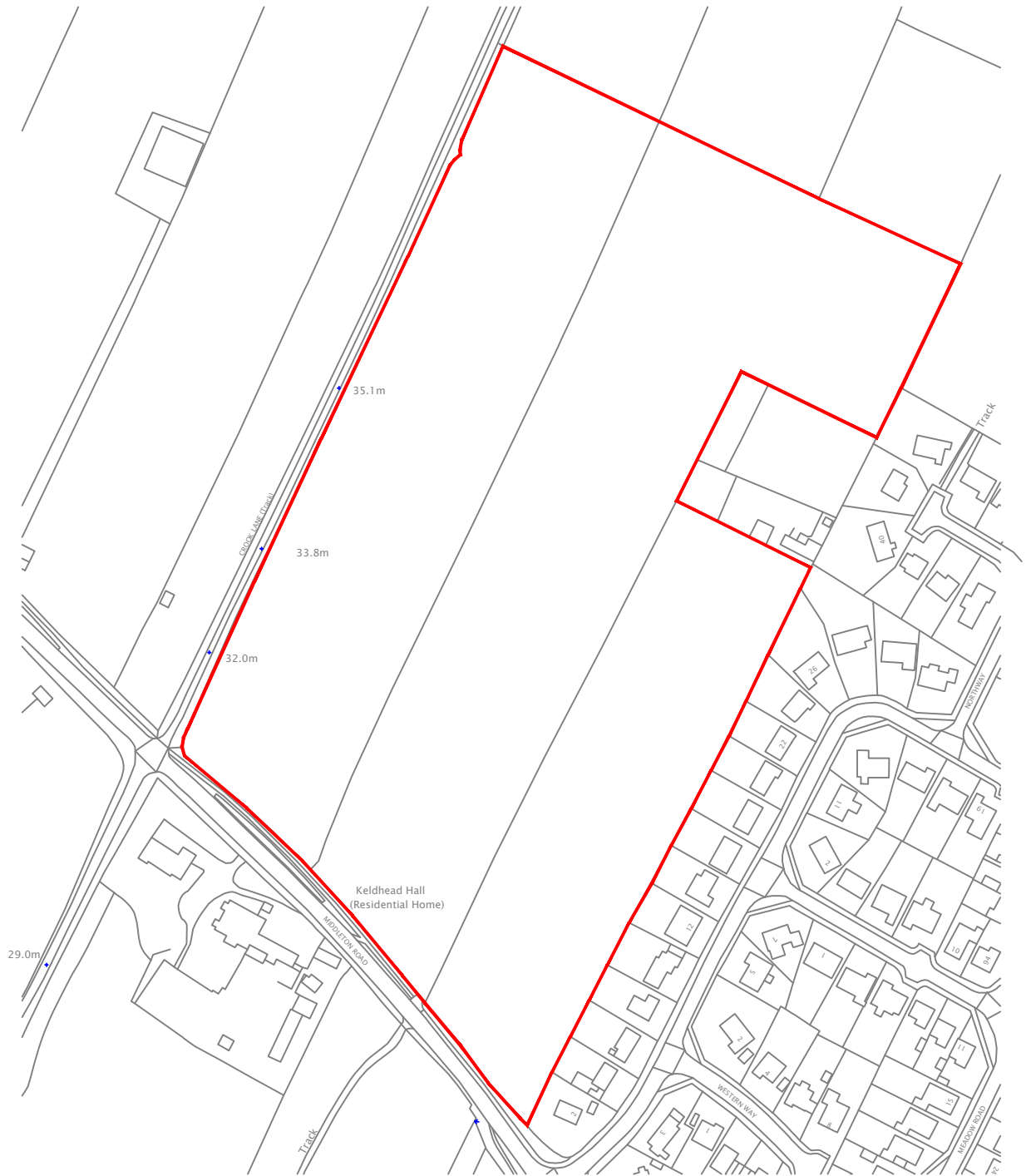
Yours sincerely



PAUL BUTLER

Director





Development :	MIDDLETON ROAD		Drawing Title:	OPTION PLAN	
Location:	PICKERING		Drawing Number:	-	Date Started: MAY '16
Marketing Name:	-		Revision:	-	Scale @ A4: 1:2500
			Drawn By:	SRA	Checked -



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