

# RICHARD ROBERTS

Development Management  
North Lincolnshire Council  
Church Square House  
30–40 High Street  
Scunthorpe  
North Lincolnshire  
DN15 6NL

**By Email Only: [planning@northlincs.gov.uk](mailto:planning@northlincs.gov.uk)**

**8th August 2025**

Dear Sir/Madam,

**APPLICATION FOR PRE-APPLICATION ADVICE: MINOR NEW RESIDENTIAL DEVELOPMENT (UP TO 9 DWELLINGS)**

**Site Address: Conway, Thornton Hill, Goxhill, DN19 7HN**

## 1. INTRODUCTION

We act on behalf of our client, **Mr M Wright**, in respect of the above site. This letter is submitted alongside a comprehensive package of supporting technical documentation to seek the Council's formal pre-application advice prior to the submission of an outline planning application for the erection of **up to nine dwellings**, including demolition of the existing dwelling 'Conway'.

The purpose of engaging at this stage is to:

- Present an updated and policy-responsive scheme that directly addresses the reasons for refusal of a previous application (Reference **PA/2023/1490**);
- Demonstrate how technical matters previously identified (including ecology, highways, and drainage) have been robustly addressed; and
- Highlight the material change in planning context arising from the **North Killingholme appeal decision** and the current **marginal nature of the Council's five-year housing land supply position**.

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#### Head Office:

Suite 6, Bowcliffe Grange,  
Bowcliffe Hall, Bramham,  
LS23 6LP

0113 733 3791

[info@richard-roberts.co.uk](mailto:info@richard-roberts.co.uk)

#### York Office:

99 Walmgate,  
York,  
YO1 9UA

0113 733 3791

[info@richard-roberts.co.uk](mailto:info@richard-roberts.co.uk)



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This enquiry is made on the basis that the outcome will inform the preparation of a revised outline planning application, to be accompanied by the supporting information enclosed with this submission as follows:

## Drawings

- Location Plan (Ref 25-001\_0001)
- Existing Site Plan (Ref 25-001\_0500)
- Proposed Site Plan (Ref 25-001\_1000)
- Proposed Landscaping Plan (Ref 25-001\_1001)

## Reports

- Preliminary Ecological Assessment – v2, 16 July 2025
- Biodiversity Net Gain Report – 30 June 2025
- Flood Risk Assessment – Ref 25225

## 2. SITE AND SURROUNDINGS

The application site extends to approximately **0.86 hectares** and lies on the southern edge of Goxhill, a larger rural settlement ranked 13th overall in the **North Lincolnshire Settlement Survey (2019)**, scoring 40 points for sustainability and demonstrating strong access to local services.

The site is situated immediately east of **Thornton Road**, with residential development to the west and south, and is well related to the existing settlement pattern. It lies **outside but adjacent to the defined development boundary** for Goxhill. The existing use comprises a single dwelling ('Conway') with associated curtilage, garage and outbuildings, and a large grass paddock bounded by established hedgerows and scrub.

The site benefits from good connectivity to local amenities within walking distance, with existing road and footpath infrastructure providing direct access to the village centre. A **Flood Risk Assessment** confirms that the site lies entirely within **Flood Zone 1**, with only a minor area of surface water risk readily capable of mitigation through the drainage strategy.

## 3. PLANNING HISTORY

The planning history is summarised as follows:

- **PA/2020/538** – Full planning permission granted (23 Nov 2020) for seven dwellings (including demolition of Conway). Approved at a time when the Council could not demonstrate a five-year housing land supply.

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- **PA/2021/1703** – Refused (14 Jan 2022) for five dwellings due to inadequate access arrangements, neighbour amenity impact, and out-of-date ecological information.
- **PA/2023/1490** – Refused (24 May 2024) for nine dwellings (outline), citing conflict with countryside policies (CS2, CS3, RD2), harm to rural character, and absence of updated ecological data.

This pre-application submission directly addresses these matters by:

1. Updating all technical assessments (ecology, biodiversity net gain, flood risk, and layout principles);
2. Amending the housing mix and indicative layout to better reflect the settlement's character; and
3. Retaining the access solution previously accepted by Highways, supported by a commitment to deliver an adoptable standard.

## 4. DESCRIPTION OF THE PROPOSED DEVELOPMENT

The proposal seeks **outline permission for up to nine dwellings**, with access to be determined at outline stage and all other matters reserved.

The indicative housing mix is as follows:

- 2 x two-bed dormer bungalows;
- 4 x three-bed dwellings;
- 3 x four/five-bed dwellings.

The indicative **Proposed Site Plan** and **Proposed Landscaping Plan** show a well-spaced, low-density layout with retention of existing hedgerows where possible, new native planting, and generous plot sizes to integrate with the village edge setting.

## 5. PLANNING POLICY CONTEXT

The development plan comprises the **North Lincolnshire Core Strategy (2011)** and saved policies of the **North Lincolnshire Local Plan (2003)**. The site is located outside the Goxhill development boundary, meaning restrictive countryside policies **CS2, CS3 and RD2** apply. However, in light of the Council's marginal five-year land supply position, the weight afforded to these policies is significantly reduced (NPPF para 11(d) and the presumption in favour of sustainable development).

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Goxhill has been identified as a **sustainable settlement** with good access to services, ranking highly in the settlement hierarchy, and the site's proximity to local amenities aligns with **NPPF para 79** in supporting housing where it will enhance or maintain the vitality of rural communities.

There is **no adopted Neighbourhood Plan** for Goxhill.

## 6. FIVE-YEAR LAND SUPPLY

The Council's **Five Year Land Supply Statement 2024–2029** claims a 5.01-year supply based on a requirement of 3,344 dwellings and a deliverable supply of 3,389 dwellings. This position is inherently marginal.

In **Appeal Ref: APP/Y2003/W/24/3352581 (North Killingholme, Feb 2025)**, the Inspector concluded:

“Based on the evidence before me, the 5 year supply set out in the Council's updated report is very marginal. If either of the two sites disputed by the appellant were found to be not deliverable, the supply would be less than 5 years... I intend to determine this appeal based on the position that a 5 year supply of housing land has not been demonstrated and that the relevant policies for the supply of housing are out of date.”

This directly undermines the Council's position and engages the **tilted balance** in favour of sustainable development under **NPPF para 11(d)(ii)**.

## 7. TECHNICAL CONSIDERATIONS

### Flood Risk & Drainage

The **FRA (Ref: 25225)** confirms Flood Zone 1 status, no significant fluvial or tidal flood risk, and only a small surface water risk area, which can be mitigated via sustainable drainage measures.

### Ecology & Biodiversity Net Gain

The **Preliminary Ecological Assessment** found no significant ecological constraints subject to standard mitigation. The **BNG Assessment** confirms a measurable net gain in biodiversity will be achieved on site through retained and enhanced hedgerows, native planting, and habitat creation.

### Highways & Access

Highways comments on PA/2023/1490 confirmed that demolition of Conway enables a suitable access, with capacity for an adoptable standard road. Conditions recommended under that application can be replicated.

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## Landscape

The indicative landscape plan proposes new tree planting, hedgerow reinforcement, and open green spaces to create a soft transition to the countryside.

## 8. DESIGN AND CHARACTER

Whilst layout is reserved for later consideration, the submitted **indicative site plan** has been prepared to demonstrate that the site can be developed in a manner which is both **deliverable and sympathetic** to its rural setting.

The arrangement has been guided by the site's physical characteristics, its relationship to existing built form, and the findings of the supporting technical work. It demonstrates:

- **A scale and form of development that reflects the grain of surrounding development;**
- **A logical and adoptable access point consistent with previous positive highways advice;**
- **Sensitive positioning of dwellings to avoid overdominance and maintain visual permeability towards open countryside;**
- **Landscape integration that strengthens the site's edge-of-settlement role and mitigates visual impact.**

The approach directly addresses the concerns raised in the refusal of PA/2023/1490 relating to **rural character and layout quality**, illustrating how a coherent and high-quality scheme can be achieved at this location.

It is stressed that this plan is **illustrative only** and intended to demonstrate capacity, compatibility, and deliverability. Detailed design matters – including scale, appearance, and landscaping – would be refined through the Reserved Matters stage, allowing for further engagement with the Council and consultees.

## 9. PLANNING BALANCE

The Council's most recent Five-Year Land Supply Statement (April 2024–March 2029) concludes there is a marginal surplus of just one month's supply. However, the appeal decision at North Killingholme (APP/Y2003/W/24/3352581, February 2025) found this position to be unproven, noting that the deliverability of certain key sites was in doubt and that removal of any of these from the supply calculation would result in a deficit. The Inspector in that case determined the appeal on the basis that a five-year supply could not be demonstrated, engaging the "tilted balance" at paragraph 11(d)(ii) of the NPPF.

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In this context, the weight afforded to restrictive countryside policies (CS2, CS3, RD2) is significantly reduced. This proposal would make an immediate and meaningful contribution to local housing supply in a highly sustainable settlement, delivering a mix of house types that meet local needs. The scale of the scheme is proportionate to Goxhill's role in the settlement hierarchy, and the indicative layout demonstrates that development can be delivered without adverse impacts on residential amenity, highway safety, ecology, drainage, or flood risk.

Environmental enhancements — including new native planting, biodiversity net gain, and integration of the site into the village edge through landscape-led design — further support the scheme's alignment with the NPPF's objectives to improve biodiversity and create well-designed, beautiful places.

Against these benefits, the only potential adverse impact identified is the localised change in character from development of an undeveloped paddock. However, this change is inevitable in delivering housing growth, and the illustrative design approach demonstrates that any such impact can be moderated through sensitive siting, landscaping, and design.

Overall, it is considered that the benefits of the scheme — notably the delivery of market and smaller homes in a sustainable location at a time of acute supply pressure — **significantly and demonstrably outweigh** any limited harm, in accordance with the NPPF presumption in favour of sustainable development.

## 10. CONCLUSION AND REQUEST FOR OFFICER COMMENT

We respectfully request that the Council's pre-application advice addresses:

1. The principle of development in light of the marginal housing land supply;
2. The proposed quantum, mix, and density;
3. The access strategy and commitment to adoptable standard;
4. Landscape and visual impact mitigation; and
5. Any further technical matters requiring attention before outline submission.

We trust this letter, together with the enclosed plans and reports, provides a comprehensive basis for your assessment. We would welcome the opportunity to meet on site to discuss the proposal in context, and look forward to engaging constructively with the Council as we move towards submission of an outline application.

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Yours sincerely,



**Harry Dee MRICS**

Managing Director

[harry@richard-roberts.co.uk](mailto:harry@richard-roberts.co.uk)

**Enc:**

## **Drawings**

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## **Reports**

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2. Biodiversity Net Gain Report – 30 June 2025
3. Flood Risk Assessment – Ref 25225
4. North Killingholme Appeal Decision (APP/Y2003/W/24/3352581)
5. North Lincolnshire Council Five-Year Land Supply Statement 2024-2029