



North Yorkshire
Campaign to Protect Rural England

CRAVEN DISTRICT COUNCIL: CRAVEN LOCAL PLAN 2012-2032
EXAMINATION IN PUBLIC

RESPONSE TO INSPECTOR'S ISSUE 1, ISSUE 2 AND SITE SG064 IN SUPPORT OF PREVIOUS REPRESENTATIONS MADE BY THE NORTH YORKSHIRE BRANCH OF THE CAMPAIGN TO PROTECT RURAL ENGLAND ('CPRENorthYorkshire')
(Ref: 009/05/SP2/TS and Ref: 009/07/SP6/TS)

MATTER 14: ECONOMIC DEVELOPMENT (Policies SP2, EC1 and EC2)

Issue 1: Need for Employment Lane - Policy SP2

Question 1: What is the estimated need for additional employment land over the plan period? What is it based on and is it robust?

The recently published National Planning Policy Framework (the 'NPPF' or the 'Framework') states that for the purposes of examining plans, policies in the previous Framework (2012) will apply where plans are submitted on or before 24 January 2019 (paragraph 214).

CPRENorthYorkshire have provided detailed responses to all of the Craven District Council's ('CDC') consultations on the emerging Craven Local Plan since 2013 and have welcomed the opportunity to do so.

CPRENorthYorkshire has expressed concern throughout the various plan consultations that initially (2016 consultation) 28Ha of employment land was allocated and then in the July 2017 consultation publication version draft Local Plan, 32Ha of employment land was allocated.

The importance of allocating sufficient land to foster and support existing businesses and allow for new business opportunities is recognised, however CPRENorthYorkshire believe that allocating an additional 27Ha of land over what evidence suggests is actually required seems excessive in this relatively small district which has many landscape constraints within it. The Framework encourages proactive planning for economic development but also sets out that policies should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose (paragraph 22). CPRENorthYorkshire, therefore, believe that it would seem sensible not to over-allocate in the plan-making stage to ensure that this does not happen and are thus concerned that the allocated figure is not robust.

Paragraph 4.26 of the emerging Local Plan sets out that “*the realistic range of employment land requirement is relatively narrow (5Ha), but it is considered appropriate to indicate a minimum level of provision to ensure that the Local Plan strategies for housing and economic growth are aligned and complementary to deliver a balanced pattern of growth in Craven over the period 2012-2032*” The Local Plan allocates an additional 27Ha of land to that which is required for employment uses. The fact that Craven has an ageing population with many people seeking to retire to the rural district must be acknowledged. Alongside this, the districts support a large percentage of people out-commuting to nearby cities for work whilst many of the remaining population of working age who reside in the district are engaged with traditional agricultural practices or within tourism sector. Thus, employment land is not required in significant amounts. The settlements themselves are relatively small with larger businesses already operating on sites within the district where potential expansion could be an option. The 5Ha of land that is required would serve those businesses who need to expand on to larger sites and would free up the sites of their original premises.

Question 8: What flexibility has been included to allow for changing economic circumstances, such as increased growth or the loss of existing employment land and buildings?

Paragraph 4.27 goes on to set out that economic growth should not be confined to land allocations or existing sites and commitments identified in the Local Plan and that the planning authority will support applications for economic related development on unidentified sites that accord with the spatial strategy and the presumption in favour of sustainable development. CPRENorthYorkshire believe due to the rural nature of Craven District and the many landscape, cultural and heritage designations which make Craven district special, the local planning authority should be encouraging the use of allocated sites above unidentified sites until all allocations have been developed. Should the employment land figure of 32Ha be adopted, as the overall required employment land is only 5Ha of land, the allocation of an additional 27Ha of land should already provide for enough flexibility that additional sites should not be required on unallocated sites apart from in exceptional circumstances.

Issue 2: Provision of Employment Land - Policies EC1 and SP5 to SP11

Question 1: Policy EC1 supports proposals for employment/ economic development in existing employment areas, on land allocated for employment/ mixed uses and “in locations that accord with the spatial strategy”, Is it clear to decision-makers, developers and local communities under what circumstances proposals on windfall sites would be supported?

It is unclear to CPRENorthYorkshire at what point proposals for windfall sites would be supported in line with the Spatial Strategy set out in Policy SP4 of the draft Local Plan. Policy SP4 largely facilitates housing opportunities within the different parts of Craven district. The supporting text to Policy EC1 does not

specify when windfall sites would be considered in preference to sites which are allocated for employment uses.

Question 2: Is it clear to decision-makers, developers and local communities what is meant by “adverse amenity effects on sensitive uses” for the purposes of Policy EC1 a)?

The relevant text, highlighted by the Inspector above, has not been explained within the supporting text to the policy. It would be helpful to CPRENorthYorkshire and other users of the Local Plan if this could be explained by CDC within the plan. Given that point c) relates directly to the environment and point f) refers to all other relevant policies within the plan, it is unclear as to whose amenity the policy is referring to.

Question 3: What is the justification for requiring all proposals for economic development to be adequately served by communications infrastructure? Is this likely, even for small-scale proposals in rural settlements?

CPRENorthYorkshire supports the inclusion of Policy EC1 d) within the draft Local Plan.

In small rural districts like Craven, the need to be connected to the surrounding area, the rest of the UK and larger world is essential to ensure competitive business opportunities. Superfast Broadband is currently being rolled out across North Yorkshire and is an initiative CPRENorthYorkshire fully supports to avoid isolation of individuals and businesses.

Adequate communications infrastructure is vital to the operation of businesses regardless of size. Traditional agricultural practices are increasingly utilising e-agricultural services to assist them in managing their operations, from finding suppliers to selling produce and investing in new technologies which are able to assist with cataloguing vaccination records and crop rotation systems to name a few. Increasingly, as a result of changes to traditional agricultural activities, more and more farms are considering diversification, whether this is by providing tourist accommodation, farm shops or developing micro-breweries and other scheme. Such small-scale proposals need to advertise and market their product or service effectively to wide markets to succeed. Similarly, the provision of new employment land and buildings need to be developed for the dynamic time we live in with the need to prepare as much as possible for current and future needs. Without the inclusion of this criterion in the policy, proposals may come forward to application stage without the needs of a potential end-user in mind and opportunities to protect and enhance livelihoods in a predominantly rural district could be missed.

Question 4: How is the ‘local area’ defined for the purposes of Policy EC1 g)? Is it clear to decision-makers, developers and local communities? Is the policy effective?

CPRENorthYorkshire believe that the term 'local area' within Policy EC1 g) would benefit from a clear definition either within the policy wording or supportive text which does not currently exist.

It would be helpful if the definition could set out whether this is designed to infer a specific locality for example, the 'area' within a specific tier within the Spatial Strategy (Policy SP4) or the Settlement Hierarchy of the Local Plan to which a development proposal may relate at application stage; or, whether it means within the whole of the district of Craven. The inclusion of this definition would make the policy effective and be considered sound.

Issue 3: Employment Land Allocations

SGO64 - Land South of Runley Bridge Farm

Question 32: What is the current status regarding planning application Ref 62/2017/18064

CPRENorthYorkshire are aware that the above referenced planning application was received and validated by CDC in May 2017. The application is still pending and awaiting decision. The Council's Public Access Register, confirms that the application will be presented to the planning committee on Monday 24th September 2018, with the 'latest neighbour consultation expiry date' being the same. The Officer Report to be presented at the Committee recommends that *"Members resolve to grant delegated authority to the Planning Manager to grant planning permission subject to the following conditions and the applicant first entering into a Section 106 Agreement covering the following:-*

- i) A programme for the phasing and delivery of the employment land*
- ii) Off-site commuted payments for open space provision to meet the quality deficiency in the Settle area."*

CPRENorthYorkshire believe, therefore, that it is premature of the Planning Officer to recommend this application to approve (subject to s106) a development proposal in principle which still has be tested at examination, especially as Natural England have maintained their objection to the proposal despite further information being submitted. The Yorkshire Dales National Park Authority ('YDNP') also share concerns regarding landscaping issues but have not objected providing the site is adequately mitigated, however, the applicant has not at this stage altered plans to address these concerns.

Question 33: Policy SP6 allocates the site for "employment led mixed use development", including an "element of residential". Is it clear to decision-makers, developers and local communities how many dwellings are allocated on the site?

SGO64 relates to land south of Runley Bridge Farm and west of the B6480. The site consists of 5.039Ha and a minimum of 2.6Ha has been allocated for B1, B2 and B8

usage - the rest presumably would be for residential use. The design brief sets out that this would be for 'employment led mixed use development' which would require an employment use to be permitted on the site before or at the same time juncture as any residential allocation could be permitted. Whilst the Plan does not set out the potential residential yield for this site, the recent pending application (62/2017/18064) discussed at Question 32 above, proposed approximately 19 dwellings.

This level of development would seem at odds with the settlement hierarchy set out in Policy SP4 at Tier 5 which directs only a "*low level of growth to support a sustainable, vibrant and healthy rural economy and communities*". The textual justification at paragraph 4.53 explains that support for housing proposals (in the open countryside) will be limited to the special circumstances identified in the NPPF and the criteria in Policy SP4 point K. Policy H2 allows rural exception sites to be delivered however sets out at Point F that these schemes would be "*in or adjoin any settlement in the plan area*" - this location clearly is not in nor does it adjoin the boundary of Settle, therefore should not be considered as a suitable exception site location.

Given the amount of employment land proposed within the draft Local Plan (SP2) and the fact that CPRENorthYorkshire have questioned the need to allocate 32Ha when the draft Local Plan states at paragraph 4.26 that the "*realistic range of employment land requirement is relatively narrow (5Ha)*", CPRENorthYorkshire must question the validity of allocating this greenfield site which is currently within a prominent open countryside location.

Question 37: How has the site allocation process considered the impact of development and mix of uses on the character and appearance of the area, having particular regard to the Yorkshire Dales National Park?

Paragraph 22 of the English National Parks and The Broads Circular 2010, the National Park Authority is required to assess external risks to natural beauty and seek to minimise harm (and maximise beneficial effects). This includes from development beyond the boundary of the National Park.

The site lies to the south-west of the YDNP, which is less than 100m from the site. There are elevated views towards this site from within the YDNP, in particular from Mitchell Lane and High Hill Lane to the north-east, and from the open access land on High Hill further north. The elevated views are at a distance and limited to some extent by the presence of the Anley Crag Plantation, the railway embankment and existing trees. The northern section of the site is likely to be the most visible from the YDNP through the gap between the Anley Crag Plantation and the Beck Ing Plantation. CPRENorthYorkshire note that in their response to the planning application (discussed in response to Question 32 above), the YDNP state the following: "*It is considered that the view out of the YDNP over the Ribble Valley towards the Trough of Bowland is an important part of the enjoyment of the National Park in this locality. As such, high density development within the*

northern half of the site has the potential to encroach into these important views.”

CPRENorthYorkshire, do not agree with the allocation of this site within the Local Plan, due to the impacts it will have on the YDNP and the fact it is a prominent greenfield location outwith the settlement of Settle and thus within the open countryside. This allocation is contrary to the settlement hierarchy set out in Policy SP4 at Tier 5 which directs only a “*low level of growth to support a sustainable, vibrant and healthy rural economy and communities*”.

Question 38: How has the site allocation process considered the impact of development and mix of uses on the River Ribble (Long Preston Deeps) SSSI?

The site is in close proximity to the Anley Crag Plantation and the River Ribble runs to the north of the of the site. The River Ribble feeds into the Long Preston Deeps Site of Special Scientific Interest (SSSi). Whilst the Council have stated a hydrological investigation and bird survey will be required as part of any application for planning permission, CPRENorthYorkshire believe that impacts further downstream must be considered with specific regard to the SSSi. The planning application (discussed in response to Question 32 above), has submitted a full Ecological Impact Assessment in support of the application including a section on birds.