

RYEDALE SITES LOCAL PLAN – MATTER 3

PROPOSED HOUSING SITE OPTION REF. 252 – LAND AT BECKETT CLOSE, NAWTON

WHARFEDALE HOMES

REPRESENTOR ID: 1094

INTRODUCTION

- 1.1 We write on behalf of our client Wharfedale Homes to provide further information in respect of the deliverability of their land interest at Beckett Close, Nawton, which we propose to be considered as a potential housing land allocation within the emerging Ryedale Plan Local Plan Sites Document.
- 1.2 It is our considered opinion that the site can deliver a comprehensive development of market and affordable housing alongside a number of community benefits to meet the needs and aspirations of the local area over the plan period.
- 1.3 Wharfedale Homes' development proposals are situated in a suitable and highly sustainable location in respect of existing settlement form and there are no technical or environmental (built and natural) constraints that would preclude the development of the site.
- 1.4 There are concerns associated with the deliverability of a number of the existing housing commitments which RDC are relying on to meet the District's identified market and affordable housing requirements. Commitments which include problematic housing allocations included within the Helmsley Plan. Our client also has concerns in respect of the deliverability of two potential housing allocations located within the Service Villages of Amotherby and Slingsby.
- 1.5 The Beckett Close, Nawton site should therefore be allocated in order to meet the housing land supply and housing needs deficit created by the anticipated reduced level of housing which will be delivered from these sites.

EXISTING RESIDENTIAL COMMITMENTS – POLICY SD1

3.1 - What is the rationale for including existing commitments in Policy SD1? What is the justification for including the sites in Policy SD1 as opposed to allocating them?

- 2.1 This question is directed to Ryedale District Council (RDC) and accordingly we do not wish to comment at this stage.

3.2 How did the Council decide which residential commitments to include in Policy SD1? Are the sites shown on the Policies map as existing residential commitments up-to-date?

- 2.2 This question is directed to Ryedale District Council (RDC) and accordingly we do not wish to comment at this stage.

3.3 If a planning permission expires, is it still allocated for residential development for the remainder of the plan period?

- 2.3 Our clear position on this is that the site would not be allocated for development. If the permission is allowed to expire by the landowner, promoter or developer then the site cannot be considered deliverable for residential development. This would more than likely be on account of availability or achievability matters.

- 2.4 The landowner, promoter or developer usually have 3 years post permission to commence development following the granting of a full application, 3 years post permission to submit a reserved matters application following the granting of an outline application, or 2 years post permission to commence development following the approval of reserved matters.
- 2.5 Furthermore, the landowner, promoter or developer would have had the same period of time to seek to extend the timescales associated with the development of a site.
- 2.6 Consequently, where permissions have lapsed this is robust evidence to demonstrate the site is simply not deliverable.
- 2.7 In such circumstances, the site should be removed from RDC's housing land supply figures and should be replaced by truly deliverable residential development sites.

3.4 How would the Council assess a proposal for a revised or alternative development?

- 2.8 In such circumstances any new planning application submitted on such sites should be assessed against up to date and relevant local and national planning policy at that time.
- 2.9 However, given the implications associated with the ability of RDC to meet their identified market and affordable housing requirements, we believe that clear evidence should be submitted to the Council to demonstrate that the previous deliverability concerns could be overcome.
- 2.10 With particular regard to affordable housing delivery, the Council's 2016 Strategic Housing Market Assessment identifies a need to deliver 78 affordable homes a year across the District. However, the Council's latest Annual Monitoring Report identifies a persistent undersupply of affordable housing over a 4-year period when measured against this requirement. Evidence of which is provided in the table below taken from Page 30 of the Council's latest Annual Monitoring Report: -

Year	Affordable Homes Completed & Available with RSL	Affordable Homes completed
2016/17	54	47
2015/16	30	53
2014/15	67	47
2013/14	40	60

- 2.11 It is therefore imperative that where existing commitments lapse, these should be replaced with truly deliverable residential development sites that can meet the identified market and affordable housing needs of the District.

3.5 Are all of the sites developable within the Plan period?

Deliverability Concerns with Existing Residential Commitments

- 2.12 The Sites Local Plan includes two existing Gladman Developments planning consents located in Kirkbymoorside and Sherburn. Sites which have benefited from planning permission for some time and which show no signs of being developed at the point of writing this statement.
- 2.13 Land at Westfields, New Road/Kirkdale Lane, Kirkbymoorside was granted outline planning approval (Ref.13/01314/MOUT) for the following development on the 13th February 2014: -

“Development of up to 225no. (Use Class C3) residential dwellings, the provision of expansion land to Kirkbymoorside Community Primary School (Use Class D1), landscape, open space, highway improvement works and associated works (site area 11.6ha)”.

- 2.14 A reserved matters planning application was submitted to RDC in November 2017. However, the reserved matters planning application has been submitted by Gladman Developments and not a recognised housebuilder which confirms the longstanding concerns over the deliverability of this site.
- 2.15 Though we do not wish to speculate, we presume that the reserved matters application has been submitted to ensure that Gladman Development’s interest in the site does not legally lapse. As we know of no other schemes in the country where they themselves have delivered the homes which they have obtained outline planning approval for.
- 2.16 In any event, this will result in further delays to the delivery of new homes at the site. Firstly, due to the fact that should the application be approved it is still likely that another housing developer will need to apply for their own reserved matters approval to deliver their own preferred house types and housing mix. This would result in at least a further 6-month delay, but more realistically a delay of a further year to enable land negotiations to take place between Gladman Developments and the prospective housebuilder.
- 2.17 Whilst the risk that the site will never come forward for development is real, due to the delays associated with the site’s delivery identified above, there is also a case to be made that the whole of the development will not be delivered before the end of the Ryedale Local Plan Strategy plan period of 2027. Due to the site’s size, there would be one development/selling outlet delivering new homes at the site. It is therefore anticipated that the development will deliver a yield of at least 35 homes per annum, which would mean that subject to the delays to commencement of development identified above, the site would still have remaining dwelling capacity beyond 2027.
- 2.18 For the avoidance of any doubt, on account of the site’s planning and development history, we are of the clear view that there are substantial questions marks associated with whether the site will be delivered at all.
- 2.19 The same can also be said for the Gladman Developments site located at Manor Farm, High Street, Sherburn. The site was granted outline planning approval (Ref.14/01207/MOUT) by RDC for the following development on the 3rd November 2015: -

“Demolition of 1 no. existing cow shed, erection of up to 73 no. residential dwellings (including up to 35% affordable housing), structural planting and landscaping, informal public open space, children’s play area, surface water attenuation, a vehicular access point from Sked Dale road and associated ancillary works (site area 3.16ha).”

- 2.20 At the point of writing this statement no reserved matters application have been submitted to RDC in respect of the development. Nearly three years since the approval of the outline planning application. Whilst the outline planning application went lapse until November 2018, the planning history of the site again raises serious question marks over the deliverability of the site. Indeed, we are not aware of any housebuilders who are actively seeking to deliver homes from the site.

- 2.21 It is anticipated that the application will have lapsed before the conclusion of the examination of the Ryedale Sites Local Plan. Accordingly, there are serious doubts associated with the delivery of 73 homes from the site.
- 2.22 The combined number of homes from the two sites identified above equates to **298 homes** that RDC have included within their current housing delivery calculations, which we believe are unlikely to come forward.
- 2.23 Should, as currently envisaged, these sites not come forward for development then we are of the view that RDC should seek to allocate sites that are demonstrably more capable of delivery of housing in sustainable locations within the District in their place. Our clients site at Beckett Close, Nawton, which could deliver approximately 10% of the 300 homes within the next 5 years, would be one such site.
- 2.24 Relying on existing committed developments that do not provide certainty of delivery will result in the loss of the socio-economic benefits associated with the delivery of these homes, including the provision of **105 affordable homes**, which are of course in great need and demand in the District.
- 2.25 Furthermore, given that new planning applications would need to be submitted for the delivery of the reallocated 298 homes, this would mean that the Council would benefit from substantial Community Infrastructure Levy payments associated with the delivery of the new housing sites.
- 2.26 We believe the above evidence provides further justification for RDC to allocate our clients site at Beckett Close, Nawton.

Deliverability Concerns with Helmsley Plan Housing Allocations

- 2.27 We understand that RDC are also aware of deliverability issues associated with the development of two of the housing allocations identified in the Helmsley Plan. Namely issues which are associated with the need to compulsory purchase land to enable the delivery of the proposed allocations at Land West of Riccal Drive and South of Storey Close, Helmsley and Land East and South of Riccal Drive, Helmsley.
- 2.28 Whilst we appreciate that Beadlam and Nawton is not located within the same tier of the District's settlement hierarchy as Helmsley, it is the closest designated settlement to Helmsley that can deliver additional sustainable growth in accordance with the policies of the Ryedale Local Plan Strategy Document. Importantly, it is also clear that the two settlements are located in the same housing market area and also share their services and facilities, including Ryedale School.
- 2.29 Therefore, should the existing issues associated with the delivery of housing sites in Helmsley continue, our client's site at Beckett Lane, Nawton could help to deliver an element of any subsequent shortfall in new homes in order to contribute to the delivery of the District's market and affordable housing needs within the same housing market area.

RESIDENTIAL LAND ALLOCATIONS IN LOCAL SERVICE CENTRES (SERVICE VILLAGES) (AMOTHERBY, SLINGSBY) - POLICIES SD10 & SD11

3.18 The following questions apply to each of the housing sites in the Local service centres (Service Villages) (Amotherby; Slingsby) (SD10/SD11).

- 3.1 RDC have only identified two further potential housing allocations located within the identified Service Villages as follows: -

- Site Ref. SD10 - Land to the south of Amotherby Primary School – 40 Homes; &
 - Site Ref. SD11 - Land to the south of Aspen Way, Slingsby – 36 Homes.
- 3.2 Whilst we agree that the level of new homes to be distributed to each of the Service Villages shouldn't be attributed on the basis of a simplistic quantitative allocation (i.e. 30 dwellings each), we consider that specific regard should be given to Policy SP1 of the Local Plan Strategy document which sets out how development sites will be identified by the Council.
- 3.3 On account of the additional level of facilities that are available within Beadlam and Nawton and the reduced impact on the character of the Village and the wider landscape setting, it is our view that the Nawton site should be considered preferable to both of the above housing allocations, or at least allocated in addition to them given that it can be considered a more sustainable and deliverable residential development site than both of the proposed allocations listed above.
- 3.4 One important reason as to why the Beckett Close, Nawton site can be considered more deliverable than both of the two allocations listed, is on account of direct developer interest. Wharfedale Homes are promoting the Nawton site directly and are in a position to be able to deliver new homes at the site upon approval of planning permission, subject to RDC accepting the principle of the site's development.
- 3.5 At the time of writing, we do not believe that either Site Ref. SD10 or Site Ref. SD11 are being promoted for development directly by a developer. This would potentially have two impacts in respect of their delivery. The first being potential delays to delivery by approximately 18 months associated with the landowner seeking outline planning consent themselves, followed by land negotiations with a housebuilder and the subsequent need for the housebuilder to submit a reserved matters planning application to deliver their own preferred scheme. More seriously, the absence of developer commitment could be due to the sites not being considered deliverable by housebuilders at this stage. Issues that are not a consideration in respect of the Beckett Close, Nawton site, so providing greater certainty of contributing to RDC's housing delivery targets within the Service Villages in the plan period.
- 3.6 On account of the above, Wharfedale Homes' Beckett Close, Nawton site therefore represents a more deliverable and sustainable residential development site than RDC's current proposed housing allocations Ref. SD10 and Ref. SD11.

THE CASE FOR THE ALLOCATION OF THE BECKETT CLOSE, NAWTON SITE

- 4.1 We believe that there is a strong case to justify the allocation of the Beckett Close, Nawton site for residential development within the Sites Local Plan document on account of the following planning considerations: -
- There are a number of local services and facilities available within close proximity of the site, in particular Ryedale School, and the sustainable benefits that arise by virtue of proximity to such services;
 - There are no known technical issues that would preclude the development of the site;
 - The site would not have an adverse impact of the character of the Village or the wider landscape setting due to its location in the context of the Village's settlement form.
 - Deliverability concerns associated with RDC's Housing Allocations Ref. SD10 & Ref. SD11.
 - Deliverability concerns associated with the two existing Gladman Development site interests in Kirkbymoorside and Sherburn.

- Deliverability concerns associated with two of the proposed housing allocations in Helmsley.

4.2 Within our previous representations to the Sites Local Plan, submitted to RDC by letter dated 22nd December 2017, we provided evidence to demonstrate the deliverability of our client's Beckett Close, Nawton site. This letter is enclosed with this statement for ease of reference. The pertinent points which confirm the deliverability of the site are as follows: -

- The development proposals can deliver 30 homes within the next five years, providing the ability to meet a range of housing need, including 11 affordable homes (35%).
- The site can be considered a logical extension to the settlement area of Nawton, with the site being largely contained by existing development and physical features on all sides.
- Ryedale School (secondary education) is located within walking distance from the site. The site is also located within 200m of bus stops on the A170.
- The Service Village of Beadlam and Nawton would score higher than a number of the other Service Villages and accordingly should be allocated more than 30 homes over the plan period in order to ensure that the District delivers sustainable housing growth over the plan period. Especially when other characteristics such as local landscape designations are considered i.e. Nawton is not located in the North York Moors National Park, the Howardian Hills Area of Outstanding Natural Beauty or other areas of High Landscape Value within the District.
- Pre-application discussions with RDC have made clear that there are no unsurmountable concerns to constrain the development of the site from a design or technical perspective. The potential delivery of a further 30 homes in Beadlam and Nawton, in addition to the 36 homes already delivered in the Village since the start of the Ryedale Strategy period, was considered to be the only stumbling block associated with the site's development. A stumbling block that we believe is based on a quantitative assessment, rather than a qualitative one.
- The site is **available** for residential development now as there are no legal or ownership constraints. Wharfedale Homes have an interest in the site and by virtue of this and previous submissions are expressing their desire to develop the site for residential use.
- The site is considered to be **achievable** for residential development now as there is a realistic prospect that the site can deliver new homes within the next 5 years. Prior to the progression of development sites, Wharfedale Homes undertake a thorough marketing and economic viability assessment for each site, including an assessment of any site specific abnormal costs.
- RDC's own assessment undertaken in their selection of preferred housing sites as part of the previous consultation process identified that the site: - *performs well through all three stages of the Site Selection Methodology, subject to appropriate site-specific considerations.*
- RDC's Strategic Housing Land Availability Assessment (SHLAA), which was prepared in October 2009 as part of their emerging Local Plan evidence base, identifies the site as being a 'Category 1' deliverable residential development site with the potential to provide 27 dwellings. 'Category 1' sites are identified in the SHLAA as having minimal development constraints and are considered to be suitable, available and achievable for development

within the next five years. The Council's own evidence base therefore identifies that this is a deliverable residential development site.

- 4.3 The Beckett Close, Nawton proposals will create a sustainable, high quality and accessible development which will provide significant social and economic benefits to Beadlam and Nawton and the wider Ryedale District area.
- 4.4 It is our clear view that a settlement of the size of Beadlam and Nawton, with the range of facilities it contains, has the capacity to accommodate this housing allocation over the remaining plan period and is of a scale that enables the viable delivery of benefits to the local area, which would importantly include affordable housing.
- 4.5 Finally, it should be recognised that allocation of the Beckett Close, Nawton site would represent approximately 1% of the District's identified housing needs, a scale which would not be detrimental to the spatial strategy of the District and thus the site could be allocated without the need to reduce the size or number of other proposed allocations across the District. Its allocation would also ensure further flexibility within the plan should other potential sites not prove deliverable in the plan period.