

Keigar Homes Ltd.

**Development of land at Wrawby for residential
development.
Applefields, phase 2.**

**Integrated Planning and Design and Access
Statement**

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Contents

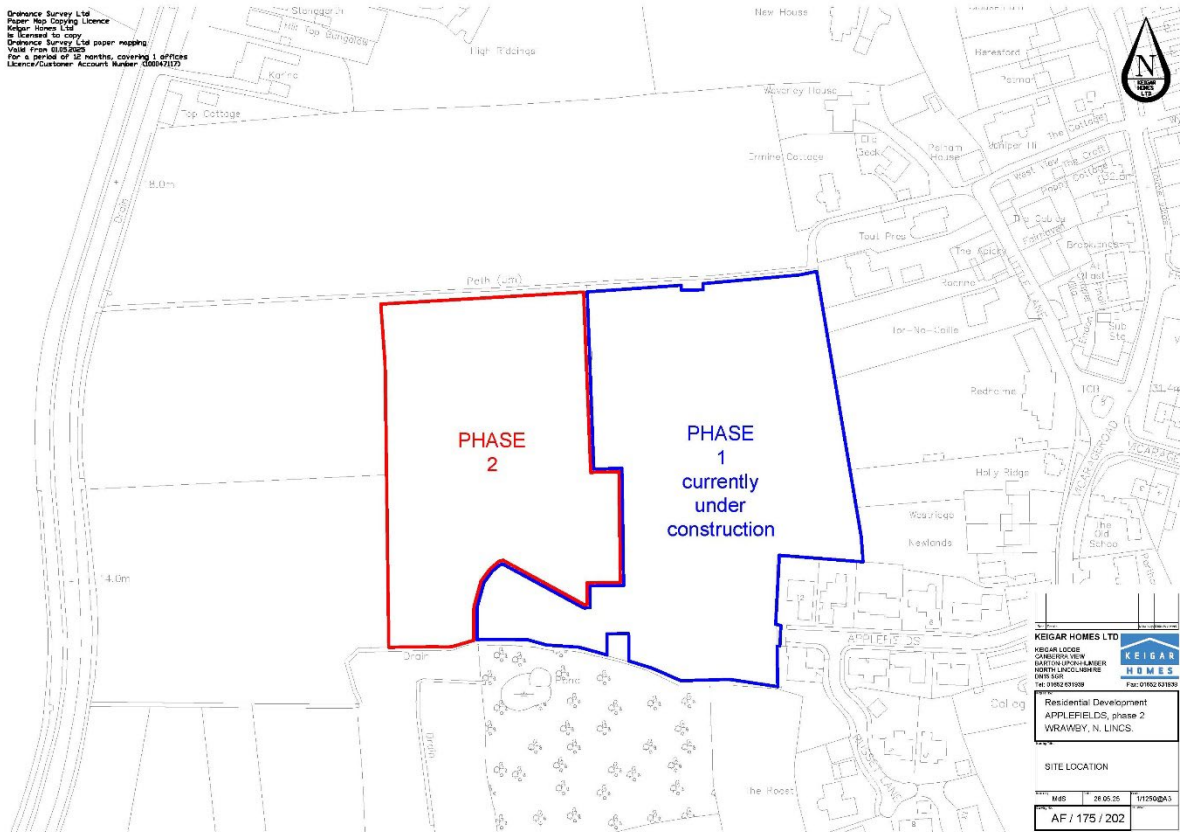
1. Introduction
2. Location
3. The Site
4. The Proposed Development – Design and Access
5. Planning Policies
6. Evaluation
7. Summary and Planning Balance

1.0 INTRODUCTION

- 1.1 This supporting statement has been prepared on behalf of Keigar Homes and relates to a full planning application for the erection of 23 dwellings and associated infrastructure at Applefields, Wrawby. It will comprise phase 2 of the residential development currently being constructed by the applicant, Keigar Homes at Applefields.
- 1.2 The report will identify the location of the site and describe its main characteristics. It will assess Wrawby as a suitable strategic location for new housing against current national and local planning policy. It will consider the suitability of the site in terms of its individual planning merits, including access to services and the efficient and effective use of land. It will consider how the site relates to its surroundings and assess any possible landscape and visual impacts arising from the proposed development.

2.0 LOCATION

- 2.1 Wrawby is situated in the east of the District on the A 18 some 1.5 miles north-east of the market town of Brigg. It lies close to the M180 which provides easy access west to Scunthorpe and east to the major employment area of the South Humber Bank and to the town of Grimsby. The major regional city of Hull is within easy striking distance over the Humber Bridge. It is well served by bus services to the nearby town of Brigg with its range of services and facilities as well as to Scunthorpe and Barton upon Humber.
- 2.2 The village had a population of 1,525 at the 2021 census. It has a strong sense of community with a good range of facilities including a primary school, the 12th century Church of St. Mary, a village hall, playing fields, a public house, a farm shop and a vehicle repair and car sales garage.
- 2.3 The site is situated on the west side of the village between the main built form of the village and the B1206 road to Elsham. It will form a further extension of Applefields.



3.0 THE SITE

3.1 The site mainly comprises a very gently sloping area of open land extending to some 1.3 hectares [3.2 acres] in area. It forms part of two fields of unimproved grassland divided by a low hedge. The fields extend westwards from the site to a strip of relatively mature woodland alongside the B1206 road. The woodland wraps round the southern boundary, whilst another field to the north divides the site from a group of houses. An accessible public right of way extends down the length of the northern boundary from Little Lane and the village westwards into the countryside. The site lies immediately to the west of the new housing currently being developed by the applicant, Keigar Homes.

3.2 The site is neither situated in an area of special control, nor protected by a development plan designation and there are no known constraints. The applicants, Keigar Homes are contracted to purchase the site on the grant of planning permission, and it will be immediately available for development as a continuation of the current phase development.

4.0 THE PROPOSED DEVELOPMENT – Design and Access.

The development

4.1 The proposed development is effectively the second phase of the “Applefields” housing site currently being developed by the applicants, Keigar Homes under references [outline]

PA/2017/674 and [reserved matters] PA/2022/1307. The intention is to provide a range of housing types whilst responding to a perceived local need for single storey bedroom accommodation. It is proposed to erect 23 dwellings with a mix of detached dwelling types consisting of 3 X 2 bed detached bungalows, 4 X 4 bed detached chalet bungalows, 4 X 3 bed detached houses, 4 X 4 bed detached houses, 8 X 5 bed detached houses and 11 detached garages. An off-site contribution will be made towards the provision of affordable housing.

- 4.2 In designing the layout and built form of the new development the applicants have endeavoured to follow the advice within paragraph 131 of the Framework which, in emphasising the importance the government attaches to good design, it remarks that *“Good design is a key element of sustainable development, creates better places to live and work and helps make development acceptable to communities”*.
- 4.3 In this instance, the scale, layout and built form of development is dictated by the physical characteristics and dimensions of the site and its relationship to the form and appearance of the phase 1 development. Accordingly, the main estate road is to be an extension of the road network currently under construction for phase 1. Surface and foul water drainage will connect to the phase 1 service arrangements and the existing surface water attenuation pond and the small area of public open space around it will be extended.
- 4.4 The design of the dwellings will be of a traditional form with a mixed palette of materials to harmonise with phase one development. Dwellings will be constructed of facing bricks under pantile or slate tiled roofs. Both the shared and individual private driveways will be of permeable paving.
- 4.5 Extensive landscaping is proposed including the planting of 33 new trees, the establishment of new sections of hedgerow, shrub planting. Ecology features will include the provision of bat boxes, bird boxes and hedgehog highways.



Technical Considerations

4.6 A wide range of investigations have been undertaken to ensure that the site is capable of being developed as proposed. The following reports are submitted separately in support of the application:

- Site Investigation: Phase 1 and 2 reports.
- Flood Risk Assessment.
- Archaeological Briefing Note.
- Ecology report and BNG Assessment.

4.7 The reports do not reveal any issues which might restrict development of the site or cause environmental harm or loss of amenity. On the contrary, they demonstrate that the site is capable of being developed in a satisfactory and beneficial manner.

5.0 PLANNING POLICIES

5.1 The purpose of this section is to consider the suitability of Wrawby in general and the site in particular, as a location for new housing in the light of national and local planning policies.

National Policy

5.2 National planning policy is set out in the National Planning Policy Framework [the Framework] and the National Planning Policy Guidance [NPPG]. The Framework was revised in December 2024 and slightly amended again in February, 2025 and provides guidance as a material consideration in the determination of planning applications. The revisions make significant policy changes that reflect the Government's stated ambition to greatly increase the delivery of new housing. The changes provide a strong incentive for local authorities to keep their local plans up to date and thus avoid the need to continually demonstrate a five-year supply of housing land. This is important because if a local authority cannot demonstrate a five-year housing land supply, then in the process of decision making, there is a presumption in favour of sustainable development.

5.3 **Chapter 2, Achieving Sustainable Development;** introduces a significant change with regard to the test relating to the "presumption" or so called "tilted balance". Policy 11 states that "Plans and decisions should apply a presumption in favour of sustainable development". With regard to decision making, Policy 11[d] now state that:

[i] where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date [8], granting permission unless:

the application of policies in this Framework that protect areas or assets of particular importance [7] provides a strong reason for refusing the development proposed; or

[ii] any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination [9].

5.4 In policy 11[d][i] the test of providing a "clear reason for refusal" is replaced by what is arguably the less severe test of providing a "strong" reason for refusal. This appears to be a deliberate change which arguably gives greater weight to the "presumption in favour" in the face of potential conflict with the policies in question, although no doubt it will be subject of debate in the courts. The new text of Policy 11[d]ii requires decision makers to have "particular regard" to a list of significant "key policies" against which any adverse impacts must be assessed. The balance seems to be tilted in favour of development in sustainable locations that generally meet these key policy objectives.

Footnote 7 explains that the policies referred to are those specified in the Framework relating generally to ecological, landscape, archaeological and heritage matters.

Footnote 8 makes clear that in the case of applications for the provision of housing, the advice in policy 11[d] include situations where a local planning authority cannot demonstrate an adequate supply of deliverable housing sites etc.

Footnote 9 explains that in policy 11[d][ii] the policies referred to are those “key” ones specified in the footnote.

5.5 **Chapter 3 – Plan making;** points out that *“the planning system must be plan led”*. To be effective it is clearly necessary for development plans to be up to date. This is emphasised at paragraph 34 which states that *“Policies in local plans and development strategies should be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary”* and earlier *“if local housing need is expected to change significantly in the near future”*. As reported to Cabinet on the 17th March 2025, the most recent changes to the NPPF have had a *“profound impact”* on the work of delivering a Local Plan to replace North Lincolnshire Council’s outdated development plan documents. The report explained that the current Local Development Scheme [LDS] would now need revising in light of recent Government *“planning reform amendments”*.

5.6 **Chapter 5 – Delivering a sufficient supply of homes;** emphasises the Government’s aim to *“significantly boost the supply of homes”*. Paragraph 78 requires local planning authorities to *“identify and maintain a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing land against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old”*. North Lincolnshire does not have an adopted plan less than five years old.

5.7 The updated NPPF introduced a very significant change to the standard method, or mechanism, which identifies the minimum number of houses a local authority should plan for. It is clear that the new approach will significantly increase the need for new homes in North Lincolnshire. Indeed, a report to the Cabinet meeting of the 17th March 2025 noted that the annual housing requirement for NLC is increased from 393 to 637 and that *“this new figure requires the Local Plan to deliver a 62% increase in the number of houses allocated in the plan period”*! Since then, a revised five-year housing land report was issued for the period April 2024 to 31st March 2029. With the addition of a 5% buffer this calculated that the housing requirement over the five-year period was 3,344 dwellings, equating to 669 [668.8] dwellings per annum and thus, that North Lincolnshire has a 5-years and one month supply of housing land. However, the surplus of only one month above the 5-year figure is equal to a mere 45 dwellings and with so little room for manoeuvre, clearly leaves the report open to question. Indeed, The

Council's position has recently been successfully challenged at appeal [Ref: APP/Y2003/W/24/3352581] and it is understood that the Council now accepts that it does not have a 5-year supply of housing land.

5.8 **Footnote 9 policies** – relating to policy 11 [d] [ii]]. Those that are relevant are as follows:

- * Policy 66 – In the case of major development a mix of affordable housing should meet identified local need.
- * Policy 84 – the development of isolated homes in the countryside should generally be avoided. It should be noted that policy 84 should be considered alongside policies 82 and 83 which support sustainable development in rural areas, particularly where it would provide opportunities “*for villages to grow and thrive*” and help support local services.
- * Policy 110 – the planning system should manage patterns of growth in support of sustainable transport objectives so that significant development should be focused on locations which are or can be made sustainable.
- * Policy 115 – development should be designed to provide safe and suitable access, offer well designed streets and parking areas etc and generally have regard to sustainable transport modes and significant impact on the transport network.
- * Policy 129 – advises that development should make the most efficient use of land.
- * Policies 135 and 139 – expand on the general aim of chapter 12 to achieve well-designed places.

The Development Plan.

5.9 The underlying thread within the NPPF that there should be a presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision-making. However, it is critically important that the development plan should be up-to-date and in this instance, it is clear that, with regard to key policies, it is not. This is particularly significant with regard to the provision of housing. However, it remains necessary to examine the relevance of the current development plan, which, it is understood, comprises three parts, being the policies of the 2003 Local Plan saved by direction of the Secretary of State in 2007, the Core Strategy adopted in 2011 and the Housing and Employment Land Allocations DPD adopted in 2016 [HELAP].

2003 Local Plan

- 5.10 Saved Policy RD2 restricts development in the open countryside, other than in exceptional circumstances. This policy has largely been overtaken by policies in subsequent plans which address the same issue. [see para 13 of appeal decision APP/Y2003/W/16/3159191 {the Winterton appeal}].

2011 Core Strategy

- 5.11 **Policy CS1: Spatial Strategy for North Lincolnshire;** explains that in delivering future development the spatial strategy will focus primarily on the renaissance of Scunthorpe whilst also supporting the district's market towns and rural communities/settlements. The explanatory text [paras 5.45 -5-48] provides a settlement hierarchy which is divided into four parts: firstly Scunthorpe, secondly the [six] Market Towns, thirdly Rural Settlements and lastly Rural Settlements in the Countryside. The first bullet point of section c] of the policy states that: "*Rural settlements will be supported as thriving sustainable communities with a strong focus on retaining and enhancing existing local services to meet local needs. Development should be limited and should take into account levels of local service provision, infrastructure capacity and accessibility. Any development that takes place should be in keeping with the character and nature of the settlement*". The policy also supports the development of the key South Humber Bank and Sandtoft Airfield employment sites which is significant with regard to the proximity of settlements in the eastern part of the district.
- 5.12 **Policy CS2: Delivering More Sustainable Development;** explains how Policy CS1 is to be delivered through a sequential approach to how future development needs will be met. The first priority is to direct development to previously developed land, principally in Scunthorpe, followed by the Market Towns and finally to Rural Settlements. The policy states that development outside defined settlement limits will be restricted. The policy states that all future development in North Lincolnshire will be required to contribute towards achieving sustainable development by meeting a specified range of criteria with which it the proposed development is considered to be generally compliant.
- 5.13 **Policy CS3: Development Limits;** states that development limits will be applied to Scunthorpe, the Market Towns and Rural Settlements. This policy is largely aimed at the preparation of subsequent development documents and thus has been overtaken by the HELAP.
- 5.14 **Policy CS7: Overall Housing Provision;** sets out the housing requirement for the Plan period and in this respect, is clearly out of date. However, the policy also recognises the need to maintain a 5-year supply of housing land and thus accords with current national planning policy.
- 5.15 **Policy CS8: Spatial Distribution of Housing Sites,** states that 82% of new housing should be at Scunthorpe with a further 18% distributed to the Market Towns. New housing will be permitted in Rural Settlements which will "create opportunities for small scale infilling development that maintains the viability of the settlement and meets identified local needs without increasing the need to travel".

- 5.16 **Policy CS9: Affordable Housing;** sets a target of 20% affordable housing in Scunthorpe and the Market Towns and 10% in Rural Settlements.

2016 Housing and Employment Land Allocations DPD [HELAP].

- 5.17 **Policy PS1** sets out a presumption in favour of sustainable development in similar terms to paragraph 14 of the Framework. [less the footnotes]
- 5.18 Policy **H1** states that the delivery of land for housing will be phased to ensure that North Lincolnshire has a continuous five-year supply of sites. The DPD includes a schedule of allocated sites which would no longer be adequate to meet current need.
- 5.19 Development limits under Core Strategy Policy CS3 were defined.

A New Local Plan

- 5.20 A new Local Plan had been in the course of preparation for some considerable time before, on the 4th October 2024, the Council withdrew it from Examination. As recently as the 10th March 2025 the Council issued a revised timetable and programme for the preparation of a single new Local Plan which it is intended to submit for Examination in Public in Spring 2026. A call for sites has very recently been issued.

6.0 EVALUATION

Main Issues

- 6.1 The main issues are considered to be:
- * Whether the proposed development is compliant with the development plan having regard to other material considerations and in particular the NPPF; and
 - * The effect of the proposed development on the character and appearance of the area

Planning policy considerations

- 6.2 Planning law requires that applications for development are determined in accordance with the development plan unless material considerations indicate otherwise. The NPPF is a material consideration. North Lincolnshire does not have an up-to-date development plan. The Core Strategy is the most recent strategic District-wide development plan but was adopted as long as fourteen years ago in 2011. The most recent land allocations plan is the HELAP which dates back nine years to 2016.
- 6.3 Paragraph 11 [d] of the Framework is clear that in the absence of relevant development plan policies, or where the policies which are the most important for determining the application are out of date, planning permission should generally be granted. It should only be refused if the application of protective policies within the Framework would provide “*strong*” reasons for refusal or any adverse impacts of doing so would override

the benefits when assessed against policies in the Framework as a whole, having particular regard to a number of key policies within it. Policy 11[d][ii] is particularly relevant as the application is almost wholly compliant with the key policies to which decision makers should pay “*particular regard*”.

- 6.4 Footnote 8 provides a key point of clarification in explaining that, in the case of proposals for the provision of housing, those policies most important for determining an application include situations where an authority cannot demonstrate a 5-year supply of deliverable housing sites. Following a recent planning appeal decision [Ref: APP/Y2003/W/24/3352581] it is apparent that North Lincolnshire Council is unable to demonstrate a five-years supply of housing land. Consequently, those policies of the development plan that are most important for determining an application for proposed new housing must be considered to be out of date. The question of what is meant by the phrase “out of date” has been the subject of much legal debate. With the Suffolk Coastal v Hopkins Homes case having been overtaken by revisions to the Framework, the Court of Appeal handed down a judgement in the case of Peel Holdings v S & S and Anor which is helpful in remarking that “*policies are out of date for the purposes of para. 11d of the NPPF if they have been overtaken by things that have happened since the plan was adopted, either on the ground or through a change in national policy, or for some other reason*”.
- 6.5 Clearly, much has changed since the various documents that comprise the development plan were adopted. For example, most of the housing allocations have been developed, or are in the process of development, so it naturally follows that very much more land needs to be released to meet the need for new housing. In this scenario, it is clear that policies such as Core Strategy CS3, which impose development limits, must be regarded as out of date. Indeed, Inspector Ware summed up the matter admirably in allowing the Winterton appeal referred to earlier, remarking at paragraph 5.10 that “*The restriction of development to land within the development limits, if strictly applied would mean that the authority could not address the need for housing*”.
- 6.6 In brief summary of planning policy, the absence of a five-year supply of deliverable housing land demonstrates that, with regard to relevant policies for new housing, the development plan is out of date. Consequently, in the absence of any adverse impacts sufficient to override the clear benefits, including compliance with “*key policies*”, planning permission should be granted.

Location

- 6.7 Notwithstanding the overriding policy conclusion that relevant policies of the development plan are out of date, it is arguable that the 2011 Core Strategy is helpful in providing a strategic overview of the land-use characteristics of the district. In this regard the strategy of the Core Strategy is generally consistent with the NPPF in that it

seeks to focus new development on the largest settlements and protect the countryside. Policy CS1 sets out a spatial strategy which, amongst other matters, provides that *Rural Settlements* such as Wrawby, will be supported as thriving rural communities with a focus on retaining and enhancing local services to meet local needs. In other words, limited development is encouraged subject to accessibility, the capacity of infrastructure and the level of local services. Whilst not allocating specific numbers to Rural Settlements, it is clear that the policy directs that they should accommodate a degree of housing development. This is confirmed through Policy CS2 which sets out a sequential approach to development in which Rural Settlements comprise the third tier.

- 6.8 In this context the key importance attached in Policy 11 of the Framework to directing development to sustainable locations is particularly relevant. Wrawby is clearly identified in development plan documents as a sustainable settlement where a degree of residential development is encouraged. The committee report into the adjoining phase 1 site [Ref. PA/2017/674] referred to Wrawby *“as being one of the more sustainable rural settlements due to its level of services and accessibility”*.
- 6.9 Accessibility to services and facilities is a key aspect of sustainability in relation to both the social and environmental dimensions of the Framework and the development plan. Paragraph 5.61 of the Core Strategy states that accessibility is *“a key consideration to ensure sustainability. As such development should be located where it is readily accessible by sustainable forms of transport including public transport, walking and cycling and where the need for travel is minimized.”* Whilst Wrawby itself is a vibrant settlement with a substantial number of services and facilities, the market town of Brigg, with its wide range of shops, schools, restaurants, pubs and employment facilities, is only one and a half miles away and easily reached by means of a good bus service or by cycle.
- 6.10 The application site lies outside the Core Strategy policy CS3 settlement boundary for Wrawby as further defined in the HELAP. However, as explained earlier, policy CS3 must be regarded as out of date, so the question in this instance, is how well does the proposed development relate to the structure and character of the village framework. Wrawby is a substantial settlement and in this context the erection of a further 23 dwellings as an extension of the current development will not be out of keeping with the either the structure or character of the village.
- 6.11 From a locational point of view, the key issue is that Wrawby is a sustainable settlement identified in the Core Strategy as one to which a degree of new housing is to be directed and that the site is well situated in relation to the structure and character of the settlement. It also is relevant that the development boundary has already been breached through the approval of phase 1 of this development project. With regard to that planning application, the committee report concluded that *“the proposal is considered to constitute sustainable development which would make an important*

contribution to meeting a proven shortfall in the provision of housing land within North Lincolnshire". The same is equally true of the present proposal!

Character and appearance

- 6.12 Paragraph 187 b) of the NPPF advises that the intrinsic character and beauty of the countryside should be recognised in decision taking. In this instance, whilst the site is not unpleasant in appearance, it has little intrinsic landscape or amenity value in itself. It is not within a nationally or regionally designated area of countryside whilst nor could it be regarded as a "valued landscape".
- 6.13 The site, which is 1.3ha in extent, comprises two fields of unimproved grassland divided by a low hedge. It is located on the western edge of the village. Relatively mature trees and hedges wrap round the southern boundary of the site and beyond to the B1206 road. Although visible close at hand, the site is not easily visible in longer distance views and whilst the proposed development would result in a visible loss of countryside, the partial enclosure and proximity of existing housing would significantly minimise the adverse effect of development.
- 6.14 The site has little landscape value and the harm caused by the loss of countryside will be low. Furthermore, that harm will be mitigated through the proposed planting of a significant number of trees, shrubs and sections of hedgerow.
- 6.15 The general aim is to make effective and efficient use of the site and to create a well designed and attractive sense of place in accordance with the objectives of those key policies 125 and 135 of the Framework.

Other matters

- 6.16 As the proposal is an extension of the current development it is not expected that there will be any technical issues. Satisfactory vehicular access is available from the public highway by means of "Applefields" and phase 1 of the development. Similarly, the proposed foul and surface water drainage arrangements are expected to be satisfactory whilst being in Flood Zone 1, the site is at low risk of flooding.
- 6.17 Whilst the site is of limited bio-diversity value, development will result in the loss of bio-diversity which will be mitigated by means of a financial contribution.

7.0 Summary and planning balance

- 7.1 Planning law requires that planning applications for development be determined in accordance with the development plan unless material considerations indicate otherwise. The Framework is an important material consideration and contains a presumption in favour of sustainable development.

- 7.2 In this instance, an evaluation of planning policy reveals that in the absence of a 5-year supply of housing land, relevant development plan policies are out of date. This is a most significant material consideration which brings into play the provisions of policy 11[d] of the Framework. This calls on decision makers to grant permission unless there are “*strong reasons*” to believe that policies in the Framework that protect what might be termed nationally important assets would be adversely affected, or that any adverse impacts would significantly outweigh the benefits, having particular regard to a number of “*key policies*”. No such important assets will be adversely affected and any other possible adverse impacts of the proposed development are not considered to be such as to provide a “*strong reason*” to override the presumption in favour of this sustainable development proposal.
- 7.3 The proposal is consistent with those policies of the development plan and the Framework which aim to direct development to the largest settlements and protect the countryside. In particular, Wrawby is identified as a settlement which is suitable to accommodate a degree of development. In addition to those facilities available within the village, the site is within very easy reach of established services, facilities and employment opportunities close by in Brigg.
- 7.4 The Framework sets out the Government’s view of what constitutes sustainable development through social, economic and environmental dimensions. The provision of much needed quality new dwellings will contribute to the social and economic dimensions, both in the construction and provision of new homes themselves, as well as through support for local community, business and social facilities.
- 7.5 In consideration of the environmental dimension, the site is unaffected by physical constraints and does not lie within an area of special planning control or in what might be considered to be a valued landscape. The proposed development will be compatible with the surrounding residential area. On balance, there are no adverse impacts of such significance as to outweigh the range of clear benefits.
- 7.6 For the reasons explained earlier, it is considered that the proposed development is sustainable, will make effective use of land and provide a well-designed sense of place in accordance with Paragraph 11 of the Framework. This suggests that planning permission should be granted “*without delay*”.
- 7.7 Importantly, the site is deliverable. The applicants, Keigar Homes are contracted to acquire it on the grant of planning permission and the Company has a very strong record of delivering homes in North Lincolnshire.