Sequential Test

Wombwell Outline Planning Application
Land off Station Road, Wombwell, Barnsley, S73 0BN

Hartwood Estates

CRM.1122.005.PL.R.009

'Experience and expertise working in union'

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Sequential Test, Wombwell outline planning application

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1 Introduction

1.1 Introduction

1.1.1 Enzygo Ltd have undertaken a sequential and exception test to support an outline planning application for residential dwellings on Land off Station Road, Wombwell, Barnsley, S73 0BN. This report seeks to demonstrate to the Local Planning Authority that the proposed development is appropriate for the application site in flood risk terms.

1.1.2 The now archived Planning Policy Statement 25 Development and Flood Risk (PPS25) sets out the most detailed guidance in relation to undertaking a sequential test. This Statement aimed to ensure that flood risk was considered at all stages of planning process. It sought to avoid inappropriate development in areas at risk of flooding, and direct development away from areas of higher risk. Paragraph 14 states that *'a sequential risk-based approach to determining the suitability of land for development in flood risk …should be applied at all levels of the planning process.'*

1.1.3 The first National Planning Policy Framework (NPPF) (2012) sought to simplify planning policy by replacing many of the planning policy documents and drawing these together into one document. The requirements for a sequential test was carried forward into the NPPF (2012) and the subsequent 2019 NPPF. Further details of how this should be applied are provided within the Planning Practise Guidance (PPG) which sits alongside the NPPF.

1.1.4 This report has been provided to meet the requirements of the NPPF (2019). A full review of relevant policy is provided within Chapter 3 of this report.

1.2 Report Format

1.2.1 Chapter two of this report provides a description of the application site. Chapter three provides a review of planning policy and context. The sequential test criteria are provided within chapter four, and the sequential test results are within chapter 5 and the exceptions test is provided within chapter six and chapter seven provides a conclusion.

2 Site Description

2.1 Site Location

2.1.1 The Site is located within the administrative boundary of Barnsley Metropolitan Borough Council. The grid reference of this site is SE 40517 03610, and the nearest postal code is S73 0BN. The proposed development occupies an area of 3.84 hectares. The application area is shown in the site layout plan (P08 4141 SK102).

Figure 1. Application site

2.1.2 The brownfield site is currently vacant and has areas of hardstanding and soil heaps across the site. There is also some vegetation present on the site as illustrated in figure 1 above. Numerous examples of fly tipping are evident in and around the application site, particularly along the western site boundary and Bulling Dike.

2.1.3 Figure 2 below shows that the site previously had a large building/ warehouse on it, with car parking to the north of the building and access roads to the north and east of the site. The building was removed at some point between 2002 and 2008. The site therefore comprises brownfield land.

2.1.4 In addition, planning permission has previously been granted at appeal, within the site for residential development and office buildings, through consent APP/R4408/06/2028445.

Figure 2. Application site in 2002

2.2 Proposed development

2.2.1 This sequential test is submitted in support of an outline planning application for residential dwellings, with all matters reserved apart from site access. An indicative layout demonstrates the site could accommodate 111 dwellings.

2.3 Flood mitigation measures

2.3.1 A Flood Risk Assessment has been undertaken, and as part of this recommendations have been made regarding the mitigation measures that can be incorporated into the site layout to reduce the risk of flooding within the site, and to reduce the impact of flooding should this occur. Mitigation measures are detailed in full within the Flood Risk Assessment supporting this application, and are summarised below:

Fluvial Flooding from Bulling Dike and the River Dove

- Set the finished floor levels of all buildings above the 1 in 100-year (plus 50% climate change) flood level (26.67mAOD) and freeboard allowance.
- Retain external levels as close to existing as feasible.
- Provide level-for-level compensatory flood storage within Flood Zone 2 when the lifetime of the development is considered based on the volume of floodwater displaced by the proposed development during the 1 in 100-year plus 50% climate change event. An initial assessment of the volume of displacement during this event caused by the proposed building units shows that at least 1,400m^3 of compensatory storage will be required. It is recommended that a more detailed assessment is completed at the detailed design stage when proposed levels within the Site are set.

- Provide a 9m easement free from development along either side of Bulling Dike, as per IDB correspondence and an 8m easement free from development along the right bank of the River Dove. These easements would provide access for inspection and maintenance purposes, including vehicle access.
- Production of a Flood Evacuation Management Plan (FEMP) for the proposed development.
- Utilise flood resilient construction.
- Adoption of a surface water management strategy.
- Undertake maintenance activities to keep Bulling Dike clear from debris and overgrown vegetation to maintain the conveyance of the channel.

Surface Water Flooding

- Adoption of a surface water management strategy.
- Set finished floor levels as per above.

Sewer Flooding

- Provide a 4m easement free from development along either side of the combined sewer. This easement would provide access for inspection and maintenance purposes.

2.4 Summary of flood risk

2.4.1 The table below provides a summary of flood risk, with the final column setting out the consequence and impact of the development with the recommended mitigation in place.

Table 1. Summary of flood risk

Flooding Source	Potential Source	Probability	Consequence & Impact Without Mitigation	Consequence & Impact with Mitigation
Fluvial	Bulling Dike and River Dove	Low to High across the Site	Low to High across the Site	Low
Tidal	None	Negligible	Negligible	Negligible
Groundwater	Aquifers	Negligible	Negligible	Negligible
Surface Water	Poor Permeability, impermeable surfaces	Negligible to Low across the Site	Negligible to Low across the Site	Negligible
Sewer	Public sewers	Low	Low	Negligible
Infrastructure Failure	Reservoir Failure	Negligible	Negligible	Negligible

3 Policy Context

3.1 Overview of relevant policies

3.1.1 Policies and documents relevant to this report are summarised below:

- National Policies
  - NPPF (2019)
  - Planning Practice Guidance
  - PPS25 (now archived)
- Local Policy
  - Barnsley Local Plan (2019)

3.2 National Planning Policy

3.3 NPPF (2019)

3.3.1 The NPPF seeks to ensure development is sustainable, and takes into account environmental, economic and social factors.

3.3.2 Chapter 14 sets out the national framework for '*Meeting the challenges of climate change, flooding and coastal change*.' Par 158 states that:

> '*The aim of the sequential test is to steer new development to areas with the lowest risk of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding.'*

3.3.3 It then goes onto state that an exception test may be required if it is not possible to locate development in areas of lower risk. The requirements for an exception test are set out within Planning Practise Guidance (PPG).

3.3.4 The NPPF also requires developments to not increase flood risk elsewhere. This requirement has been met, as detailed within the Flood Risk Assessment submitted as part of the planning application.

3.4 Planning Practice Guidance

3.4.1 Planning Practice Guidance (PPG) provides advice on how sequential and exception tests should be approached. This identifies that a sequential test must be carried out for developments in Flood Zone 2 or 3, assuming one has not already been undertaken at the site (which in this instance, it hasn't).

3.4.2 Once alternative sites have been identified, flood risk should be compared at the site to identify if any alternative suitable sites have a lower risk of flooding than the proposed site. The PPG also confirms that factors such as site allocations, technical constraints and capacity should be considered if alternative sites are identified, to understand if these could genuinely accommodate the development proposed.

3.4.3 The Guidance goes on to identify that if the sequential test shows that an alternative site is not available, an exception test should be undertaken for sites in specified flood zones and of specified vulnerability.

3.4.4 The exception test shows how flood risk will be managed on the site and must show that the sustainability benefits of the development to the community outweigh flood risk. The exception test must also show that the development will be safe for its lifetime taking into account the vulnerability of its users, and it must also demonstrate that the development won't increase flood risk elsewhere.

3.5 PPS25

3.5.1 Although now replaced by the NPPF, PPS25 sets out more detail regarding how a Sequential test should be undertaken. Therefore, this document remains relevant and a useful resource.

3.5.2 The aims of planning policy relating to development and flood risk is to ensure that flood risk is taken into account at all stages in the planning process in order to avoid inappropriate development in areas at risk of flooding, and to direct vulnerable development away from areas at highest risk.

3.5.3 PPS25 requires the use of flood risk assessments and the risk-based sequential test, followed by the exception test if required.

3.5.4 The sequential test should be applied to demonstrate that there are no reasonably available sites in areas with a lower probability of flooding that would be appropriate for the type of development or land use proposed. A sequential approach should be used in areas known to

be at risk from other forms of flooding, with preference given to locating new development in Flood Zone 1. If there is no reasonably available site in Flood Zone 1, the flood vulnerability of the proposed development can be taken into account in locating development in Flood Zone 2 and then Flood Zone 3. Within each Flood Zone new development should be directed to sites at the lowest probability of flooding.

3.5.5 If, following application of the Sequential Test, it is not possible for the development to be located in zones of lower probability of flooding; the Exception Test can be applied if the development meets specific criteria. The exception test must consider the following:

- The wider sustainable benefits
- Whether the development is on previously developed land
- Whether the development is safe

3.5.6 The Practice Guide states at paragraph 2.33 that for individual planning applications where the site is within an area at risk of flooding and is not identified within a Local Development Document (LDD) to which the sequential and exceptions tests have been applied, '*the developer will need to provide reasoned evidence in the Flood Risk Assessment (FRA) for the location of the proposed development. This justification must explain how the development would meet the requirements of the Sequential, and where necessary, the Exception Tests'*.

3.5.7 A Flood Risk Assessment has been undertaken and submitted as part of the planning application. This confirms that, subject to a number of mitigation measures being put in place (see section 2.3 of this report), the development would operate with minimal risk from flooding, and would not increase flood risk elsewhere.

3.5.8 Section 4 of the Practice Guide relates specifically to the Sequential and Exception Tests. Guidance is provided on identifying the appropriate area to which the sequential test will be applied, the guidance emphasises that regard must be given to local circumstances. In all cases the developer must justify with evidence to the LPA what area of search has been used when making the planning application.

3.5.9 Paragraphs 4.23 – 4.32 of the Practice Guide are concerned with the application of the Sequential Test for individual planning applications; in particular paragraph 4.25 states that '*where a site has not yet been sequentially tested in the LDD, the Sequential Test will need to be applied at the individual site level. In these cases, the developer will need to provide evidence to the LPA that there are no other 'reasonably available' sites which could be*

considered as being suitable and appropriate for the development that is proposed, that the development could be located'.

3.6 Local Planning Policy

3.6.1 Policy LG2 The Location of Growth states priority will be given to development in the locations of Urban Barnsley, Principal Towns (including Wombwell) and villages. Significantly more growth should be accommodated in Urban Barnsley than any principle town, and the principle towns should accommodate significantly more growth than the villages.

3.6.2 Policy H2 Distribution of New Homes sets out that Wombwell for the period 2014 – 2033 will accommodate 2069 dwellings which is 10% of the total housing supply of the Borough.

3.6.3 Policy H8 Housing Regeneration Areas identifies Wombwell as a lower value housing market area where housing market regeneration programmes will be supported aimed at the renewal of poor housing and the revitalisation of neighbourhoods and communities.

3.6.4 Policy CC1 Climate Change seeks to reduce the causes of and adapt to the future impacts of climate change by, inter alia;

- Giving preference to development of brownfield land in sustainable locations;
- Locating and designing development to reduce the risk of flooding
- Promoting the use of SuDs;

3.6.5 Policy CC3 Flood Risk states the extent and impact of flooding will be reduced by inter alia;

- Not permitting new development where it would be at an unacceptable risk of flooding from any sources of flooding, or would give rise to flooding elsewhere;
- Requiring developers with proposals in Flood Zone 2 and 3 to provide evidence of the sequential test and exception test where appropriate;
- Expect all development proposals on brownfield sites to reduce surface water run-off by at least 30% and development on greenfield sites to maintain or reduce existing run-off rates requiring development proposals to use SuDs in accordance with policy CC4; and
- Using flood resilient design in areas of high flood risk.

3.6.6 Policy CC4 Sustainable Drainage Systems (SuDS) states all major developments will be expected to use SuDs to manage surface water drainage, unless it can be demonstrated that all types of SuDs are inappropriate.

3.6.7 To enable the Council to determine the suitability of a proposed SuDs scheme Outline Planning Applications must be supported by a conceptual drainage plan and SuDs design statement.

3.6.8 In the Local Plan (paragraph 19.13) it states the Council's Level 1 Strategic Flood Risk Assessment (SFRA) indicates that the majority of areas where growth will be located in the Local Plan will be in Flood Zone 1.

3.6.9 This report forms the sequential test and exceptions test as part of the planning application. Thus compliance with local policy can be demonstrated.

4 Sequential Test Criteria

4.1 The sequential test

4.1.1 PPG and Local Plan Policy CC3 identifies that a sequential test is required for developments within flood zones 2 or 3, where a sequential test has not already been done for the development type in the proposed location.

4.1.2 The proposed development falls into the above criteria, and therefore there is a requirement for a sequential test.

4.2 Justification for proposed site

4.2.1 The PPG requires the following information to be provided as part of the sequential test:

- The name and location of the site you're proposing for development;
- An explanation of why you chose that specific site.

4.2.2 The application site address is:

Land off Station Road
Wombwell
Yorkshire
S73 0BN

4.2.3 The applicant is the landowner. The site is previously developed land which was last used for an employment use over 10 years ago. Previously the site has benefitted from planning permission for residential dwellings and offices. A residential development is necessary to deliver the redevelopment of this brownfield site, which has been vacant for over 10 years.

4.2.4 The site is identified as being within the urban fabric of Wombwell in the Council's Proposal Map and is a sustainable location for development.

4.2.5 The site is bounded to the south by Station Road with residential development to the east and employment uses to the west. To the north is a substantial block of woodland. The site has been vacant for a considerable number of years and the redevelopment of the site would make the efficient use of a brownfield site and create an attractive streetscene when travelling past the site on Station Road.

4.2.6 The Council has identified Wombwell as regeneration area as a low demand housing market area. It is considered the sensitive redevelopment of the site will aide the wider regeneration

of Wombwell and deliver a range of homes including family housing (up to 111 dwellings) with the site providing a footpath link to Netherwood Academy on a visually prominent site that is subject to anti-social behaviour particularly fly tipping.

Potential alternative Sites

4.2.7 PPG requires applicants to contact the local planning authority to discuss the scope of the sequential test. The scope of the sequential assessment was agreed with Matthew Smith at Barnsley Metropolitan Council by email on the 13th December 2019 and the relevant correspondence is included within Appendix A.

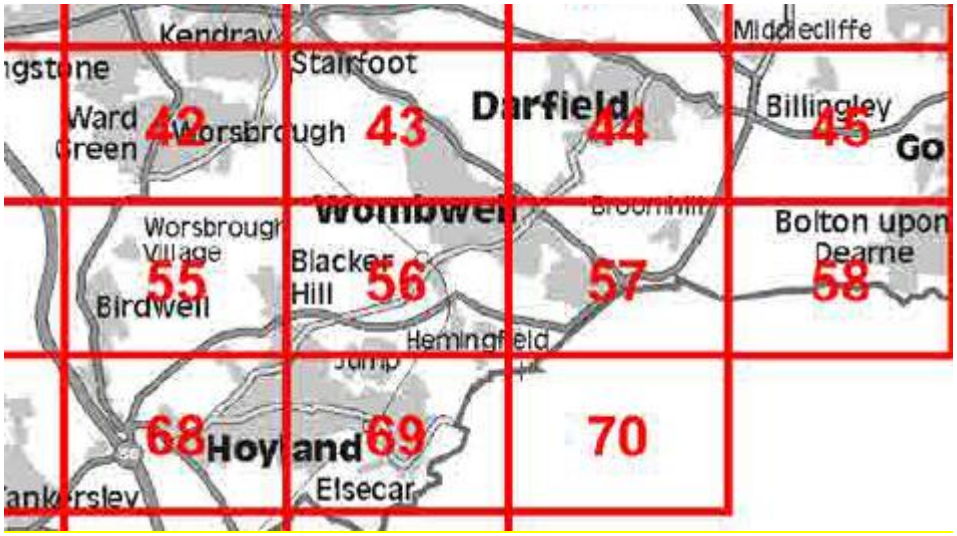

Fig 3: Site Search Area

4.2.8 It was proposed that due to the recent adoption of the Local Plan a review of alternative sites would be limited to the settlement of Wombwell. For ease of reference a review of sites identified as housing and mixed-use allocations in the Local Plan was undertaken for Proposal Maps 43, 44, 56 and 57 (refer to figure 3). This site search area also included part of Darfield.

5 Sequential Test Approach and Result

5.1 Introduction

5.1.1 This chapter provides an assessment of alternative sites, based on the sequential test criteria set out within the previous chapter.

Sites within the criteria area

5.1.2 Within the proposed sequential test scope agreed with the Council, which was limited to Proposal Maps 43, 44, 56 and 57 (refer to Figure 3).

5.1.3 A review of the allocations included in the Local Plan for the identified area was undertaken for

- Housing allocations; and
- Mixed Use allocations.

5.1.4 The need for the development is clear in that there is a national crisis in housing delivery. Though Barnsley has an up to date Local Plan and a 5-year housing land supply the housing target should be considered as a minimum and not a ceiling. Sites that are in sustainable locations, where the technical issues of the site can be suitably addressed should be considered as sustainable development and granted planning permission without delay.

5.1.5 Based on a review of local plan allocations, the following parcels of land were identified.

- Site Ref: HS77 Land at Pitt Street, Wombwell. Indicative yield 109 dwellings. *Comment: Located in Flood Zone 1. Planning Application submitted, decision pending.*
- HS78 Land south of Doncaster Road, Indicative Yield 441 dwellings. *Comment Flood Zone 1. No application submitted to date.*
- Site HS79 Former Foulstone School Playing Fields Indicative Yield 189 dwellings. *Comment Flood Zone 1. No application submitted to date.*
- Site HS80 The Former Fouslstone School Indicative Yield 49 dwellings. *Comment Flood Zone 1.*
- Site HS81 Land rear of Kings Oak Primary School. Indicative Yield 49 dwellings. *Comment: Planning permission granted. Flood Zone 1.*

- Site HS82 Land off Newsome Avenue. Indicative Yield 43 dwellings. *Comment: Planning Permission Granted. Flood Zone 1.*

- Site HS83 Former Kings Road School Site. Indicative Yield 34 dwellings. *Comment Planning Permission Granted. Flood Zone 1.*

- Site HS84 Land east of Lundhill Road. Indicative yield 150 dwellings. *Comment: Avoid locating built development in parts of the site within flood zones 2 and 3. Full planning application (Ref: 2017/1001) granted 27/04/2018. Two conditions discharged (Number 31 and 34) numerous pre-commencement conditions still to discharge.*

- Site HS85 Land at Hill Street/Snape Hill Road Darfield Indicative Yield 32 dwelling. *Comment: Flood Zone 1.*

- Site HS86 Land at New Street, Wombwell. Indicative Yield 35 dwellings. *Comment: Flood Zone 1.*

- Site HS87 Land east of Wortley Avenue, Wombwell Indicative Yield 32 dwellings. *Comment Flood Zone 1.*

- Site MU6 Former Wombwell High School. Wombwell Indicative yield 250 dwellings + primary school. *Comment: Flood Zone1. Full application submitted and validated in January 2019 (Ref: 2019/0089) for 239 dwellings, not determined to date.*

5.1.6 It should be noted that of the allocations identified above only 4 sites have an indicative housing yield of over 100 dwellings and so directly comparable to the application site. It is acknowledged that there are alternative sites (HS77, HS78, HS79, HS84 and MU6) which are located in sequentially preferable locations to the application site. However, it should be noted that only allocation HS84 benefits from planning permission, with pre-commencement conditions still outstanding. For allocations MU6 and HS77 planning applications have been submitted but are yet to be determined.

5.1.7 Given the site is a vacant, brownfield site in a sustainable location the application has been considered against the exceptions test. This allows the benefits of the development proposal to be considered in the overall planning balance.

6 Exception Test

6.1.1 As summarised in Section 5 it is acknowledged that there are allocated sites within Wombwell for residential development located in Flood Zone 1. However due to the specific site history and location the exception test has been applied to the application site.

6.1.2 The NPPF at paragraph 160 sets out that for the exception test to be passed it should be demonstrated that;

a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and

b) the development will be safe for its lifetime taking into account of the vulnerability of its users, without increasing risk elsewhere, and where possible, will reduce flood risk overall.

6.1.3 Dwellings are classed as 'more vulnerable' development. The flood risk vulnerability classification table in the PPG sets out in Flood Zone 2 dwellings as more vulnerable development is appropriate.

6.1.4 The application site is identified as within the urban fabric of Wombwell in the adopted proposal map. Wombwell is identified as a principle town in the Local Plan settlement hierarchy and a sustainable location for new development.

6.1.5 As outline planning application ref: 2005/2017 was granted at appeal (APP/R4408/06/2028445) for residential development, the principle of residential development is considered to be appropriate on the application site. A reserved matters application has been submitted on the site (2010/0310) though the application was never determined.

6.1.6 It is clear from the planning history of the site that it is a suitable location for residential development. The application site is previously developed land which has been vacant for a considerable number of years. The redevelopment of the site would make the efficient use of a brownfield site and create an attractive streetscene on a prominent site when travelling along Station Road which is currently subject to anti-social behaviour particularly fly tipping.

6.1.7 The Council has identified Wombwell as regeneration area as a low demand housing market area. It is considered the sensitive redevelopment of the site will benefit the wider regeneration of Wombwell and deliver a mix of housing including family housing (up to 111 dwellings) on a vacant brownfield site located centrally to Wombwell and Darfield. The

development will also provide footpath connectivity to the surrounding rights of way network including a link to Netherwood Academy.

6.1.8 Substantial landscaping is proposed across the site particularly along the western boundary to Bulling Dike and the northern boundary to the River Dove where ecological corridors are proposed. The indicative site masterplan demonstrates how blocks of green infrastructure will be provided across the site to create linkages through and to the wider green infrastructure assets of Wombwell. The application proposal and deliver a net gain in biodiversity from the existing.

6.1.9 The application will also provide a policy compliant level of affordable housing onsite (10%/11 units) which would comprise of an 80/20 split in terms of social rent/affordable ownership in accordance with the Council's pre-application advice.

6.1.10 Accordingly it is considered part a) of the exceptions site has been clearly passed and subject to part b) of the exceptions test to demonstrate the is safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall planning permission should be granted.

6.1.11 The applicant has provided a site-specific Flood Risk Assessment for the site. The risk of fluvial flooding from the River Dove is medium for most of the Site, with the north-western corner, the south-western part of the Site and small areas towards the centre at low risk. The risk of surface water flooding for most of the Site is assessed as negligible. Bulling Dike and the River Dove are associated with high risk surface water flow pathways and there are three areas of low risk ponding within the central northern part of the Site.

6.1.12 The risk of sewer flooding is low and the risk of flooding from all other sources is negligible.

6.1.13 The FRA sets out a number of measures (refer to paragraph 2.3.1) including, but not exclusively a surface water management strategy, a maintenance plan for Bulling Dyke, compensatory flood storage, finished floor measures and retaining external levels where possible to ensure the development will be safe for its lifetime in respect of flooding.

6.1.14 Consideration of flood issues is not confined to the floodplain. The alteration of natural surface water flow patterns through developments can lead to problems elsewhere in a catchment, particularly flooding downstream; and replacing permeable vegetated areas with low permeability roofs, roads and other paved areas will increase the speed, volume and peak flow of surface water runoff.

6.1.15 A surface water management strategy for the development is proposed to manage and reduce the flood risk posed by surface water runoff from the Site. The site is previously developed land with 55% of the site area considered to be impermeable. The current drainage arrangement within the Site is predominantly by overland flow, following the topography towards the River Dove in the northern part of the Site or Bulling Dike in the southern and western parts of the Site. A small amount of infiltration to bedrock, and throughflow to watercourse is also likely.

6.1.16 Though the site is brownfield, for the purpose of the drainage strategy the existing impermeable area is taken as zero as brownfield rates will not be sought and the Site will be treated as greenfield. The use of infiltration-based SuDS is not feasible for the application site due to the presence of Made Ground beneath the Site. It is therefore proposed to route discharge from the existing Site by outfall to Bulling Dike.

6.1.17 In the FRA (paragraph 6.6.67 Table 6.4) it is calculated the greenfield runoff rates for the developable area and the betterment with outfall is restricted to 5l/s. Restricting discharge to 5l/s would offer a significant betterment on existing conditions when compared to existing undeveloped conditions where runoff is uncontrolled across all return periods. As such, an outfall to Bulling Dike would not increase flood risk downstream from the site.

6.1.18 Attenuation volume for the 100-year event (plus climate change) is 1,318m3. Drainage calculations are included in FRA Appendix 9. The calculated runoff rates and attenuation volumes will be reviewed at detailed design stage.

6.1.19 This FRA demonstrates that the proposed development could be operated with minimal risk from flooding, and would not increase flood risk elsewhere, subject to the implementation of a floodplain compensation scheme, and would in fact reduce flood risk overall.

6.1.20 On Thursday 7th and Friday 8th November 2019, South Yorkshire experienced heavy rainfall which led to widespread flooding in the region. Low Valley, Wombwell was one of the areas which flooded. Enzygo Ltd undertook a site walkover of the Station Road, Wombwell site on Friday 8th November. The purpose of the site walkover was to assess the extents and mechanisms of flooding and compare what happened in reality to how the updated River Dove and Bulling Dyke flood modelling Enzygo Ltd completed in June 2018 performed. The site walkover is evidenced through a File Note and attached to Appendix B of the sequential assessment.

6.1.21 Overall the model predicts fluvial flooding in the area well and the assessment of risk in the Flood Risk Assessment for the Site is reinforced by the evidence observed on 8th November 2019. The mitigation measures recommended in the Flood Risk Assessment (such as surface water management strategy, a maintenance plan for Bulling Dyke, compensatory flood storage, finished floor measures and retaining external levels where possible) should therefore be adhered to ensure residential development is safe at the application site for its lifetime.

7 Conclusion

7.1.1 The sequential assessment and exceptions test relate to an outline application of up to 111 dwellings including a policy compliant 10% onsite affordable housing at land of Station Road, Wombwell.

7.1.2 The site is previously developed land in a highly sustainable location identified as a regeneration area in the adopted Local Plan. The site has previously benefited from planning permission for residential development and the principle of residential development has been established for the site.

7.1.3 The site has been vacant for a considerable period and is subject to fly tipping and has a negative impact on Station Road and the wider Wombwell area. The development of the site for new homes will provide an efficient use of this brownfield site while delivering a range of housing including affordable homes which will add vibrancy and vitality to Wombwell.

7.1.4 The FRA clearly demonstrates the site is safe for its lifetime, and in fact the proposed surface water drainage will be improved through the proposed development and so reduce flood risk overall.

7.1.5 Therefore, the specific site history, constraints and opportunities allow for the Council to support the application and planning permission should be granted without delay.

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