



Craven Local Plan Examination

Matter 14

Statement by Craven District Council

Matter 14 – Economic Development (Policies SP2, EC1 and EC2)

Hearing Day 8 – Tuesday 23rd October 2018 (Week 3)

September 2018

Issue 1 – Need for Employment Land – Policy SP2

Q1. What is the estimated need for additional employment land over the plan period? What is it based on and is it robust?

Council's Response

1. The need for additional employment land over the plan period is estimated to be within a range of 27 and 32 hectares. This is based on the evidence provided in the *March 2017 Employment Land Review* and the *November 2017 Employment Land Review Addendum (Ec002 and Ec003)*.
2. Ec003 focussed on updating the economic factors driving the demand for employment land in the district, factoring in the results of the October 2016 version of the Regional Econometric Model [REM] projections and the new data informing the Council's SHMA Update [Ho013]. The report commented on the nature of employment typologies including the needs of specific sectors, use classes and types of B-Class employment uses. The report concluded by providing the likely land and floorspace needs for Craven District to guide employment land allocation in the Council's emerging Local Plan.
3. In doing so, both Ec002 and Ec003 were conducted in full accordance with the Planning Practice Guidance. A key input into the process was consultation with various organisations with an interest in the supply of employment land including local businesses, economic development officers and property agents. A Business Survey was issued to local companies and a number of responses were returned which directly informed the conclusions. In accordance with the Duty to Co-operate, consultation took place with adjoining local authorities to identify cross boundary work being undertaken and to understand the extent of available employment land / unmet requirements across the wider sub-region.
4. Paragraph 2.55 (Page 13 of Ec003) in referring to the above range, states:

".....It is considered that this range approximately dovetails with the 2017 SHMA and comprises the appropriate objectively assessed need for employment land in Craven District."
5. To estimate the broad scale and type of additional employment land required, a number of different indicators and factors were considered in both documents. A series of scenarios were developed based upon forecast employment growth in the main B-class sectors and the consideration of population forecasts and

future growth of local labour supply and the amount of jobs and employment space this could support in line with the Practice Guidance¹. In accordance with the PPG, the analysis was therefore based on a range of different data and forecasts of quantitative and qualitative need. This avoids relying on single sources of data or projections which tend to rely upon a number of different variables which are inevitably subject to change.

6. These included the following scenarios:
 - i) Forecasts of employment growth in the main B class sectors (labour demand) derived from the latest available economic forecasts which, for Ec003, comprised the October 2016 version of Experian’s REM;
 - ii) Estimating future growth of local labour supply based on four scenarios in the Council’s October 2017 SHMA Update; and
 - iii) Consideration of past take up, or completions, of employment space based on monitoring data supplied by the Council, and how these might change in future.
7. The results from these 6 modelled scenarios are set out below and in Figure 2.2, Page 11 of Ec003.

Modelling scenario	B Class Employment Land (hectares)
Experian REM March 2017	27.2
SNPP 2014 (2017 SHMA)	26.6
SNPP 2014 (Rebased at 141 dpa)	27.5
PG Short Term (167 dpa)	28.6
PG Long Term (199 dpa)	31.8
Past completions	28.0

8. The 27 ha – 32 ha range is therefore considered to provide the appropriate revised Employment Land OAN range for Craven District for the 20-year period 2012-32.
- 9 In summary, the approach taken to identifying the objectively assessed need for economic development in land and floorspace terms is considered appropriate and effective. It is based on up-to-date, robust evidence and a methodology that

¹ 2a-032-20140306

was undertaken in full accordance with the NPPF and the Planning Practice Guidance.

Q2. Are the land requirements set out in Policy SP2 gross or net figures? As submitted is this clear to decision-makers, developers and local communities?

Council's Response

1. The employment land OAN range set out in both Ec002 and Ec003 are 'gross' figures (see, for example, Table 2.7 on page 10 of Ec003 and the discussion in the preceding section for confirmation of this).
2. The 32 hectares and the 15.63 hectares referred to in SP2 a) and SP2 a) ii) represent the total amount of land required to allow the construction of sufficient built form to accommodate the number of jobs projected by the labour supply modelling scenarios. It also includes a suitable and realistic allowance for some replacement of losses of existing employment space that may be developed for other, non B-Class, uses in future. This allowance is necessary to ensure that sufficient space is re-provided to account for employment space that is anticipated to be lost in future and helps prevent the continued erosion of employment space that would otherwise occur.
3. These figures are therefore gross figures, although CDC accepts that this could be made clearer in the policy by adding the word 'gross' after the above figures.

Proposed Modification
Page 40 of the Submission Draft local Plan: Policy SP2 Amend criteria SP2 a) and SP2 a) ii) as follows:- "a) Making provision for a minimum of 32 hectares <u>gross</u> of employment land over the plan period for B1, B2 and B8 Uses through:" "a)ii) Allocating 15.63ha <u>gross</u> of additional employment land for B1,B2 and B8 Uses in Skipton (Policy SP5), Settle (Policy SP^) and Ingleton (Policy SP9)"

Q3. What are the reasons for the variation in the amount of employment land considered necessary from the March 2017 Employment Land Review to the November 2017 Employment Land Review Addendum?

Council's Response

- 1 The range of employment land need in the Ec002 March 2017 *Employment Land Review* was estimated at between 20 to 29 hectares, narrowed down to 26 to 29 hectares by excluding the lowest labour supply projection. This compares to the 27 to 32 ha recommendation in Ec003.
- 2 As can be seen in Figure 2.2 of Ec003, the 27-32 ha range is higher than the 20-29 ha range in the March 2017 ELR, predominately because of the lower job creation associated with the labour supply scenarios previously.
- 3 As summarised in Table 2.4 of Ec003, the POPGROUP modelling work underpinning the SHMA update utilised more up-to-date data on population growth. In seeking to align demographic and economic forecasting, the latest demographic scenarios use economic activity rate, unemployment rate and commuting ratio assumptions derived directly from the REM (March 2017). These three key economic assumptions are used to determine the relationship between population growth and employment change over the plan period. Using the latest REM economic activity rate assumptions, a greater *change* in the size of the labour force is estimated over the plan period than previous demographic forecasts, resulting in the potential to support higher employment growth. In addition, the latest REM estimates the level of employment available in Craven to be greater than the forecast number of resident workers, resulting in net in-commuting balance over the plan period. Therefore the latest REM assumptions, operating in tandem with the forecast population size and structure under the demographic scenarios, would suggest that a higher level of employment could be supported than previously estimated in Ec002.
- 4 In terms of the other scenarios, the Experian REM projection is slightly lower in Ec003 than Ec002, as the total job growth is now expected to be around 22% below the level of growth previously projected by the REM (although the resultant employment land requirement still sits within the 27-32 ha recommended range).
- 5 The past completions scenario was not adjusted and remained at 28 ha for both Ec002 and Ec003.
- 6 As a result, the revised modelling work indicated that the 27 ha – 32 range ha provides the appropriate revised employment land OAN range for Craven District.

Q4. What is the justification for the expected decline in demand for Class B2 General Industrial land, but a growth in the need for Class B1a/b office floorspace?

Council's Response

1. Ec002 concluded that an indicative split of 15% for B1a/B1b office, 85% for B1c/B2/B8 industrial and warehousing land could be appropriate. However, on the basis of the new evidence available since the March 2017 ELR was published, Ec003 concluded that the potential growth in the office market could have been slightly under-estimated, whilst the decline in manufacturing jobs forecast was even higher than before. Skipton also has a clear agglomeration of high quality financial and professional sector jobs, with Skipton Building Society remaining a major influence.
2. On balance and incorporating the new evidence since the publication of the March 2017 ELR, Ec003 concluded that an indicative split of 25% for B1a/B1b office, 75% for B1c/B2/B8 industrial and warehousing land could be appropriate.
3. This sought to balance:
 - the replacement of some existing industrial stock with the continued demand in this sector going forward (which was the firm view of the agents and other stakeholders contacted during the study) despite the projected ongoing job restructuring in this sector;
 - the limited past growth in office requirements but with stronger potential for future demand (as per the latest REM employment forecasts); and,
 - the demand for B8 warehousing (recognising that this land hungry sector requires a disproportionate amount of land relative to employment generated).
4. The Council's economic evidence set out in Ec003 therefore sought to balance the (often conflicting) qualitative and quantitative considerations regarding the prospective future demand for office/industrial land and took a balanced judgement as to the level that could be appropriate.
5. As Ec003 points out in paragraph 2.51, the split represented an indicative guide only; given the considerable economic uncertainty surrounding Brexit CDC will need to ensure that there is sufficient flexibility within the emerging Local Plan to accommodate any likely shifts in demand for different types of employment space over the period to 2032.

Q5. How has the evidence base considered qualitative, as well as quantitative needs for employment land?

Council's Response

- 1 Chapter 5 of the March 2017 (Ec002) report sets out the results of the Lichfield's assessment of the commercial property market. The views of local businesses, local agents, surrounding local authorities and other key stakeholders were sought and formed the basis for the qualitative evidence provided in this chapter. Chapter 4 of the March 2017 (Ec002) outlines how this stakeholder consultation was undertaken. The conclusions of this qualitative research is given in paragraphs 5.58 to 5.63 (Page 36) of the March 2017 (Ec002) report.
2. A further element of the consultation process involved undertaking a business survey in order to gain a better understanding of the needs of businesses operating within Craven and the main factors that support and inhibit business growth. A summary of the business survey's key findings are set out in Section 5.0 of Ec002.
- 3 In accordance with the Duty to Co-operate, consultation took place with adjoining local authorities. The purpose of this was to identify cross boundary work being undertaken and to understand the extent of their employment land portfolio and any major new economic developments which might compete with Craven for future demand. Details of these discussions are presented in Section 3.0 of Ec002.
- 4 Overall, the qualitative analysis was informed by extensive key stakeholder and business consultations which provided a wider view of Craven's economic potential and market demand in order to supplement the quantitative approach which is based on statistical data and employment forecasts. The main findings of this consultation are set out in various sections of Ec002 and helped to inform the conclusions and recommendations set out in Chapter 9.0 of Ec002 and Ec003 more generally.

Q6. How does the provision of 32ha of employment land over the plan period relate to past completion? Is the provision of at least 32ha of land realistic?

Council's Response

1. Past completions from 1990/2000 to 2013/2014 data held by Craven District Council show that if similar take up rates were projected forward between 2012 and 2032 approximately 28 hectares (gross) of B class employment land would

be required. The plan is therefore expecting some 4 hectares more of employment land to be developed than past completions might suggest would take place.

2. Nevertheless, the plan provision of 32 hectares of employment land is the closest aligned to the 'PG Long Term' modelled scenario used in the SHMA Update November 2017 (Ho013) to determine the OAN for housing. Furthermore there is some optimism (Brexit uncertainties permitting) that higher growth rates than the 2008 to 2014 recession period will be forthcoming. The Council are looking to adopt a positive approach to planning for the economy.
3. The Council are looking to adopt a positive approach to planning for the economy, which fully accords with the NPPF. The NPPF states that the planning system should do *"everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system"*. [paragraph 19].
4. On this basis, the Council's allocation of 32 ha of employment land reflects their decision to plan proactively to meet the development needs of business and support an economy in Craven that is fit for the 21st century, which aligns with NPPF paragraph 20 and helps justify a slightly higher level of need than is otherwise suggested by past trends.
5. Furthermore, the 32 ha figure aligns closely to the labour supply scenarios set out in the SHMA Update. The evidence base therefore dovetails together and ensures that CDC fulfils its remit, set out in paragraph 158 of the NPPF, that their assessment of and strategies for housing, employment and other uses are integrated.

Q7. Does the Local Plan provide sufficient sites to meet the identified need for employment land over the plan period?

Council's Response

1. Yes. The local plan allocates employment land on six new sites, three in Skipton, two in Settle and one in Ingleton. Together they will supply 17.28 hectares of new employment land. Add to this the existing supply of employment land of 16.12 hectares (See paragraph 4.24 of the Submission Plan and Table 8.2 Page 64 of Ec002) and the result is a total supply of 33.4 hectares of employment land available during the plan period. This is about 1.4 hectares above the 32 hectare target for employment land provision in Policy SP2 and 6.4

hectares above the lower range of OAN (27 hectares) for employment land identified in EC003. Furthermore, the OAN estimate for employment land includes a 'safety margin' of additional land compared to 'actual land need'. (Paragraphs 7.56 and 7.57 and Table 7.8 of Ec002 (Page 55). This allows for such factors as delays in some sites coming forward.

Q8. What flexibility has been included to allow for changing economic circumstances, such as increased growth or the loss of existing employment land and buildings?

Council's Response

1. There is a risk that existing employment land could be lost, but this risk is reduced for the following reasons:
 - The March 2017 ELR (Ec002) has assessed existing employment land across the District and identified a sufficient amount of land of reasonable quality, which along with the local plan allocations will provide for 32 hectares of employment land.
 - Policy EC2 of the plan safeguards existing land from loss to other uses

2. Increased growth in the economy is catered for by Policy EC1 of the plan which will allow, in principle, additional employment land to that which exists and which is allocated, provided it is located in or around those settlements identified for growth in Policy SP4. Also, the employment land allocation at Rock Quarry, Skipton has scope to be enlarged to accommodate more jobs growth.

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

Q1. 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?

Council's Response

1. It is accepted that the current wording of this policy in relation to locations that accord with the Spatial Strategy should be changed to make it clear to decision makers, developers and local communities where exactly this support for employment/economic development will be. The following modification achieves this clarification and also results in clarity over where the second part of the policy, which begins with the wording “Elsewhere proposals.....”

Proposed Modification
<p>Page 182 of the Submission Draft Local Plan: Amend first paragraph of Policy EC1 to read:-</p> <p>“ Proposals for employment/economic development in existing employment areas (policy EC2), on land allocated for employment/mixed use (SP5 to SP11), or in locations that accord with the Spatial Strategy (SP4) <u>within the main built up area of Tier 1 to 5 settlements, as defined in Policy SP4,</u> will be supported subject to compliance with the following criteria:-“</p>

Q2. 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)?

Council’s Response

It is accepted that Policy EC1 a) and supporting text could be clearer with regards to what is meant by ‘adverse effects on sensitive uses’. The supporting text to Policy EC1, at paragraph 7.4 could include more detail about which land uses are considered to be potentially sensitive to emissions from industry and infrastructure including residential developments, hospitals, hotels, motels, hostels, caravan parks, schools, nursing homes, child care facilities, shopping centers, playgrounds, and some public buildings. Decision-makers, developers and local communities would then have clarification with regards to what the adverse effects of industrial development could be and which uses are considered sensitive to these effects.

Proposed Modification
<p>Pages 180/181 of the submission local plan: Paragraph 7.4 of the supporting text to Policy EC1 to be modified to include:</p> <p>7.4 Draft Policy EC1 sets out a positive context within which proposals for economic/employment uses are considered. The policy seeks to facilitate the delivery of economic development and employment proposals through a criteria based policy approach that enables the delivery of economic/employment related</p>

development in the right locations, within the context of draft policy SP2 and the spatial strategy – draft Policies SP5 to SP 11. As such economic/employment related development will be appropriately located to avoid emissions arising from industry and infrastructure affecting sensitive land uses including residential developments, hospitals, hotels, motels, hostels, caravan parks, schools, nursing homes, child care facilities, shopping centers, playgrounds, and some public buildings.

Q3. 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?

Council's Response

It is accepted that Policy EC1 d) would be clearer if communications infrastructure was defined as relating to broadband connection, and if it was modified to acknowledge that there may be cases where proposals for employment/economic development could not be adequately served by communications infrastructure, i.e. in rural areas where broadband connection is limited.

Proposed Modification

Page 182 of the submission local plan: Policy EC1, criterion d) to be amended to include:

d) The proposal being adequately served by communications infrastructure i.e. broadband, where possible; and

Q4. 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?

Council's Response

1. To make this policy wording clearer, the modification below is recommended. However, the 'local area' cannot be defined in the policy as this will clearly vary dependent upon the location of the proposal.

Proposed Modification

Page 182 of the Submission Draft Local Plan: Policy EC1 criterion g) – amend

criterion g) as follows:-

~~“There are no allocated sites or existing employment areas available in the local area that could accommodate the proposal; The proposal cannot be accommodated, on an allocated site for employment or in an existing employment area safeguarded for employment use in this plan, within one or more of Tier 1 to 3 settlements, dependent upon the location of the proposal.”~~

Issue 3 – Employment Land Allocations

Methodology

Q1. How were different sites considered for inclusion as allocations? What process did the Council follow in deciding which sites to include in the Local Plan?

Council’s Response

1. The assessment of existing employment sites and potential site allocations was undertaken as part of the Employment Land Review (ELR). (ref Ec002) Appendix 4 of the ELR. This refers to, and contains pro formas and details of sites that were assessed. Sites assessments were broken down into 3 categories; allocations in the previous adopted/saved local plan, non- allocated employment sites, and potential employment sites.
2. Employment land allocations from the saved local plan were assessed and recommendations made relating to site retention, site retention and protection for employment use, or whether sites or parts thereof could be released to other uses.
3. Non-allocated existing employment sites were assessed and recommendations made relating to site retention, site retention and protection for employment use, or whether sites or parts thereof could be released to other uses including mixed uses.
4. Potential employment sites were assessed and recommendations made as to whether the sites should be allocated for employment uses, mixed uses, or whether the site should not be allocated at all. In addition, the assessment also made recommendations on potential mitigation that was required to mitigate known issues.
5. It is these site assessments that have directly informed site allocations.
6. In addition, sites were also the subject of sustainability appraisal (SA), where potential sites were assessed against a range of sustainability criteria. Sites that did not perform well in the assessments, were not taken forward in the plan

as allocations. Examples are land south of Springfield, High Bentham, and land west of Bentham Industrial Estate, Bentham. See also the response to question 7 below.

Q2. How was the spatial distribution of employment allocations determined? How does it relate to the spatial strategy and settlement hierarchy?

Council's response

1. The spatial distribution of employment allocation is aligned with the spatial strategy and settlement hierarchy. The majority of employment sites are allocated in the Tier 1 settlement and Principal Town Service Centre of Skipton where the majority of housing growth is proposed in the plan. Two sites for employment are allocated in Settle, a Tier 2 settlement and Key Service Centre. The lack of suitable sites in the other Tier 2/Key Service Centre, Bentham has prevented the Council from allocating employment land here. Instead, Sites IN022 and IN035 in nearby Ingleton have been allocated for employment land. Ingleton is a Tier 3 settlement and Local Service Centre in the settlement hierarchy, and has the advantage of good access to the strategic highway network (A65), public transport. and available suitable land .

Q3. Was the site selection process robust? Was an appropriate selection of potential sites assessed, and were appropriate criteria taken into account?

Council's Response

1. Yes. The site selection process is set out in the Council's evidence base, is robust and an appropriate selection of potential sites were assessed.
2. Candidate sites were assessed against a range of considerations and matters that informed whether a site
 - Should be retained for employment uses;
 - New uses should be sought for all or part of the site; or
 - Whether the site should be allocated for employment uses in the local plan.

A thorough assessment of sites using appropriate criteria has been undertaken, the details of which is set out in Appendix 4 of the Ec002. Also see responses to Q4 and Q7 below which refer to sustainability objectives and site factors taken into account.

Q4. Are there any factors which indicate that a site(s) should not have been allocated for development?

Council's Response

1. No, sites were assessed against a range of criteria including flood risk, access,

and/or topography and none of these indicate that allocated sites should not have been put forward.

2. Where a site did not perform well against these criteria, potential allocations were not taken forward in the plan. In addition, alternative uses for existing sites were also recommended in appropriate circumstances. This is set out in the Ec002. Also Appendix 4 of Ec002 provides details and outcomes of site assessments.

Q5. Is there any risk that site conditions and constraints might prevent development or adversely affect viability and delivery? Are all sites viable and deliverable?

1. Known site constraints have been assessed as part of the ELR site assessments in Appendix 4 of Ec002. Known site issues and constraints are identified and accounted for as part of the site assessments.
2. There are no known issues that could adversely affect site viability/deliverability.

Q6. How has the effect of allocations on the local and strategic road network been assessed? Where specific mitigation has been identified as necessary is this set out in the relevant polices?

Council's Response

1. North Yorkshire County Council (NYCC) is the Local Highways Authority (LHA) for Craven District. All candidate site allocations were assessed by the LHA. Highways constraints were identified and taken into account as part of the site assessment process.
2. The proposed larger employment land allocations in the Plan which will generate significant movement are located in the Tier 1 and 2 settlements of Skipton, Settle and Bentham and the tier 3 settlement of Ingleton, adjacent to the A65.
3. In preparing the Local Plan, the CDC has cooperated, and consulted, with the highways authority on sites across the plan area, and all the authorities and organisations responsible for the strategic planning and maintenance of the transport network within and beyond the plan area.
4. Details of such cooperation and consultation are contained in the plan's Statement of Consultation (PD008) and Duty to Cooperate Statement (SD006).
5. Transport demands arising from the Local Plan's allocations have been taken into account during the plan making process. Where concerns have been expressed by NYCC as highways authority over candidate sites on the transport network the impact has been assessed and taken into account as part of the site

assessments. Sites have either not proceeded to allocation, or mitigation has been specified. Where mitigation is required, these are set out in site development principles.

6. Transport demands on the highway network in Skipton were highlighted by stakeholders as of concern. Detailed traffic modelling work has been undertaken by the Council to assess the impact of the plan's employment and housing land allocations on the local highway network. The Council's response to Matter 11 provides full commentary.
7. The issue of the capacity of the local highway network to accommodate the plan's proposed growth in Bentham has also been raised by a local resident. In response to this, the Council has undertaken an impact assessment of the network in Bentham and Settle. The Council's response to Matter 11 provides further detail.
8. A Statement of Common Ground has been completed between the LEA and this Council regarding the impacts on the highway network in Skipton and the approach to ensuring that mitigation measures required are delivered to make acceptable the level of growth proposed in the town over the plan period. This is set out in Appendix 2 to the Council's hearing statement on Matter 11.
9. The mitigation required in Skipton involves relatively modest widening of three arms on two junctions on the approaches to the town from the north. The evidence provided in Appendix 1 to Matter 11 indicates that the widening would be effective in making these junctions perform at an acceptable capacity. This road widening can be achieved within existing highway land. Preliminary costs for the work, including design costs have been estimated in this modelling work. Proposed Modification Policy INF7 – Sustainable Transport and Highways sets out that these mitigation measures will be funded by developer contributions.
- 10 Local Plan growth proposals in Settle and Bentham are modest and neither settlement experience significant traffic congestion. This led CDC to the initial conclusion that traffic modelling was unnecessary for these settlements. However, following concerns raised by a local resident on traffic flows in Bentham, it was decided to ensure that the Plan was supported by proportionate evidence on the impact of the Plan's development proposals in the two 'Key Service Centres' of Settle and Bentham. This work is set out in Appendix 3 to the Council's hearing statement on Matter 11. It concludes that there will be no need for highway mitigation in either settlement as a result of the plan's growth.
- 11 The low level of growth proposed in the Tier 3 and below settlements of Policy SP4 (Submission Draft Plan (PD001)) indicates that the traffic impacts of additional development within these settlements does not require assessment for the Local Plan. Suggested Policy INF7 – Sustainable Transport and Highways will allow the local planning authority, guided by the local highway authority, to

seek transport assessments and statements on individual development proposals as necessary. These may identify localised impacts on the highway network that require mitigation.

Q7. How has the effect of allocations on the natural and built environment been taken into account, including biodiversity, geodiversity and heritage assets?

Council's Response

1. The effect of allocations on the natural and built environment has been taken into account as part of the SA process. The SA contains 20 criteria against which potential allocations have been assessed.
2. The following SA criteria are relevant to the question at hand:
 - SO9) - Reduce the risk and impacts of flooding on people, property and the environment including through the implementation of Sustainable Urban Drainage;
 - SO10) - Protect and enhance the natural and agricultural conditions to maintain soil quality and grow food within Craven;
 - SO12) - Conserve and where appropriate enhance the historic environment including heritage assets and their settings and areas of identified and potential archaeological interest;
 - SO13) - Protect, and where possible enhance, Craven's biodiversity and geodiversity, particularly protected habitats and species;
 - SO14) - Protect and enhance the open countryside and wider landscape character;
 - SO18) - Conserve and enhance water quality and resources and improve the efficiency of water use;Sites were assessed, and impacts measured from ++ to –.
3. The outcome of the assessments is that sites are reflective of biodiversity, geodiversity and heritage assets.

Q8. Are the allocations justified, effective and consistent with national policy?

Council's Response

1. Yes. The proposed allocations have been assessed and are considered to be justified, effective, and supported by underpinning evidence and national policy.

SK139 – Land east and west of Cavendish Street, Skipton

Q9. Is it clear to decision-makers, developers and local communities what uses will be permitted on the site, including the amount of potential Class A1 uses? What ‘commercial’ uses does the Local Plan support?

Council’s Response

1. The site development principles are clear in providing for the mix and balance of uses in the regeneration opportunity area. It is anticipated that the retail element of proposals will seek to address identified retail capacity requirements as set out in underpinning evidence. Policy EC5 sets out retail capacity for Skipton (comparison and convenience) for the period to 2032, and the site will meet some or all of the identified capacity requirements.

2. In terms of ‘commercial’ uses, the local plan supports the following uses for the site:

- Food and drink;
- Office uses

However it is accepted that the mix and balance of uses could be more clearly expressed and the following modification is proposed:

Proposed Modification
<p>Add the following bullet point to “uses” section at page 72:</p> <ul style="list-style-type: none">• Proposals are to incorporate the following mix and balance of uses as part of regeneration proposals:<ul style="list-style-type: none">○ Food and drink○ Retail○ Office uses under use class B1

Q10. In allocating the site for retail purposes, how has the Council considered the availability and suitability of sequentially preferable sites in the town centre, and the impact of development proposals on the vitality and viability of the centre?

Council’s Response

1. For the avoidance of doubt, the site is not allocated for solely retail uses, and is a mixed use opportunity site, including an element of retail as part of a wider mix of uses.

2. There are existing retail uses on the site, along with food and drink and surface car parking. Allocation of the site for regeneration will make a contribution towards meeting identified capacity requirements as set out in the retail and leisure study. The location of the site adjacent to the identified town centre of Skipton means that it is sequentially preferable in principle in any event.

As the site is already in a range of uses, including an element of retail uses, the impact on vitality and viability will have already been accounted for, and can be reconsidered as development proposals come forward for consideration.

Q11. Is the allocation consistent with paragraph 100 of the Framework, which states that Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property?

Council's Response

1. Yes. It is acknowledged that the SFRA identifies the regeneration opportunity area as lying partly in flood zone 3a and partly in flood zone 3b. However the SFRA does not account for the Skipton Flood Alleviation scheme (FAS), which is relevant to site SK139. Construction of the Skipton FAS is largely complete, and is anticipated to alter the flood risk profile on the site and surrounding area.
2. Modelling the impact of the FAS works is due to take place during the Autumn of 2018. These results will be used by the Environment Agency to inform any future updates of their Flood Map.
3. For the avoidance of doubt, it is expected that the likely result of the FAS will be to provide improved flood protection for the mixed use opportunities/regeneration areas and site SK139 in particular.

Q12. What is the current use of the site? What effect will the proposed allocation have on the availability of car parking in the area?

Council's Response

1. The site is currently in a mix of uses and is primarily including retail units, surface car park, and food and drink outlets.
2. There is a multiplicity of uses and ownerships on the site. With regard to the availability of car parking, redevelopment of the site is expected to account and make provision for car parking, as part of the master planning process and development of regeneration proposals. The Council, as owner of part of the site will seek to ensure that parking is accounted for as part of regeneration of it. However to be clear the following modification to the plan is suggested, to ensure parking is taken account of:

Proposed Modification
Add the following bullet point to "uses" section at page 72: <ul style="list-style-type: none">• Proposals are to take account of car parking and should mitigate any loss as part of regeneration.

Q13. Taking into account that the site has multiple owners, and considering the identified development constraints, is it deliverable within the plan period?

Council's Response

1. Yes. The Council will consider the use of site assembly powers including compulsory purchase to bring the site forward for redevelopment at the appropriate time. It is acknowledged that site assembly including compulsory purchase will take some time. Therefore delivery of the site is anticipated later in the plan period to account for this.
2. Nonetheless, it is submitted that the site is considered deliverable within the plan period.

SK140 – Land at Skipton Station Areas A and B

Q14. Is it clear to decision-makers, developers and local communities what uses will be permitted on the site, including the amount of potential Class B1/B2/B8 uses?

Council's Response

1. Yes. It is anticipated that the site will be regenerated for commercial and employment led uses, whilst also taking account of existing uses on the site including employment under use classes B1, B2 and B8 and community related uses as part of the mix of uses.
2. However it is accepted that the mix and balance of uses could be more clearly expressed and the following modification is proposed:

Proposed Modification
<p>Add the following bullet point to “uses” section at page 72:</p> <ul style="list-style-type: none">• Proposals are to incorporate the following mix and balance of uses as part of regeneration proposals:<ul style="list-style-type: none">○ B1, B2 and B8○ Community uses under use class D1, D2.

Q15. In identifying the site as suitable for main town centre uses under Policy EC5, how has the Council considered the availability and suitability of sequentially preferable sites in the town centre, and the impact of development proposals on the vitality and viability of the centre?

Council's Response

1. Regeneration of the site is centred upon and fixed around improving connectivity between the town centre and station area. Both are fixed locations and unable to move.
2. As such, the mix and balance of uses on the site means that it is employment led, and any main town centre uses means that sequentially preferable sites are

not available in the area to undertake an assessment.

Q16. What is the flood risk identified in Policy SP5? Is the site consistent with paragraph 100 of the Framework, which states that Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property?

Council's Response

1. It is acknowledged that the SFRA identifies the regeneration opportunity area as lying partly in flood zones 1, 2, 3a and 3b as identified in the SFRA. However the SFRA does not account for the Skipton Flood Alleviation scheme (FAS), which is relevant to site SK140. Construction of the Skipton FAS is largely complete, and is anticipated to alter the flood risk profile on the site and surrounding area.
2. Modelling the impact of the FAS works is due to take place during the Autumn of 2018. These results will be used by the Environment Agency to inform any future updates of their Flood Map.
3. For the avoidance of doubt, it is expected that the likely result of the FAS will be to provide improved flood protection for the mixed use opportunities/regeneration areas and site SK140 in particular.

Q17. What is the justification for requiring the production of a masterplan for the site? Is it clear who will be responsible for producing the masterplan and/or what it should contain?

Council's Response

1. The site is over 5 hectares in area and is a substantial tract of land within an urban setting for Skipton. The nature and range of anticipated uses of the site means that it is prudent to produce a masterplan setting out how regeneration and the mix and balance of uses could be achieved.
2. Craven District Council has been awarded a total of £5 million from the York, North Yorkshire and East Riding Local Enterprise Partnership to deliver the Council's Growth Deal project. The Council will lead on a master plan to identify new uses and market opportunities to exploit the area's full development potential to create an attractive gateway for the town. The outcome will be a prospectus setting out land use and design parameters to guide the future development of the area, underpinned with an implementation plan based on sound market testing and analysis. Completion of the Growth Deal project will be before March 2021.

SK049 – Land east of Skipton bypass

Q18. Is it clear to decision-makers, developers and local communities what uses will be permitted on the site, including the amount of potential Class B1/B2/B8 uses?

Council's Response

1. Site SK049 is identified within the local plan as a draft employment allocation for B1, B2 & B8 within local plan policy SP5. The area of land immediately to the south east of the site has outline planning consent for mixed use development comprising business/employment floorspace (use classes B1, B2 & B8) and residential dwellings (use class C3) with access from the A629 and Carleton Road, provision of infrastructure and associated landscaping at land north of A692 And West Of Carleton Road Skipton (63/2015/15792). Site SK049 has been identified as potential phase 2 employment land within an illustrative master plan submitted as part of this application. In the context of the wider area, including the site with planning permission (63/2015/15792), site SK049 has been allocated for B1, B2 and B8 employment uses, as set out within policy SP5. In order to avoid confusion and to provide clarity to decision-makers, developers and local communities what uses will be permitted on the site the following modification to the submission draft local plan is proposed:

Proposed modification
<p>The following development principle will be deleted for site SK049 on page 75 of the local plan:</p> <ul style="list-style-type: none">• Development of the site will be employment led (B1, B2, B8) to ensure the delivery of socio-economic objectives set out in the Local Plan.

2. The boxes relating to 'Uses' on Page 75 sets out clearly that the entire site has been allocated for B1, B2, B8 employment uses.

Q19. How has access to the site been considered and assessed? Where will development proposals be expected to access the site from?

Council's Response

1. Through the sustainability appraisal process the access of this site has been considered and assessed against sustainability appraisal objective SO8) Improve connectivity, reduce the need for travel, and ensure proposed developments have safe access. When considered against this objective the site scores a double positive, which means that access to this site is achievable

and safe. The justification for the allocation of site SK135 is based on the recommendations set out in the Employment Land Review (Ec002), which considered accessibility of sites, therefore sites recommended for allocation in the Employment Land Review have good accessibility and therefore achieve a positive assessment against SO8.

2. There are two possible access points to site SK049. One via Ings Lane, which is located immediately to the north of the site and is included within the Skipton Housing and Employment Growth Project. Craven District Council has been awarded a total of £5 million from the York, North Yorkshire and East Riding Local Enterprise Partnership to deliver this project which includes the creation of a new road linking the end of Ings Lane with the road network, improving pedestrian routes from the Railway Station, preparation of a masterplan for the re-development of the area surrounding the Railway Station, and remediation of the Council's Waste Depot on Engine Shed Lane in readiness for the development of business space.
3. The second via the implementation of the planning consent on land immediately to the south east of site SK049 63/2015/15792: Outline application for mixed use development comprising business/employment floorspace (use classes B1, B2 & B8) and residential dwellings (use class C3) with access from the A629 and Carleton Road, provision of infrastructure and associated landscaping at land north of A692 And West Of Carleton Road Skipton. This scheme was approved in March 2016 and incorporates a road that would link to site SK049. The approved scheme also incorporates a road that would access the A692 via a roundabout, providing a road link from site SK049 onto the A692.
4. In order to provide clarity to decision makers, developers and local communities in terms of access to site SK049 the following modification is proposed:

Proposed modification
<p>The following development principle will be added for site SK049 on page 75 of the local plan, specifically relating to access:</p> <ul style="list-style-type: none"> • <u>Access to the site will be gained from Ings Lane. Alternatively there is the potential to access the site via a scheme with consent for business/employment floorspace and residential dwellings to the south east of the site.</u>

Q20. What is the justification for requiring an assessment of ground conditions? What has the site previously been used for and is it likely to be subject to contamination?

Council's Response

1. The site is a historic landfill site known as Ings Lane Tip, as identified by the Council's Environmental Health records. Given the potential presence of ground contaminants potentially arising from historic uses/activities in the area, the requirement for an assessment of ground conditions is justified.

Q21. Is the allocation consistent with paragraph 100 of the Framework, which states that Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property?

Council's Response

1. The Council's site selection and allocation process has taken a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property. The process has been developed and applied in consultation with and to the satisfaction of the Environment Agency (Representation 050).
2. The Council's Strategic Flood Risk Assessment maps (SFRA) (FI002) shows that the site is within FZ3b and is at risk from surface water flooding and groundwater emergence,
3. In accordance with paragraph 100 and 101 of the Framework, the Sequential Test in the SFRA was applied to all available sites suitable for employment development in Skipton, including SK049. However, following the application of the Sequential Test, it was not possible for all the employment land identified as being required over the plan period to meet objectively assessed employment needs (commensurate with the plan's spatial strategy and level of housing growth in Skipton) to be located in zones with a lower probability of flooding. It was appropriate therefore for the Council in accordance with paragraph 102 of the Framework to apply the Exception Test in the case of SK049. Taking account of the proposed use of the site for B1, B2 & B8 uses (which are less vulnerable uses) the Council considers the Exception Test is met because the provision of employment development on the site provides wider sustainability benefits to the community that outweigh the flood risk.
4. Furthermore, the construction of the Skipton Flood Alleviation Scheme (FAS) is almost complete and has been designed to reduce the risk from Eller Beck, Waller Hill Beck and Ings Beck. The Skipton FAS is expected to significantly reduce the flood risk on the site together with the proposed works to reduce the risk from Ings Beck (titled the Ings Beck and Gallow Syke Water Management Project), which is projected to have a significant impact on reducing the risk of flooding within the Ings Lane area, including site, SK049. The pre-modelling report for the Project, prepared by the Flood Risk Consultancy on behalf of Craven District Council, dated 6th July 2018, shows

that the likely effect will be to reduce the extent of the area where flooding occurs. It is anticipated that the reduction in flooding will enable land currently in Flood Zone 3b to be moved to Flood Zone 3a, thereby increasing the amount of the developable land available.

5. In order to ensure that any flood risk assessment carried out for site SK049 reflects the impacts of the completed Skipton FAS prior to commencement of any development, the following modification is proposed:

Proposed Modifications

Page 75 of the submission local plan: The second development principle for site SK049 will be reworded as follows:

'High flood risk is likely to be reduced on completion of the Skipton Flood Alleviation Scheme. However, a Flood Risk Assessment is required to be carried out for this site prior to the commencement of any development and must incorporate the findings of the Skipton Flood Alleviation Post-Scheme Modelling Report and demonstrate that a sufficient amount of Flood Zone 3b land on the site has changed to Flood Zone 3a, in order to achieve development of B1, B2 & B8 Uses on this site.' ~~is likely to be required in order to assess any residual fluvial or surface water hazard within the site. Proposals for development on this site will incorporate Sustainable Urban Drainage Systems (SUDS), unless this is not possible or feasible.'~~

SK113 – Land south of Skipton Auction Mart

Q22. Is it clear to decision-makers, developers and local communities what uses will be permitted on the site, including the amount of potential Class B1/B2/B8 uses?

Council's Response

1. Site SK113 is identified within the local plan as a draft employment allocation for B1, B2 & B8 within local plan policy SP5, which is set out within the 'Uses' section relating to this site within policy SP5. These uses are supported across the entire site allocation area of 3.01ha.
2. A representation received on this site which states that it is essential that the description of permitted uses on this site is widened to include educational *Use Class D1) and other Sui Generis Employment Uses, for example for use by Craven Cattle Marts as an Auction Mart, which is generally held to be sui generis. The representation suggests an additional development principle is added for this site. It is considered that the suggested additional development principle would provide clarity and certainty that further development by Craven College and the Auction Mart would be supported by this policy. To only allow B1, B2 & B8 uses would not be sufficiently wide to

accommodate the foreseeable requirements for development by these existing employers. The following modification is proposed:

Proposed Modifications

Page 76 of the submission local plan:

The boxes relating to 'Uses' on Page 59 & 76 of the submission Local Plan will be modified to state the following:

Mixed employment development including B1, B2, B8 and expansion of Craven Cattle Mart Ltd and Craven College.

The following additional development principle will be added:

Development of this site will be a mix of employment and economic development including B1,B2 & B8 uses and potential for expansion of adjoining existing employment area to the north to accommodate the expansion of Craven Cattle Mart Ltd and Craven College.

3. If consent is granted for proposals for the expansion of Craven Cattle Mart and Craven College (D1 and Sui Generis Employment Uses) the amount of potential Class B1/B2/B8 that can be achieved on this site would be reduced. Other opportunities for the provision of B1/B2/B8 uses within Skipton area likely to exist, for example through the remediation of the Council's Waste Depot on Engine Shed Lane in readiness for the development of business space, which is part of the Skipton Housing and Employment Growth Project. Craven District Council has been awarded a total of £5 million from the York, North Yorkshire and East Riding Local Enterprise Partnership to deliver the waste depot project, Engine Shed Lane, Skipton.

Q23. What is the justification for restricting use of the site to proposals falling within Use Classes B1/B2/B8, and not for use by Craven College or Craven Cattle Marts?

Council's Response

1. The proposed modification set out in the answer to matter 14, issue 3, question 22 above would not restrict the use of the site to proposals falling within Use Classes B1/B2/B8 and would relate to a mix of employment and economic development including B1,B2 & B8 uses and potential for expansion of adjoining existing employment area to the north to accommodate the expansion of Craven Cattle Mart Ltd and Craven College. See answer to question 22 above for details of the proposed modification to policy SP5 in relation to site SK113.

Q24. How has the effect of the proposal on the character and appearance of

the area been considered, having particular regard to the type of uses permitted and proximity to the Skipton Conservation Area?

Council's Response

1. The site allocation process has considered the impact of B employment uses on this site, on the character and appearance of the area and proximity to the Skipton Conservation Area as part of the Sustainability Appraisal and site selection process for sites (SA004 and SA005). The Sustainability Appraisal recognises that the site adjoins the Skipton Conservation Area and the Leeds and Liverpool Canal, which is an important feature and gateway to the town. Whilst the SA accepts that there will be some impacts with respect to the character and appearance of the area (including the proximity to the Skipton Conservation Area nearby YDNP), it concludes that development principles will mitigate. As such the second development principle for this site recognises the prominent position of this site and requires the developer to carry out a detailed assessment of the likely impact of development on the character and appearance of area, including the conservation area and its setting, and to incorporate any necessary mitigation measures into the proposals.

Q25. What is the justification for requiring buildings to be set back at least 15m from the Leeds & Liverpool Canal?

Council's Response

1. In order that special attention is paid to the proposed siting, design, layout and landscaping of development to ensure that the character and appearance of the area is not adversely affected. This requirement will also ensure that built development avoids the small area of flood zone 3a (10.14% of the site) located within the south east of the site.

Q26. What are the fluvial and surface water hazards identified in the supporting text to Policy SP5? Is the allocation consistent with paragraph 100 of the Framework, which states that Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property?

Council's Response

1. The Council's site selection and allocation process has taken a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property. The process has been developed and applied in consultation with and to the satisfaction of the Environment Agency (Representation 050).
2. The Council's Strategic Flood Risk Assessment maps (SFRA) (FI002) shows that some of the site is within FZ3a (10.14%), but the majority is in FZ1 (89.66%)

with some surface water flood risk.

3. The flood risk on the site can be mitigated through design, layout, landscaping and SuDS. The first development principle for this site requires a flood risk assessment and the incorporation of SuDS within any proposals on the site unless this is not possible, as required by recommendation D, section A4 of the Council's SFRA (FI001), which requires any proposal to be accompanied by a site specific Flood Risk Assessment for employment sites within Flood Zone 3a assuming the site use falls within the less vulnerable or water-compatible category of the flood risk vulnerability classification of the FRCC-PPG. It is therefore considered that the allocation is consistent with paragraph 100 of the Framework. Details of the site selection process for site SK113 are set out in the Council's Residential Site Selection Process Background Paper (Ho007) and Part e) of the Council's Final Sustainability Appraisal Report (March 2018) (document PD007).

SK135 – Skipton Rock Quarry

Q27. What is the justification for allocating the site for only B2/B8 uses?

Council's Response

1. The Employment Land Review (Ec002) recommends allocation of the site (which includes former quarry workings, an HGV yard and some woodland) for employment use (not B1), subject to a detailed ecological appraisal, because of the site's proximity to a SINC. The allocation of site SK135 is therefore justified by the Employment Land Review (Ec002), which recommends that the site is not allocated for B1 uses.

Q28. Is the allocation of the site for employment purposes consistent with the spatial strategy which seeks to support sustainable economic activity?

Council's Response

1. Yes. The justification for the allocation of site SK135 is based on the recommendations set out in the Employment Land Review (Ec002) which shows that the main demand for employment land is in the principle town of Skipton. Policy SP2: Economic Activity and Business Growth; criterion a ii) allocates 15.63ha of additional employment land for B1, B2 & B8 Uses in Skipton, Settle and Ingleton, the majority of which is allocated in Skipton (10.094ha). This approach is in accordance with the overall growth strategy set out in Policy SP4, which identifies Skipton as a Tier 1 Principle Town Service Centre as it offers the widest range of employment opportunities, goods and services in the District and plan area and is well connected with the A road network and rail network. Site SK135 represent 1.064ha of the of employment land within the town and is considered to be a sustainable location for B2 & B8 employment uses as it is well connected to the A road network.

Q29. What is the surface water hazard identified in the supporting text to Policy SP5? Is the allocation consistent with paragraph 100 of the Framework, which states that Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property?

Council's Response

1. The Council's site selection and allocation process has taken a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property. The process has been developed and applied in consultation with and to the satisfaction of the Environment Agency (Representation 050).
2. The Council's Strategic Flood Risk Assessment maps (SFRA) (FI002) shows that the entire site is within Flood Zone 1 with some surface and ground water flood risk.
3. The flood risk on the site can be mitigated through design, layout, landscaping and SuDS. The first development principle for this site requires a flood risk assessment and the incorporation of SUDS within any proposals on the site unless this is not possible, as required by recommendation D, section A4 of the Council's SFRA (FI001), which states that any site 100% within Flood Zone 1 where surface water flood risk is considered to be significant enough so as to require investigation through a site-specific FRA and for any site within Flood Zone 1 that is greater than or equal to 1 hectare in area. It is therefore considered that the allocation is consistent with paragraph 100 of the Framework. Details of the site selection process for site SK135 are set out in the Council's Residential Site Selection Process Background Paper (Ho007) and Part e) of the Council's Final Sustainability Appraisal Report (March 2018) (document PD007).

SG060 – Northern part of Sowarth Industrial Estate

Q30. Is it clear to decision-makers, developers and local communities what uses are permitted? In particular, how much Class B1/B2/B8 floorspace is the site expected to provide?

Council's Response

1. SG060 is not specifically allocated for a mix of new B1, B2 and B8 uses on site. Rather it is identified as a regeneration opportunity for the area, to enhance and regenerate the current mix of employment, retail, leisure uses on site, with the

possibility to consider an element of housing if it makes the regeneration of the larger site more viable and if it is in keeping with existing housing to the north of the site. Specifically, the policy for SG060 is to be utilised to guide future regeneration of the area and to ensure a quality of good design in keeping with the nearby historic town centre. The local plan is not relying on redevelopment of the site to meet either employment or housing land requirements. The inclusion of the site in the local plan however may give sufficient encouragement to landowners to enhance and regenerate their land.

Q31. In identifying the site as suitable for main town centre uses under Policy SP6, how has the Council considered the availability and suitability of sequentially preferable sites in the town centre, and the impact of development proposals on the vitality and viability of the centre?

Council's Response

1. SG060 has not been allocated for new uses and consequently does not fall under the sequential site selection process for employment sites in Settle. The identification of this site as a mixed use opportunity site/regeneration area enables the current uses on site to be retained and enhanced in keeping with the historic core of Settle town. For greater clarity it would be useful to specify in the table on pg. 78 for Policy SP6 that site SG060 is a 'Mixed-Use Regeneration Site', rather than an 'Employment/Mixed Use Site'. This approach has been taken with similar Mixed-Use Regeneration Sites SK139 and SK140 in Skipton (pg. 59).

Proposed Modification
Page 78 of the submission local plan: Additional heading preceding SG060 to refer to the site as a ' <u>Mixed-Use Regeneration Site</u> '. 'Employment/Mixed use Site' heading to precede SG064 only.

SG064 – Land South of Runley Bridge Farm

Q32. What is the current status regarding planning application Ref 62/2017/18064?

Council's Response

1. With respect to planning application ref. 62/2017/18064, on 24th September 2018 the Council's Planning Committee resolved to grant delegated authority to the Planning Manager to grant planning permission subject to conditions and the applicant first entering into a Section 1096 Agreement covering (a) a programme for the phasing and delivery of the employment land, and (b) off-site commuted

payments for open space provision to meet the quality deficiency in the Settle area. At the time of writing the S106 agreement has not yet been executed.

Q33. 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?

Council's Response

1. SG064 is identified as a mixed use employment-led site with an element of residential. Any residential uses approved on site would be in addition to the housing provision proposed in Settle. As such no specific housing numbers are proposed on site. The local plan is not relying on redevelopment of the site to meet housing land requirements for Settle. The housing is proposed on site as an enabler for employment development, and as mitigation to minimise impact on the nearby YDNP.

Q34. How does the Local Plan ensure that development of the site will come forward in a planned and coordinated manner?

Council's Response

1. This site is in single ownership therefore it is not envisaged that there will be difficulties with ensuring a coordinated approach to development. The recently approved planning application (subject to the signing of a S106 Agreement, see Q32 above) is for a mixed use development which includes three separate uses (B1, B2 and residential). The S106 Agreement, once executed, will set out details of the phasing of the development and the order in which each of the uses are to be brought forward. This is to ensure that the employment uses on site are commenced prior to the residential element. For clarity the local plan could have a similar clause in a development principle for SG064 to ensure that phasing of the site is planned and coordinated.

Proposed Modification
Page 88/89 of the submission local plan: An additional development principle as follows: <u>“Phasing of development on site to be timed to ensure employment uses are commenced prior to commencement of the residential element.”</u>

Q35. What is the justification for the location of the allocation? How does it accord with the Vision of the Plan which describes Settle as a well-connected hub for the Yorkshire Dales which has a concentration of shops, services, cultural facilities, creative businesses and industry?

Council's Response

1. The justification for the allocation of SG064 is based on the Employment Land Review (Ec002 and Ec003) which shows that the main demand for employment land is in the principle town of Skipton, but there is also demand, albeit to a lesser degree, in Settle (and Ingleton lesser still). The ELR rates SG064 as 'very good' for employment uses. Following Sustainability Appraisal (SA004) of potential employment sites in the Settle and Giggleswick area, SG064 performed to a suitable standard and, whilst there were concerns regarding impact on biodiversity, landscape and character of the area, the SA determined that these were outweighed by benefits of achieved social and economic objectives (see Qs 33 and 34 below). The allocation accords with the Vision of the Plan which states that Settle is the focus for new homes and jobs in the mid Craven area. The site is also well connected as it lies on a regular bus route into the town centre.

Q36. How has the site allocation process considered the impact of development and the mix of uses on the highway network?

Council's Response

1. The site allocation process has considered the impact of development and the mix of uses on the highway network as part of the Sustainability Appraisal and site selection process for sites (SA004 and SA005). Comments from NYCC Highways were sought which confirmed that, in terms of a land allocation, access would be acceptable for this site onto Skipton Road. The Council has also undertaken Highways Modelling work for Settle, which will form part of a wider Statement of Common Ground between the Council and NYCC Highways on the cumulative effects of development proposed in the local plan on the highways network. This work concludes that junction improvements are not needed in this area, either with regards to development of this site or with regards to the cumulative impact on the highway network from other developments proposed in the local plan for Settle.

Q37. 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?

Council's Response

1. The site allocation process, including Sustainability Appraisal (SA004) and the Residential Site Selection Process (SA005) has identified potential negative landscape impacts resulting from development of site SG064. Whilst the SA accepts that there will be some landscape impacts with respect to the character and appearance of the area (including the nearby YDNP), it concludes that

development principles will mitigate. The SA says the adverse impacts on landscape are outweighed by benefits of achieved social and economic objectives.

Q38. How has the site allocation process considered the impact of development and mix of uses on the River Ribble (Long Preston Deeps) SSSI?

Council's Response

1. Site SG064 has been addressed in the Sustainability Appraisal (SA004) for the entire plan. The SA accepts that there will be some impact on biodiversity but that development principles will mitigate. In addition and with respect to the recently approved planning application on site (subject to the signing of a S106 Agreement, see Q32 above), Natural England requested that a survey on migrating birds was carried out over the 2017/18 winter to ascertain the impact development in this area would have on the River Ribble (Long Preston Deeps) SSSI. The Anley Crag Wintering Bird Report (May 2018) concludes that due to the large number of Lapwing recorded on one occasion and the presence of other waterbirds within the blue line boundary, there is clearly some linkage between the site and the SSSI, however, given the small numbers, their resident time on site and the preferential flight routes, the site does not appear to functionally linked to the SSSI. Nevertheless, given that there will be a loss of foraging habitat during the construction and operational phases, the development is likely to have an adverse effect on these species unless some degree of compensation is provided off site.

IN022 and IN035 – Land adjacent to Southern edge of Industrial Estate, New Road

Q39. Is it clear to decision-makers, developers and local communities what uses will be permitted on the site, including the amount of potential Class B1/B2/B8 uses?

Council's Response

1. Yes, it is clear to decision-makers, developers and local communities what uses will be permitted on the site. It states in the development principles that the sites are allocated as an extension to the existing industrial estate to the south of New Road, Ingleton. It is not required to state the amount of potential Class B1/B2/B8 uses.

Q40. Is the allocation of the site for employment purposes consistent with the strategy for economic growth in Policy SP2 which seeks to support sustainable economic activity?

Council's Response

1. Yes, the allocation of this site in Ingleton for employment purposes consistent

with the strategy for economic growth in Policy SP2 which seeks to support sustainable economic activity. In Policy SP2 (ii) it states that the local economy will grow, diversify and generate new employment and productivity opportunities, and this will be achieved by allocating 15.63 ha of additional employment land for B1, B2 and B8 uses in Skipton (Policy SP5), Settle (Policy SP6) and Ingleton (Policy SP9). Hence, Policy SP9 specifies Ingleton for employment allocation and the allocation of the site for employment purposes is consistent with this.

Q41. How has the effect of additional employment development on the landscape character of the area been assessed? Is it clear what is expected of proposals for new development in this regard?

Council’s Response

1. The Landscape Visual Impact Assessment (La007) considered these sites. On page 43, it stated “Sites form an extension to the busy industrial estate to the south of New Road, Ingleton. Large industrial sheds occupy the site and restrict views of the YDNP, which can be seen in the long distance from various points within the Industrial Estate. There is no PROW on the site.” It was concluded that the visual impact of development on the site is deemed to be negligible. However, impacts may be prominent in terms of short distance views into the site, and landscaping around the site may be necessary to mitigate public viewpoints at these close distances. In the local plan’s development principles for the site, it can be clearer that is expected of proposals for new development in this regard. It is proposed to add a development principle concerning landscape impact reduction, as follows:

Proposed Modification

Page 104 of the submission local plan: An additional development principle as follows: “Development proposals will be carefully and sensitively designed to minimise visual impact on the character and appearance of the area, and include measures to minimise impacts on air quality, noise and light pollution. This is particularly important in terms of mitigating impact on public viewpoints at close distances to the site”.

Q42. What is the fluvial and/or surface water hazard identified in the supporting text to Policy SP9? Is the allocation consistent with paragraph 100 of the NPPF, which states that local plan should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property?

Council’s Response

1. The Council's site selection and allocation process has taken a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property. The process has been developed and applied in consultation with and to the satisfaction of the Environment Agency (Representation 050). The Council's Strategic Flood Risk Assessment maps (SFRA) (FI002) shows that this site can be developed subject to FRA. Approximately 40% of the site reference IN035 is in Flood Risk Zone 3a, and none of the site reference IN022 is in Flood Zone 2 or 3. The flood risk on the site can be mitigated through design, layout, landscaping and SuDS. The first development principle for this site requires a flood risk assessment and the incorporation of SUDS within any proposals on the site unless this is not possible, as required by recommendation D, section A4 of the Council's SFRA (FI001), which states that all development proposals within Flood Zone 2 or Flood Zone 3a must be accompanied by a site specific Flood Risk Assessment. It is therefore considered that the allocation is consistent with paragraph 100 of the Framework. Details of the site selection process for IN022 or IN035 are set out in the Council's Residential Site Selection Process Background Paper (Ho007) and Part e) of the Council's Final Sustainability Appraisal Report (March 2018) (document PD007).

Issue 4 – Safeguarding Existing Employment Areas – Policy EC2

Q1. Does Policy EC2 apply to all sites falling within 'B' use classes, or just those sites identified on the Policies Map?

Council's Response

1. Policy EC2 applies to all sites in 'B' class use so that an adequate supply of employment land is maintained.
2. However, it is acknowledged that as drafted, the policy could be more clearly expressed, to reflect the fact that the policy applies to all sites in employment use, not just those identified on the policies map.
3. As such the following modification to the plan is suggested:

Proposed Modification
<p>Page 183 of the submission draft Local Plan. Replace the following text at paragraph 1 of policy EC2:</p> <p>“In order to ensure that there is an adequate supply of employment locations in Craven for 'B' Class Uses, sites identified on the policies inset map as: existing</p>

sites and premises in 'B' Class use in existing employment areas, sites with extant commitments for 'B' Class Use, and sites currently in 'B' class uses will be safeguarded from non 'B' Class uses unless:-“

Q2. Does Policy EC2 c) apply in all cases? As submitted is this clear to decision-makers, developers and local communities?

Council's Response

1. Criterion c of policy EC2 applies to all proposals for non 'B' class uses, in locations currently in 'B' class uses and those identified on the proposals map.
2. The criterion seeks to ensure that where changes of use from 'B' class uses to other uses are considered, a potential change of use would not prejudice the ongoing operation of the remainder of the site/area for 'B' class uses. This is particularly the case where new uses are defined as sensitive and potentially incompatible with existing uses is not mitigated.
3. The change of use of a site to non-employment generating 'B' class use should not prejudice the ongoing 'B' class employment use of the wider site/employment location. The criterion seeks to safeguard this.
4. It is submitted that the criterion is considered clear.

Q3. Is it clear to decision-makers, developers and local communities how applicants for planning permission should demonstrate that there is no reasonable prospect of a site being retained, reused or redeveloped for 'B' use classes?

Council's Response

1. Yes. However, it is submitted that the plan would benefit from further guidance and clarification, and the following minor modification to the plan is suggested:

Proposed Modification

Page 181 of the submission draft Local Plan. Amend paragraph 7.7 as follows:
'It is though, recognised that there will be circumstances where it will not always be appropriate or desirable to retain sites and premises in employment generating uses. Matters such as ongoing amenity issues to surrounding receptors arising from existing 'B' class uses that cannot be mitigated, or continued use of the site for employment uses leading to highway safety issues, could be reasons to demonstrate that an alternative use is desirable or preferable. Such matters would need to be demonstrated as part of a planning application submission however. Policy EC2 sets out circumstances where non employment generating uses on sites and premises currently in employment uses may be considered appropriate and/or

acceptable. In particular, where employment generating activities cause amenity issues to surrounding sensitive uses that cannot adequately mitigated, In such circumstances, non- employment uses may be considered favourably ‘

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If you would like to have this information in a way that's better for you, please telephone **01756 700600**.