

Craven Local Plan

Hearing Statement

Matter 5: Residential Allocations

Submitted on behalf of Giggleswick School

September 2018



GIGGLESWICK
SCHOOL

Turley

Contents

1.	Matter 4: Residential Allocations	1
<hr/>		
Appendix 1:	Photographs of the playing surface at the Eshton's Field AGP	7
<hr/>		
Appendix 2:	Photographs of the playing surface at the Lord's Close playing field	9
<hr/>		
Appendix 3:	Sports pitch options	11

Contact

[Redacted]
[Redacted]

Client

Giggleswick School

Our reference

GIGM3002

25 Sep 2018

1. Matter 4: Residential Allocations

Issue 8 – Strategy for Tier 4A and 4B Villages (Policy SP11)

SG014 – Land at Lord’s Close, Giggleswick

Q3. Is the allocation consistent with paragraph 74 of the Framework concerning development on existing open space, sports, recreational buildings and land, including playing fields? How does the allocation meet the tests set out in the Framework?

1.1 Paragraph 74 of the Framework¹ states as follows:

“Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- *an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements*
- *the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location*
- *the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.”*

1.2 The Lord’s Close site currently forms part of Giggleswick School’s existing playing field provision. It is located to the south of a wider area of playing field land. However, an existing Public Right of Way (PRoW) runs east-west across the northern edge of the Lord’s Close site, which means that it is distinct and separated from the wider area of playing field land. As such, the use of the Lord’s Close site by the school for sports is somewhat intermittent. Nevertheless, it is currently used as a playing field. The school therefore acknowledges that the residential development of the Site will result in a loss of playing field land.

1.3 The Playing Pitch Strategy² (PPS) for Craven identifies that there is not a surplus of open space in the local area. As such, the school acknowledges that the loss of playing field land which will result from the development of the Lord’s Close site must be replaced by equivalent or better provision in terms of quantity and quality in a suitable location, in accordance with the second bullet point of paragraph 74 of the Framework. The draft Local Plan itself includes a broadly similar test. For example, criterion d) of Policy INF3 makes clear that the development which involves the loss of sport, open space or built sports facilities will only be permitted where, *inter alia*:

¹ National Planning Policy Framework (2012)

² Craven Playing Pitch Strategy, Craven District Council (February 2016)

“An equivalent replacement sport, open space or built sports facility, the benefit of which will be at least equal to that being lost, is to be provided on the site or in an accessible location nearby.”

- 1.4 Giggleswick School has submitted representations to Craven District Council (CDC) in response to every stage of public consultation on the Local Plan. These representations have consistently made clear that the release of the Lord’s Close site for residential development is required to enable the school to invest in its facilities. Giggleswick School is an independent co-educational day and boarding school. It faces ongoing competition with other similar educational establishments throughout the north of England and beyond. The future sustainability and success of the 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 educational and recreational facilities.
- 1.5 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 development – such as the existing Lord’s Close development to the east of Bankwell Road – has enabled the delivery of, *inter alia*, a new £1.5m Sports Hall and the Richard Whiteley Theatre. These facilities are essential in enabling the school to compete in the market place, but also convey direct benefits to the local community who make use of the facilities.
- 1.6 Giggleswick School is aware that there is a need for enhanced sports facilities in the local area. In particular, the PPS identifies that there is a shortage of artificial grass pitches (AGP) in Craven, particularly for Rugby. There is therefore strong competition and demand amongst local sports clubs for space to practice and hold matches, both during weekdays and at weekends. For example, the PPS identifies that the North Ribblesdale RUFC and Wharfedale RUFC will benefit from the development of new sports pitches in Giggleswick, and the school itself is often contacted by local rugby, football and tennis clubs asking to use its facilities.
- 1.7 The school’s previous representations to the emerging Local Plan have consistently made clear that the residential development of the Lord’s Close site will generate financial revenue which the school will invest to deliver improvements to its campus, including to its sport facilities. The school has identified various options which it could pursue in order to do so. These are outlined in the following table.

Proposal	Summary	Estimated benefit
Relaying the existing playing surface of the AGP at the Eshton’s playing field, to the west of Raines Road	The existing AGP is used primarily for hockey by both the school and Settle Hockey Club. It is the subject of a Community Use Agreement, which is included within a Section 106 Agreement. The playing surface was laid 17 years ago and is nearing the end	Secure the continued use of the existing AGP by both the school and local hockey and football clubs over the long-term.

	<p>of its lifespan. Its quality was assessed as “standard” by the PPS in 2015 and it has declined significantly since then. Given the age of the carpet, its pile has worn down and is increasingly contaminated by moss and algae, resulting in a slippery surface which has poor drainage. Given its scale of use, it is estimated by the school that it can continue be safely used for only another one to two years. The surface needs to be relaid in the near future to secure its continued use by the school and local hockey clubs.</p>	
<p>Develop a new AGP at the Eshton’s playing field, to the west of Raines Road</p>	<p>The school is exploring the potential to deliver an additional AGP at the Eshton’s playing field. This would could either involve:</p> <ul style="list-style-type: none"> • A junior-sized rugby pitch to the south of the existing AGP; or • The reconfiguration of the full Eshton’s playing field site to deliver two new AGPs. <p>The delivery of a new AGP is supported by the PPS². It would involve a 3G surfaced pitch with appropriate furniture and flood lighting.</p>	<p>The replacement of an existing grassed playing field with an AGP, enabling significantly greater use by the school and local sports clubs.</p>
<p>Develop a new sports pitch at the Lord’s Close playing field, to the east of Bankwell Road</p>	<p>Existing areas of open space to the north and east of the Lord’s Close playing field are unusable due to:</p> <ul style="list-style-type: none"> • Undulations in the ground caused by the roots of adjacent trees • Tree roots breaking through the playing surface. • A significant change in levels (up to 2m) across the playing field. • A generally poor quality surface comprised of thick/fast growing agricultural grass species which is not well-suited to sports activities. <p>Photographs at Appendix 2 illustrate the issues associate with the playing surface.</p> <p>The school proposes to address the above issues by raising the ground level by up to 2m to create a level playing</p>	<p>The creation of a new rugby and/or footpath pitch on land which is currently unusable.</p>

	surface which is unaffected by tree roots. The area would be re-seeded with a grass mix appropriate to sports use or laid with a 3G/AGP carpet surface. This would enable the creation of a new rugby and/or footpath pitch, and increase the durability of the playing surface.	
Cover the outdoor tennis courts	The school has six outdoor tennis courts to the west of its campus, off Craven Bank Lane. It is currently exploring the reconstruction of these courts to include a covered roof. This would enable the courts to be used on a regular basis during the winter months.	Significant enhancement to the playing use of the tennis courts

- 1.8 The above options are illustrated on the plan at Appendix 3.
- 1.9 There are no insurmountable physical constraints which would prevent an obstacle to the delivery of the above options. Both the Eshton’s playing field and Lord’s playing field are – or have previously been – used for sports uses, such that the principle of their use for this purpose is established. An Arboricultural Assessment of the trees to the south-west of the Eshton’s playing field has identified that they are Category A specimens; however, they would be unaffected by the adjacent development of a new AGP pitch. Similarly, the trees to the west of the Lord’s Close playing field would be retained alongside the works to develop a new pitch. An arboricultural specialist will be engaged in defining the detailed proposals of the delivery of the new pitch at the Lord’s Close playing field to ensure that the root zones of the trees are protected and unaffected by the works.
- 1.10 All of the options are subject to further detailed design work, such as that which is typically required in preparing a detailed planning application. However, the school is confident that an appropriate “package” of works – comprising one or more of the above options – can be identified which will provide an enhancement to the open space and sports facilities of the local area in terms of both the quantity and quality of playing surface. This will involve the creation of at least one new sports pitch. This will mitigate for the loss resulting from the residential development of the Lord’s Close site. The draft Local Plan itself acknowledges that the school’s proposals for a new pitch will address an existing shortage of such facilities (paragraph 8.21).
- 1.11 Following the adoption of the Local Plan, the school intends to undertake pre-application discussions with CDC and Sport England to refine the options and determine the extent to which they are aligned with – and can meet – the needs of both the school and the local community. These discussions will determine the precise nature of the new and/or improved sports facilities to be delivered by the school.

Q2. Based on the answer to question 3 above, is the site deliverable?

- 1.12 Policy INF3 of the draft Local Plan states that “...all new housing and mixed-use developments of 11 or more dwellings...” will be required to provide or contribute towards “...new or improved sport, open space and built sports facilities...”. This requirement will apply to the residential development of the Lord’s Close site. This is particularly the case given its current use as a playing field. It will therefore be necessary for the planning application for the Lord’s Close site to address and satisfy this policy test, and in doing so to satisfy the tests set out at paragraph 74 of the Framework and criterion d) of Policy INF3.
- 1.13 As set out above, the school has identified various options for the delivery of new and/or improved sports facilities within its estate. These options will be the subject of further refinement, detailed design work and pre-application discussions with CDC and Sport England. However, all of the options are readily deliverable and the school is confident that an appropriate “package” of works can be identified which will provide an enhancement to the open space and sports facilities of the local area in terms of both the quantity and quality of playing surface. This “package” will comprise one or more of the options outlined above and will mitigate for the loss resulting from the residential development of the Lord’s Close site. Policy INF3 will provide the vehicle by which CDC will be able to “secure” the enhanced sports facilities through the planning application process.
- 1.14 The school has sought initial advice from a market agent and is confident that the revenue which will result from the residential development of the Lord’s Close site will be sufficient to underpin the delivery of an appropriate package of new and/or improved sports facilities. This is particularly the case given the school’s charitable status, with all revenue to be reinvested in the improvement of its campus.
- 1.15 The school intends to submit an outline planning application for the residential development of the Lord’s Close site within approximately six months of the adoption of the Local Plan. This application will include details of the “package” of new and/or improved sports facilities. Where the delivery of these facilities requires planning permission, a “joint” or “linked” planning application will be submitted. The delivery of the new and/or improved sports facilities will be secured via a Section 106 Agreement, the precise details of which will be determined through discussions with CDC both prior to and following the submission of the planning application/s. The school envisages that it will include a “Community Use Agreement” which will specify the extent to which the new and/or improved sports facilities will be made available for use by local sports clubs and other elements of the community. The school has entered into Community Use Agreements for previous developments, for example to secure the use of its indoor Sports Hall and existing Eshton’s Field AGP by the local community.
- 1.16 The school’s representations to the emerging Local Plan³ have demonstrated that the Lord’s Close site is suitable, available and achievable for residential development. The proposed development – including a “package” of new and/or improved sports facilities which satisfies the tests at paragraph 74 of the Framework and criterion d) of

³ Publication Draft Local Plan: Representations by Giggleswick School (January 2018)

Policy INF3 – is readily deliverable. It is envisaged that both the new homes and the new and/or improved sports facilities will be delivered within five years of the adoption of the Local Plan. The school considers that the allocation of the land is sound mindful of the tests at paragraph 182 of the Framework.

Appendix 1: Photographs of the playing surface at the Eshton's Field AGP

Figure 1.1: The image below illustrates the short pile and moss infestation at the surface of the AGP.





Figure 1.2: The image below illustrates the lines of the pitch lifting, creating a trip hazard.



Appendix 2: Photographs of the playing surface at the Lord's Close playing field

Figure 1.3: The image below taken to the west of the Lord's playing field shows the undulations in the ground as well as the thick sward of agricultural turf which comprises the current playing surface.



Figure 1.4: The pictures below taken looking west to east across the Lord's playing field illustrate the undulations in the ground and the significant level change across the field.





Figure 1.5: The images below show the roots of adjacent trees breaking the surface at the western side of the Lord's playing field.



Appendix 3: Sports pitch options



Copyright of Turley

This drawing is for illustrative purposes only and should not be used for any construction or estimation purposes. To be scaled for planning application purposes only. No liability or responsibility is accepted arising from reliance upon the information contained within this drawing.

Plans reproduced by permission of Ordnance Survey on behalf of The Controller of Her Majesty's Stationery Office. © Crown Copyright and database right [2018]. All rights reserved. Ordnance Survey Licence number [100020449]

KEY

- Existing pitch
- Proposed pitch
- Eshton's playing field
- Lords playing field

CLIENT:
Giggleswick School

PROJECT:
Giggleswick

DRAWING:
Playing Pitch Options

PROJECT NUMBER:
GIGM3002

DRAWING NUMBER: 3001 **CHECKED BY:** DC

REVISION: 01 **STATUS:** Draft

DATE: September 2018 **SCALE:** 1:2500 @ A3

0 metres 100
(1:2,500)



Turley Office
1 New York Street
Manchester
M1 4HD

T [REDACTED]

Turley