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Statement Of Representation – 22/12/2017 – The Ryedale Plan

On Behalf Of Mr David Hume
 Manor Farm
 Amotherby
 YO17 6TG

Ryedale Local Plan Sites Document & Policies Map

We would wish you to take into account the following comments & queries in response to the above named consultation:

Mr Hume is the owner of site 635 Manor Farm, Amotherby.

1.) Objection to Site Selection Methodology & the non-selection of site 365.

- The owners object to the preference of the site 148 over their site 365 & believe it has not been treated equally in the preferred allocation.
- The owners naturally question why the site is not being considered favourably as a preferred site? 365 has the support of both the Parish Council & support to the principle of development from local residents (ref: Amotherby Parish Council Submission to RDC on LDF sites in Amotherby, Dec 2014 pg 14: Response from APC, Dec 2015 on sites consultation-Local Plan Sites Document & SSM page 6/7 consistently, in the past & currently.
- The capacity fits better with the size of the service village & the houses the village can reasonably accommodate (c.16% increase) & that residents support (Ref: APC Submission to RDC on LDF sites in Amotherby, Dec 2014, page 14: Response from APC, Dec 0215 on Sites Consultation-Local Plan Sites Document & SSM pg. 4, Pgs, 5-8 – Parish Plan Statistics & Comments)
- It clearly fulfils the adopted local plan strategy requirements for ‘limited small scale sites in, or adjacent to, current development limits’ (ref Local Plan Strategy page 53). It plainly provides for resident’s views & the criteria for a limited number of houses accessed directly from the B1257 & does not create parking issues within the village.
- There is a clear benefit to pedestrian safety from improved footpaths & minimal impact to the street scene & open countryside & ANOB in contrast to the current preferred selection of site 148.

- It has reduced impact compared to any other site in the village under consideration & fills a gap within the village along the B1257 between the existing Manor Farm & Eastfield council house development.
- Local Plan Sites Document, Amotherby & Swinton Background Paper pg.19 acknowledges this. It is the Parish Council's & the landowners view that it fulfils the Local Plan Strategy policy SP1 which states development "should be accommodated without detriment to the character of the settlement & its setting" & that it also complies with the Sustainability Appraisal & Strategic Environmental Assessment document para.6.5, pg.29 - "sites will be expected to be well-related in form & situation to the existing settlement".
- The site 365 has continued though the SSM accompanied by two planning applications (17/00645/MOUT which through the process has provided technical reports to clarify the sites ability to be developed, including Aboricultural, Ecology, Hydrology, Surface Water & Drainage, Contamination, Archaeology, Landscape & Visual Impact Assessment, Heritage Statement, Acoustic, Transport & Highway comments.
- The SSM table includes a number of inaccuracies about site 365 - amenity & deliverability & including Stage 2, Q. 1A - the distance to the school and because of the planning applications further information is available on Q3 highways Q.13 Heritage Q.25 Groundwater Q29 Noise Light & Smell
- Site 148 has known problems including non-single site ownership, running sand & non-quantified poor ground conditions.
- Site 148 has does not appear to have the clarity for deliverability & development already provided by site 365 & 365 has less impact recognised under professional & accepted British Standard methodology.
- The Parish Council & the site owner wish to challenge the Grouping Conclusions of the SSM which have placed site 365 in Group 2 and appear to have resulted in this site not being considered as a potential "preferred site". The perceived problem of "source protection zone vulnerability" is, in both the Parish Council's & the site owner's view, somewhat irrelevant. There are houses adjacent & opposite the site which do not appear to affect this, not to mention proven identified contaminated sites like the former Bentleys garage & the 365 site has had the benefit of a hydrology and contamination report.
- The site is available for immediate development & delivery of 20 homes with up to 8 no. affordable 2 bedroom houses for the local community. The advantages & lesser impact of site 365 outweigh that of those of Site 148, in the opinion of the landowner.

2.) Objections to Local Plan Sites Document, Amotherby & Swinton Background Paper

- This states on pg.17 that site 148 is in single ownership which is incorrect. Site 365 is in single ownership & agreement for development is simpler.
- In the conclusions, pg.29 states 'site 148 represents the best site...' In conjunction with the land owner of 365 & the Parish Council they would wish to challenge this & request that the whole SSM process is looked at again.

3.) Objection to Policy SD10, pg.16 Local Plan Sites Document—allocation of Site 148

- The landowner of site 365 & Amotherby Parish Council **OPPOSES Site 148** as the preferred site for the reasons below.
- According to the Parish Council they would only be willing to review this decision if there was certainty over a lesser number of houses being developed, although it does see benefits to this site in the form of access from the B1257, school car parking & play space.
- Their decision has been taken after much thought & discussion, taking into account the past (ref: APC Submission to RDC on LDF Sites in Amotherby, Dec 2014 pg.3, pg.13; Response from APC , Dec 2015 on Sites Consultation-Local Plan Sites Document & SSM pgs.5/6) & current views of residents.

Their reasons for their decision are as follows:-

- The site is too large. The indicated 40 houses (in SD2) would be an excessive increase (c.32%) in relation to the 123 currently in the village. The Sustainability Appraisal & Strategic Environmental Assessment document on pg.37 indicates a yield of 59 (c.50% increase). Either of these figures are contrary to Local Plan Strategy policy SP2 which states for Service Villages “Limited small-scale sites—“. In the Local Plan Sites Document, Amotherby & Swinton Background Paper pg.16 the size of the site relative to the existing village is acknowledged.
- There is the potential for a developer to increase the number of houses to 80+ (c.65% increase on existing village) on the grounds of covering the cost of building the road down the field & providing the indicated facilities (school parking & play area).
- Development of the site would extend the village westwards into open countryside towards Appleton-le-Street. This large chunk of development would be contrary to the character of what is a largely linear developed village. It is contrary to Local Plan Strategy policy SP1 which states development “should be accommodated without detriment to the character of the settlement & its setting”.
- If this site is developed there may be a need to extend the school (ref: Sustainability Appraisal & Strategic Environmental Assessment document pg.11; SSM Q). (ref.SSM). There is no guarantee that increased pupil numbers will come from the local area & this would increase the parking problem in the village.
- Whilst the proposed drop-off facility would potentially be of benefit to the village there is no guarantee that this would solve the parking and traffic congestion (unless the whole village had parking restrictions imposed). A school car-park is needed, not just a drop area.

4.) Policy SD2, pg.8 Local Plan Sites Document.

- In response to the Service Village Allocation having already been exceeded (ref: Local Plan Sites Document, appendix 2, pg.28) & the statement (ref: Local Plan Sites Document, Amotherby & Swinton Background Paper pg.7) that “the planned amount of housing established by the Local Plan Strategy for the Service Villages as a whole, has been met”, we believe this figure has been met quickly by land take up in service villages but does not mean it shouldn't be maintained with small infill sites of lower impact like 365.
- It must be pointed out that the spread across the villages does not appear to have been proportionate in allocating larger individual allocations & that a healthy housing supply could be maintained with a series of smaller more selective, proven sites. As far back as 2014 Swinton & Amotherby would only expect to accommodate about 30 houses between the two villages. Even if the currently preferred site 148 was to be included on a smaller scale, providing the solution for the school access & parking, that it appears to be currently preferred for, site 365 could still be accommodated in the service village allocation.

5.) Conclusion.

- This site, 365, through 4 years of extensive dialogue, revised applications, detailed reports & great cost, has worked hard to present no real issues or reason why, apart from a policy issue, that it could not be allocated & delivered quickly. The applicants are from the village & are builders who would develop themselves, employing local firms providing much needed smaller & generous affordable housing.
- Approximately 15 reports for site 365, including contamination, hydrology, surface water, flooding, drainage, transport, archaeology, visual impact assessment, ecology, trees and heritage impact assessments have all been done, to the positive. In summary then we feel there are no technical reasons to prevent the site being developed.
- Unusually, a point worth noting for the 365 site of this size outside the current development limits, is that there are no resident objections & the parish council support this development in principle, unlike the brownfield site or the preferred allocation site 148 on the edge of the village.
- They raise some valid points in their comments, many included in this submission. The site does not have as great an impact as the preferred site to the west edge of the village. It is surrounded by development within the village. The noise is no greater than that experienced by current residents from the road.
- The preferred site in the local plan does not appear to have provided any reports? Or to the level that we are aware, to compare to the application site, on equal terms? It will be faced with all the same uncertain issues that have been resolved on this site & its impact on the openness & area of outstanding natural beauty is undeniably greater & would be confirmed with a landscape & visual impact assessment.
- The question has been asked, is it not possible to develop both these sites with a reduction in site 148?
- Within the village there is no doubt that issues for the school & parking could be resolved with the preferred site developed in some capacity, but the parish council

suggest that the size is too great & the current 365 site fits the criteria better with 20 homes, if allocated.

- The application site presents a clean pair of heels & is further advanced & better presented to provide & maintain housing supply for the locality in Amotherby & its service village status. The site does compliment the draft local plan & therefore we believe that site 365 should be included in the allocation.
- The service village status of Amotherby & Swinton identifies the need for a reasonable allocation of housing & site 365 provides a viable & efficient solution to all the local plan criteria. It is recognised that service village allocation has been disproportionate in land take up but despite base figures being met under the local plan & the residual amounts of land, the extent of the base figure of 3,000 units +20% has not been fully taken up & settlement sizes in settlement villages for the 300 units + 20% buffer is flexible & in the individual case of site 365, could provide a proportionate low impact infill either individually, or in conjunction with other sites to maintain a healthy housing supply.