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[Publication Draft Local Plan - Representations by Giggleswick School 13.02.2018.pdf](#)
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Sir / Madam,

On behalf of our client Giggleswick School, we are pleased to submit the attached representations to the Publication Draft Craven Local Plan, which is currently the subject of public consultation. We would be grateful if you could confirm receipt and let us know if you would like us to provide hard copies.

We trust that the attached is helpful, but please do not let us know if you have any queries.

Kind regards,

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Publication Draft Local Plan Representations by Giggleswick School

January 2018



GIGGLESWICK
SCHOOL

Turley
Planning

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Client



Client

Giggleswick School

Our reference

GIGM3002

13 Feb 2018

1. Introduction

- 1.1 This Report is prepared by Turley on behalf of our client Giggleswick School (hereafter referred to as “the School”). It provides representations to Craven District Council (CDC) regarding the Publication Draft Craven Local Plan¹ (December 2017) (PDLP) which is currently the subject of public consultation. It also provides comments on other relevant “background documents” which comprise the underpinning evidence base for the PDLP.
- 1.2 CDC will be aware that in response to previous Local Plan consultations in the preceding three years the School has promoted the following sites in Giggleswick village – all of which are within its ownership – for a mix of sports and housing development:
- Land adjacent to Lords Close and Sandholme Close (ref. SG014)
 - South of Riversdale (ref. SG015)
 - South of Church Street, east of Tems Street (also referred to as ‘The Glebe Field’) (ref. SG004)
 - Land at Eshton’s playing field, west of Raines Road
- 1.3 These sites and the School’s intentions for them are discussed in Section 6 of this Report.

Overview

- 1.4 The School welcomes CDC’s progress with the emerging Local Plan and the changes which have been made from the Pre-Publication Draft version made available in June 2017. In particular, the School strongly supports the allocation of its land at Lord’s Close for residential development (reference: SG014), the development of which is required to meet housing needs and facilitate the delivery of much-needed new and improved sports facilities and open space within the School’s estate.
- 1.5 However, the School remains concerned with some aspects of the PDLP, including:
- The scale of housing growth proposed across the District and in the Tier 4 villages; and
 - The proposed designation of the Schools land at Church Street (reference: SG004) and south of Riverdale (reference: SG015) as Local Green Space (Policy ENV10) and Open Space (Policy INF3) respectively.
- 1.6 The School’s concerns are set out in detail in this report and it respectfully requests that CDC reconsiders the content of the emerging Local Plan accordingly.

¹ *Publication Draft Craven Local Plan*, Craven District Council (December 2017)

Structure

1.7 The remainder of this Report is structured as follows:

- Section 2: Giggleswick School
- Section 3: Policy Context
- Section 4: The District-Wide Housing Need
- Section 5: The Need for Housing in Giggleswick
- Section 6: Development Opportunities in Giggleswick
- Section 7: Conclusion

2. Giggleswick School

- 2.1 Giggleswick School is an independent co-educational day and boarding school which caters for children of all ages. The School was founded on approximately half an acre of land in the early 16th Century. Over the last 500 years it has steadily grown in size and today the campus comprises several sites across the Giggleswick village, including the principal school buildings and chapel to the north, boarding houses in the heart of the village itself, and sports pitches/playing fields located towards the centre and south.
- 2.2 The School has a rich history and has played an instrumental role in the growth and development of Giggleswick village. The village has grown in tandem with – and indeed because of – the success of the School. The School continues to play a crucial and active role in village life, with regular sporting and social events, whilst a significant number of residents living in the local area work on the campus, either as part of the educational team or in maintaining and managing the School's estate. The School is therefore a major asset both for Giggleswick and Craven as a whole; it is a significant local employer, has a critical role in the economic and cultural vitality of the area, and raises the profile of the District both in the UK and internationally.
- 2.3 The School operates at a high level and is recognised for the exemplary education which it provides to its students. However, it faces ongoing competition with other similar educational establishments throughout the north of England and beyond. The future sustainability and success of Giggleswick School is dependent upon its ability to maintain its high standards and its highly regarded reputation, and to provide an attractive “offer” for prospective UK and international students. It is therefore critically important for the School to continue its programme of investment, to maintain and enhance both its education and recreational facilities.
- 2.4 Mindful of the School's charitable status, the development of small-scale but high quality residential developments which are well integrated into the built fabric of the village has been essential in providing finance to underpin the expansion and improvement of the School's campus. In the last 10 years, the revenue from such developments has enabled the investment of £13m in new facilities to give the School the best possible classrooms and sports and cultural facilities. This includes a new £1.5 million Sports Hall and the Richard Whiteley Theatre which hosts a full programme of live productions, music and dance as well as being used for drama lessons and co-curricular clubs and societies. These facilities are essential in enabling the School to compete in the market place, but have also conveyed direct benefits to the local community who make use of the facilities.
- 2.5 To this end the School has identified a small number of future opportunities to generate investment funds for further much-needed improvements to its campus. The opportunities themselves will contribute towards meeting the housing and sporting needs of the local area in the interests of improving the quality of life in the wider community. The School remains keen to work with CDC to realise these opportunities.

3. Policy Context

3.1 The National Planning Policy Framework (NPPF) provides the overarching policy context for the emerging Local Plan. In this regard, insofar as its policies are relevant to this representation, the NPPF requires local planning authorities to:

- *“...boost significantly the supply of housing...”* (paragraph 47);
- *“...identify the size, type, tenure and range of housing that is required in particular locations....”* (paragraph 50);
- *“...ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing...”* (paragraph 47);
- Ensure that their Local Plan incorporates *“...sufficient flexibility to adapt to rapid change...”* (paragraph 14);
- *“...plan positively to support local development, shaping and directing development in their area...”* (paragraph 16). Indeed, the need to “plan positively” is one of the four tests of soundness;
- Ensure *“...that the planning system does everything it can to support sustainable economic growth...”* (paragraph 19);
- Ensure that Local Plans are *“...aspirational but realistic...”* (paragraph 154);
- Ensure that their Local Plans not only meet needs but also respond *“...positively to wider opportunities for growth...”* (paragraph 17); and
- Conserve and enhance the natural environment (paragraph 109).

3.2 We refer to other policies of the NPPF, as well as the national Planning Practice Guidance (PPG), elsewhere in this Report.

4. The District-Wide Housing Need

4.1 This Section provides comments on the need for new homes in Craven.

The Scale of Housing Delivery

Assessing the options

4.2 Before commenting on the scale of the housing requirement identified in Policy SP1 of the PDL, we set out an initial fundamental point regarding the basis on which it has been identified. Previous consultations in respect of the emerging Local Plan have identified that, in addition to the housing requirement itself, several “alternative growth options”² have been considered by CDC, including in particular:

- Option A (145 dpa) which is “...based on the annual average number of dwellings completed (net) over the past 9 years...”; and
- Option D (350 to 400 dpa) which is the level of delivery required to enable the District “...to meet all its need for affordable housing (FOANAH)...”.

4.3 Option A is not a logical, reasonable or robust growth option. It is supply-led; it has not been identified by a robust assessment of potential housing needs but instead simply projects forward the number of new homes completed in previous years. It does not therefore represent a legitimate growth option which has been identified in accordance with the methodology set out in the PPG or the NPPF.

4.4 Moreover, Option A is well below the OAN for the District and would evidently fail to meet housing needs in full. It is therefore unsustainable and wholly inconsistent with the requirements of the NPPF. It would effectively plan for decline, constrain economic growth, and exacerbate the housing crisis which is evident in the extremely low and worsening affordability in the District (see below).

4.5 Option D is broadly aligned with the scale of the affordable housing need in the District. As such, and unlike Option A, it is a legitimate growth option. However, it is notable that it is significantly higher than the other options considered by CDC. Options A, B and C are different from each other by 32 to 37 dwellings respectively; in contrast, the lower end of the range presented by Option D is 136 dwellings – almost 64% – higher than Option C.

4.6 CDC has subsequently considered intermediary growth options, which are higher than Option C but lower than Option D³. However, the higher growth options are ruled out because, *inter alia*, the additional dwellings required could not be accommodated in Skipton, such that additional delivery would need to take place in the District’s “...lower order service centre settlements...”. CDC contends that this “...would not represent a sustainable pattern of growth...”. The School disagrees with this conclusion. It is not considered a sound approach to fail to meet housing needs principally because the District’s largest settlement is unable to accommodate its required share of growth.

² Pre-Publication Draft Craven Local Plan: Consultation Document, Craven District Council (June 2017)

³ Craven Local Plan; Housing Growth Option Paper: Addendum, Craven District Council (November 2017)

This is particularly the case given that the identified “share” is somewhat arbitrary and artificial. Moreover, it is evident that the “lower order” settlements are capable of sustainably accommodating higher levels of growth and that it is necessary to do so if they are to be sustainable in future years. This matter is discussed in greater detail in relation to Giggleswick in the following chapter.

- 4.7 Mindful of the above, it is considered that the process of identifying the housing requirement proposed in the PDLP is flawed and cannot be considered to be “...*the most appropriate strategy...*”⁴ when considered against the reasonable alternatives, given that the alternatives themselves are not reasonable. It is therefore unjustified in the meaning of paragraph 182 of the NPPF. It is important to note that, in this respect, the assessment of the impact and appropriateness of the PDLP undertaken by the associated Sustainability Appraisal⁵ (SA) is also considered to be deficient.

The Housing Requirement

- 4.8 Policy SP1 of the PDLP identifies a requirement to deliver 230 dpa between 2012 and 2032. A higher requirement has been disregarded by CDC on the basis that:
- It may not be deliverable given the low rate of past dwelling completions in the District;
 - It would result in greater environmental harm; and
 - It would be “out of balance” with current economic growth forecasts for the District.
- 4.9 Each of these issues is discussed in turn below.

Past dwelling completions

- 4.10 It is acknowledged that housing completions in Craven over the preceding 10 years have been low, averaging approximately just 162 dpa between 2007/08 and 2016/17⁶. However, as acknowledged by the Local Plan evidence base⁷, this can be attributed to two key factors:
- The economic downturn in the late 2000’s. This was deepest and longest period of economic recession since the 1920’s, which resulted in a significant decline in housing completions as finance – both for development and for mortgages – was extremely constrained.
 - The absence of an up-to-date local Development Plan which provides a deliverable supply of development land.

- 4.11 As such, it is both erroneous and misleading to use past dwelling completions as a benchmark for the level of housing growth which should be provided for to secure a

⁴ NPPF, paragraph 182

⁵ *Craven Local Plan: Sustainability Appraisal Report and Sustainability Appraisal of Policies*, Craven District Council (June 2017)

⁶ *Annual Monitoring Report for the Period April 2016 to March 2017*, Craven District Council (December 2017)

⁷ *Housing Growth Option Paper*, Craven District Council (June 2017)

sustainable future for the District. They are not representative of what can be achieved in a positive economic context where a deliverable and viable supply of housing land is made available. Instead, they represent periods of recession and land supply constraints. The approach of CDC in this respect does not meet the clear requirement of the NPPF to plan positively and will not overcome obstacles experienced in previous years to achieve a sustainable and aspirational vision for growth.

4.12 There is clear evidence that:

- A higher level of development can be achieved in the District, with 278 dwellings delivered in 2007/08; and
- There is a recognised imbalance between supply and demand, with the District having an affordability ratio of 8.12 – almost 8% higher than that across England as a whole.

4.13 It is evident that there is high demand in the District, as acknowledged by CDC in its assessment of market signals. In this context, the low rate of past completions does not justify a reduced housing requirement.

Environmental considerations

4.14 The PDLP sets out that a requirement in excess of that proposed would risk environmental harm and/or unsustainable patterns of growth. However, it is evident that there is development land in the District that is not identified as a draft allocation but which is both suitable for development and sustainably located. For example, the School's land south of Riversdale is not located in a flood zone or subject to any overriding environmental constraints. CDC's own evidence base⁸ notes that the site "...performs satisfactorily..." in the Sustainability Analysis and is deemed to be sustainable for residential development.

4.15 The evidence base for the PDLP therefore demonstrates that a higher housing requirement can be achieved whilst ensuring that the Local Plan itself is environmentally sustainable. Whilst environmental considerations might not support a requirement of 350-400 dpa, a requirement of 256 dpa – 11.3% higher than currently proposed – was set out in the previous version of the Local Plan and was judged by CDC at that time to be environmentally sustainable.

Conclusion

4.16 It is clear that the rationale applied by CDC in selecting the requirement – and in rejecting a requirement in excess of 214 dpa – is somewhat flawed. As such, the housing requirement proposed by Policy SP1 of the PDLP is not justified and is, therefore, unsound. We consider that CDC should re-consider the merits of a higher housing requirement.

4.17 Given the wide array of potential and environmentally sustainable development options identified by CDC, coupled with the scale of housing demand in the District, there is no reason why a higher level of growth should be considered unsustainable or

⁸ *Background Paper: Residential Site Selection Process (incorporating employment site selection)*, Craven District Council (January 2018)

unachievable. As CDC acknowledges, a higher rate of growth would result in the delivery of more affordable housing, which is an important consideration given that the approach set out in the PDLP is incapable of meeting such needs. We therefore strongly encourage CDC to pursue such a strategy.

The Plan Period

- 4.18 The NPPF states that Local Plans should be “...drawn up over an appropriate time scale, preferably a 15-year time horizon...” (paragraph 157). It is noted that CDC’s current timetable⁹ anticipates adoption of the emerging Local Plan in March 2019. Even if this is achieved, which is considered to be somewhat unlikely, it will mean that the Local Plan covers only a 13-year time horizon given that the plan period will end in 2032. In this respect, the PDLP is inconsistent with the NPPF and is therefore unsound. The plan period must be extended to 2034 at the earliest.

Reserve Sites

- 4.19 In identifying land allocations which are sufficient to deliver housing growth, the presumption in favour of sustainable development established by the NPPF includes a specific requirement to ensure that Local Plans have “...sufficient flexibility to adapt to rapid change...” (paragraph 14). For example, if CDC only allocates just enough land to deliver the Local Plan housing requirement, there is a risk that the requirement will not be achieved if one or more of the allocated sites is not delivered. Local Plans should therefore “over-allocate” to an extent, thereby ensuring that they incorporate flexibility. Such an approach is endorsed by the Local Plans Expert Group (LPEG) – an independent panel of planning experts assembled by the Government to advise on improvements to the plan-making process. LPEG has recommended that Local Plans should “...make provision for, and provide a mechanism for the release of, developable Reserve Sites equivalent to 20% of their housing requirement...Reserve Sites represent land that can be brought forward to respond to changes in circumstances...”¹⁰. This is a sensible approach to ensure that development needs are met and that Local Plans are capable of being robust throughout the entire plan period.
- 4.20 The scale of the land allocations identified in the PDLP is sufficient only to deliver the proposed housing requirement. It will not therefore provide the flexibility required to ensure that the minimum housing requirement is delivered in the event that only one or two sites are not delivered or do not come forward as quickly as envisaged by CDC. We therefore encourage CDC to identify Reserve Sites in its emerging Local Plan to ensure that it is capable of being found sound.

Affordable Homes

- 4.21 CDC’s SHMA Update¹¹ identifies that there is a net shortfall of 126 affordable dwellings pa. The PDLP identifies a target for affordable housing provision of 30%, which will be insufficient to meet the shortfall. The PDLP evidence base notes that the scale of

⁹ *Local Plan Timetable*, Craven District Council (December 2017)

¹⁰ *Report to the Communities Secretary and to the Minister of Housing and Planning*, Local Plans Expert Group (March 2016)

¹¹ *Strategic Housing Market Assessment Update 2017*, Arc4 (November 2017)

affordable need in the District would justify a higher target but that it is important that the target itself is realistic and maintains general housing delivery. We highlight that the identification of a slightly higher housing requirement would yield a greater amount of affordable housing delivery, whilst achieving additional economic gains. We strongly encourage CDC to consider such an approach.

- 4.22 The 30% target is lower than that identified in the Pre-Publication Draft Local Plan (40%). This change in policy is proposed in response to an update to the Local Plan evidence in respect of viability¹². The School welcomes the change in approach, noting that it is necessary to ensure that the delivery of new homes in the District is not compromised by unduly onerous obligations.

¹² *Craven Local Plan Pre-Publication Consultation Draft – Viability Assessment, Aspinall Verdi (November 2017)*

5. The Need for Housing in Giggleswick

5.1 Policy SP4 of the PDLP sets out a spatial strategy for the delivery of the proposed housing requirement. It seeks to focus growth in the key settlements of Skipton, Settle, and Low and High Bentham, whilst directing lower levels of growth to other locations. 0.8% of the housing requirement is proposed to be delivered in Giggleswick, equating to 1.84 dpa and an overall requirement for just 37 dwellings over the 20-year plan period. However, on the basis that completions to date and extant commitments total 36 dwellings, the PDLP identifies that there is no baseline need to allocate any further land development in the village.

5.2 The PDLP does allocate the School's land at Lords Close for a residential development, with an estimated yield of 35 dwellings. However, mindful that this exceeds the 1 dwelling residual requirement referred to above, it identifies that the site is an "exception". The School disagrees with this conclusion.

The Requirement

5.3 The School objects to the very low rate of growth proposed for Giggleswick. The rate of growth is significantly lower than that which has been achieved in the recent past. For example, Census data shows that between 2001 and 2011 the dwelling stock of the village increased by 69 dwellings, an average rate of 7 dpa¹³. The PDLP therefore proposes to drastically reduce the rate of delivery in Giggleswick.

5.4 The delivery of 1.84 dpa in Giggleswick equates to an annual growth rate of 0.33%¹⁴. This is much lower than the average rate of growth for the District (0.85%). It is acknowledged that growth is principally focussed on the larger settlements, which are typically more sustainable given that they offer a greater range of services and facilities. However, it is noted that the housing requirement in the PDLP equates to an annual growth rate of:

- 1.63% in Skipton; and
- 1.5% in Settle.

5.5 It is therefore evident that the spatial strategy focusses on the larger settlements to a disproportionate extent.

5.6 A low rate of growth in Giggleswick, particularly compared to Settle and other larger settlements, would risk the village being left behind and could diminish its role within the settlement hierarchy of the District. The PDLP proposes a low rate of growth in all of the Tier 4 settlements, referred to as 'Villages with Basic Services'. The villages account for over a quarter (25.39%) of all of the housing in Craven, but are apportioned just 12.61% of the proposed requirement for the District in the PDLP. As illustrated in Figure 5.1 below:

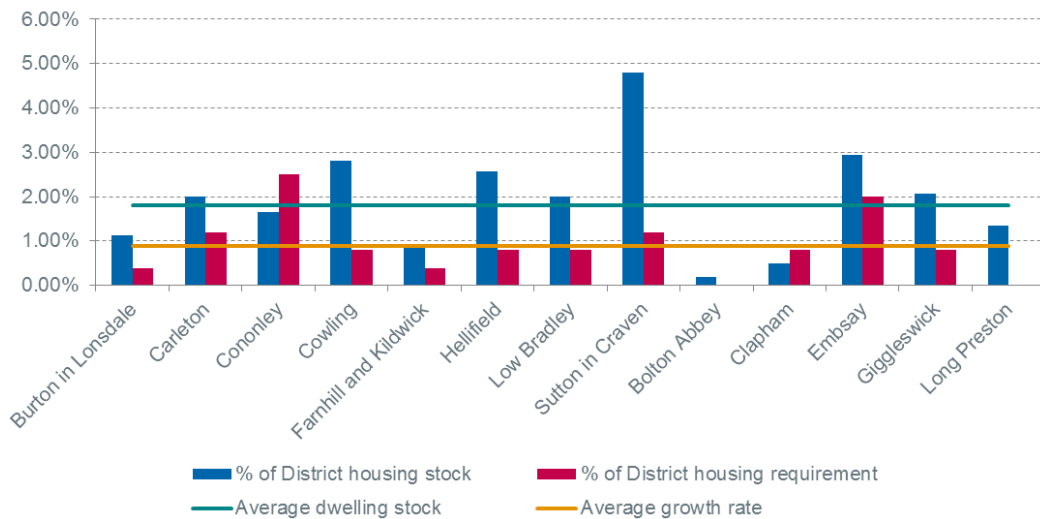
¹³ Source: Census data for Giggleswick Parish, Office of National Statistics (ONS)

¹⁴ Based on an existing dwelling stock of 556 dwellings (Census 2011).

- On average each village accounts for 1.81% of the housing stock in the District but they have a proposed growth rate in the PDLP of just 0.84%.
- Giggleswick makes an above average contribution to the housing stock of the District (2.06%, compared to the average of 1.81%) but has a below average growth rate (0.80%, compared to the average of 0.84%).

5.7 It is therefore clear that the Tier 4 settlements are disproportionately constrained in terms of growth by the PDLP, with provision in Giggleswick being particularly unreasonable given that it falls considerably short of the average. This is despite CDC's own evidence base acknowledging that Giggleswick is one of the largest Tier 4 villages¹⁵.

Figure 5.1: Percentage of housing stock and proposed rate of growth in Tier 4 settlements



5.8 The rate of housing delivery in Giggleswick is much more constrained than some of the other villages. In particular:

- Giggleswick is notably larger than Cononley (556 and 456 dwellings respectively). However, the proposed rate of development in Cononley – 6 dpa – is more than double that proposed in Giggleswick.
- Giggleswick is over four times larger than Clapham (131 dwellings respectively). Despite this, the PDLP proposes that the two villages will have the same proposed rate of housing delivery of 2 dpa.
- Giggleswick is comparable in size to Carleton (542 dwellings). However, the PDLP proposes that Carleton will accommodate 3 dpa, significantly above the growth rate proposed for Giggleswick.

¹⁵ A Spatial Strategy for Growth Distribution in Craven: Alternative Spatial Strategy Options and Preferred Spatial Strategy Option and Sustainability Appraisal of Spatial Strategy Options, Craven District Council (April 2016)

- 5.9 It is therefore clear that the level of growth in Giggleswick identified in Policy SP4 is unreasonably low. This may be due in part to the spatial distribution for the Tier 4 settlements being determined on the basis of the existing commitments in each. For example, the PDLP proposes a requirement in Embsay of 5 dpa – more than double the rate of development in Giggleswick, despite Embsay being only slightly larger in size. This high requirement for Embsay appears to be proposed principally on the basis that there are extant planning permissions to deliver 101 dwellings in the village. A similar situation is evident for other villages – larger housing requirements are proposed where there are a high number of extant commitments. This is not a sound approach to plan-making; Local Plans should seek to positively plan for sustainable development, not be influenced unduly in this way.
- 5.10 Giggleswick is one of the largest Tier 4 settlements and is a demonstrably sustainable location for the development of new homes. It adjoins the town of Settle immediately to the east of the village. Local residents have access to a wide range of shops, services and facilities – including food stores, a library, doctors surgery, dentist, schools and extensive areas of public open space, all of which are located within or approximately 1km from Giggleswick. The village lies approximately 600m to the north east of the A65 highway and the majority of it is within a 1km walking distance of Settle railway. The range of services and facilities in Giggleswick and its accessibility means that it is demonstrably more sustainable than several of the other Tier 4 settlements in the District, some of which – such as Embsay – have a significantly larger housing requirement.
- 5.11 There is therefore no reason why growth in Giggleswick should be constrained. Indeed, given the size, role and function of the village, it is considered that the scale of its need is likely to exceed that identified by Policy SP4. The rate of growth proposed for Giggleswick in Policy SP4 should be increased such that it is commensurate with the sustainability and role of the village.
- 5.12 Notwithstanding the level of growth proposed in Giggleswick by Policy SP4, the PDLP proposes the allocation of the School's land at Lords Close (ref. SG014) for residential development (Policy SP1). The School welcomes this allocation, which will bring forward much-needed new homes in Giggleswick to meet the needs of the settlement and underpin its future sustainability. Mindful that the extent of land allocations proposed in the PDLP equates almost exactly to the identified housing requirement, it is evident that the residential development of the Lords Close site is an important component in meeting the housing needs of the wider District.

6. Development Opportunities in Giggleswick

6.1 Giggleswick School has promoted three potential residential development sites to CDC in previous representations, including the following:

- SG014: Land at Lords Close
- SG015: South of Riversdale and north of school playing fields
- SG004: South of Church Street, east of Tems Street

6.2 The first of the above sites (SG014) is proposed to be allocated for residential development by Policy SP11 of the PDLP, with an estimated yield of 35 dwellings. The second two sites (SG015 and SG004) are not proposed to be allocated for development and are instead proposed to be designated as Local Green Space (Policy ENV10) and as Open Space (Policy INF3) respectively. Each of the three sites is discussed below.

Land at Lords Close (SG014)

6.3 The Lords Close site is comprised of approximately 1.01ha of undeveloped land which sits in the gap between Lords Close to the west and Sandholme Close to the east. It is bound on three sides (east, south and west) by existing residential development, and to the north by a footpath and by the remainder of the Lords playing fields. It has an estimated yield of approximately 35 dwellings at a density of 32 dwellings per hectare (dph).

6.4 The following paragraphs discuss the deliverability of the allocation, the need for the allocation, and the development principles proposed within the PDLP.

Deliverability of the allocation

Suitability

6.5 The site is demonstrably suitable for residential development. In particular:

- It is well-related to the existing built-up urban area of Giggleswick, with established residential uses on three sides. It would comprise a logical 'rounding off' which would have minimal impact on the urban form of Giggleswick and which would integrate successfully with the existing community.
- It is located entirely within Flood Zone 1 and is not at risk of flooding from surface water, as confirmed by the online Flood Map for Planning¹⁶. As such, flooding/drainage issues pose no obstacle to the development of the land, as has been demonstrated by the delivery of homes immediately to the site's western boundary.
- It does not include any trees. There are a small number of trees within the adjacent residential development at Sandholme Close are located immediately

¹⁶ <https://flood-map-for-planning.service.gov.uk/>

adjacent to the Lords Close site. An Arboricultural Report¹⁷ has confirmed that these trees do not pose an obstacle to the residential development of the land and that the use of appropriate safeguards during construction can ensure that they are protected.

- It is not of high ecological value. It does not recognised for its ecological value by the presence of any statutory or non-statutory designations. Rather, it is comprised of a grassed area which is mown at regular intervals and used as a playing field. A Phase I Habitat Survey¹⁸ has confirmed that it is only of “low to moderate” ecological value.
- It is accessible from the adopted highway, via a spur from the access road which runs between Bankwell Road and Lords Close.
- It is not subject to any known utility issues in the locality and, given the relatively limited scale of the site, it is readily capable of being integrated into the existing infrastructure network.

6.6 The site currently forms part of the School’s existing playing field provision (see below for discussion of matters relating to the loss of designated open space). Nevertheless, given that it is somewhat of an outlier from the main area of playing fields to the north and would represent a logical ‘rounding off’ of the existing residential development in this location, it is considered that it represents a suitable and sustainable site for residential development. Indeed, this conclusion is reached both by CDC’s Strategic Housing Land Availability Assessment (SHLAA) and by the evidence base which accompanies the PDL¹⁹.

Availability

6.7 The School can confirm that the Lords Close site is available for residential development. The land is entirely within the ownership of the School, which is a ‘willing landowner’ that has expression an intention to sell the land for development. The land is not subject to any legal or ownership problems, such as ransom strips or tenancies, which might present an obstacle to the early delivery of the development. As such, the land is available for development in the short term.

6.8 Subject to the allocation of the land within the adopted development plan, the Schools intention is to secure outline planning permission for its residential development. The School will thereafter market and sell the land to an appropriate housebuilder.

Achievability

6.9 The residential development of the Lords Close site is achievable and viable in the short-term. It is located in a strong market area which experiences high demand for new family homes. It is in close proximity to high quality transport routes and public transport services, such that it can be easily accessed. Mindful of the scale of the

¹⁷ *Arboricultural Report to BS5837:2012 at land off Lords Close, JCA (2015)*

¹⁸ *Phase I Habitat Survey Report at Lords Close, JCA (2015)*

¹⁹ *Background Paper: Residential Site Selection Process (incorporating employment site selection), Craven District Council (January 2018)*

development, it is envisaged that the new homes can be delivered in a single phase within two to three years.

The need for the development

- 6.10 As discussed in the preceding chapters of this report, The School considers that the PDLP has significantly underestimated the scale of housing development required both across the District and in Giggleswick itself. It is considered that the residential development of Lord's Close is required to meet such needs. It will meet the growing demand for new homes in the local area, addressing the affordability challenges which are present, and underpinning its sustainability over the longer-term.
- 6.11 The delivery of the development is also a critical aspect of the School's proposals for future growth. As discussed in Chapter 2 of this representation and mindful of the School's charitable status, the development of small-scale but high quality residential developments which are well integrated into the built fabric of the village is essential in providing finance to underpin the expansion and improvement of the School's campus. This is required to enable the School to compete in the market place, but also conveys direct benefits to the local community who make use of the facilities.
- 6.12 In this context, the development of new homes at Lord's Close will provide the financial resources required to deliver improvements to the School's campus. This could entail improvements to the School's sports facilities. In this regard, CDC will be aware that various parts of the School's existing sports facilities are in urgent need of repair and enhancement. This is essential to ensure that the sports facilities remain fit for purpose and to enable the School to compete in the market place. In particular:
- The Schools existing artificial playing surface on land at the Eshton's playing field to the west of Raines Road is nearing the end of its lifespan. It needs to be relaid in the near future in order for its continued use by the School and local community to be safe.
 - Existing areas of open space to the north of the Lords Close playing field are unusable, as a result of the roots of adjacent trees creating an uneven playing surface. There is a need to re-profile the land in this location such that the land can be brought back into use for sports and recreation activities.
- 6.13 In addition, the School has identified a need to enhance the scale and quality of the sports pitches within its estate such that it is able to present an attractive "offer" to prospective students. Similarly, CDC's Playing Pitch Strategy²⁰ has identified an urgent need for increased rugby pitch provision in the local area and recommends that *"...further 3G provision is developed at Giggleswick school, in order to service the northern and central sub-areas..."* (paragraph 3.8.21). The objective to deliver enhanced sports facilities within the School's estate is identified in the PDLP²¹.
- 6.14 The School has explored funding options for the improvements to its campus from external investment partners and public sector organisations, but any such opportunities are of insufficient scale to deliver the works required. As such, the

²⁰ Craven Playing Pitch Strategy, Craven District Council (February 2016)

²¹ Paragraph 8.21, Publication Draft Craven Local Plan, Craven District Council (December 2017)

residential development of the land at Lords Close is required in order to provide the essential funding necessary. If new homes are not delivered at Lords Close and the School is unable to obtain the associated uplift in land value, the School will be unable to deliver the required improvements to its campus.

Conclusion

6.15 The School strongly supports the allocation of SG014 and the associated “development principles” identified in the PDLP. The residential development of the land is required to:

- Meet the housing needs of the local community in this part of the District, as discussed in Chapters 4 and 5 of this representation.
- Facilitate the delivery of new and improved sports facilities and open space within the School’s estate, in respect of:
 - The repair of existing facilities; and
 - Deliver improved sports facilities in response to a local need and to enable the School to compete in the market place.

6.16 The land at Lords Close is suitable, available and achievable for residential development. The land is demonstrably deliverable and it is envisaged that the new homes will be developed within five years of the adoption of the Local Plan. The School considers that the allocation of the land is sound.

South of Riversdale (SG015)

6.17 Site SG015 comprises 0.22ha of land immediately south of Riversdale and north of Lord’s playing fields. It is an undeveloped site and includes a small number of trees which were the subject of an Arboricultural Assessment, which was submitted to CDC in August 2014 alongside an illustrative layout for residential development. These submissions demonstrated that the site can be appropriately developed whilst also retaining the most valuable trees.

6.18 CDC also controls a small area of land at and adjoining the site. The School has previously been in discussions with CDC regarding its delivery and would be willing to work with CDC in respect of its joint promotion and disposal. The School would appreciate further discussions with CDC in respect of this matter.

6.19 There are no known utility or infrastructure capacity issues within the area which would pose an obstacle to the early delivery of the site. It is small in scale with a potential yield of 6 dwellings, and it is therefore anticipated that it can be readily accommodated within the existing infrastructure network. It can be accessed either via:

- Riversdale without necessitating access from the narrow access road at the northern boundary of the site; and/or
- Bankwell Road by means of a link at the north of the Lord’s playing field.

- 6.20 CDC's SHLAA identified that the land is suitable for residential development and this was confirmed by its identification as a 'Preferred Housing Site' in the first draft Local Plan in late 2014. This conclusion is reiterated in the evidence base which accompanies the PDL¹⁹.
- 6.21 The site was previously designated as 'Existing Recreation/Amenity Space' by the Craven District Local Plan (1999) and is proposed to be designated as 'Open Space, Civic Space, Sport and Recreation Facilities' by Policy INF3 of the PDL. The School objects to the designation of the land as such. It is marginal land and is unused. It is currently dominated by overgrown scrub vegetation and cannot be viably used as part of the playing fields to the south. As such, it is not used and has no value as open space. The designation of the land as such is therefore unjustified and, as such, is unsound.
- 6.22 The School objects to the designation of SG015 as open space and considers that it should instead be allocated for a small-scale residential development.

Church Street (SG004)

- 6.23 Site SG004 – referred to as the Glebe Field – comprises 0.35ha of land immediately south of Church Street and west of Tems Street. The PDL proposes that the land be designated as Local Green Space (Policy ENV10).
- 6.24 CDC will be aware that the School has promoted the land for a residential development allocation during previous Local Plan consultations. The School remains of the view that the land is suitable for development – it provides an important opportunity to deliver new homes in a sustainable location and on land which has very few constraints. However, the School's attention over the short- to medium-term will be focussed primarily upon the delivery of the proposals for the residential development of Lord's Close. As such, the development of the Glebe Field is not currently a significant priority and the School is therefore no longer actively seeking the allocation of it for residential development. Nevertheless, the land remains an important asset within the School's estate. As such, the School strongly objects to the designation of the land as Local Green Space.
- 6.25 The PDL identifies that the site proposed to be designated as Local Green Space. The School provided a detailed note to CDC in November 2015 and again in January 2017, setting out that it does not have the attributes of Local Green Space. The most recent representation is provided in full at Appendix 1 and identifies that:
- The site does not have any local significance in terms of its visual attractiveness or aesthetic value, and its contribution to the townscape and character of Giggleswick is extremely limited given its contained location to the rear of existing buildings on Church Street;
 - The land does not have any historic significance;
 - The Site is privately owned land and is not formally used for any recreational activities. The School permits access to the PROW which runs across the land, but any use of the land itself represents misuse by the local community;

- Mindful that the land is privately owned, it has no value to the local community as a place of reflection and peaceful enjoyment; and
- Ecological surveys have identified that the Site is not demonstrably special in terms of its richness of wildlife.

6.26 The School therefore objects to the designation of the site as Local Green Space, which is considered to be unjustified and therefore unsound.

7. Conclusion

- 7.1 The ability of Giggleswick School to deliver a small number of high quality residential developments is critical to its ability to generate investment funds. This is particularly the case given the current scarcity of public sector investment. The ability to deliver such developments is essential to enable the School to undertake much-needed maintenance of and improvements to its facilities, whilst the opportunities themselves will contribute towards meeting housing needs and improving the quality of life for communities in the local area. The School is experienced at delivering residential development opportunities.
- 7.2 The School strongly supports the allocation of the land at Lord's Close for residential development. The residential development of the land is required to:
- Meet the housing needs of the local community in this part of the District.
 - Facilitate the delivery of much-needed new and improved sports facilities and open space within the School's estate.
- 7.3 The land at Lords Close is suitable, available and achievable for residential development. The land is demonstrably deliverable and it is envisaged that the new homes will be developed within five years of the adoption of the Local Plan. As such, the School considers that the allocation of the land is sound.
- 7.4 Notwithstanding the above, the School objects to the content of the PDLP which:
- Seeks to unnecessarily suppress the rate of housing development across the District. In this regard, it is considered that there is a lack of alignment between the housing OAN and employment OAN, and the rationale for the rejection of a higher housing requirement is flawed.
 - Disproportionately constrains the amount of growth proposed in the Tier 4 villages and in Giggleswick in particular.
 - Proposes to designate the land south of Riverside (SG015) as 'Open Space, Civic Space, Sport and Recreation Facilities' (Policy INF3) despite the current inability to viably use the site for such a purpose. The School considers that such land should be allocated for residential development.
 - Proposes to designate the land south of Church Street (SG004), also referred to as the 'Glebe Field', as 'Local Green Space' (Policy ENV10), despite the land not having the attributes required in this respect.
- 7.5 In respect of the above points, the School considers that the content of the PDLP is unsound and respectfully requests that it is amended accordingly. We trust that these representations are helpful to CDC as it continues to progress the emerging Local Plan. The School would welcome discussions with CDC about the content of this report.

Appendix 1: Representations regarding the proposed Local Green Space designation at The Glebe Field

Note from Craven District Council

Appendix 1 has been removed at the request of the representor and with the agreement of the Inspector.