
Dated: September 2018



Craven Local Plan Examination

Matters, Issues and Questions

**Matter 5 – Residential Allocations (Policies SP5, SP6, SP7, SP8,
SP9, SP10 and SP11)**

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On behalf of

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1. Response to Matter 5

Issue 1 – Methodology

Q4. How were site areas and dwelling capacities determined? Are the assumptions justified and based on available evidence?

- 1.1 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. This figure has been applied to determine dwelling capacities for the proposed allocations.
- 1.2 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 the required landscaped buffer along with topography constraints and standard open space requirements. Relying on this density for Skipton will result in too few dwellings being delivered when sites are brought forward for development as the density is too high for this locality.
- 1.3 Keyhaven Homes have reviewed recent developments / applications in Skipton, which demonstrate that 32 dph is unrealistic:-
 - Aldersley Ave BD23 2LH (Persimmon). Officers report recommending approval. Site area 14.08 acres / plots 98. Density 6.9 dwellings per acre.
 - Eley Croft (Skipton Properties). Scheme built out – 63/2013/13350. Site area 9.64 acres / plots 107. Density 11.1 dwellings per acre.
 - North Parade (Keyhaven Homes). Implemented consent. 107 dwellings / 10.14 acres. Density 10.55 dwellings per acre.
- 1.4 Out of the 312 properties consented or which have an officer's report recommending approval in this area, there is an average density of 8.7 plots per acre (26 dwellings per hectare).
- 1.5 Table 5 (Summary of Housing Requirement and Proposed Supply by Settlement) which forms part of the supporting justification to Policy SP4 identifies 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. As the 32 dwelling per hectare density is not considered to be achievable on the proposed urban extension sites in Skipton, this 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 in the event the Inspector concludes a higher housing growth option should be supported. On this basis, additional sites should be identified for allocation to meet the identified need in Skipton.

Q6. What contingency arrangements does the Plan include should some of the larger sites not come forward as expected?

- 1.6 The plan does not appear to have any contingency arrangements should sites not come forward as expected. We have identified that in Skipton, the Council has only identified sufficient sites to meet the proposed distribution with only 3 dwellings proposed above the distribution figure, but this is based on site capacities which are not considered to be realistic. If larger sites are not developed out at the capacity expected or if one or more site does not come forward at all, the Council will not have sufficient sites to meet the identified need. It remains our case that the Council should identify additional sites to provide flexibility and choice in their housing land supply.
- 1.7 In the event the Inspector considers that additional sites are required and further hearings are to be held, we request that site SK119 is duly given consideration for allocation. (See response to question 12 below for additional information in relation to this site.)

Q12. Was the site selection process robust? Was an appropriate selection of potential sites assessed, and were appropriate criteria taken into account?

- 1.8 We do not consider the site selection process was robust in respect of the assessment of Site SK119. This site was proposed for allocation in an earlier version of the Local Plan, but is no longer proposed for allocation.
- 1.9 This site lies adjacent to a housing commitment site in the same ownership and was proposed an allocation in an earlier version of the Local plan but was subsequently removed on the basis that it was assumed a suitable access to the site could not be achieved with North Yorkshire Highways stating that they considered the site to be landlocked.
- 1.10 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 consent for the adjoining site has now been implemented. The site is not therefore landlocked with the intention being to connect the two sites.
- 1.11 The Council's Site Response Paper 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. On this basis, the Council's assessment of this site is not supported. Whilst it is understood that the Inspector will not examine sites not proposed for allocation, in the event that additional sites are required to be allocated, we request that this site is given due consideration as part of that process.

Issue 2 – Strategy for Skipton – Tier 1 (Policy SP5)

SK061 – Land west of Sharphaw Avenue

Questions 12-14

- 1.12 Site SK061 is being brought forward by Barnfield Construction as Craven's preferred development partner. Keyhaven Homes are working alongside Barnfield Construction in working up engineering plans for the building of a new bridge alongside Horse Close Bridge and its delivery.
- 1.13 See response to SK101 questions 34-36 which replicate SK061 questions 12-14.

SK101 – Land east of Keighley Road and south of Cawder Lane

Q34. Policy SP5 states that the width of the existing Horse Close Bridge is currently restricted, and therefore would need to be widened (or a new bridge provided) to serve the allocation. What assessments have been carried out to determine whether such works would be feasible and viable?

- 1.14 Keyhaven Homes are working alongside Barnfield Construction (owners of site SK061) and in conjunction with North Yorkshire County Council Highways in working up plans for the construction of a new bridge along with estimated costings. The current bridge is Listed and to preserve its character, a new bridge is proposed. Once the new bridge is constructed, the current bridge will become a pedestrian footpath. The Councils previous preferred partner, Lovells undertook a considerable amount of work on the bridge feasibility before withdrawing from the project. The attached plans and bridge options report set out the work prepared to date. There are three possible crossing points as shown on the attached plan.
- Option 1 – was Lovells preferred choice and designs have been worked up in detail as attached
 - Option 2 – is available if Option 1 does not work
 - Option 3 – also available if the other two options do not work. This option will require the approval of NYCC who own the land on the other side of the Canal.

Barnfield have instructed Paul White Associates to review the current options and start preparing detailed designs. This process will take about 4-6 weeks and then a further 4 months to seek the necessary consents from Highways and the Canalside Trust. The works are estimated to cost between £500,000 and £700,000 with Keyhaven Homes and Barnfield Construction proposing to share the cost of these works. Both parties have factored this into their development appraisals and can confirm the widening of the bridge is feasible and viable at this stage.

Q35. Taking into account the access constraints of the site, is the allocation deliverable?

- 1.15 This allocation, along with SK061 and SK114/124, are deliverable. The site owners / developers are aware of the works required to obtain an appropriate

access and initial work has been undertaken to ensure feasibility and viability. In addition, alternative options have also been explored which demonstrate there are alternative access options. In this regard, access is not considered to be a constraint with suitable contingency options being available to provide certainty these allocations can be delivered.

Q36. Is the site expected to come forward either in conjunction with, or alongside site refs SK061 and SK114/124, which also potentially require bridge widening and/or a new crossing over the Leeds and Liverpool Canal?

- 1.16 As previously identified, Barnfield Construction will be bringing forward Site SK061 and Keyhaven Homes will develop SK114/124 and SK101. Both parties are working together to deliver the bridge widening and will share the cost of the works in order that these sites can then individually be delivered.

SK114 and SK124 – Land north and east of North Parade and Cawder Road garage

Q37. What is the current status regarding planning permission ref: 63/2016/15503?

- 1.17 Keyhaven Homes have recently implemented this permission.

Q38. Is access to the site expected to be taken from Cawder Road and/or the existing reservoir track from Whinny Gill Road? At present is it clear to decision makers, developers and local communities? Is the policy effective?

- 1.18 The development principles for site SK114 / SK124 identifies the access into the site will be taken from Cawder Road, with the access via the reservoir track from Whinny Gill Road also being an alternative option. It is also the case that access could be provided from North Parade. This demonstrates that access into the site is not a constraint and therefore the policy is effective.

Q39. Policy SP5 states that the width of the existing Horse Close Bridge is currently restricted, and therefore would need to be widened (or a new bridge provided) to serve the allocation. What arrangements are proposed / approved for the site under planning permission ref 63/2016/15503?

- 1.19 See response to SK101 Q34.

Q40. Taking into account the access constraints of the site, is the allocation deliverable?

- 1.20 See response to SK101 Q35.