



**North Lincolnshire Housing and Employment Land Allocations DPD**

**Inspector's Matters, Issues and Questions for Examination at the  
Hearing**

**Matter 3: Housing Allocations (Scunthorpe Area Sites)**

**Submitted by Signet Planning on behalf of Moorwalk Limited**



## **North Lincolnshire Housing and Employment Land Allocations DPD**

### **Inspector's Matters, Issues and Questions for Examination at the Hearing**

#### **Matter 3: Housing Allocations**

The sustainability, deliverability, Phasing (with reference to Policy H1) infrastructure requirements, biodiversity considerations and constraints, including any necessary mitigation measures will be discussed – set out in the submission DPD for each site under 'proposed development', 'Policy' e.g. Policy SHUH-1 and (implementation)'. Any proposed minor amendments that may be necessary to update the plan will also be considered

#### **Scunthorpe Area Site**

We make similar comments regarding flood risk issue relating to the following sites:

- SCUH-4 – Land at Capps Coal and Timber Yard
- SCUH-8 Land North of Doncaster Road
- SCUH-10 – Land south of Ferry Road West
- SCUH-16 – Land at Ashby Decoy off Burringham Road

These sites, as well as for that matter the Lincolnshire Lakes site, have been identified as falling within Flood Zone 2/3a within the SFRA. The NPPF is quite specific in the way in which development of land which is at risk of flooding should be treated and this reflects the importance which Government attaches to the matter. The principle set out in Paragraphs 99 to 102 of the NPPF seek to avoid, where possible, flood risk to people and property and to manage residual risk.

To achieve this Local Plan should adopt a sequential, risk based approach to the location of development. This involves applying the sequential test designed to steer new development to areas with the lowest probability of flooding. If following the application of the sequential test, it is 'not possible' and consistent with wider sustainability objectives to locate development in zones with a lower probability of flooding, Exceptional Tests may be applied. To pass the Exceptional Test, it must be demonstrated that there are wider sustainability benefits to the community which outweigh the flood risk and site specific flood risk assessment must demonstrate that development must be saved for its lifetime without increasing flood risk elsewhere. Based on the above sites the Council have chosen, we have seen no evidence from the Council seeking to steer development away from areas with the highest probability of flood risk. We are not aware that in so far as these sites are concerned, the Council have weighted the risk from flooding against the wider sustainability benefits to the community. Furthermore, we are not aware that site specific flood risk assessments have been carried out.

In our opinion, the Council's approach to the selection of these sites has not given due consideration to the alternatives of developing elsewhere in order to avoid making



allocations in areas of flood risk. This overall rational approach to site selection involving flood risk issues was adopted by the Planning Inspector who presided over the Doncaster Sites and Policies DPD Process. In his letter dated 3 June 2014 the Inspector concluded at Paragraph 44:

**"The NPPF tests sets a 'high bar'. It is only when it is 'not possible' to direct development to areas of lower risk that the Council can move onto apply the Exceptions Test. The test is not that it would be preferable to locate development in the area of highest risk of flooding but that it should be impossible to do otherwise".**

The lack of applying the Flood Risk Policy required by the NPPF this was one of the reasons why the Doncaster Sites and Policies DPD was eventually withdrawn earlier this year.



**North Lincolnshire Housing and Employment Land Allocations DPD**

**Inspector's Matters, Issues and Questions for Examination at the  
Hearing**

**Matter 3: Housing Allocations (Scunthorpe Area Omission Sites)**

**Submitted by Signet Planning on behalf of Moorwalk Limited**

Appendix 1: Statement of Community Consultation Executive Summary

Appendix 2: Concept Framework Plan



## **North Lincolnshire Housing and Employment Land Allocations DPD**

### **Inspector's Matters, Issues and Questions for Examination at the Hearing**

#### **Matter 3: Housing Allocations**

The sustainability, deliverability, Phasing (with reference to Policy H1) infrastructure requirements, biodiversity considerations and constraints, including any necessary mitigation measures will be discussed – set out in the submission DPD for each site under 'proposed development', 'Policy' e.g. Policy SHUH-1 and (implementation)'. Any proposed minor amendments that may be necessary to update the plan will also be considered

#### **Scunthorpe Area Omission Sites - Yaddletorpe**

Within our representations to the submission version of the HELA DPD a substantial and comprehensive case was submitted to support this site as being a suitable and deliverable proposed housing allocation justified with sound technical and environmental evidence based works.

A key issue to bear in mind is that immediately prior to the release of the revised submission draft DPD early in the year, there was strong evidence to suggest that the Council viewed this site as a suitable and strong candidate as it featured within a previous version of the Sustainability Appraisal (SA) Site Allocation (SCUH-14) Land off High Street, Yaddletorpe. We have managed to obtain a copy of the previous version of the SA (which was never officially published) and extracts feature within our representations. The unpublished version of the Sustainability Appraisal was subsequently advanced as the final version with the only major change being the removal of the Yaddletorpe site. It was therefore comprehensively assessed and from the SA scores the Yaddletorpe site received, it performed extremely well. The more technical detailed work we provided as part of our representations continues to build upon the suitability of the site as a housing allocation.

The decision to remove it as a proposed allocation appears to be as a direct result of political intervention of a Ward Councillor although the decision making process is unclear.

We consider the removal of the site as a potential allocation at a late stage in the process is a short sighted approach to adopt given the sustainability qualities and planning merits this site has to offer. It is also available in the short term, suitable for development and deliverable.

Given our view that the Local Authority lacks a five year land supply, we are currently well advanced in preparing an outline planning application with an anticipated submission to the Local Authority early in 2015. We have already submitted a Screening Opinion as to whether an EIA is required and intend to use the detailed technical documents that have supported



our case through the Local Plan Process as the basis for our submission. These include a detailed Transportation Assessment, Flood Risk and Drainage Assessment and Ecological Phase 1 Assessment.

In October 2014 and as part of advancing forward with a planning application. We agreed a Community Involvement Strategy with the Local Authority to engage with the public. This has resulted in a well-attended public exhibition held on 24 October 2014.

We invited Ward Members and approximately 450 households within the local area and we attracted in the region of 80 people to the exhibition. The consultation period ended on 10<sup>th</sup> November and we have had over 74 responses. The main issues expressed have been as follows:

1. Development is not needed;
2. Other sites are more appropriate;
3. Access and egress to the site is poor;
4. Concerns regarding the increase in traffic (noise, congestion etc);
5. Concerns regarding ability of existing amenities and utilities in the area to cope with additional development;
6. Public transport infrastructure is poor.

An Executive Summary of the Community Consultation approach and finds can be found at Appendix 1.

Whilst clearly there has been a negative reaction to the proposal, we consider that their concerns need to be balanced against the strong sustainability qualities of the site. The technical and environmental work suggests that the site is suitable subject to overcoming the identified constraints with achievable mitigation measures as well as on the basis that there is an overriding requirement to deliver more homes in the area based on the distribution of growth set out within the Core Strategy; namely 82% direct to Scunthorpe and Bottesford. Furthermore, by undertaking meaningful engagement with the community local residents have not been compromised and their views are being fully considered through both the Local Plan and decision taking process. As such, this site can be recognised on a similar basis to those sites that feature as proposed housing allocations within the HAELA DPD. In other words they have all been subject to a consultation process and are known to members of the public.

In the interests of achieving the spatial objectives of the Core Strategy, it is sometimes necessary for the Council to make challenging planning decisions particularly where a development could be perceived as being contentious. We are not denying there has been significant local interest expressed to the Yaddlethorpe site much of which has been negative towards the proposed development. However, there is overwhelming evidence set out within the initial Sustainability Appraisal prepared by the Council and backed up with further supporting technical documents of our own to demonstrate that in rational terms, the Yaddlethorpe site should be chosen as it is one of the most suitable housing allocations to deliver the objectives of the plan, particularly when compared to other housing allocations being promoted in the HAELA DPD.



The site would contribute to improving the existing housing stock and provide greater choice and accessibility to good quality housing which would be a key benefit to the town of Scunthorpe.

### **Key Tests of Evidence and Deliverability**

In terms of testing the evidence and deliverability of the Yaddlethorpe site, we have considered the following key principles:

- i. Identifying clear objectives intended for the overall development;

To create a high quality design a collaborative approach has been undertaken with our technical team of experts and the identified issues, constraints and opportunities have been filtered through an initial masterplan process. The Concept Framework Plan produced (see Appendix 2) shows residential development set within a framework of green corridors with a hierarchy of streets and creating new connections. There would also be the opportunity to create a softer urban edge to the existing built form, as well as respond to the relationship between existing and proposed dwellings.

- ii. Identifying site constraints, opportunities and level of mitigation required.

It became evident when we initially started to promote this site in early 2012 that transport issues would be a main concern to address and overcome. To avoid any uncertainty and provide assurance a full Transportation Assessment (TA) has been prepared to test and support the site. Through dialogue with the Highway Officer, the contents of the TA have been confirmed as being acceptable subject to appropriate mitigation measures that have since been agreed and are outlined within our representations. As anticipated, this issue was a key concern raised by local residents as part of the recent consultation process. However, based on the detailed evidence submitted, an agreement has been reached with the Council's Highways Officer and so we remain firmly of the view that the highways concerned can be satisfied and overcome subject to the agreed mitigation measures.

The site is located entirely within Flood Zone 1 and based on the Flood Risk Assessment we have prepared, the site is considered to be a low risk of flooding from all sources which is clearly beneficial when compared to other potential housing allocations that feature within the HAELA DPD (the rationale for the Council's selection process has been questioned above). There is an appropriate drainage strategy which demonstrates that this can be achieved through soakaways on part of the site and the provision of retention basin. We have established there is sufficient capacity in the foul drainage to accommodate development. The study area has been found to be of low ecological value and in any event there will be an opportunity to enhance the provision of wildlife and biodiversity particularly as a result of the creation of greenspace areas and the surface water drainage system.



The constraints and opportunities plan within our representations show a clear depth of understanding of the site. We have particularly taken into account within the layout design the potential impacts of various factors which include the easement lines for the oil and gas pipe lines that diagonally traverse the site.

iii. Agreeing the overall quantum and distribution of uses across the site.

Within the context of achieving clear development objectives as well as examining the range of constraints and opportunities, the broad disposition of development has evolved through the masterplan process.

The overall site area extends to 11.5Ha and with the removal of the openspace and SUDS area (amounting to 2Ha) the net developable area amounts to 9.5Ha. Whilst Paragraph 3.32 of the HAELA DPD suggests that within Scunthorpe and the Market Towns the density range should be between 40-45 dwellings per hectare, we consider that given the character of the surrounding area, we propose a lower density of around 37 dwellings to the hectare which would generate in the region of 350 dwellings on site. This would allow for a range and choice of dwellings that are both affordable and attractive to the market.

iv. Identifying infrastructure needs to ensure the development is attractive and sustainable.

Clearly a development of this size will require a package of development obligations and measures to be agreed to comply with the various policies and the Infrastructure Delivery Schedule relating to education, health and community facilities whilst also ensuring that the scheme remains viable.

It is also accepted that there will be provision made within the development for affordable housing units. The level of provision would be negotiated with the Local Authority in the context of Policy C9 of the Core Strategy.

v. Timing of delivery.

As confirmed above, we are currently preparing an outline planning application and therefore there is every intention and a commitment to secure an early delivery of the site. Subject to the planning process, the envisaged start on site would be in two years' time (i.e End of 2016) and assuming 40-50 unit completions on an average year, the development would be completed over a 7-8 year period.

It has been demonstrated that there are no major barriers associated with the facilitating the scale and mix of the development together with the appropriate infrastructure requirements.





## **Summary**

A significant amount of detailed assessment work has been undertaken to investigate the development potential of the site for housing purposes. Our examination is at such a detailed level that we are able to provide a high degree of certainty and assurance that the site is achievable, suitable and available in accordance with the guidance found in NPPF. This site could therefore contribute to delivering housing units in the short term to boost a much needed increase in housing supply.

The '11<sup>th</sup> hour' political intervention to remove this site as a housing allocation in the Local Plan process before the release of the submission draft of the HAELA DPD together with the concerns that have been expressed locally during the consultation process should be outweighed in favour of the rational assessment work identified within a previous version of the Council's SA and our technical study work. This evidenced based work has provided a strong foundation for developing a well-conceived masterplan approach which draws together the identified opportunities, constraints and mitigation options. It provides a realistic development opportunity that will contribute to delivering the overall spatial objectives of the Local Plan in the short term.

Statement of Community Consultation  
Yaddlethorpe, Scunthorpe  
December 2014

## Introduction

This report has been prepared in support of a planning application submitted by Moorwalk Limited, who seek consent for a residential development in Yaddlethorpe, which will include 350 dwellings with associated open space and related infrastructure.

A period of pre-application community consultation commenced on October 24<sup>th</sup> 2014 at a Public Exhibition held at the Bottesford Civic Hall and the closing date to receive responses was Monday 10 November 2014. This statement details the consultation activities and the feedback.

The National Planning Policy Framework (NPPF) encourages applicants to engage with the local community on large development proposals, it states: “66. Applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community. Proposals that can demonstrate this in developing the design of the new development should be looked on more favourably.”

The applicant has carried out public consultation in order to meet this requirement, raise awareness of the proposal and engage local residents and stakeholders in the planning and design process. On behalf of Moorwalk Limited, Signet Planning has organised the consultation and produced this Statement of Community Consultation to support the forthcoming planning application and inform the Local Plan process.

## Executive Summary

A programme of pre-submission community consultation was undertaken in October 2014. This centred on a public exhibition to provide the opportunity for local people to view the plans, meet the project team and ask any questions. This was publicised via leaflet distribution and posters placed around the local Civic Hall and Bottesford Library.

Over 450 people (residents and local councillors) were contacted directly about the project and were invited to the public exhibition, the wider public was informed by a public notice published in the Scunthorpe Telegraph which is distributed to the whole town.

Approximately 80 people attended the public exhibition and 34 comments forms were completed on the day with a further 41 comments forms received after the consultation. The closed questions on the questionnaire and the relevant responses are listed below:

Question 1) Growth – Scunthorpe has been identified as a location for future housing growth over the next 15 years. Do you think this site is a good location for new housing?

Yes	5	5%
No	63	88%
Unsure	5	7%

Question 3) Affordable Housing – A proportion of the new homes would be affordable housing. Do you think this site is a good location for new affordable housing?

Yes	7	8%
No	63	88%
Unsure	3	4%

Question 4) Facilities – Do you think the development is close to community facilities such as shops, schools, parks, play areas, pubs or cafes?

Yes	9	11%
No	59	82%

Unsure            5            7%

Question 5) Public Transport – Do you think the scheme would have good access to public transport?

Yes                7            8%  
 No                60        84%  
 Unsure            6            8%

Question 6) Character – Do you think the proposed development would be in keeping with the character of the local area?

Yes                6            7%  
 No                60        84%  
 Unsure            7            9%

Question 7) Open Space – Do you think the range and type of landscaping and open spaces provided on the site is suitable?

Yes                8            9%  
 No                53        74%  
 Unsure            12        17%

## Response to Key Themes

Theme (Occurrences)	Sub-Theme	No. Occurrences
<b>Design Comments/ Suggestions</b>	Open space area should be smaller	1
	Open space areas should be larger / is inadequate	3
	Design is not in keeping with the existing surrounding homes	4
	Development would alter character of the area	8
	Multi-use games area would cause noise and disruption	1
	Development will involve the loss of green space / park	2
	More facilities needed on site	4
	Inadequate housing mix	1



<b>Affordable Housing</b>	Concern affordable housing will bring antisocial behaviour, crime and noise	3
	Affordable housing is not needed in this area	9
<b>Need for Development</b>	Other housing proposals accepted elsewhere in Yaddlethorpe	9
	Development is not needed	90
	Yaddlethorpe will become a town	4
	Quick development for maximum profit	1
<b>Location</b>	Site is unsuitable / other sites are more appropriate	6
	Concerns that development will devalue properties in the immediate area	6
	Risk of flooding	3
	Loss of open space due to development	2
<b>Traffic</b>	Access and egress to the site is poor	30
	Concerns regards the increase in traffic (noise, congestion etc.)	16
	Inadequate road infrastructure	14
	Other / more access points are needed	5
	Junction is too dangerous	5
<b>Village Infrastructure</b>	Concerns regarding ability of existing amenities and utilities in area to cope with additional development (doctor's surgery, school, shops etc.)	13
	Concerns about distance to nearest facilities	14
	Not enough employment in the area	4
<b>Size</b>	Development is too large	4
<b>Public Transport</b>	Public transport too far away	6
	Public transport infrastructure is poor	15
<b>Support</b>	Affordable housing proportion	4
	Suitable amount of open space provided	4
	Housing mix	7
	Homes are needed in the area	2
	Suitable amount of close amenities	1



## Key



- Indicative Built Form
- Neighbourhood Play Area
  - 1. Children's Play Equipment
  - 2. Small Multi Use Games Area (MUGA)
- New Planting
- Water Retention Basin
- Primary Road
- Secondary Road
- Shared Surface/  
Small Scale 'Square'
- New Footpath/Cyclepath
- Existing Trees
- Statutory Public Footpath

## Land Budget

- Site Area = 11.5ha
- Open Space = 0.7ha
- SUDS = 1.3ha
- Residential = 9.5ha

approx 350 dwellings

# Concept Masterplan

Land off Greengarth, Bottesford



**SIGNET PLANNING**  
VISION | STRATEGY | ACTION

Drawing No: HG1901/CP  
Scale 1:2000 @ A3  
Date: 30.05.14

