

Matter 3 – Housing Allocations

General comments have already been made with regard to the Scunthorpe sites in response to Matter 2. Comments under this heading relate mainly to Winterton and Brigg.

Winterton

- 1.0 Winterton is identified in the Core Strategy [CS] as a second tier Market Town which is suitable to accommodate growth. Policy CS8 provides for it to provide for some 2.3% of the new houses to be built which equates to 244. Bearing in mind the apparent lack of a five year housing land supply it would be sensible to consider whether it might be possible to increase this figure. However, it is first necessary to consider the relative merits of existing sites as well as those of the omission site alongside North Road. Comments will be brief and intended only to clarify and update previous representations.
- 2.0 The omission site was first acquired by Keigar Homes in 2005. It has been the subject of regular discourse with Council planning officers and was identified as a preferred housing site in the earlier consultation draft Allocations Plan. It is not clear why it was deleted in the Pre – Submission Draft after being supported by officers and it is disappointing that no effort was made to discuss ways of overcoming perceived problems. The only clues are in an internal Council consultation response relating to the Heritage Asset and to comments by the Town Council relating to traffic impact in Cemetery Road.
- 3.0 These issues are currently being addressed in the course of preparing a planning application. However it is possible to demonstrate in principle how easily these matters can be overcome.
- 4.0 The overall area of the site is some 6.8 hectares [16.5 acres] although it has always been proposed to develop only about two thirds of that. The indicative total was previously 131 houses. The reason was and indeed remains so, to ensure that the Heritage Asset should remain undisturbed and be ensured of protection.
- 5.0 The position of the Roman remains is reasonably certain although the extent is less so. An archaeological survey is currently in hand and will be available by the time of the Examination. However the indicative layout plan at Appendix 1 demonstrates how some 4.5 hectares [11 acres] could be developed whilst the remainder of the site containing the Heritage Asset would be set aside as open space.
- 6.0 It will be noticed that it is proposed to access the site from North Road and that the geometry of the access meets the required highway standard. A pedestrian/cycle access is proposed to

Cemetery Road although, if necessary it could double up as an emergency access. Obviously the Town Council's concerns about the direct impact of traffic in Cemetery Road are unfounded.

7.0 No direct access to the adjacent public open space known as Simons Wood is currently proposed although it will be seen that an existing public footpath along the northern boundary of the site links the two areas.

8.0 From an accessibility point of view the omission site compares very favourably with the allocated sites, particularly WINH-3 and WINH-2. This becomes obvious from the four plans which are produced at Appendix 2. These show all the known facilities and services within the town whilst a radius of 800 metres is drawn round each of the sites. This clearly indicates that site WINH-3 [Top Road] and to a large extent WINH-2, does not comply with the accessibility criteria set out in Appendix 2 of the H&EADPD. By comparison the omission site is very well located.

9.0 It is understood that site WINH-3 is at least partly to be accessed from Top Road. This is a very busy A class road whilst the site, which lies outside the 30mph limit, is situated opposite a busy junction. For some obscure reason this seems to be a preferred traffic solution to the omission site. Even the alternative option of routing more traffic through the tortuous network of residential roads leading to Teanby Drive is far from ideal in terms of traffic and pollution impact. A letter from Highway Consultants BSP Consulting which is produced at Appendix 3 explains this in a little more detail.

10.0 There are obviously good grounds for allocating the omission site, either as an alternative or as an addition to WINH-3. Of particular relevance in the light of the lack of a five year supply of housing land, is that it is immediately available for development.

Brigg

11.0 The majority of the proposed housing allocation in Brigg wraps around the northern edge of the town from Wrawby Road to Atherton Way. It is intended to link all the sites by a new relief road and therefore it is said that *"all the sites will need to be considered jointly"* and phased appropriately. This is a very similar proposal to that included in the previous Local Plan and which has failed spectacularly as predicted at the last Examination. One of the problems is that land is in different ownerships, particularly at the northern end of Grammar School Road. Unless the Council is prepared to use compulsory purchase powers to assemble the land it is unlikely to succeed. This means that allocations BR1H -1 and 5 are unlikely to be developed.

12.0 The difference this time is that the access from Wrawby Road will allow allocations BRIH-4 to proceed reasonably soon; probably within five years. However allocation BRIH-2 and BRIH-2 rely on the progressive construction of the relief road and therefore, are very unlikely to come forward in the foreseeable future.

13.0 It is also of note that BRIH-2 and much of BRIH-3 do not comply with many of the accessibility criteria, particularly with regard to the walking distance to town centre retail and service facilities.

14.0 This leaves a black hole in the supply of land necessary to meet the need for housing in Brigg. In these circumstances the omission sites off Bigby High Road and off Churchill Avenue are immediately available to meet the deficit.

Conclusion

15.0 In response to the questions raised in Matter 2, it has already been said that the Plan is unsound on the grounds that the strategy is unjustified and will be ineffective in dealing with the persistent undersupply of housing, particularly during the early years of the Plan period. Consequently it is inconsistent with national policy. In order to remedy the situation it is considered necessary to release more land in the Market Towns, particularly Winterton and Brigg which have failed to match Barton upon Humber in the provision of new homes.

16.0 It must also be recorded that many of the proposed allocations fail to meet the accessibility criteria set out in the Plan which begs the question as to whether they are justified when considered against reasonable alternatives. In the case of Brigg the site allocation strategy is flawed and will not be effective in so far as it will fail to deliver the planned number of homes. For these reasons the Plan is considered unsound in its present form.

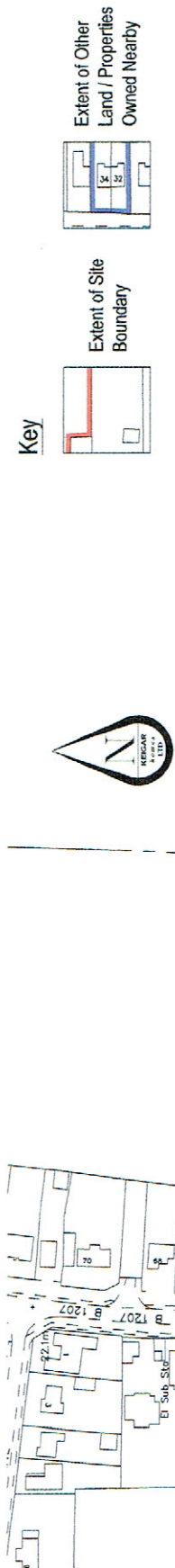
17.0 It is recommended that in order to remedy the problem, that more sites be allocated in Brigg and Winterton and that consideration is given to the omission sites put forward by Keigar Homes and [in Brigg] in conjunction with Mr John Jacklin.

R.I. Stuart.

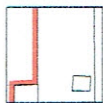
Avoca PLD

For Keigar Homes.

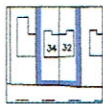
Appendix 1



Key



Extent of Site Boundary



Extent of Other Land / Properties Owned Nearby



Existing Footpath Routes



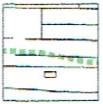
Proposed Footpath Routes



Proposed Estate Roads



Proposed Public Open Space



Proposed Footpath / Cycle / Emergency Access Route



Existing Bus Stop



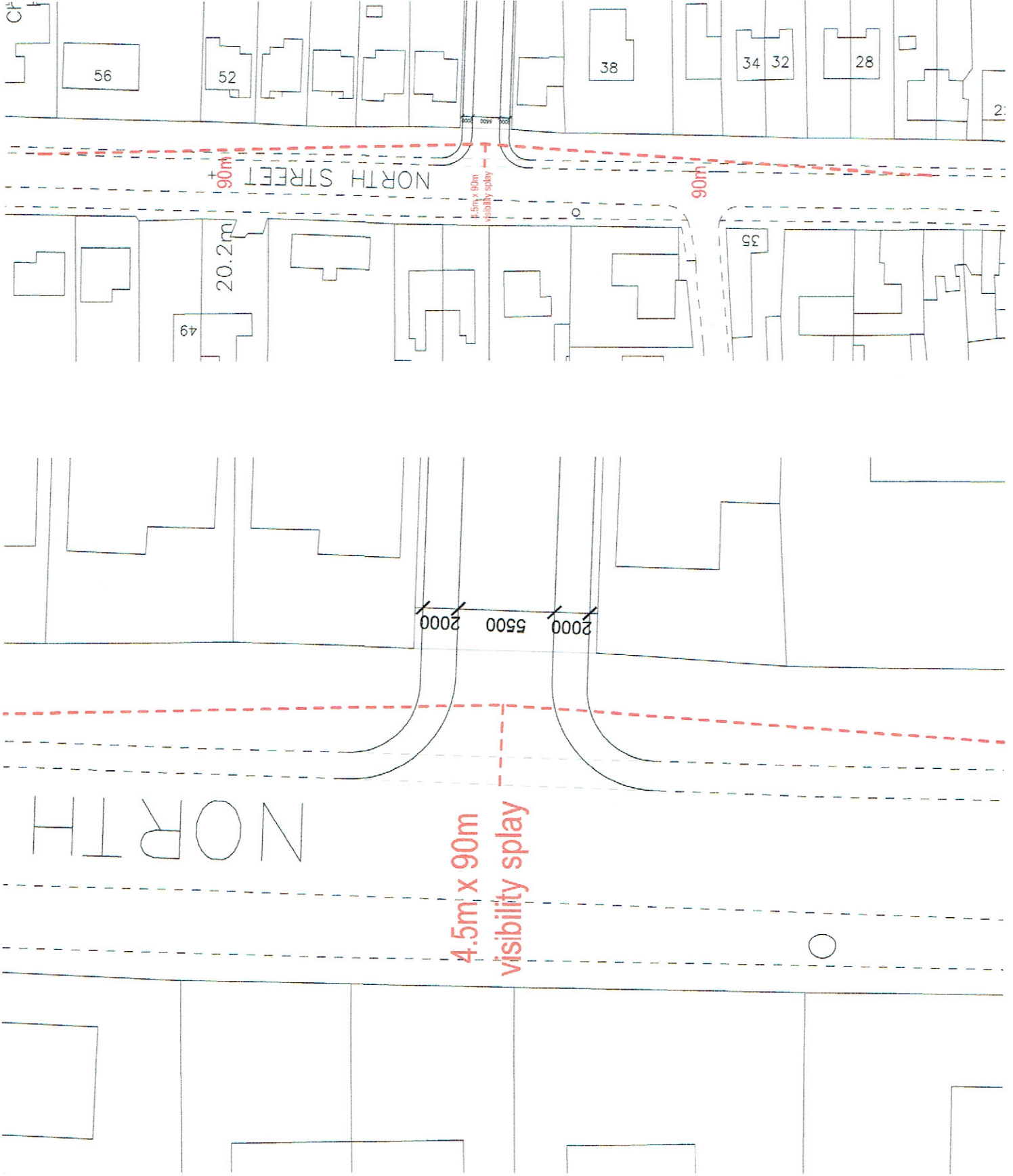
Existing Post Box

KEIGAR HOMES LTD
 KEIGAR LODGE
 CAMBERA VIEW
 1000 NORTH LINCOLNSHIRE
 DN15 5GR
 Tel: 01652 631939
 Fax: 01652 631938

**LAND OFF NORTH STREET
WINTERTON**

Illustrative/Optional
Layout Plan

NMP 03.12.14 1:2000 @ A3
 NSW/165/102



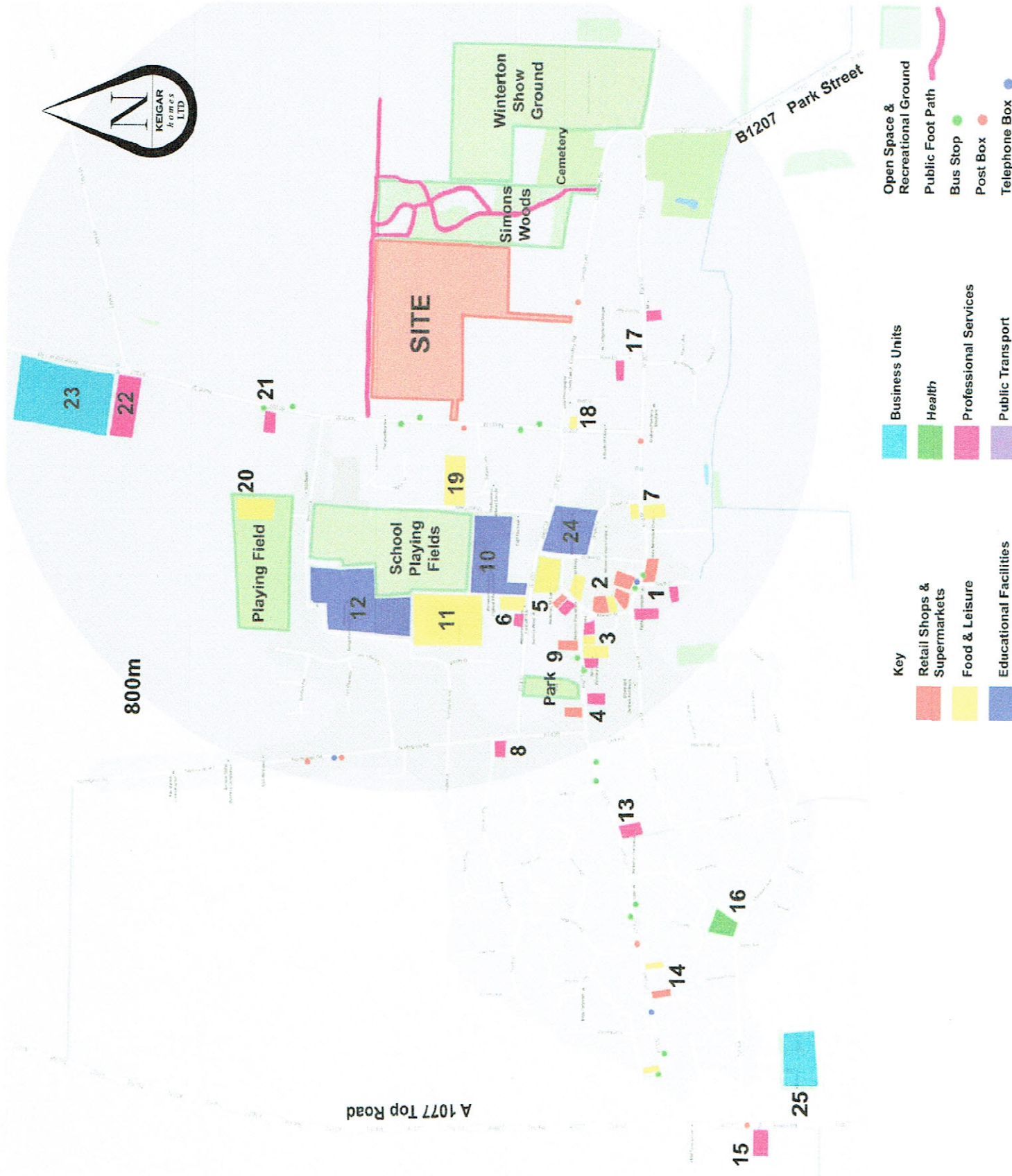
KEIGAR HOMES LTD		KEIGAR HOMES LTD	
KEIGAR LODGE		KEIGAR LODGE	
KARRINY		KARRINY	
NORTH LINCOLNSHIRE		NORTH LINCOLNSHIRE	
DN15 5GR		DN15 5GR	
Tel: 01652 631939		Tel: 01652 631939	
Fax: 01652 631938		Fax: 01652 631938	
LAND OFF NORH STREET WINTERTON			
Proposed Access Layout Plan			
NWP		03.12.14	
1200 & NTS @ A3		1200 & NTS @ A3	
NSW/165/103			

Appendix 2

Amenities List

- 1 - Various Shops, Dentist & Car Repairs Garage
- 2 - Co-op (food), Chip Shop, Car Showroom & Tesco (express)
- 3 - Vets, Public House, Takeaway & Opticians
- 4 - Hair Dressers & Convenience store
- 5 - Church, Hair Dressers, Public House & Bakers
- 6 - Car Repair Garage & Town Council Office
- 7 - Church & Takeaway
- 8 - Police Station
- 9 - Post Office
- 10 - C of E Infant School
- 11 - Winterton Rangers Football Club
- 12 - Winterton Community Academy Secondary School
- 13 - Fire Station
- 14 - Spar Shop & Butchers
- 15 - Petrol Station/Garage
- 16 - Doctors Surgery & Pharmacy
- 17 - Car Repair Garage & Car Showroom
- 18 - Takeaway
- 19 - Winterton Bowls Club
- 20 - Winterton Community Pavilion
- 21 - Welding & Fabrication Works
- 22 - Winterton Recycling Centre
- 23 - Winterton Shopping Village (30+ Business Traders)
- 24 - Winterton Junior School
- 25 - Roxby Road Industrial Estate

KEIGAR HOMES LTD KEIGAR LODGE CHURCH LANE BARTON LINCOLNSHIRE DN15 5GR Tel: 01652 631939 Fax: 01652 631938	
Residential Development at LAND OFF NORTH STREET WINTERTON	
Local Amenities Map	
NWP 03.12.14 NTS @ A3	NSW/165/101



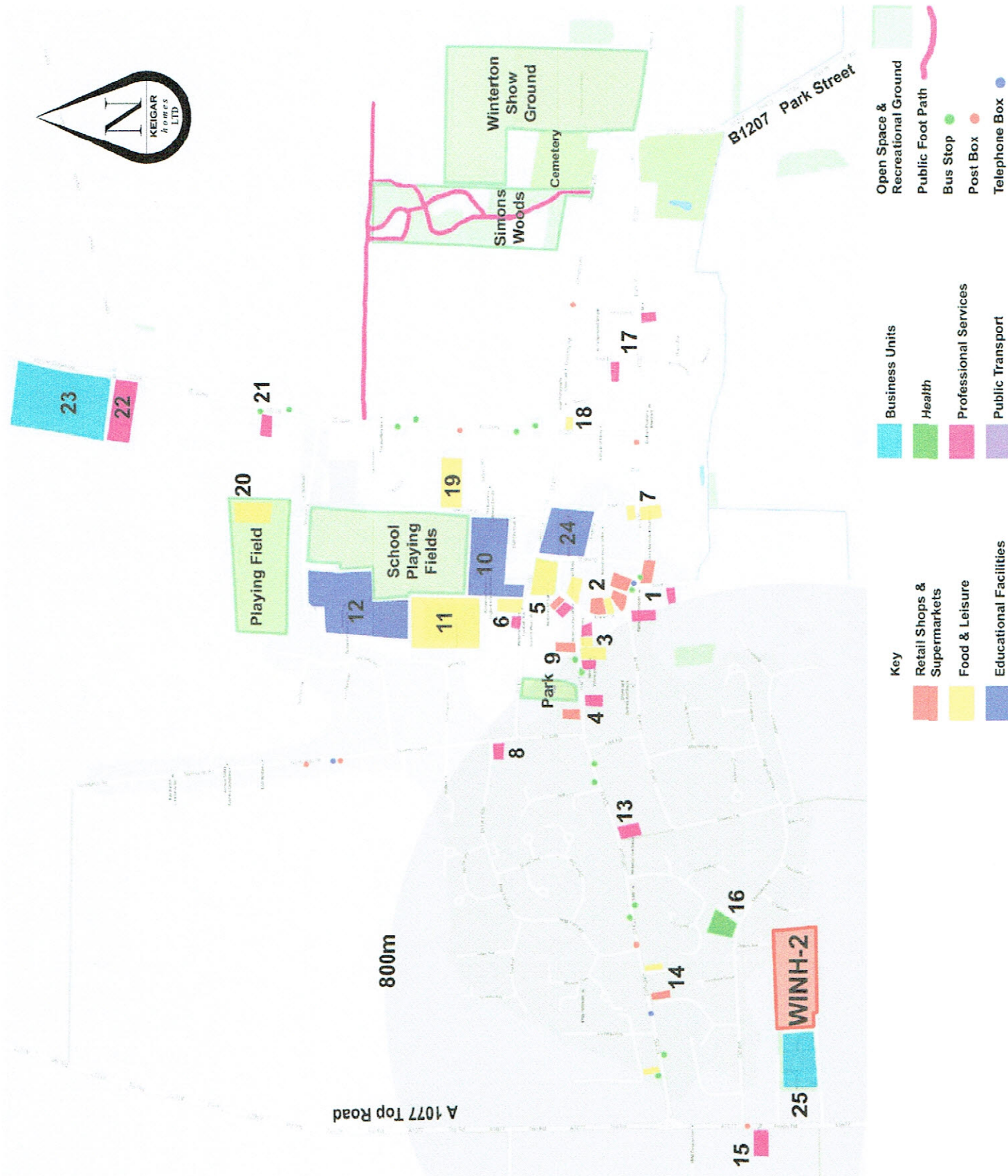
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Residential Development at
**LAND OFF NORTH STREET
 WINTERTON**

WINH-2 Local Amenities Map	
NWP	03.12.14
NTS @ A3	
NSW/165/106	



Amenities List

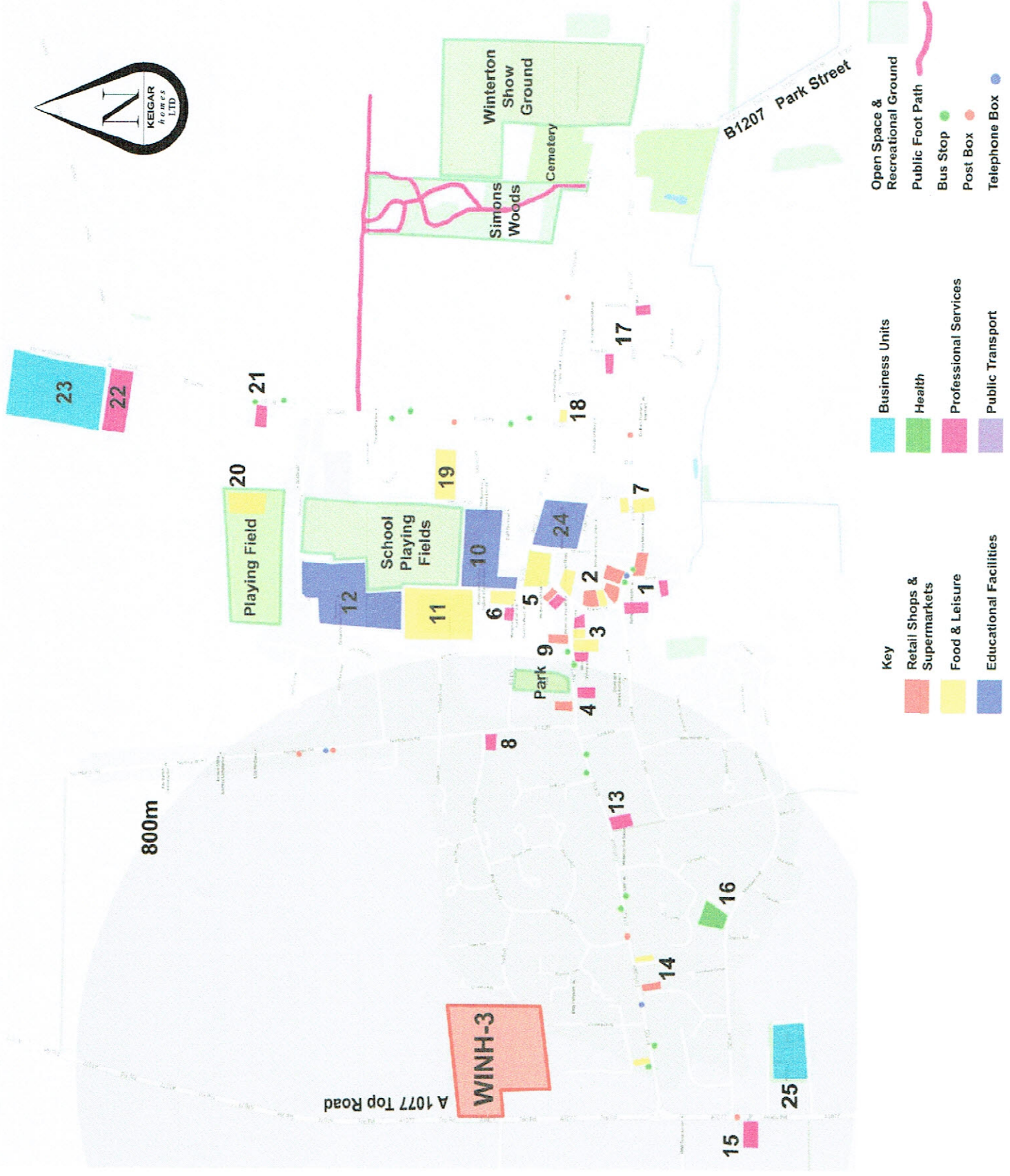
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- 21 - Wedding & Fabrication Works
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- 24 - Winton Junior School
- 25 - Roxby Road Industrial Estate

Plot	Details	Planning/Status
1	Various Shops, Dentist & Car Repairs Garage	Approved
2	Co-op (food), Chip Shop, Car Showroom & Tesco (express)	Approved
3	Vets, Public House, Takeaway & Opticians	Approved
4	Hair Dressers & Convenience store	Approved
5	Church, Hair Dressers, Public House & Bakers	Approved
6	Car Repair Garage & Town Council Office	Approved
7	Church & Takeaway	Approved
8	Police Station	Approved
9	Post Office	Approved
10	C of E Infant School	Approved
11	Winton Rangers Football Club	Approved
12	Winton Community Academy Secondary School	Approved
13	Fire Station	Approved
14	Spar Shop & Butchers	Approved
15	Petrol Station/Garage	Approved
16	Doctors Surgery & Pharmacy	Approved
17	Car Repair Garage & Car Showroom	Approved
18	Takeaway	Approved
19	Winton Bowls Club	Approved
20	Winton Community Pavilion	Approved
21	Wedding & Fabrication Works	Approved
22	Winton Recycling Centre	Approved
23	Winton Shopping Village (30+ Business Traders)	Approved
24	Winton Junior School	Approved
25	Roxby Road Industrial Estate	Approved

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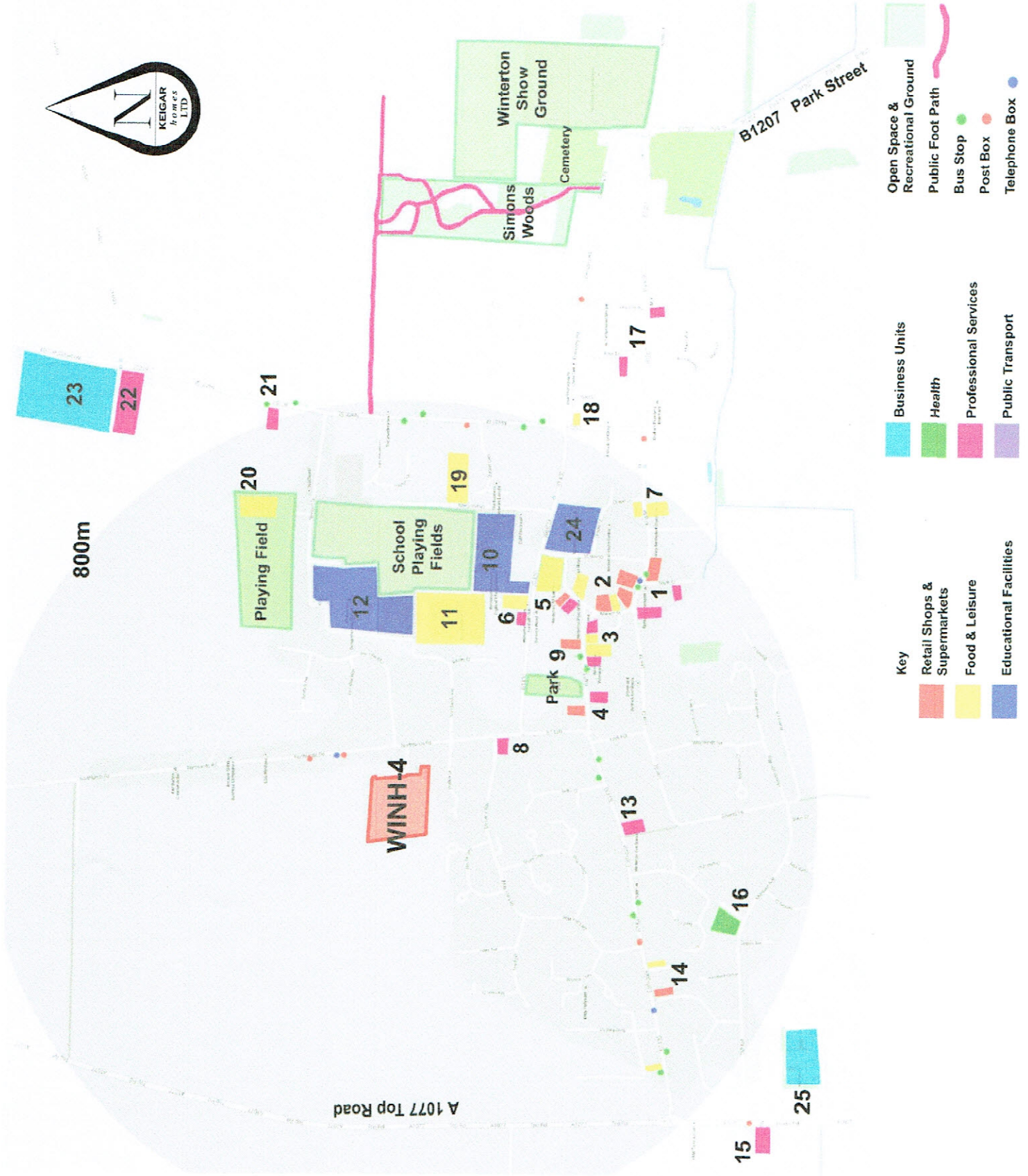
**Residential Development at
 LAND OFF NORH STREET
 WINTERTON**

WINH-3 Local Amenities Map	
Project Name	WINH-3
Client	NTS @ A3
Date	03.12.14
Scale	1:1000
Sheet No.	NSW/165/104



Amenities List

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Appendix 3



10424/MWR

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5th December 2014

For the attention of Mr. Ian Stuart

Dear Ian

Re: Land East of the A1077 Top Road, Winterton



Further to our recent discussions, I have considered the proposed allocation site on land to the east of the A1077 Top Road, Winterton from a highways and transport perspective. As you will remember, we have been involved at an appeal for a site previously in Winterton and I am familiar with the highway and transport networks in the area.

With regards to the above site, I would like to make the following comments:

- 1) I understand that the primary access to the site will be taken from the A1077 Top Road. This is a high speed road, and the proposed access will be situated outside of the existing 30mph limit and in a de-restricted (60mph) area. In addition, the busy B1430, Thealby Lane also joins Top Road in the vicinity of the proposed access. The photograph below shows the national speed limit signs, and the site access would be on the right hand side of the road after the bungalows. The required junction spacing between the site access and Thealby Lane should be at least half the stopping sight distance, which for a 60mph limit would $0.5 \times 215\text{m} = 107.5\text{m}$. This junction spacing would be very difficult, if not impossible to achieve, within the proposed site frontage.



Photograph showing national speed limit signs – proposed access on right after bungalow.

- 2) Top Road is a busy, fast 'A' class road and there have been a number of accidents in the vicinity of the proposed site access over the last 5 year period as indicated on the image from crashmap below. Due to the high speed nature of Top Road, accidents could easily result in casualties, and the image indicates that there have been 2 serious injury accidents on Top Road and Thealby Lane. An additional access at this location would inevitably result in an increased risk of serious accidents. Even if the 30mph limit was moved beyond the proposed access point, speeds of vehicles along Top Road are likely to remain high given the straightness of this section of highway.



Image from Crashmap showing personal injury accidents

- 3) Due to the tortuous nature of the existing estate road network leading up to Teanby Drive, it is not considered appropriate for Teanby Drive to act as a primary access point for such a large site/high number of dwellings. In addition, if Teanby Drive was intended to act as the access to the site, then the length of the resulting culs-de-sac would be very long and it would potentially be serving too many dwellings overall.
- 4) The location of the site is not considered to be sustainable in transport terms. The site is not well located to the village centre and is a walk distance of around 1km. This would inevitably encourage many people to use their cars as the primary means of travel, which is contrary to the aims and aspirations of the National Planning Policy Framework (NPPF). Furthermore, drive distances will be increased as residents would have to drive out onto Top Road before turning back down Earlsgate towards the village. This would effectively double the drive distance of some new residents with obvious detrimental effects in terms of traffic impact and increased greenhouse gas emissions when compared to a better located site.
- 5) The NPPF states at paragraph 29 that **“Transport policies have an important role to play in facilitating sustainable development. . . .”** Paragraph 30 indicates that **“Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion.”** Paragraph 32 sets out that **“All developments that generate significant amounts of movement should be supported by . . . a Transport Assessment. Plans and decisions should take account of whether . . . safe and suitable access to the site can be achieved for all people. . .”** Finally paragraph 34 states that **“Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.”**

- 6) In light of our comments above, we consider that the proposed site is in a location which is contrary to the NPPF. Sites located closer to the village centre of Winterton would be much more sustainable, with travel by sustainable modes of travel being significantly more attractive in line with the aims of the NPPF. We have been involved at recent appeals where Inspectors have viewed sustainability as a fundamental consideration in the allocation/permissions process, and hence we do not consider that this site should go ahead if a sequential approach is taken regarding sustainable transport.

Prepared by:

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Director

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