

**From:** [REDACTED]  
**To:** [Local Dev. Framework](#)  
**Subject:** Publication Draft Local Plan Reps (SG085 and SG086)  
**Date:** 09 February 2018 11:45:07  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[18.01.30 LETT RainesRoad.CDCLP.PDF](#)

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Dear Sir/Madam,

Please find attached representation to the Publication Draft Local Plan. The information relates to sites SG085 and SG086, land west and east of Raines Road, Giggleswick.

We'd be most grateful if you could confirm receipt of the attached information.

Kindest regards,

[REDACTED]  
Planner

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**WATCH: [REDACTED] & [REDACTED] Discuss the Benefits of Rural Diversification**

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30<sup>th</sup> January 2018

Planning Policy Team  
Craven District Council

Via Email

Dear Sir / Madam

**REPRESENTATION TO PUBLICATION CONSULTATION DOCUMENT IN RELATION TO LAND WEST AND EAST OF RAINES ROAD, GIGGLESWICK (SITES SG085 AND SG086)**

Our client [REDACTED], of Burley Developments Ltd, has made previous representations on the Local Plan and wishes to take this opportunity to OBJECT to the proposal in the Plan Publication Consultation Draft for sites SG085 and SG086, land to the west and land to the east of Raines Road, Giggleswick.

The two sites are located on the southern edge of Giggleswick and have been promoted throughout the emerging Local Plan process as shown in the image below. The sites adjoin a Site SG072 which attained planning permission for seven dwellings in May 2015 (identified by the number 7 in the below image). This site is currently being developed by our client, Burley Developments Ltd.



Fig1: Sites SG085 and SG086 as proposed within 'Pool of Sites Options' May 2016.

Initially, our client wishes to make known their OBJECTION to the consultation draft Local Plan, in particular the decision not to allocate sites SG085 and SG086 as draft housing allocations within the Local Plan.

The Publication Draft Local Plan notes that the NET Housing Requirement for the village, based on 230 dpa 2012 to 2032 is 37 dwellings, representing a 0.8% proportion of housing growth in line with draft Policy SP4.

In April 2016 the suitability of each site for development was considered as part of the 'Pool of Site Options with Potential for Residential or Mixed Use and Sustainability Appraisal'. As part of this assessment it noted that the sites provided 'a good opportunity for suitable residential development'. Following this, the sites were included in the subsequent consultation document 'Preferred Sites for Housing' published in July 2016.

Further analysis in both 2017 and 2018 confirmed that the sites 'perform satisfactorily in the Sustainability Analysis' and are 'deemed sustainable in order to enter the Pool of Sites (with mitigation measures and recommendations)' subject to Stage 2 analysis. The Stage 2 analysis for each site concludes that 'the site passes all four District Level Analyses. It can be potentially a Preferred Site, but Giggleswick is not to be allocated any Preferred Sites under the draft Local Plan'.

Whilst the above assessment advised that 'Giggleswick is not to be allocated any Preferred Sites under the draft Local Plan', a review of draft Policy SP11 and the draft proposal plan includes site SG014 at Lords Close, Giggleswick which has the potential to yield 35 dwellings.

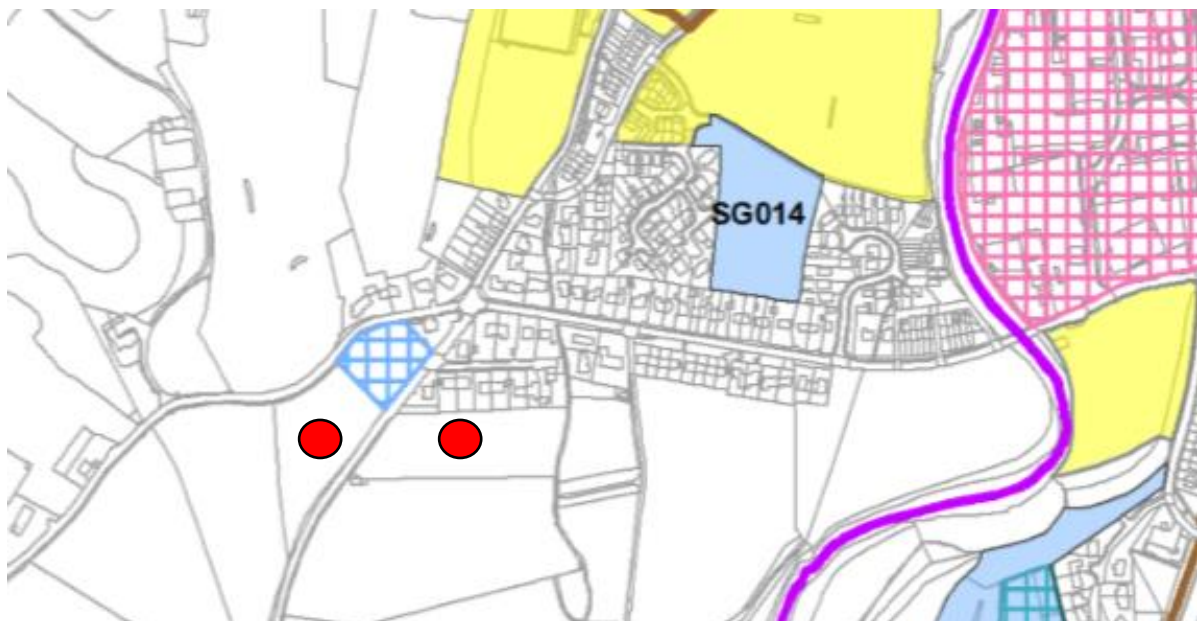


Fig2: Site SG014 as proposed within 'Publication Draft Proposals Map' January 2018 (sites SG085 and SG086 marked by red dot)

As site SG014 is included within the draft Publication Plan there are no reasons why sites SG085 and SG086, both being considered sustainable by the LPA, cannot be included also.

The two sites are extremely deliverable, a point emphasised as our client is currently in the process of developing 7 dwellings on land to the north of, and adjacent to site SG085 (as shown on the image above).

The two sites are both of a size that can provide a level of affordable housing. There has been no affordable housing in Giggleswick in recent years and the provision of additional housing allocations within the village can guarantee the provision of affordable housing throughout the plan period.

Whilst Giggleswick has not received any affordable housing in recent years, the nearby town of Settle has received affordable housing. It is considered that Giggleswick could take additional housing allocation as it is less constrained than the town of Settle, particularly in respect to the topography.

The National Planning Policy Framework is clear that local planning authorities should 'boost significantly the supply of housing' and the housing figures set out in both the current and emerging Local Plan are acknowledged as being a minimum requirement.

Both sites are considered to be sustainable locations within the village of Giggleswick and are sites that have been included as housing allocations within the Local Plan throughout its development.

The allocation of a single site for development within the village does not allow for sustainable growth throughout the plan period (from 2012-2032). At present, it is likely that the proposed housing site at Lords Close would be delivered within the first half of the plan period resulting in no further growth in the second half of the plan period. By allocating more than a single site, the council would ensure that there is the potential for continued housing growth throughout the plan period.

The council could choose one site for the first half of the plan period and one for the second half of the plan period, based on the sites deliverability. It is clear that sites SG085 and SG086 would be extremely deliverable within the plan period, and more deliverable than other potential development sites, particularly as the client is currently on site developing the adjacent land to the north of site SG085.

Given the above it is contested that the Publication Draft Craven Local Plan can be considered 'sound' as it would fail to support positive growth in locations that have been identified to be sustainable.

## Comments on Soundness of Local Plan (Non-Allocation of sites SG085 and SG086)

In line with paragraph 182 of the National Planning Policy Framework we provide the following comments in respect to the soundness of the proposed allocation:

**Positively prepared** – the only reason why the sites have not been allocated by the council are because ‘Giggleswick is not to be allocated any Preferred Sites under the draft Local Plan’. In spite of this, the Publication Draft Policies Map identifies site SG014 as a Draft Housing Allocation within the village. As site SG014 is included within the draft Publication Plan there are no reasons why sites SG085 and SGH086, both being considered sustainable by the LPA, cannot be included also.

**Justified** – Following the council's own assessment of the sites as being ‘a good opportunity for suitable residential development’ the site there is no justifiable reason why the site cannot be considered as a housing allocation.

**Effective** – The allocation of the sites for housing development would be effective as it would deliver housing to the benefit of both the village and wider district. The sites are also being promoted by a local housing developer who has confirmed that the site is deliverable within the plan period and can make an effective contribution to housing need in the district. Plan Objective PO4 seeks to ‘maintain a continuous supply of housing land to meet housing needs throughout the plan period’. The allocation of a single housing site within the plan period will not result in a continuous supply of housing for the residents of Giggleswick. Plan Objective 5 also seeks to improve housing choice in terms of house type, size, tenure, price and location. Again we argue by only allocating a single housing site within Giggleswick would restrict the potential for the council deliver the required mix of housing, including affordable housing over the plan period. By allocating additional land as part of the plan, the council allow themselves the potential for a continuous supply of housing in the village throughout the plan period. Additional allocation will also allow for the delivery of affordable housing throughout the plan period. For these reasons we do not consider the plan to be effective in its current form.

**Consistent with national policy** – The allocation of these sites would be consistent with the NPPF's objective to ‘boost significantly the supply of housing’. Should the site at Lords Close (SG014) not come forward in the plan period then the council would be at risk of being unable to meet their OAN, as required by the NPPF. The inclusion of additional deliverable housing allocations in the village would allow the council the flexibility to adapt to any changes within the district and would allow for a continuous supply of both market and affordable housing over the plan period.

## Conclusion

As has been established in previous representations, there are no site-specific land, ecology or landscape designations, neither are there any listed buildings or designated


heritage assets on or adjacent to either site that would prevent or restrict their development.

Given the above, it is considered that each site represents excellent options for delivering new, high quality housing in Giggleswick on sites that can be genuinely integrated into the village without causing harm to it or its surroundings. The sites are of a scale that can provide much needed affordable housing to the village and wider district as is required within the draft Local Plan.

Our client, therefore OBJECTS to the proposal in the Plan Publication Consultation Draft for sites SG085 and SG086, land to the west and land to the east of Raines Road, Giggleswick.

With kind regards

Yours sincerely

  
Planner

