

**NORTH LINCS HOUSING AND EMPLOYMENT ALLOCATIONS DPD – EXAMINATION IN PUBLIC
MATTER 3 –HOUSING ALLOCATIONS BARTON –ON-HUMBER- ALLOCATION PROPOSAL BY
WREN LIVING TO THE EAST OF FALKLAND WAY BARTON.**

POST EIP SUMMARY STATEMENT ON BEHALF OF WREN LIVING.

INTRODUCTION:- This summary statement has been produced in response to the Inspector's invitation towards the end of the EIP session on the Wren Living proposal.

The proposed development site for this residential led proposal of 300 dwellings is part of the former Kimberley Clark industrial complex established in 1992 and acquired by Wren in August 2013 at a point when the Submission draft DPD was well advanced. The proposed allocation site has the benefit of a general planning permission for B1/B2/B8 development. Part of the site (circa 25-30%) is brownfield being occupied by a 400 space car park, access roads, gatehouse and other built features. The whole of the residential proposal together with the small ancillary commercial development falls within the EA's flood zone 1 and is therefore sequentially preferable to the proposed cycle works redevelopment proposals, though Wren are not specifically objecting to that proposal.

Wren are able to accommodate all of their industrial development within the extensive factory building complex via the new access proposed off Barrow Road with some revisions to the internal circulation and parking system. The grant of planning permission for the new Barrow Road access was unanimously supported by planning committee in September 2014 and the required section 106 unilateral undertaking has now proceeded to the endorsement stage.

These proposals lie predominantly within the development limits of Barton and the case for amending the current incongruous southern development limit has been made to the Inspector.

THE DEVELOPMENT PROPOSALS:- During the EIP session I explained the nature of the development proposals using a copy of the master plan which has been 'fixed' for EIA purposes and has been submitted as part of the application along with parameters plans describing the scale and nature of the development. I referred to the particularly strong linkages between these residential proposals and Wren's expanding core industrial operation. Of the 300 dwellings proposed a total of 50 are to be held in a private rental portfolio by the owner of Wren for the specific use of Wren employees. While it is not possible to estimate the number of the remaining 250 open market dwellings which will over time be occupied by Wren employees we envisage that a number will choose to purchase houses in in the proposed development and also in the adjacent Keigar Homes development sites. This is a highly sustainable solution creating the maximum propensity for modal shift away from private vehicle trips.

ASSESSMENT AGAINST NATIONAL POLICY:- These proposals meet the Government's policy for growth in the National Policy Framework as well as the three dimensions of sustainable development outlined in paragraph 7 of the Framework. The presumption in favour of sustainable development is the golden thread running through plan-making and decision taking. We submit that the Council have not given appropriate weight to the content of the first part of paragraph 14 of the Framework. They have not positively sought to include this growth opportunity and have not produced good strategic policy reasoning for the rejection of the allocation proposals. The Council have not met full objectively assessed needs and have not been willing to introduce the necessary flexibility which national policy, the development industry, including our clients, have advocated. The Council in rejecting the allocation proposals have not met the test in the second bullet point of paragraph 14 of the Framework which requires them to show that any adverse impacts arising from the allocation would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole. The case for Wren has demonstrated the high positive score of the

allocation proposal against the Council's sustainability objectives contained in the SEA of the Plan. Indeed this high positive score on any objective assessment is by degrees better than the other sites being put forward for allocation.

Natural England have made a holding objection in relation to further information requirements which have to be met with regard to the completion of bird surveys, assessment of any additional recreation impact on the SPA/SAC and details of the drainage outfall in terms of quantity, quality and pathways. Discussions have been held and all this information is being provided. Natural England and the authority will then decide whether a Habitats Regs Assessment is required. Consequently Natural England have not objected to the principle of the development. Similarly the EA have not objected to the principle of development. Their holding objection relates to information requests regarding the achievement of an agreed rate of agricultural run-off and surface water quality. The applicants are providing this information.

HOUSING NEED, SUPPLY, DISTRIBUTION AND DELIVERY:- At the matter 2 session on the housing requirement we made representations on these subject breakdowns and in our written and oral site specific submissions made the supply contribution and delivery case for this allocation in relation to the broader strategic issues considered under matter 2. The following provides a brief summary of our composite arguments in support of the allocation on the basis of section 6 of the Framework:-

- Our assessment of the full objectively assessed need range based on SHMA scenarios 1 and 4 leads to a requirement range in the first five years of the remaining plan period of 1,402 dwgs/annum to 1,690 dwgs/annum and a range of 886 dwgs/annum to 1,138 dwgs/annum (see table at para 2.17 of our matter 2 statement). These figures are significantly greater than the Council's assessment. Even if the Able UK jobs growth is delayed until the later years of the remaining plan period as suggested by the Council there is a need for introducing flexibility into the supply of sites which supports the allocation of the Wren site.
- The delivery rates assumed by ourselves and the Council for the three current Barton allocation proposals will struggle to meet the Council's lower base assessment of the housing requirement distributed to Barton. The allocation of the Wren site and support for the current application would enable delivery of houses to commence in spring 2016 with a willing landowner and a new experienced house builder being introduced into the market.
- While the housing need case for this allocation is therefore not dependent on our subsequent arguments related to economic performance and the relative proximity of Barton to the South Humber Bank Growth Zone (sub-section C of our matter 2 statement) and the re-distribution of a limited proportion of the housing growth intended for Scunthorpe (sub-section D of our matter 2 statement) these arguments do strengthen the case and the need to support flexibility and an enhanced supply.

SERVICE CAPACITY:- A new primary school is to be provided in Barton and this and other sites will make proportionate section 106 financial contributions. At an early stage in the remaining plan period a new GP surgery will be required in Barton. We have held first stage discussions with the CCG and further negotiations will take place during the application period. We understand that there was interest in establishing a new surgery next to the Tesco superstore but that there were difficulties in securing the site. Our clients are prepared to enter into positive discussions with the CCG with a view to incorporating a new surgery within the commercial element of these development proposals. Negotiations are underway with Anglian water with regard to their requirement for drainage strategies to resolve foul and surface water capacity issues and they have recommended suitable conditions to the planning authority. Agreement has been reached with the IDB on the discharge rate into the drainage channel they control to the north of the outlet from the large balancing lake and a similar agreement is expected with the EA on the discharge rate from the site. Negotiations are on-going with the Council on off -site highway improvements at external junctions and a package of traffic management measures . If the allocation and the parallel planning application are not supported the further job expansion at the factory complex would generate a similar number of car trips to that

produced by the combined residential and employment development but a significant proportion of the commuting trips would be middle to long distance which is a less sustainable outcome.

LANDSCAPE POLICY:- The Council in their opposition to this proposed allocation have stated that the site is subject to a landscape designation (LC15-6) in the adopted and emerging plans. While this is partly correct a comparison of the red line boundary of the application/master plan scheme with the two areas of landscape designation demonstrates that a) the southern designated section is outside the site and only part of the northern section is lost to the proposed commercial development and b) the extensive area of the proposed new public open space network more than compensates for any loss.

CONCLUDING STATEMENT:- We conclude that the site is suitable, available and deliverable within the plan period. These proposals provide flexibility and help to ensure that the adjusted base requirement distributed to Barton can be fully delivered. The proposal is not in any way premature and will not adversely impact on policies in the Core Strategy or the emerging H&EA DPD.