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December 19th 2017

Dear Ms. Thompson,

**Ryedale Local Plan Site Allocations: Response to Consultation.
Housing Site SD5; East of Whitby Road, Pickering**

On behalf of local residents who have expressed a number of concerns about this proposed allocation, I request that the accompanying paper be treated as a formal representation in respect of this site.

I can confirm also that corresponding representations are being made to your Development Management colleagues in response to the current planning application for this site (ref 17/01220/MFUL), submitted on behalf of David Wilson Homes. These follow the request to the Head of Planning Services that this application should not be granted pending the conclusion of the forthcoming EIP consideration of Site Allocations, as this would be prejudicial to the Local Plan process.

Please note my request for this representation to be considered through oral participation in the EIP.

Thank you in anticipation of your consideration of this submission.

Yours sincerely,

John Lynch

LAND EAST OF WHITBY ROAD, PICKERING

Site ref SD5

1. This representation is made on behalf of local residents, who have expressed concerns about this allocation, approved by the Council's Planning Committee in October 2017 and subsequently published for formal public consultation.

2 The relationship of the Site Allocations document to the 2013 Local Plan Strategy is acknowledged and the most recent review of the SHLAA and updating of the SHMA for Ryedale has been noted and taken into account. It is recognised that the allocation as proposed accords with the adopted settlement hierarchy and would help fulfil the identified housing need for the remainder of the Plan period.

3 However, whilst it is appreciated that questions of housing need and the monitoring of housing supply and delivery are outside the scope of the current consultation and therefore not for discussion at the forthcoming Examination in Public, it is relevant to the representation concerning this site to note that the stated housing need could conceivably be met without the total aggregate of proposed allocations being fully developed, in view of the potential margin for over-provision. Conversely, if this were not the case, it could be argued that if the projected allocated supply is based on assumptions about site capacity which may prove to be over-optimistic, the result could be a failure to meet the Strategic Plan requirement. The degree of dependence on large site allocations such as this therefore represents a risk to the fulfilment of the housing strategy

4 Based on the information in recent published reports, the Council's conclusion that the allocation of the site east of Whitby Road is appropriate, in full conformity with the Plan Strategy and necessary for its successful delivery is open to question. Also, it is considered that the application of the Site Selection Methodology has not been shown to be sufficiently rigorous to justify this scale of allocation at this site. Thus, it is yet to be demonstrated that the site is capable of being developed at the scale proposed, whilst complying with the provisos which are implicit in the Strategy and the development principles for site SD5 as listed in the published submission report. Whilst some matters can be resolved at a subsequent detailed design stage and secured by appropriate conditions and undertakings, there are fundamental issues which should be further explored before the allocation is confirmed.

Risk of flooding

5 Local residents have concerns about flood risk and drainage, based on events which have been experienced in Pickering. Although this site is in the Environment Agency's Flood Zone 1 which is the lowest risk in the locality, the potential impact of the development itself upon surface water outfall from the site needs to be fully considered. It is not yet established that a suitable sustainable drainage system, as required by the development principles will be feasible for an allocation of this scale, taking account of the site's topography and geology.

6 Site SD5 has a steep sloping profile, broadly rising from south to north, with a pronounced central valley, which is an overland flow route, identified by the Environment Agency as low to medium flood risk, but high flood risk close to the southern boundary of the site. This is borne out by local residents' experience. In wet periods, the southern part of this valley section is already prone to waterlogging, such that the gardens of existing houses which adjoin the southern boundary of the site are affected on occasions. This experience gives weight to local residents' concerns that an adequate sustainable drainage system for additional housing on the scale proposed will not be feasible. Thus, parts of the new development itself and existing houses in Corbie Way and Marshall Drive are likely to be put at risk from ground run-off and/or surcharge from existing sewers. As stated in the LP Strategy (para 2.16), the risks posed by climate change emphasise the need for greater resilience against flooding than previously recognised and this adds weight to local residents' concerns on this point.

7 This concern is reinforced by actual experience of flooding in the recently completed neighbouring Woodlands Park development, to the west of Whitby Road, with broadly level topography with apparently a lower risk than site SD5. It is understood that assurances about the provision of sustainable drainage provision on this development have not been satisfactorily met to date and that parts of the development have been adversely affected by excessive run-off, with, as yet, no satisfactory solution being achieved. It is also understood that, as a result, Yorkshire Water have not been prepared to adopt the installed drainage, despite continuing attempts by the developer to rectify the situation.

Highway / Transportation issues.

8 It can be expected that the single point of vehicular access to the site will experience periods of traffic congestion, given the level of traffic generation for a development of this size. Whitby Road itself is frequently congested at this point, with traffic queuing from the roundabout in the centre of town at busy periods. This is likely to be exacerbated by the additional traffic from site SD5, with potentially harmful deterioration in air quality in the immediate locality. This concern is highlighted in LP Strategy paragraphs 2.35 and 2.36 as a particular concern for market towns.

Other matters.

9 The 2013 LP Strategy identifies a number of challenges and priority concerns across the whole range of topics relating to sustainable communities, including social and community facilities, environmental protection and enhancement and combatting and adapting to the effects of climate change. These are expressed in turn through its wide-ranging policies, including a number which refer specifically to Pickering. The progressing of site allocations is identified as one of the principal means of delivering its ambitions and it follows that the proposal development allocation SD5, as one of the larger sites within the settlement hierarchy, should offer a means whereby this can be pursued.

10 It is therefore considered that the published LP Sites document does not appear to have given sufficient attention to the implementation of the strategic policies adopted for Ryedale. This is applicable to the impact of SD5 upon the wider area, as well as to the consideration of the form which the development itself might take and any immediate

impacts on the site itself and adjacent developments. In particular, the publication of Development Principles applicable to SD5, simply as a series of bullet points, is regarded as less than adequate for an allocation of this significance.

13 Without prejudice to the consideration of the suitability of the allocation, it is therefore considered that the Development Principles should be reinforced and the requirements for the development of the site made more explicit. This is particularly relevant to site drainage, as discussed in the preceding paragraphs, but also to the first such point *“a built form, layout and detailing that works with the contours and topography of the site”*. In addition, particular reference should be made to the need for a suitable landscape structure for the development, which incorporates and protects existing mature trees, in accordance with SP13, (Landscape), SP14 (Biodiversity) and SP15 (Green Infrastructure Networks).

14 The Development Principles should also be extended to include reference to requirements for housing mix and affordable housing, to give effect to SP3 and SP4 as well as SP17 (Air Quality) and SP18 (Renewable and Low Carbon Energy).

15 In short, it is considered that a comprehensive Planning Brief for the development of the site should be a pre-requisite of any decision to confirm this allocation and that this should be prepared as a Supplementary Planning Document (SPD) to ensure that it carries appropriate weight.

Conclusions

16 Full examination of the issues which have been highlighted, relating to the suitability of this site for large scale development is requested. Pending the outcome of this exercise, it is considered that the allocation should not be confirmed.

17 Without prejudice to the question of the suitability of SD5 for development, it is considered that the Development Principles listed should be reinforced, made explicit and extended in scope and incorporated into a comprehensive Planning Brief, which should have SPD status, to govern the form of development which may take place in conformity with and in fulfilment of the adopted LP Strategy.

18 The opportunity to participate in the forthcoming Examination in Public, to further pursue this representation, is formally requested.

John Lynch MRTPI

December 2017