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Forward Planning Manager  
Forward Planning and Conservation  
Ryedale District Council  
Ryedale House  
Malton  
North Yorkshire  
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18<sup>th</sup> March 2019

Dear Jill,

**RYEDALE SITES LOCAL PLAN – LAND AT BECKETT CLOSE, NAWTON – WHARFEDALE HOMES - SITE REF. 252 – RESPONSE TO MAIN MODIFICATIONS**

We write on behalf of our client Wharfedale Homes to provide Ryedale District Council (RDC) with their response to the Sites Local Plan Main Modifications consultation. The comments are made in association with their land interest at Beckett Close, Nawton, which we maintain is a deliverable residential development site that should be included as a housing land allocation within the emerging Ryedale Sites Local Plan.

Our client **objects** to RDC's latest rejection of the Beckett Close, Nawton site as a potential housing allocation.

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. The site is located 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.

Indeed, we wish to place in writing that RDC made it clear within the examination in public hearing sessions that they shared our view that the Beckett Close, Nawton site represents a deliverable residential development.

The only difference between the two parties was whether the site was needed to be released for development within the current Sites Local Plan. Whilst our previous representations have provided evidence to demonstrate that the site should be released now, it is the Council's view that there are sufficient alternative sites identified within the plan to meet the District's identified housing needs within the plan period.

At the hearing sessions RDC did however make it clear to the Inspector that they considered this site to be one of those which can be considered "next in line" for release as soon as the housing needs would require it.

Accordingly, much of the discussion at the examination was associated with the deliverability of those sites which the Council are currently relying on to meet the District's identified housing needs. There was particular focus on the two Gladman sites at Kirkbymoorside and Sherburn.

We believe the evidence that we previously submitted is still valid in respect of the site's deliverability and the need for it to be released as part of the current Sites Local Plan. For this reason we will refer the Council to our previously submitted hearing statements, rather than repeat them here. However,

given nearly 6 months has passed since the submission of our hearing statements and the examination in public, we consider it pertinent to provide an update on the delivery of those sites which we previously identified as having significant question marks against their deliverability.

## **DELIVERABILITY CONCERNS WITH THE PROPOSED HOUSING ALLOCATIONS IN SERVICE VILLAGES**

RDC have only identified two 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.

At the time of writing, no planning application has been submitted at Site Ref. SD10. At the hearing sessions a number of objections were raised in respect of the allocation of the site. No developer was present at the hearing sessions to defend the site. There can therefore still be some doubts about the delivery of the site. At the very least there is a potential delay to the site's delivery by approximately 18 months associated with the fact that the landowner is seeking outline planning consent themselves, most probably followed by land negotiations with a housebuilder and the subsequent need for the housebuilder to submit a reserved matters planning application to deliver their preferred scheme. More significantly, the continued absence of developer commitment could be due to the site not being considered deliverable by housebuilders at this stage. These factors 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.

With regards to Site Ref. SD11, we understand that members will be asked to agree to undertake a site visit at the March 2019 planning committee. The recommendation is as follows: -

***It is recommended that Members undertake to visit the application site to gain an understanding of the proposed development in the context of the surrounding land, heritage assets, topography, significant landscape features, nearby residential development and the public highway prior to the determination of the outline planning application at a future meeting of the Committee.***

We are unsure at this point whether the identified constraints will have a significant impact on projected dwelling numbers at the site. Unfortunately the committee meeting takes place on the 19<sup>th</sup> March 2019, the day after the Main Modifications consultation deadline, meaning that we will be unable to understand the full details of the discussion that takes place at committee. However, we suspect that members will likely agree to this recommendation and that in all likelihood the application will be returned to planning committee in April or May of this year.

## **DELIVERABILITY CONCERNS WITH EXISTING RESIDENTIAL COMMITMENTS**

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 still show no signs of being developed at the point of writing this statement, almost 6 months since the hearing sessions took place.

With regards to the site at Kirkbymoorside, the reserved matters application submitted in November 2017 is no closer to being determined. We are also still not aware of any developer interest in the site. Therefore, whilst the risk that the site will never come forward for development is very real, due to the continued delays associated with the site's delivery, a stronger case can now 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, it is likely there would be just one developer selling new homes at the site. It is therefore anticipated that the development will yield approximately 35 homes per annum, which would mean that delays to commencement of development on the site will leave capacity beyond 2027.

We believe that the site is realistically at least 18 to 24 months away from commencement of development due to the need for resolution of an agreement with a developer; for that developer to then secure planning permission for their scheme and the subsequent lead in time associated with initial site infrastructure works. Consequently, if the site does come forward, we would expect first dwelling completions to take place no earlier than the monitoring year 2021/2022. The shortfall in homes from the site within the plan period would also translate to the reduced delivery rate of affordable homes in the district.

For the avoidance of doubt, on account of the site's planning and development history, we are still of the opinion that there is significant reason to question whether the site will be delivered at all in the plan period

The same can also be said of the Gladman Developments site located at Manor Farm, High Street, Sherburn. No reserved matters application was submitted to RDC ahead of the required November 2018 deadline. Accordingly, the outline permission has now lapsed. Consequently, it is our view that reference to this site/permission within the Sites Local Plan should be removed. Creating a deficit of 73 homes.

The combined number of homes from the two sites equates to **298 homes** that RDC have included within their current housing delivery calculations, which we firmly believe are unlikely to come forward in totality, if at all. A view shared by the majority of the development industry.

We therefore maintain our view that RDC should seek to replace these sites with sites that are demonstrably more capable of delivering housing in sustainable locations within the District and within the plan period. Our client's site at Beckett Close, Nawton, which could deliver approximately 10% of the 300 homes within the next 5 years, is one such site.

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 more than **100 affordable homes**, which are greatly needed in the District.

Finally, with regard to the guidance presented in Paragraph 68 of NPPF 2019, the allocation of the Beckett Close, Nawton site would also contribute to the delivery of a flexible supply of housing sites of approximately 1ha in size in the District. The guidance specifically identifies the capability of such sites to be "built out relatively quickly". The Beckett Close, Nawton site could deliver circa 30 homes within approximately 18 months of allocation. As identified above, the same cannot be said for a number of sites currently included within the Council's housing land supply as outlined within the Sites Local Plan.

The evidence provided completely justifies our continued request for RDC to allocate our client's site at Beckett Close, Nawton prior to the final adoption of the Sites Local Plan.

## CONCLUSION

Our client's Beckett Close, Nawton proposals represent a deliverable residential development that 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.

We maintain our view that RDC should identify the Beckett Close, Nawton site as a draft housing allocation within the Ryedale Local Plan Sites in order to contribute to the potential shortfall of homes due to the demonstrable issues regarding deliverability of housing sites currently relied on within the

Sites Local Plan. Specifically, Site Ref.SD10 and the two Gladman Development sites located in Kirkbymoorside and Sherburn.

Finally, as the proposals would only amount to 1% of the District's total housing requirement, the allocation of the Beckett Close, Nawton site would also provide further flexibility should other potential sites not prove deliverable or collectively fall short of the anticipated numbers identified by the allocation.

We trust that the information provided will be taken into consideration in the preparation of the final Ryedale Sites Local Plan prior to its proposed adoption. Should you need any further information or wish to discuss any of the points made in these representations further please do not hesitate to contact the undersigned.

Yours sincerely



**PAUL BUTLER**

Director

