

From: [REDACTED]
To: [Local Dev. Framework](#)
Subject: Craven Publication Draft Local Plan - Representations prepared on behalf of Keyhaven Homes
Date: 13 February 2018 10:02:05
Attachments: [46b19847.fe5367ea.png](#)
[4c80f6a4.91f99237.jpg](#)
[7140f75f.1284035e.png](#)
[Craven_Response_Form.pdf](#)
[CRAVEN - Publication Draft Local Plan - Skipton Sites.doc](#)

Dear Sir / Madam

Please find attached a completed response form and detailed representation statement prepared on behalf of Keyhaven Homes in relation to their land interests in Skipton (Sites Sk101 / SK114 / SK119).

The detailed representation statement raises issues of soundness in relation to the following policies:-

- SP1
- SP3
- SP4
- SP5 (Site SK119)
- H2

Support is given to the proposed allocation and proposed development principles for Site Allocations SK101 and SK114.

Should you have any queries in relation to the attached representation statement or Keyhaven Homes land interests in Skipton, please do not hesitate to contact me.

Kind regards

[REDACTED]

[REDACTED]

Associate – Strategic Planning

ID Planning
9 York Place
Leeds
LS1 2DS

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Company Registration Number: 05271142

Please note the ID Planning Leeds Office is moving.....our new address from Monday 11th December 2017 will be 9 York Place, Leeds, LS1 2D



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Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Publication Stage Representation Form

Publication draft Craven Local Plan public representations period runs from Tuesday 2nd January 2018 – Tuesday 13th February 2018.

Regulation19-Townand Country Planning (Local Planning) (England) Regulations 2012

Representations must be received no later than 5pm on Tuesday 13th February 2018

Please return completed forms to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	██████████
First Name:	██████████
Last Name:	██████████
Job Title (where relevant):	
Organisation (where relevant):	KEYHAVEN HOMES
Address 1:	C/O AGENT
Address 2:	
Address 3:	

Address 4:	
Postcode:	
Telephone:	C/O AGENT
Email:	C/O AGENT

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	[REDACTED] / [REDACTED]
Address:	ID PLANNING 9 YORK PLACE LEEDS LS1 2DS
Telephone number:	[REDACTED]
Email:	[REDACTED]

Part B

Please fill in a separate form for each representation

The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the legal and procedural requirements, and whether it is sound.

Section 3

Name or Organisation:	KEYHAVEN HOMES
To which part of the Local Plan does this representation relate?	
Section and Paragraph	SEE REPRESENTATION STATEMENT ATTACHED
Policy	"
Policies Map	"

Section 4: Legal Compliance & Duty to Cooperate

Do you consider the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant		
2. Sound		<input checked="" type="checkbox"/>
3. In Compliance with the Duty to Cooperate		

Please refer to the Council's representation guidance notes at <http://www.cravendc.gov.uk/newlocalplan>

Section 5: Details of Representation

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

SEE REPRESENTATION STATEMENT ATTACHED

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which section, paragraph, policy or element of the policies map your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination) You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

SEE REPRESENTATION STATEMENT ATTACHED

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which section, paragraph, policy or element of the policies map your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not be a subsequent opportunity to make further representations based on the original representation at publication stage.

After the representations period of the Publication Craven Local Plan has closed, further submissions will only be at the request of the Inspector, based on the matters and issues debated at the examination.

Section 7: Participation at the Examination

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (please select one answer with a tick)	
Yes, I wish to participate at the oral examination	✓
No, I do not wish to participate at the oral examination	
If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:	
<p>TO ENGAGE IN DISCUSSION REGARDING THE ISSUES OF SOUNDNESS HIGHLIGHTED IN THE ATTACHED REPRESENTATION STATEMENT</p>	

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Section 8: Being Kept Informed

Would you like to be kept informed of the progress of the Craven Local Plan through to adoption? (please select one answer with a tick)	
Yes, I want to be informed	✓
No, I don't want to be informed	

Please note that if you do not wish to be kept informed of the progress of the Craven Local Plan through to adoption, you will not receive any subsequent updates relating to the Local Plan examination etc.

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	[REDACTED]
Date	13/02/18

After the end of the representation period the Council will submit all individual representations received to the Secretary of State, together with a summary of the main issues raised during the representations period.

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or

the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

If you wish your personal details to be treated in confidence and not published please tick the box below:	
I wish to request that the personal details submitted with this representation are treated in confidence and not published.	<input type="checkbox"/>
Please explain below, why you have made this request:	

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ |
www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



INVESTOR IN PEOPLE



If you would like to have this information in a way that's better for you, please telephone 01756 700600.

February 2018

**Representations to the Craven Local
Plan Publication Draft
(December 2017)**

On behalf of
Keyhaven Homes

Prepared by
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9 York Place
Leeds
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1.0 Executive Summary

- 1.1 The detailed representations contained in this statement have been prepared in response to the Publication Draft Craven Local Plan on behalf of Keyhaven Homes who own / control sites SK101, SK114 and SK119.
- 1.2 The key points raised in these representations are:-
- We support the proposed allocation of Sites SK101 and SK114 in principle.
 - We object to the Site SK119 no longer being proposed as a housing allocation. The Council's pre-publication draft assessment of the site suggested it was landlocked and the response to our representations states that it is not proposed as an allocation as access is dependent on the adjoining site with consent being developed. The site is accessible through Site SK114 which is in the same ownership and an access road from SK114 to SK119 has been approved as part of the Reserved Matters for site SK114 (see Appendix 2 and 3). Access to the site is therefore not a constraint to development and the site can be delivered in the 15 year plan period.
 - The Council has not considered all reasonable options for meeting housing need. Policy SP1 (Meeting Housing Need) is not set at a level which will deliver market and affordable housing need and there is no justifiable reason why the Council cannot meet the identified need.
 - The expected yield for proposed allocations is based on 32 dwellings per hectare which is not considered to be achievable in Skipton. Given the yield of proposed allocations in Skipton only just meets the proposed distribution, if just one site does not come forward at this density, the identified need for Skipton will not be met. Additional sites therefore need to be identified to address this.
 - The reduction in the proposed affordable housing provision from 40% to 30% is welcomed but it is still expected that this level of provision will be too high on sites in Skipton due to higher than average build costs associated with the topography and weather in this locality.
- 1.3 The following sections of this statement provide detailed comments and evidence to support the key issues highlighted above.

2.0 Introduction

- 2.1 These representations have been prepared in response to the Pre-Publication Draft Craven Local Plan on behalf of Keyhaven Homes.
- 2.2 These representations are made in the specific context of following three sites in Skipton:-
- **SK101 – East of Keighley Road and south of Cawder Lane (3.99 ha)**
 - **SK114 – Cawder Hill / Horse Close and Garages off Cawder Road (8.28 ha)**
 - **SK119 – Land South of Whinny Gill Reservoir (6.57 ha)**
- 2.3 Sites SK101 and SK114 have been identified as potential housing sites in the Publication Draft Local Plan and are being promoted for residential allocation by Keyhaven Homes who have an interest in these sites.
- 2.4 Site SK119 was proposed as a residential allocation in the pre-publication draft consultation in April / May 2016. This site is no longer being proposed as a housing allocation as the Council's re-assessment of the site concluded that a suitable access cannot be achieved without the adjoining consented site being developed. The representation statement prepared in relation to the pre-publication draft along with the associated highways statement that was appended, demonstrated that a suitable access could be achieved and the site should be allocated for housing.

3.0 Site Description

- 3.1 The three potential housing sites lie to the south and south east of Skipton.
- 3.2 Sites SK114 and SK119 lie adjacent to housing commitment site 114, which is also under the control of Keyhaven homes. These sites would therefore form a natural extension to the settlement in conjunction with the development of the housing commitment site.
- 3.3 Site SK101 lies to the south of Skipton and would also form a natural extension to the existing settlement.
- 3.4 The sites have no previous planning history relevant to their promotion for a residential allocation.
- 3.5 The EA flood map shows that the sites lie within Flood Zone 1 and are therefore at the lowest risk of flooding and sequentially preferable.
- 3.6 There are no known physical constraints that would prevent the development of these sites.

4.0 Representation Structure & National Planning Policy Framework Tests of Soundness

4.1 These representations have been prepared in relation to the Local Plan Consultation Draft and are based upon a review of the following:-

- Publication Draft Craven Local Plan Consultation Document
- Residential Site Selection Process Background Paper (June 2017)
- Policy Response Paper (January 2018)
- Site Response Paper (January 2018)
- Housing Growth Option Paper: Addendum (November 2017)
- SHMA Update (November 2017)

National Planning Policy

National Planning Policy Framework (NPPF)

4.2 The National Planning Policy Framework (NPPF) was published on 27th March 2012 and therefore the emerging Local Plan should be prepared in accordance with the guidance set out in the NPPF.

4.3 Paragraphs 150 to 185 of the NPPF relate to plan-making. Paragraph 151 advises that local plans must be prepared with the objective of contributing to the achievement of sustainable development and therefore they should be consistent with the principles and policies set out in the Framework, including the presumption in favour of sustainable development.

4.4 Paragraph 154 requires plans to be aspirational but realistic. Paragraph 178 advises that public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to strategic priorities.

NPPF Tests of Soundness / European SEA Directive and Environmental Assessment of Plans and Programmes Regulations 2004.

4.5 When the Local Plan is examined by an independent Inspector, the document will be assessed on the basis of whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound.

4.6 Our response therefore gives due consideration to the Pre-Publication Draft and the associated evidence based on the four tests of soundness set out in the NPPF.

4.7 Paragraph 182 of the NPPF states:-

“A local planning authority should submit a plan for examination which it considers is “sound” – namely that it is:

-
- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
 - **Justified** - the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
 - **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
 - **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

4.8 In addition, the representations focus on the legal duty to comply with the European SEA Directive – 2001/42/EC and the Environmental Assessment of Plans and Programmes Regulations 2004. The Directive and the Regulations require the need for:

1. Environmental reports to be of sufficient quality and provide proper information to allow consideration of all the potential effects
2. Sufficient detail to allow the public to understand why the plan is said to be sound.
3. An accurate and equal assessment of the alternatives to the chosen strategy / policy and explanation as to why they were not considered to be the best option.

4.9 For the plan to be found sound it will be necessary for the Council to be able to demonstrate that all alternative options were duly considered.

5.0 Representations to the Craven Local Plan Publication Draft

- 5.1 This section of the representations has been prepared in relation to the Publication Draft Craven Local Plan and provides comments on the relevant questions contained within the Plan.

Section 3: Sustainable Development

Vision for Craven in 2032

- 5.2 We support the emerging vision for Craven which acknowledges Skipton is the largest settlement in the District and identifies it as the main focus for growth in Craven.
- 5.3 The vision for Craven is considered to be sound.

Section 4: Strategic Policies and Spatial Strategy

Draft Policy SP1 – Meeting Housing Need

- 5.4 We object to the proposed approach to meeting housing need for Craven and the Council's proposed approach of taking forward growth option F (230 dwellings per annum) set out in the Housing Growth Option Paper (Addendum 2017).
- 5.5 The SHMA Update 2017 identifies an OAN figure for Craven District as a whole is 242 dwellings (a baseline of 141, with a long term migration adjustment to 199 and a headship rate adjustment to 202) with a further uplift of 40 to take account of market signals. This figure has been apportioned with 206 dwellings in the Craven District LPA and 36 to the Yorkshire Dales National Park.
- 5.6 The rejection of the higher Housing Growth Options C1 (242 dwellings per annum) and E (280 dwellings per annum) and the Council's decision not to assess any option in the Growth Option Addendum (November 2017) that would meet the full, objectively assessed need for market and affordable housing is UNSOUND.
- 5.7 As highlighted at paragraph 4.2 of the consultation document, the NPPF requires local authorities to use their evidence base to ensure that, unless there are robust grounds why not, then the housing requirement should meet the full, objectively assessed need for market and affordable housing in their area. At paragraph 4.14 of the consultation document it is advised that the proposed housing requirement figure of 230 dwellings per annum will not meet the full need for affordable housing. It is stated that higher growth options assessed in the Local plan Housing Growth Options Paper have been rejected because of their conflict with the plan's spatial strategy and the significant uncertainty over their deliverability.
- 5.8 Such an approach clearly conflicts with the aims of the NPPF and the Council's own objectives in the Local Plan, particularly given the Council identify

Affordable Housing Need as a 'Key Issue' for the Craven Plan Area at paragraph 2.41 (Key Issues).

- 5.9 In the Housing Growth Option Paper Addendum (November 2017) it is acknowledged at paragraph 4.15-4.16 that even Option E (280 dpa), the Council's highest growth option in this Paper, is likely to fall short of meeting the full objectively assessed need for market and affordable housing. The Council state that this option is likely to be an unsustainable and undeliverable option and as such there is 'no need to consider any higher alternative growth option to that of Option E'. We do not agree with this conclusion.
- 5.10 It is suggested at paragraph 4.14 that higher growth options have been rejected because of their conflict with the plan's spatial strategy and the significant uncertainty over their delivery. We do not agree with this conclusion, in particular Keyhaven Homes have a deliverable and developable site in Skipton, the most sustainable location for new development and which lies in Flood Zone 1. Site SK119 was proposed for allocation at the draft consultation stage but is no longer proposed for allocation as the Council consider a suitable access cannot be achieved as the delivery of the site is dependent upon the adjoining consented scheme being developed out.
- 5.11 Site SK119 is in the same ownership as the adjoining housing commitment site (114) which the Council have granted planning permission for residential development. The requirement for the adjoining consented site to come forward first is not an insurmountable constraint; it is merely a matter of timing that is wholly achievable with the 15 year plan period. This is an example of a sustainable and deliverable site in the main settlement of Skipton that could deliver additional dwellings without significant risks to the environment or loss of land at medium / high risk of flooding and which accords with the plan's spatial strategy. This demonstrates the Council's chosen growth option is not sound as they have not fairly considered all reasonable alternatives in rejecting the higher Housing Growth Options.
- 5.12 It is also noted at paragraph 5.15 of the Housing Growth Option Paper that the Council suggest that the level of housing required in Skipton for Growth Options C1 (1,533 dwellings) and E (1,959 dwellings) cannot be met as a maximum yield in Skipton from suitable sites is suggested to be 1,402 dwellings. Again, we do not agree with this conclusion as previously identified, site SK119 which was identified for allocation at the draft consultation stage, remains a suitable and deliverable site which could deliver up to 210 dwellings and would increase the capacity in Skipton to at least support Option C1 (1,533 dwellings).
- 5.13 The Council acknowledge at paragraph 5.36 of the Housing Growth Option Paper Addendum (November 2017) that supporting Housing Growth Option 'F', the provision of 230 dwellings / annum will result in approximately 66% of the 126 dwellings per annum identified affordable housing need in the housing market area being delivered, based on 30% affordable housing provision. It is suggested at paragraph 4.18 of the consultation document that the Council is proactive in seeking to maximise affordable housing supply through its action

plans and strategies and on all opportunity sites, but this does not constitute a strategy for delivering the unmet need. The NPPF is clear (paragraph 182) that a plan should be prepared based on a strategy which seeks to meet objectively assessed requirement including unmet requirements from neighbouring authorities where it is reasonable to do so. There is no evidence within the consultation document that Craven has an agreement in place with neighbouring authorities to deliver the unmet need.

5.14 On the basis of the preceding assessment, it is maintained that **Policy SP1 and the evidence base which sits behind it is UNSOUND** as it is:-

- Not positively prepared as the policy does not meet the full objectively assessed need for market and affordable housing and has not set out a strategy for unmet needs being addressed in neighbouring authorities.
- Not justified - preferred housing growth option F (230 dwellings per annum) cannot be justified and the Council has not fairly assessed all reasonable alternative options. The Council has not provided robust evidence to demonstrate why the higher housing growth options are not sustainable particularly in light of the delivery of affordable housing being a key issue for the District and the availability of additional suitable sites in Skipton, which I have highlighted (SK119).
- Not consistent with national policy – the policy does not comply with the requirement in the NPPF for the full objectively assessed need for market and affordable housing to be met and it is not accepted that there are no further suitable sites in Skipton which could meet a higher level of housing need.

Draft Policy SP3 – Housing Mix and Density

5.15 Draft Policy SP3 states that the Local Planning Authority will use 32 dwellings per hectare (net) as a general guide for achieving appropriate overall housing density across the plan area and across all tenures. Whilst the policy does state that the density and mix will be applied as general guides and with flexibility to ensure that individual proposals across the plan area are able to take account of local variations in housing need, scheme viability or other site-specific circumstances, which may indicate that different housing mix or density is required in order to achieve local plan objectives.

5.16 We do not consider that 32 dwellings per hectare for sites in Skipton is achievable given the proposed allocations are urban extension sites and will therefore have to take into account their location adjacent to open countryside, and topography constraints alongside standard open space requirements. Whilst the flexibility in the policy is welcomed, it is questioned whether in this context, there is any merit in setting out a specific density given the policy essentially supports density of development appropriate to local circumstances.

5.17 Of greater concern in relation to the proposed housing density is that the figure of 32 dwellings per hectare appears to have been applied to proposed allocations in identifying the expected yield for each site. As identified later in

this statement, the sites proposed to be allocated in Skipton are expected to yield on just the amount of dwellings needed to meet the proposed distribution for Skipton. As we do not consider that a density of 32 dwellings per hectare is achievable on the proposed greenfield extension sites in Skipton, should the sites come forward at any lower than 32 dwellings per hectare, there would be insufficient sites to meet the proposed distribution for Skipton.

- 5.18 On this basis, the proposed density of 32 dwellings per hectare and its application to the expected site yield for proposed allocations in Skipton is UNSOUND as it will result in the plan not being EFFECTIVE as the reliance on this density for sites in Skipton is expected to result in too few dwellings being delivered when sites are brought forward for development, as the density is too high for this locality.

Draft Policy SP4 – Spatial Strategy and Housing Growth

- 5.19 Draft Policy SP4 seeks to deliver 50% of the proposed housing growth in Skipton as it is the Tier 1 settlement. We support the proposal to deliver the majority of growth to Skipton. However, we do not support the housing growth option proposed by the Council and consider the figure should be higher to ensure the delivery of the full objectively assessed need for market and affordable housing is delivered. In this regard, the proportional housing provision figure for Skipton should be higher to ensure market and affordable housing need is met.
- 5.20 To meet the full objectively assessed need for market and affordable housing, taking into account the 27 affordable houses that are expected to be delivered in the Yorkshire Dales National Park plan area, there is a requirement for 99 affordable dwellings per annum in the Craven Local Plan area. To deliver this quantum of affordable dwellings through the proposed affordable housing policy of 30%, a housing requirement figure of 330 dwellings per annum would be needed, 100 dwellings per annum higher than the figure currently proposed by the Council. This figure would result in a requirement for Skipton of 150 dwellings per annum, an increase of 35 dwellings per annum (535 dwellings over the plan period).
- 5.21 As identified later in this representation statement, Keyhaven Homes site SK119 was proposed for allocation at the draft consultation stage and was therefore deemed to be suitable for allocation by the Council. The site was removed at the pre-publication stage due to concerns over the site being landlocked. The site is accessible through the adjoining consented site and is in the same ownership. The site should not therefore be assessed as having an access constraint, it is only a matter of timing, with the site being deliverable with the plan period.
- 5.22 Site SK119 extends to 6.57 hectares and therefore at the Council's identified density of 32 dwellings per hectare, the site could deliver 210 dwellings, nearly half of the additional housing that should be identified in Skipton under Policy SP1 to meet the full objectively assessed need for market and affordable housing, although based on Keyhaven Homes experience the actual site yield

would be lower than this as it is maintained that 32 dwellings per hectare is not achievable on greenfield urban extension sites in Skipton.

5.23 Table 5 (Summary of Housing Requirement and Proposed Supply by Settlement) which forms part of the supporting justification to Policy SP4 identified a gross residual housing requirement of 1,399 dwellings for Skipton set against an approximate yield of 1,402 dwellings from the proposed Skipton allocations. This provides no flexibility should one or more allocation not come forward as expected and in the context that the housing requirement figure is a minimum. It has also been highlighted that the expected yield for each site is based on the Council's general density guide of 32 dwellings per hectare. As this is not considered to be achievable on the urban extension greenfield sites in Skipton, the presents a real risk that there are insufficient sites identified to meet even the Council's current proposed residual housing requirement in Skipton of 1,399 dwellings, with the deficit increasing should a higher housing growth option be supported. In this context, given the availability and suitability of Site SK119, this site could provide flexibility and choice with Skipton, the principal town and address any deficit as a result of the Council's assumption that all the proposed allocations in Skipton will deliver at a density of 32 dwellings per hectare.

5.24 The wording in Policy SP4 (Spatial Strategy and Housing Growth) should also replicate the wording in Policy SP1 which states that the housing provision figures are minimum figures.

5.25 Whilst we therefore support the proportion of 50% of housing growth to be distributed to Skipton, **Draft Policy SP4 is UNSOUND**, as the policy has:-

- Not been positively prepared, is unjustified and does not accord with national policy as the housing provision figure relates back to the proposed housing requirement which we do not support for the reasons set out at paragraph 5.13 of this statement.
- Not effective as the wording of this policy should accord with the wording of Policy SP1, which states that provision figures are a minimum and the proposed yield from each site is based on an expected density of 32 dwellings per hectare which we do not consider is achievable in Skipton and therefore the reliance on the figure will result in insufficient dwellings being developed to meet the proposed distribution for Skipton, particularly as the Council has only identified sufficient sites to just meet the residual requirement based on delivery at 32 dwellings per hectare. In the event that just one proposed allocation in Skipton came forward at a lower density, the identified need for Skipton will not be met. Additional sites therefore need to be identified to address this.

Draft Policy SP5: Strategy for Skipton – Tier 1

Site SK114 – Land to the east of North Parade and Cawder Road Garage Site

- 5.26 We SUPPORT the proposed allocation of site SK114 (Land to east of North Parade and Cawder Road garage site). This site is deliverable, being available for development and in a suitable location and would form a natural extension to the current built form of Skipton. In addition, there are no known constraints that would result in the development of this site not being viable.
- 5.27 The Council's assessment of site SK114 (Cawder Gill / Horse Close) identifies seventeen positive or neutral effects and only four negative effects of development, with no 'significant negative' effects.
- 5.28 Given the sustainability appraisal shows the majority of effects are neutral and positive and the identified negative effects do not constitute a barrier to development and can be mitigated through sensitive design and development principles, it is maintained this site is wholly suitable for allocation for housing.
- 5.29 We also support the increase in the proposed extent of site SK114. The inclusion of this additional land results in a more natural rounding off of this part of Skipton as delivering additional dwellings in the Principal Town of Skipton.
- 5.30 The allocation of Site SK114 is SOUND.

Site SK101 – East of Keighley Road and south of Cawder Lane

- 5.31 We SUPPORT the proposed allocation of site SK101 (East of Keighley Road and south of Cawder Lane, Skipton) for housing. This site is deliverable, being available for development and in a suitable location, forming a natural extension to the current built form of Skipton. There are no known constraints that would result in the development of this site not being viable.
- 5.32 We support the Council's sustainability appraisal assessment of site SK101 (East of Keighley Road and South of Cawder Lane) in the Residential Site Selection Process Background Paper which identifies only positive or neutral effects as a result of this site being developed. This is therefore a wholly suitable site for development that can meet the growth identified for Skipton and should be identified as a housing allocation.
- 5.33 The allocation of Site SK101 is SOUND.

Site SK119 – Land South of Whinny Gill Reservoir

- 5.34 We object to Site SK119 no longer being proposed for allocation. This is a sustainable site in the principal town of Skipton and which lies adjacent to a housing commitment site. The assessment of this site in the Residential Site Selection Process Paper stated that suitable access to the site cannot be

achieved with North Yorkshire Highways stating that they considered the site to be landlocked.

- 5.35 As part of our representations to the Pre-Publication Draft it was highlighted that the site adjoins an existing housing commitment site which has Reserved Matters approval and is in the same ownership. The Reserved Matters approval includes an access spur which will provide direct access into SK119. The site is not therefore landlocked with the intention being to connect the two sites.
- 5.36 The Council's Site Response Paper (January 2018) refers to the representation we previously submitted in relation to this site and it is stated in response that. *'selected sites are considered to be deliverable / developable and capable of meeting the objectively assessed need for housing / employment land. Allocation of other sites if therefore unnecessary. However, draft local plan policy H1/EC1 does make provision for housing / employment development on unallocated sites.'*
- 5.37 In this regard the Council's reasoning for not allocating this highly sustainable Skipton site is at odds with the Council's justification for not supporting higher growth options as it suggested there are insufficient sites in Skipton to meet a higher growth level, yet in relation to this site it is suggested it is not needed as opposed to the site not being suitable.
- 5.38 The Council's Site Response Paper also states that the site was not identified as access to it is dependent on the site with consent being developed and that if that site was developed during the plan period the site could enter the pool of sites during a subsequent review of the plan. In this regard, it is evident the suitability of the site for development is only a matter of timing, rather than there being any issue with the principle of developing the site. In this regard, it is unreasonable to assume that the adjoining consented site, which has Reserved Matters approval, will not come forward within the plan period. It is also relevant to highlight that Keyhaven Homes are due to commence the discharge of pre-commencement conditions imminently on the consented scheme. On this basis, the Council's response to our previous representations is not supported. It is maintained the site is suitable for allocation and could increase the level of affordable and market housing growth in Skipton.
- 5.39 The Council' assessment of site SK119 (Land south of Whinny Gill Reservoir) identifies eighteen positive or neutral effects and only three negatives effects of development. One of these is a significant negative effect which relates to the Council's assessment of the site access, which we have demonstrated is not a constraint. The two minor negative scores have been attributed to the following objectives:-

SO10 – Protect and enhance the natural agricultural conditions to maintain soil quality and grow food in Craven

SO14 – Protect and enhance the open countryside and wide landscape character

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- 5.40 Whilst negative effects are identified against sustainability objectives 10 and 14, these both relate to the site's greenfield nature and should not be considered a barrier to development. As with site SK114, this site is not materially different in use and character to the adjoining housing commitment site, which has planning permission for residential development and has therefore been deemed to be suitable for development.
- 5.41 As SK114 and SK119 are adjacent sites, it is unclear why the assessment has identified a negative effect against Sustainability Objectives SO11, SO16 and SO17 for site SK114 when neutral impacts are identified for site SK119. Both sites are grassed over and used for grazing and are in a similar location.
- 5.42 This site is not materially different in use and character to the adjoining housing commitment site, which has planning permission for residential development and has therefore been deemed to be suitable for development.
- 5.43 The sustainability appraisal shows the majority of effects are neutral and positive. The identified major negative effect relating to the site's accessibility is not based on correct information as the site can be accessed through the adjoining housing commitment site via the road spur which forms part of the approved plans and can be delivered within the plan period. The identified minor negative effects do not constitute a barrier to development and can be mitigated through sensitive design and development principles. The site is therefore wholly suitable for allocation for housing.
- 5.44 Even in the event the Council's proposed housing growth option remains unchanged, it is noted that Table 5 of the Publication Draft identifies a gross residual housing requirement for Skipton of 1,399 dwellings with an approximate yield of 1,402 dwellings based on the proposed allocations. The allocations are expected to deliver just 3 dwellings above the requirement and the site yields upon which these figures are based rest on an expectation that every site will deliver at a density of 32 dwellings per hectare. As we have highlighted in this statement, we do not consider this achievable on every site in Skipton. This presents a very real risk that if just one site does not come forward as expected then the requirement for Skipton, the principal town, will not be met. The allocation of Site SK119 will therefore provide flexibility and choice to address this and ensure that there are sufficient sites to meet the proposed distribution for Skipton.
- 5.45 Site SK119 should therefore be duly re-instated as a proposed allocation as the Council's reason for no longer proposing to allocate the site is based on incorrect information. The site is not landlocked, there is a suitable access into the site and the site is suitable for development. The allocation of the site will also assist in providing flexibility and choice in Skipton and ensuring market and affordable housing need can be met.
- 5.46 **To make the plan SOUND Site SK119 should be identified as a proposed allocation** for the following reasons:-
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- Positively Prepared – the inclusion of this site will assist the Council in meeting the full objectively assessed need for market and affordable housing in the principal town of Skipton
 - Justified – the inclusion of site SK119 is the most appropriate strategy when considered against reasonable alternatives. The site is suitable for development and can be delivered within the plan period alongside the existing housing commitment site. There is no justifiable reason why this site should be excluded from the pool of sites which are expected to deliver within the 15 year plan period.
 - Effective – the inclusion of this site will assist in ensuring the plan is deliverable over its period by providing choice and flexibility in the supply of housing in Skipton as the Council's current strategy is reliant on all identified sites delivering as expected, which is unrealistic, particularly given the Council are relying on all sites in Skipton delivering at a density of 32 dph.

Development Principles for Policy S5 Housing Sites – Site SK101 (East of Keighley Road and south of Cawder Lane)

5.47 Keyhaven Homes support the development principles identified in relation to proposed housing allocation SK101.

5.48 The allocation of Site SK101 is deemed to be SOUND.

Development Principles for Policy S5 Housing Sites – Site SK114 (Land to the east of North Parade and Cawder Road Garage Site)

5.49 Keyhaven Homes support the proposed development principles in relation to site SK114 and welcome the additional reference to the potential for an alternative access to the site via an existing reservoir track from Whinny Gill Road.

5.50 The allocation of Site SK114 is deemed to be SOUND.

Section 6: Housing

Draft Policy H2: Affordable Housing

5.51 Keyhaven Homes support the proposed amendment to the proposed levels of affordable housing set out in Draft Policy H2. The policy now seeks a provision of 30% of new dwellings as affordable housing on-site as part of developments of 11 dwellings or 1000 sqm or more. This reduction is welcomed given Keyhaven Homes experience of sites in the Craven area that the previously proposed figure of 40% was not viable and is preventing sites from being brought forward for development. However, it is still maintained that the transfer price of £1000 per sqm is insufficient to cover the higher than average building costs associated with developing in this area as a result of its topography, which also results in a higher number of lost work days due to bad weather and the distances sub-contractors have to travel to site. The transfer rate applied is

considered to only be sufficient when applied to flat, greenfield sites in lower lying areas.

- 5.52 Paragraph 6.20 of the Draft Local Plan advises that the value of affordable housing will be determined by the Council's latest transfer prices, with a footnote now highlighting that this is currently set at £1000 per sqm. This is a critical part of the policy in determining the level of affordable housing that is deliverable in Craven. It is essential that this forms part of the policy and is duly consulted upon. Based on Keyhaven Homes experience a transfer value of £1000 per sqm is insufficient to cover the higher than average building costs associated with developing in this area as a result of its topography, which also results in a higher number of lost work days due to bad weather and the distances sub-contractors have to travel to site. The transfer rate applied is considered to only be sufficient when applied to flat, greenfield sites in lower lying areas. On this basis, any affordable housing being provided at a loss, this directly impacts on viability.
- 5.53 Whilst the reduction from 40% to 30% affordable housing provision is welcomed, it is considered that viability will remain an issue on sites in Skipton due to the transfer prices not covering the higher than average build costs associated with developing in this area.

6.0 Conclusions

- 6.1 These representations have been prepared on behalf of Keyhaven Homes who are promoting three sites for allocation in Skipton (SK101, SK114 and SK119).
- 6.2 Sites SK101 and SK114 have been identified as potential housing sites in the Draft Local Plan, with the extent of site SK114 having been extended. We support the allocation of these sites.
- 6.3 Site SK119 was proposed as a housing site at the previous consultation stage. However, it is no longer identified as a proposed allocation as the Council consider there is not a suitable access into the site. Whilst access into the site is to be gained from the adjoining housing commitment site, the two sites are in the same ownership and an access spur has been incorporated into the reserved matters approval for the site. The site is therefore deliverable within the 15 year plan period.
- 6.4 Site SK119 should be identified as a proposed housing allocation in its own right but also in the context of the Council's background evidence which suggests there are insufficient sites in Skipton to support higher housing growth options and even in the event the housing growth option chosen remained unchanged, the allocations identified in Skipton are only just sufficient to meet the identified need based on all sites delivering at 32 dwellings per hectare, such that if just one site does not come forward as expected, then the identified need will not be met. In this regard, the allocation of site SK119 will also provide choice and flexibility in ensuring the identified need for Skipton can be met.
- 6.5 Keyhaven Homes welcomes the proposed change to Draft Policy H2 which seeks to secure 30% affordable housing on developments of 11 dwellings or more or 1,000 sqm or more although it is maintained that as result of the higher than average build costs associated with developing in Skipton and the £1000 per sqm transfer rate that is applied, affordable housing would still be delivered at a loss resulting in viability issues.