

North Lincolnshire Housing and Employment Land Allocation Plan

Post EIP Statement on behalf of Keigar Homes.

1.0 Winterton: Omission Site at North Street, to the north of Cemetery Road.

- This site was included in early drafts of the Plan but eventually deleted as a result of consultation with Winterton Town Council. It became clear during the EIP that the Town Council's only concern related to a fear that the proposed development of the site might lead to an unacceptable rise in traffic movements in the town centre; particularly caused by commuter traffic to Scunthorpe.
- This belief led to a suggestion that in starting to prepare a Neighbourhood Plan [NDP], it was thought that housing land allocations should predominantly be located to the west of the town; even it was suggested at the EIP, to the south west of Top Road. However, it must be noted that the NDP has not yet reached a stage where it can be afforded any material weight. Furthermore the idea that new housing allocations in Winterton should not be related to the function of the town and the services and facilities it offers, is plainly not based on sound planning principles.
- The Inspector invited Keigar Homes to undertake and submit a traffic assessment. This has been done by BSP Consulting and a copy has been submitted separately. This demonstrates very clearly that traffic is not the problem in the town centre that has been alleged. Furthermore it shows that the amount of new traffic likely to be generated by the proposed development would not significantly and unacceptably increase the alleged problem. It also points out that destinations other than Scunthorpe are relevant, particularly the route to the M180 and north to the Humber Bridge and Hull. Indeed the recent reduction in toll charges is likely to increase the popularity of Hull as destination. None of these routes would result in traffic from the omission site entering the town centre.
- It is clear from BSP's assessment that the Town Council's objection to the omission site is unfounded. It should be remembered that this was the only justification put forward by the [N Lincs] Council for omitting it in the first place. It is equally clear that it is highly sustainable, particularly in terms of accessibility where it scores much better than WINH-2 and WINH-3. The only other concern alluded to by the LPA was the matter of archaeology. However the report by Allen Archaeology demonstrates that the area of land proposed for housing is not constrained. This is emphasised by Alison Williams, The Council's Historic Environment Record Officer, in her consultation response of 19th January 2015 [Exam 34]. In the penultimate paragraph she says "in my opinion there is no statutory or historic environment policy reason why the southern area should not be developed." She means the area of land currently promoted by Keigar Homes as the omission site.

- It has previously been argued that the western part in particular, of Site WINH-3, is questionable on grounds of landscape impact, accessibility to local services and access to Top Road. As an offshoot of BSP's traffic assessment it was found that speeds on Top Road are very excessive in relation to the 30mph speed limit, with 43.4% of vehicles recorded over a 7 day period travelling over 35mph. The 85thile speeds [used in highway design to determine the required geometries and visibility splays, etc] are 48.8mph northbound and 33.6mph southbound; significantly higher northbound heading towards the end of the restricted area. This is not surprising as it is a local distributor A class road which is very straight, partly rural in character and with minimal frontage access. The volume of through traffic and proximity to Thealby Lane and turning movements are important considerations.
- It has become clear that site WINH-4 [Northlands Road] is highly questionable on grounds of access. At the EIP the LPA were unable to demonstrate how the site could be accessed and there seemed a lack of commitment from any potential site promoter. Whatever last minute response the LPA might now be able to submit to support the site, it is difficult to reconcile such lack of commitment with the certainty needed for it to be allocated.
- The issue of the need for a 5 year supply of housing land will be referred to later. In this regard it is of huge importance to point out that the omission site is immediately available for development. It is owned by Keigar Homes and all the preparatory work necessary to support a planning application has already been completed satisfactorily.
- **In conclusion it is requested that the Omission site be allocated either as an alternative to other proposed sites in Winterton which are less sustainable [WINH-2 and 3] or uncertain [WINH-4], or as an addition, in view of the obvious lack of a 5 year supply of housing land.**

2.0 **Amendment to Settlement Boundary in Park Street, Winterton.**

- The Inspector requested Keigar Homes to seek the views of Winterton Town Council on the proposal to extend the settlement boundary to enable a comprehensive scheme of barn conversions to take place. Discussions were held with town councillors who suggested that a submission be made in writing through the Clerk to the Council. This was done by email of the 3rd February 2015. A copy has been forwarded separately to the Programme Officer. To date no reply has been received.

3.0 **Five Year Housing Land Supply.**

- It is unnecessary to comment in detail on all the proposed housing sites as it became abundantly clear during the EIP that many are not deliverable and the Council currently does not have a 5 year supply of housing land.
- It also became clear that the Core Strategy policy of concentrating new housing within Scunthorpe does not comply with the NPPF requirement to "boost significantly the supply of housing" because it constrains the housing market within the district as a whole. It is no doubt a significant part of the problem as to why there is a serious shortfall in the housing land supply. Even more significantly it is a serious issue for the delivery of the whole Core Strategy.

- When a strategy fails, or is badly delayed, there needs to be a back up option. In this instance that falls to the release of the allocated contingency sites. However it is now clear that this is an inadequate response because they are all in Scunthorpe and the Council does not have a “Plan B”.
- The Allocations Plan might have been an opportunity to address the problem and ensure a continuity of supply. Unfortunately the Council has not properly addressed the problem, so as it stands the Plan is not sound.
- Paragraph 49 of the NPPF states that “Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites”. In this instance this means that the housing supply policies of the Core strategy are out of date.
- The “presumption in favour of sustainable development” [PSFD] is available to rectify the situation. It is designed to facilitate the release of more land for housing when delivery is not taking place. When there are delivery problems, as there are here, the PSFD acts to try to get the supply moving again. The objective is to boost significantly the supply of housing which, in North Lincolnshire, has been sliding backwards for years in the wrong direction.
- As things stand, the problem might be addressed in one of two ways: either through the ad-hoc approval of significant numbers of windfall planning applications, possibly at appeal, or through a less restricted approach to the present Land Allocations Plan. The latter would seem to be by far the most appropriate.
- The present opportunity to address the problem by distributing a greater proportion of housing sites to the market towns and rural settlements is supported in the case of those situated east of Scunthorpe, by the growing employment opportunities at the Humber Bank. **In this regard those sites promoted by Keigar Homes in Winterton, Brigg, Barton upon Humber and Goxhill are readily available and deliverable.**

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February 2015.