

29 Marshall Drive
Pickering
YO18 7JT

22nd December 2017

Jill Thompson
Specialist (Place) Team
Ryedale District Council
Ryedale House
Old Malton Road
Malton
North Yorkshire, YO17 7HH

Dear Ms Thompson,

Re: Ryedale Local Plan Site Allocations Consultation 2017

I wish to submit a number of comments and concerns related to site allocation SD5 (formerly site 347) Land East of Whitby Road, Pickering.

Strategic Sites

Section 3.8 of the LP promotes the importance of developing “small to medium sized sites... as opposed to relying on the delivery of one or more strategic sites... Ryedale is not dependent on strategic sites”. Site SD5 fails to meet this important objective and reflects the many downsides of large sites as highlighted in the LP.

Housing Yield

The indicative housing yield of 250 homes (30hph) does not take into account that the site, due to topography cannot be fully developed/would not be developed in order to comply with landscaping conditions and drainage mitigation. Approximately a quarter of the site will not be built upon therefore the yield has been significantly over estimated. If the site were to yield 250 homes, on the six hectares that can be developed, then the housing density would be in excess of 40hph – this is far too dense for a development on the edge of a small market town.

In relation to S1.1 of the LP no associated plans have been published which show how the town’s already overstretched infrastructure (transport and services) would be developed to cope with the 10% population increase resulting from the influx of new residents.

Site Selection Methodology

The site selection methodology does not appear to have been applied in a rigorous or robust manner.

Q1A

Whilst there is a bus stop within 5 minute walk of part of the site, that bus stop does not provide access to buses on the main commuting routes. The nearest bus stop for meaningful bus services can be found on Eastgate. As such, the applied score should be (-).

The “Nearest Commercial Limit” has also been miscalculated and a more appropriate scoring would be (+) at most.

The “Nearest Employment Area” has also been optimistically scored and should be regraded (+).

It would be essential to maintain a very brisk pace to get to The “Nearest Doctors Surgery” within 10 minutes. The score should be regraded (-).

Q2 Overall Flood Risk Assessment

The submitted FRA has identified a “High Flood Risk at the southern edge of the boundary”. The score should reflect this (-)

Q3

With only a single access road, bringing all traffic – foot, cycle, car, service vehicles – to a single junction/crossing point, this site has multiple highways issues which would need to be mitigated. Until the Highways Agency has responded formally, the applied scoring is dangerously optimistic. As such, the score should be adjusted to (--)

G Overall Rating

Almost a quarter of the site will be unable to support built structures. The score should reflect this (-).

Q25

The developer has failed to provide appropriate mitigation at the neighbouring site.

Q29

As a large site and considering the release phasing, the site, should it be developed will be a long term project. The significant and long term nuisance to the neighbouring cemetery and for residents living on the site borders will be sustained for a number of years. Special conditions must be rigorously applied and enforced to ensure that nuisance is minimised. The score should reflect this (-).

Q30

The proximity to existing residential properties and the proposed density will lead to loss of privacy and light for existing residents. Whilst it may be possible to minimise this loss of amenity, the effects are unlikely to be avoided completely.

Workings at the farm buildings to the eastern border of the site will contribute a noise and odour nuisance to new residents. The score should reflect this (-).

I Overall Rating for Amenity

The score should reflect the above points and be downgraded to (-)

Q32

The score here does not reflect the summary – further investigation is required and the score should reflect this (-).

J Overall Rating for Flood Risk

Noting the point above, the score should drop to (-).

Q36

The site is farmland of the highest grade, no alternative is proposed (-).

Q38

With just a single access road to the site – in the North East corner of the site – it is unlikely that a safe cycleway and footpath/junction can be created. Furthermore, anyone living in the south and eastern reaches of the site would be unlikely to walk/cycle to access local services – this will promote use of cars for short trips/school runs etc. The score should reflect this (-).

Q46

The single site access emerges onto a sweeping bend on a heavy traffic road with an excess speed problem. It is unlikely that the inherent dangers therein cannot be mitigated and risk to life will be inevitable. (--).

Q47

At the proposed housing density levels it is unlikely that the site will provide appropriate accommodation. One need only look at the developers existing Woodlands Park estate to see this demonstrated. (-)

Conclusion

It is my view that the Council has not demonstrated how this site - with all the problems illustrated - has become one of only two preferred sites for residential development within the town. Many of the site scores appear to be optimistic and/or based on little more than a wing and a prayer. The Council needs to justify the conclusion that SD5 is indeed 'Suitable for Development'.

The sheer size of the site means that the site fails to meet primary Local Plan objectives and, fails to meet the government strategy to promote the use of brownfield sites and, the development of smaller sites by smaller developers.

I'm aware that a planning application has already been submitted by David Wilson Homes to develop this site. However, the application relies heavily on site SD5 being adopted into the Local Plan next summer. As such, the application should not be granted in advance of the EIP and the Inspectors report.

As a closing point, please note that I wish to participate in the forthcoming Examination in Public. I will be pleased to represent the views of local residents in my role as Chairman of the Heatherside (Pickering) Residents Association.

Yours faithfully,

Paul Littlewood