

CS/01/n1147

Jill Thompson
Specialist Place Team
Ryedale District Council,
Ryedale House
Malton,
North Yorkshire
YO17 7HH

22nd December 2017

Dear Mrs Thompson

**THE RYEDALE PLAN: LOCAL PLAN SITES DOCUMENT AND POLICIES MAP
PUBLICATION STAGE REPRESENTATIONS
SITE 194: LAND TO THE WEST OF NOS. 72 TO 126 WELHAM ROAD, NORTON**

nineteen47 are instructed on behalf of Linden Homes ("our Client") to submit representations as part of the current consultation on the Publication Version of The Ryedale Plan: Local Plan Sites Document and Policies Map in relation to Land to the west of Nos. 72 to 126 Welham Road, Norton ("the Site"), in which they have an interest.

This Site has previously been promoted for allocation for residential development in earlier iterations of the Local Plan Sites Document and Policies Map, including as part of the Council's Sites Consultation of October 2015, with the Site being referred to by the Council in that consultation as '**Site 194**', albeit that the Site the subject of our Client's interest is now slightly smaller, at 5.5 hectares, compared to the site previously promoted extending to 9.32 hectares. A Site Location Plan is enclosed with this correspondence for clarity.

As above, our Client's interest in **Site 194** extends to 5.5 hectares of greenfield land. The Site comprises a series of paddocks and fields to the west of what is existing single-depth frontage development of dwellings, with stable buildings to the west. The Site is currently grazed and forms part of a series of fields in the wider area, which are generally flat and subdivided by modern hedging and fencing. Access to the Site is currently available from between two properties on Welham Road (Nos. 68 and 72), though would also be available from the part of the Site further southwards, which also fronts directly onto Welham Road.

Having reviewed the Publication Version of The Ryedale Plan: Local Plan Sites Document and Policies Map, we are disappointed to learn that the Site the subject of our Client's interest has not been included as an allocation for residential development.

We consequently have concerns about the soundness of the Publication Version of The Ryedale Plan: Local Plan Sites Document and Policies Map by virtue of:

Not being justified: We consider there to be insufficient justification to support the allocation of **Site 450 (Ryedale House)** over **Site 194**.

Not being effective: We note the net residual requirement for the delivery of 246no. dwellings in Malton/Norton across the Plan period but we have concerns over the rates at which new residential development can potentially be delivered on **Sites 450** and **649 (Norton Lodge)** and consider provision should therefore be made for alternative/additional allocations by way of a buffer should these two sites fail to deliver to the anticipated rates for those reasons.

Not being consistent with national policy: We consider **Site 194** represents a more sustainable and deliverable option than **Site 450** and that the housing requirement for Malton/Norton should be increased to ensure the delivery of an adequate supply, given the deliverability rates for residential development on **Site 649** could be constrained by the need to deliver significant infrastructure as part of that development.

These concerns are expanded on below, following a summary of the sustainability merits of **Site 194**.

Sustainability Merits of Site 194 (Land to the west of nos. 72 to 126 Welham Road, Norton

Site 194 has been shown to perform well through the Council's Site Selection Methodology 2017, particularly with regards a lack of site-specific constraints, as summarised below:

- **Site 194** has good accessibility to existing bus stops, commercial units, primary and secondary schools and a doctor's surgery.
- By virtue of the scale of **Site 194** and its relationship to existing residential development, allied with the low-lying nature of the Site, it is unlikely to result in development that would detract from the surrounding landscape character.
- **Site 194** has only limited features of ecological interest, with a limited extent of what are modern hedgerows.
- The development of **Site 194** would not affect any designated heritage assets either directly or indirectly.
- **Site 194** includes no known sources of contamination.
- It is unlikely that noise, light or dust will present a nuisance to future occupants of a residential development on **Site 194**.

- Subject to design and layout, development of **Site 194** is unlikely to have a significant impact on the amenity of existing residential development.

Site 194 is therefore considered suitable for development, is available now and is capable of delivering residential development in the short-term, with no insurmountable constraints to delivery of such a development. With a site area of 5.5 hectares, we consider the Site could comfortably accommodate between 115 and 165 dwellings of a varied style and mix, including affordable housing.

Constraints and Deliverability Issues relating to Site 450 (Ryedale House)

We consider **Site 194** represents a more appropriate and deliverable option to **Site 450** for the following reasons:

- **Site 450** is stated to have potential to accommodate approximately only 60 dwellings, which does not provide for an appropriate buffer should delivery of residential dwellings on **Site 649** stall due to its significant infrastructure requirements (see below).
- The frontage to **Site 450** is constrained by the presence of a number of mature trees, which are the subject of a Tree Preservation Order(s).
- Land to the south-east of **Site 450** is open and subject to a Visually Important Undeveloped Area, which constrains the site in terms of its potential impact on the adjoining landscape.
- The aforementioned open land adjoining **Site 450** is also part of the Scheduled Monument to the Derventio Site, which constrains the site in terms of its potential impact on designated heritage assets.
- Pockets of **Site 450** are known to have problems with surface water flooding.
- Significant existing parking over the last few decades on **Site 450** is likely to result in potential contamination issues that will need to be remediated.
- **Site 450** currently comprises the occupied HQ of Ryedale District Council and, whilst it is claimed that the Council has resolved in principle to the release of the site for development, there are no assurances as to the mechanisms or logistics for this, which clearly places a potential constraint on the actual delivery of development on the site.

Deliverability Issues relating to Site 649 (Norton Lodge)

We consider **Site 649** has potentially significant deliverability issues, which could prevent residential development being delivered at the anticipated rates for the following reasons:

- The sheer scale of **Site 649** is such that it is required to deliver significant infrastructure to mitigate its impact, including a new link, which will potentially constrain the timescales for delivering new residential dwellings on site.

- **Site 649** is located in close proximity to an industrial estate and Malton Bacon Factory, which constrains the Site in terms of its layout/potential yield and requirement for noise mitigation.
- **Site 649** has been shown to have a high potential for survival of prehistoric and Romano-British remains. The course of a Roman road also passes through the area, as does a prehistoric triple dyke boundary feature known from crop marks. Iron Age square barrow burials and other ditched enclosures have also been plotted from aerial photographs. The site is therefore potentially heavily constrained by existing heritage assets that could feasibly dictate the layout/potential yield of the site and/or delay the delivery of residential development below the anticipated rates.

In summary, we consider that the housing requirement for Malton/Norton for the Plan period can be most appropriately and sustainably delivered via the allocation of **Site 649** and **Site 194**, which we consider to be a more sustainable and deliverable option than **Site 450** and one which would also provide a greater buffer to the supply of housing should the significant infrastructure requirements associated with **Site 649** result in the delivery of residential development on that site not coming forward at the rates anticipated .

The allocation of **Site 194**, will provide an opportunity for the delivery of a sustainable, high quality and accessible development, which will provide significant social and economic benefits without significant detriment to the environmental qualities of the area.

We trust that you will take our representations into consideration when progressing the Publication Version of The Ryedale Plan Local Sites Document and Policies Map and respectfully request that consideration be given to the allocation of **Site 194** for residential development in preference to the allocation of **Site 450**.

We wish to reserve the right to present evidence to the Inspector as part of the Examination process.

Yours sincerely

Carl Stott
Director

Enc: Site Location Plan

