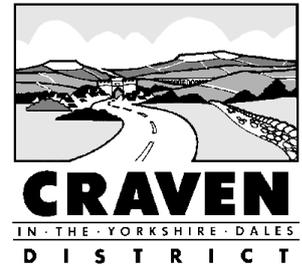


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Mr Matthew Birkinshaw
Planning Inspector
c/o Tony Blackburn
Programme Officer

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Date 20th June 2018

Dear Mr Birkinshaw,

Council Response to Inspector's Initial Questions for Examination of the Craven Local Plan

Further to your letter dated 18th May 2018, setting out a number of initial questions for the Council in preparation for the examination of the Craven Local Plan, please find set out below the following responses:-

1. Potential Main Modifications

1.1 “ **As part of the documents submitted for examination is a suggested Main Modification; draft Policy INF7. As required by Section 20(7C) of the 2004 Act, please can the Council confirm if a formal request has been made for the appointed Inspector to recommend modifications to the Plan where necessary in the interests of soundness?**”

Council Response

1.2 A formal request in accordance with Section 20 (7C) of the 2004 Act has not yet been made, but officers expect to receive instructions from the Council to make such a request following the next meeting of the Full Council on 7th August 2018, which will then be notified to you via the Programme Officer. In the meantime, the Council would invite the Inspector to continue his preparations on the assumption that such a request will be forthcoming.

2. Alternative (Omission) Sites

2.1 “**Some representors are seeking a different use of land to the one proposed in the Local Plan. Please can the Council prepare a list of such sites that were put forward in response to the Publication Local Plan? It would be helpful if the list includes details of each representor, the allocation proposed in the plan, the allocation/land use being sought and a map showing their location**”

Paul Shevlin, Chief Executive
Calls may be recorded for training and monitoring purposes
For general enquiries telephone 01756 700600



Council Response

- 2.2 The Council has prepared a schedule and accompanying maps providing relevant details of “Omission Sites” and is attached to this letter at Annex 1. The schedule includes (where applicable) a summary of how the site performed in the site selection process, including the reasons why the Council has not proposed them for allocation in the Submission Draft Local Plan. Those ‘Omission sites’ which had not been put forward earlier in the plan’s preparation have not been assessed by the Council.
- 2.3 For residential development, the Council has undertaken a number of assessments of site options (Strategic Housing Land Availability Assessment (SHLAA) sites). These assessments have resulted in the selection of an appropriate number and distribution of sites across the plan area to meet the plan’s housing requirements in a sustainable pattern of development.
- 2.4 Three selection assessments have been undertaken and documented:
- **Initial Screening** (Stage 1, Level 1)
 - **Selection of Pool of Sites:** Main Sustainability Appraisal (Stage 1, Levels 2 and 3)
 - **Selection of Preferred Sites:** District Level Analysis (Stage 2, Steps 1 and 2)
- 2.5 To be selected as a ‘preferred site’ for allocation in the Submission Draft Craven Local Plan, site options needed to pass all the above assessments. A site which failed to pass the **Initial Screening** tests remained at Stage 1, Level 1 of the process. Sites which passed the **Initial Screening** tests reached Stage 1, Level 2. Sites which performed satisfactorily in this level’s sustainability appraisal and could gain suitable access to the public highway reached the **Pool of Sites** (Stage 1, Level 3). Each site in the **Pool of Sites** was then subject to **District Level Analysis**.
- 2.6 The **District Level Analysis** incorporates consideration of the housing requirements for each settlement based upon the plan’s proposed housing requirement as a whole and the plan’s distribution of that requirement within individual settlements (Draft Policies SP1 and SP4). Options for the plan’s housing requirement and spatial strategy have been the subject of sustainability appraisals. These appraisals and the discussions on option selection can be read in Submission documents SA002 ‘SA of Strategies and Growth Options’; Sp001 ‘A Spatial Strategy for Growth Distribution in Craven (Options Appraisal) and Ho004 ‘Housing Growth Options Paper; Addendum’ and Ho005 ‘Housing Growth Options Paper’.
- 2.7 The detail of what the above assessments required of SHLAA sites can be found at paragraphs 4.57 to 4.60 of the Submission Draft Plan and in Submission Document SA004, ‘SA of SHLAA Sites and Process Description’. The relevant section of SA004 is ‘Description of SA for Residential Site Selection Process’.
- 2.8 To see the details of how each SHLAA site performed in the relevant assessments, the Submission Document SA005 ‘Residential Site Selection Process’ should be read. Each site assessment can be found within the folder for the relevant settlement under its SHLAA reference number.
- 2.9 For B class employment development, Lichfields, on behalf of the Council has undertaken an assessment of the following types of sites:
- Sites allocated in the existing Local Plan which are partially undeveloped
 - Existing employment sites not formally allocated in the Local Plan
 - Site’s with planning permission for B class employment use
 - Site’s put forward by landowners or developers for future B class employment use.
 - Sites put forward by Craven District Council.
- 2.10 The details of this assessment are given in Submission Document Ec002 ‘Employment Land Review (March 2017)’ at Sections 6 and 8, and Appendix 3.

- 2.11 The Council has also undertaken a Sustainability Appraisal of employment sites which can be found within Submission Document SA004 'SA of SHLAA Sites and Process Description'.
- 2.12 For Local Green Space Designations, details of the Local Green Space methodology and site assessments can be found in Submission Document Lo002 'Local Green Space Assessment (December 2017)'
- 2.13 All the above Submission documents can be found in the Submission library on the Craven Local Plan Examination webpage <https://www.cravenc.gov.uk/planning/planning-policy/new-local-plan/craven-district-council-local-plan-examination/>

3. Objectively Assessed Need for Housing ('OAN')

- 3.1 **“What are the primary reasons for the variations in the OAN for housing between the 2016 SHMA (2,280 dwellings) and the 2017 SHMA (4,840 dwellings)? Where is this set out in the evidence base? “**

Council Response

- 3.2 The demographic starting point for establishing the OAN in the two studies are:
- SHMA 2016: 130 dwellings per annum
 - SHMA 2017: 141 dwellings per annum
- 3.3 In establishing a demographic starting point for dwelling need, analysis takes account of vacant dwellings, which is 8.9% based on 2011 census data.
- 3.4 The 2016 figure is based on the official population and household projections (2014 based) over the 2012 to 2032 plan period; the Department of Communities and Local Government (DCLG) 2014 based household projection model suggests an increase of 2,128 households, approximating to 118 each year and 130 dwellings per annum over the plan period (Paragraph 6.7 and 6.15 of Submission Document Ho012 'Strategic Housing Market Assessment Update (December 2016)' and Paragraphs 3.7 to 3.20 of Submission Document De002 'Demographic Forecasting Update (October 2016)).
- 3.5 The 2017 figure is based on an adjustment to the latest official population and household projections (2014 based). An adjustment to these projections has been made because the recent Office for National Statistics (ONS) mid-year estimates (MYE) for Craven District has recorded a sharp uplift in the district's population. This suggests that the 2014 based projections may have underestimated population growth in 2015 and 2016. Therefore this adjustment or 'rebased' 2014 scenario results in a higher demographic starting point of 141 dwellings per annum for establishing the OAN in this later SHMA (Paragraph 6.7 of Submission Document Ho013 'Strategic Housing Market Assessment Update (November 2017)' and Paragraphs 3.6 to 3.16 of Submission Document De001 'Updating the Demographic Evidence (November 2017)').
- 3.6 The influence of local demographic trends in the establishment of the OAN in the two studies results in an uplift of the demographic starting point to:
- SHMA 2016: 188 dwellings per annum
 - SHMA 2017: 202 dwellings per annum
- 3.7 Both these figures are based on longer term migration trends. The 2017 figure is based on a higher household formation rate for the 25 to 34 age group than in the 2016 figure over the plan period. The latter is based on the 2014 household formation rates whereas the 2017 figure is based on a mid-point between the 2014 rates and the higher rates in 2008 for this younger adult age group. (For 2016:- See paragraphs 6.9 to 6.15 of Submission Document

Ho012 'Strategic Housing Market Assessment Update (December 2016)' and Chapter 4 of Submission Document De002 'Demographic Forecasting Update (October 2016)'; For 2017: See paragraphs 6.9 to 6.13 of Submission Document Ho013 'Strategic Housing Market Assessment Update (November 2017)' and paragraphs 3.17 to 3.20 of Submission Document De001 'Updating the Demographic Evidence (November 2017)'.

3.8 A market signals uplift of 20% to the demographic requirement to take account of affordability is applied to both studies which results in the following uplifts:

- SHMA 2016: 26 dwellings per annum (dpa) (Paragraphs 6.26 to 6.34 of Submission Document Ho012 'Strategic Housing Market Assessment Update (December 2016)')
- SHMA 2017: 40 dwellings per annum (dpa) (Paragraphs 6.22 to 6.30 of Submission Document Ho013 'Strategic Housing Market Assessment Update (November 2017)')

3.9 The addition of the last two sets of figures (taking into account they are rounded figures) produces two different OAN's of:

- SHMA 2016: 4,280 dwellings (214 dpa)
- SHMA 2017: 4,840 dwellings (242 dpa)

3.10 **“What is the justification for estimating that 15% of housing growth within the District is likely to take place in the Yorkshire Dales National Park? What cooperation has taken place with the National Park Authority in reaching this figure? How does it correlate with plans for growth in the National Park?”**

Council Response

3.11. This response has been jointly prepared and agreed between Craven District Council (CDC) and the Yorkshire Dales National Park Authority (YDNPA).

3.12 Paragraph 6.31 of the SHMA 2017 (Submission Document Ho013) states that 'An estimated 15% of the growth of the District, is likely to take place in the Yorkshire Dales National Park'. The evidence to justify this statement is contained in the Craven Local Plan, Demographic Forecasting Update: Addendum November 2017 (Submission Document De001). It is a growth forecast figure based on demographic and employment led projections forming part of the assessment of OAN for Craven District. It is not an estimate of housing delivery based on past completion trends, site allocations or windfalls estimates. It is not a housing target that either CDC or the YDNPA are seeking to meet in their Local Plans. Notwithstanding this, and as stated later in this paper, both authorities are in agreement that the planned level of growth in the two Local Plans is appropriate to meet the OAN of the Craven Housing Market Area (HMA).

3.13 Section 5 of Submission Document De001 presents population growth forecasts for the 2001 to 2032 period for each of the four sub-district areas assessed. These are North Craven, Mid Craven, South Craven and the area of the YDNP that falls within Craven District. Paragraph 6.15 of Submission Document De001 concludes that:

“In considering the updated PG Long Term scenario alongside the SNPP-2014 and Employment-led scenarios, the estimated proportion of Craven's dwelling growth in each of the four sub district areas is illustrated (Figure 20). An estimated 9% is associated with North Craven; 19% with Mid Craven, 57% with South Craven and 15% with the portion of the district that falls within the Yorkshire Dales National Park.”

- 3.14 The Demographic Forecasting Update (October 2016) (Submission Document De002) also estimated that 15% of Craven's dwelling growth would occur in that part of the district within the YDNP.
- 3.15 Discussions on the establishment of an OAN for their respective areas between the two authorities have taken place during plan preparation (See paragraph 5.3, Table 3 (pages 29 and 30) and Appendix A of the Duty to Cooperate Statement Update (Submission Document SD006)). There would have been advantages to have the YDNP Local Plan and the Craven Local Plan based on the same evidence and the production of a single figure for the objectively assessed housing need in that part of the YDNP within Craven District for both parties to agree on. However, the YDNP authority was advancing its Local Plan to Examination ahead of the three Local Plans of its constituent District Councils. These authorities are Craven, South Lakeland and Richmondshire.
- 3.16 Hence, and as accepted by the Local Plan Examination Inspector for the Yorkshire Dales National Park Local Plan, the YDNP authority adopted its Local Plan in December 2016 following a pragmatic approach to establishing an OAN for a National Park which fell within 4 different Housing Market Areas (HMA) and where other district's OAN had not been finalised. Paragraphs 37 to 44 of the Inspector's report (attached at Annex 2) explains the difficulties which the YDNP authority faced on this matter and accepted its use of three different approaches to establish an OAN for the whole YDNP. None of these approaches adopt the same methodology as that used by CDC.
- 3.17 The use of these three different approaches and the Inspector's report (paragraph 47) has resulted in an OAN for the whole YDNP of between 32 to 38 dwellings per annum up to 2030. At paragraph 53 of the Inspector's report, he concludes that a disaggregation of the OAN for the relevant Districts within the National Park might be 'ideal', but not necessary for soundness. The YDNP authority does not therefore have a formal basis upon which to agree an OAN for that part of Craven District within the National Park.
- 3.18 It is clear from using different methodologies that there would likely be differences in OAN figures between the two authorities. Both authorities accepted this likelihood during the preparation of both their plans and rather than agree a single evidence base, discussions took place on the consequences of these differences to ensure that the OAN for the Craven District Housing Market Area (CDHMA) would be met – whichever approach/forecast scenario/derived figures were used.
- 3.19 This response paper now deals with these differences and answers the question of how does the 15% of growth attributed by Craven's evidence base on OAN to the YDNP compare with the YDNPA's plans for growth.

Evidence base: Craven District Council

- 3.20 The Craven SHMA 2017 (Submission Document Ho013) establishes that the OAN (from 2012 to 2032) for the CDHMA is

- 242 dwellings per annum (dpa) (4,840 dwellings)

Attributing 15% of this OAN to that part of the district which falls in the YDNP results in the following:

- The OAN for the Craven plan area is 206 dpa (4,120 dwellings)
- The OAN for the YDNP within Craven is 36 dpa (720 dwellings)

Evidence base: Yorkshire Dales National Park Authority

- 3.21 The OAN of the whole of the National Park lies between 32 and 38 dpa (2015 to 2030). There is no disaggregation of this OAN to the lower district levels.

Plans for growth: Craven District Council

- 3.22 Policy SP1: Meeting Housing Need of the Submission Draft Craven Local Plan (Submission Document PD001) states that provision is made for 4,600 net additional dwellings in the plan area and that this equates to a minimum provision of 230 dpa.

Plans for growth: Yorkshire Dales National Park

- 3.23 Policy SP3: Spatial Strategy of the YDNP Local Plan (Submission Document Ot007) sets out the planned level of growth for the YDNP as a whole and disaggregates that planned level of growth to the HMA's that fall within the Park. This results in the YDNP Local Plan target for growth as follows:

- All YDNP: 55 dpa
- Richmondshire HMA: 18 dpa
- Craven/Lancaster HMA: 27 dpa (all within Craven District)
- South Lakeland Dales HMA: 10 dpa.

- 3.24 Whilst there are no directly comparable figures, it would be reasonable to suggest that the YDNP OAN assessment would result in a significantly smaller housing figure for that part of the Park within Craven District, than CDC's assessment of 36 dpa. Purely as an indicative figure, if an existing population pro rata approach was taken to disaggregating the whole National Park OAN between HMA's, 50% of housing need would be attributed to Craven District. 50% of 32 to 38 dpa is 16 to 19 dpa. This discrepancy is unsurprising given the difficulties in identifying and disaggregating OAN for National Parks and parts of HMA's, and the fact that NPPG accepts that '*establishing future need for housing is not an exact science*' (PPG para 014 2a-014-20140306).

- 3.25 However, in terms of the key message from the NPPF (Paragraph 47) that local planning authorities should ensure that the OAN in the relevant HMA is met, then both planning authorities are satisfied that their respective Local Plan's will deliver.

- 3.26 The two authorities planned growth for the CDHMA is:

- Craven Local Plan: 230 dpa
- YDNP Local Plan for that part of the Craven HMA: 27dpa.

- 3.27 In total, the planned growth for the CDHMA is 257 dpa compared to the OAN established in the Craven SHMA 2017 (Submission Document Ho013) of 242dpa. Planned growth across the two local plans is clearly seeking to meet the OAN for the CDHMA.

- 3.28 In conclusion, the Council has not used the SHMA 2017 (Submission Document Ho013) 15% figure for 'housing need' in that part of the district which falls in the YDNP as reflecting an appropriate planned level of growth for that area (for reasons given in the Housing Growth Options Paper and Addendum (Submission Documents Ho004 and Ho005)). Rather the Draft Craven Local Plan's housing requirement of 230 dpa assumes that only about 5% of the CDHMA housing need will be met in the National Park (12 dpa). The YDNPA is planning for 27 dpa in its Local Plan within the same area and they are content that this provides some flexibility in meeting the residual 12 dpa from the Draft Craven Local Plan.

- 3.29 All the Submission Documents referenced in the preceding paragraphs 3.2 to 3.28 can be found in the Submission library on the Craven Local Plan Examination webpage <https://www.cravencd.gov.uk/planning/planning-policy/new-local-plan/craven-district-council-local-plan-examination/>

4. Housing Mix and Density

- 4.1. **“Draft Policy SP3 sets out a general guide for the mix of housing and housing density. What are the criteria based on and which evidence based documents support their inclusion in the Local Plan?”**

Council Response

- 4.2 The policy criteria are based on the findings and recommendations of the Council's background paper 'Approaching Housing Density and Mix' (Feb 2017) (Submission Document Ho001).
- 4.3 The background paper refers to the Council's Strategic Housing Market Assessment Update (December 2016) (Submission Document Ho012), which has now been superseded by a further Strategic Housing Market Assessment Update (November 2017) (Submission Document Ho013).
- 4.4 However, the SHMA 2017 update (Submission Document Ho013) has not affected the findings and recommendations of the background paper, because the update's conclusions on dwelling mix, contained in paragraph 7.16 and Table 7.3 of Submission Document Ho013, are effectively unchanged from those of the previous update of December 2016 (Submission Document Ho012).
- 4.5 This explains why paragraph 4.30 of Policy SP3's supporting text is able to refer to the SHMA update of November 2017 and Section 3, page 2, of the background paper is able to refer to the SHMA update of December 2016 without any resulting inconsistency in the evidence.
- 4.6. **“Does draft Policy SP3 apply to all new residential development, regardless of size or location?”**

Council Response

- 4.7 The general guide set out in Policy SP3 is intended to be broadly applicable across the plan area, subject to two qualifications.
- 4.8 First, criterion c) requires a flexible application of the general guide to take account of any relevant site-specific circumstances, which may include the particular size or location of a site.
- 4.9 Second, paragraph 4.32 of the Policy SP3's supporting text states that proposals for brownfield development with a significant element of conversion should be approached individually in terms of their housing mix and density. This statement is based on Section 4, page 3, of the background paper (Submission Document Ho001), which provides further detail and explanation.
- 4.10 Therefore, draft Policy SP3 does apply to all new residential development, but with the exception of development involving a significant element of conversion and with the flexibility to take account of the potential effect, on mix and density, of an individual site's particular size or location.
- 4.11 All the Submission Documents referenced in the preceding paragraphs 4.7 to 4.10 can be found in the Submission library on the Craven Local Plan Examination webpage <https://www.cravencd.gov.uk/planning/planning-policy/new-local-plan/craven-district-council-local-plan-examination/>

5 Habitats Regulations Assessment ('HRA')

- 5.1 **“The Habitat Regulations Assessment (Iteration II) refers to ‘buffer zones’ of both 2.5km and 7km around the South Pennine Moors SPA and SAC. When considering the need**

for strategic mitigation arising from allocations and policies in the Plan, which screening distance has the HRA used?”

Council Response

- 5.2 The background evidence base, and relevant sections, to support paragraphs 5.3 to 5.9 below can be found within Submission Document HRA003, 'HRA – AA Report (Iteration II) (March 2018)' at Sections 8.2 and 8.3 which can be accessed in the Submission library on the Craven Local Plan Examination webpage <https://www.cravencdc.gov.uk/planning/planning-policy/new-local-plan/craven-district-council-local-plan-examination/>
- 5.3 The Habitat Regulations Assessment for the Craven Local Plan has utilised two screening distances, each responding to the buffer zones of 2.5km and 7km, which follows the methodology of the neighbouring Bradford Metropolitan District Council's Core Strategy. A similar approach to the Bradford methodology in this regard was suggested by a Natural England representative during the HRA preparation process. The number of dwellings put forward by the Craven Local Plan and the Bradford Core Strategy differs greatly, and hence different mitigation measures are proposed in the Craven HRA when compared to the HRA of the Bradford's Core Strategy within each screening distance utilised. These mitigation measures are aimed to be suited to the settlement sizes, the number of new dwellings, and the context of the Craven district.
- 5.4 For the initial screening distance of 7km, any proposed housing development in Craven falling within this buffer zone is assessed in the recreational context and possibilities of each settlement. This is particularly based on the existing accessible recreational green space and public rights of way, and green space and other recreational areas put forward by the local plan. This approach is primarily to sufficiently reduce the recreational impact of new housing on any nearby Special Areas of Conservation (SACs) or Special Areas of Protection (SPAs). This green space can be in the form of green infrastructure provided within a preferred site itself, in addition to local green space designations, green wedge areas, and existing parkland and forest areas.
- 5.5 The overall aim is to ensure that there are sufficient amounts of usable, public green space to appropriately meet the increased recreational demand resulting from new development in the local plan area. A considerable amount of the preferred sites in the Craven Local Plan area lie within 7km of a SAC or SPA. These include sites in, for example, the largest town of Skipton. Here, much emphasis has been placed in the local plan on providing green infrastructure within preferred site areas, in addition to local green space allocations, to complement existing parkland and forest areas open to the public within and around the town.
- 5.6 The second screening distance represents the buffer zone of 2.5km from a SAC or SPA. Any proposed development within this zone is subject to a similar emphasis as sites within 7km, in terms of the sufficient reduction of recreational pressure on any nearby SACs or SPAs. However, there is firstly a more targeted effort on ensuring that the recreational impact of these sites can be contained almost entirely within the site itself, and secondly, research on whether key bird species of a nearby SPA would be affected in terms of foraging activity.
- 5.7 There is only one such proposed housing site within 2.5km of a SAC or SPA in the Craven Local Plan. This is site number SC085 (Land at Malsis, Glusburn). In the local plan, the development principles for this preferred site acknowledge that the site is within the 2.5km buffer zone of the South Pennine Moors SPA/SAC. To relieve recreational pressure on the SPA/SAC, the site is to include extensive areas of green infrastructure accessible to the public to complement existing green space features. A Public Right Of Way (PROW) will be also created through the site to link to existing PROWs on Malsis Lane to the south and High Corn Mill to the northeast. Studies show that the site SC085 does not seem to have protected bird species foraging on the site from the nearby South Pennine Moors SPA.
- 5.8 A study and site visit was undertaken on proposed sites in the north of the town of Skipton to establish if there is the likelihood of the foraging presence of curlew or golden plover on the sites. These are protected bird species associated with the North Pennine Moors SPA to the north of Skipton, within the Yorkshire Dales National Park. The sites SK081,

SK082 and SK108 in the northwest of the town, and also SK087 and SK088 to the northeast, are a little outside of the 2.5km screening distance, but were still assessed in terms of establishing the likelihood of these bird species being present in notable foraging numbers.

- 5.9 Consultation took place on this subject with the local RSPB bird watching group in the Skipton area. It was established that these bird species do not frequent these greenfield sites in any significant numbers. This is unsurprising, given the evidence established in site visits of existing human disturbance in terms of neighbouring housing, agricultural activity, heavy vehicle traffic and street lighting.
- 5.10. **“With regard to air quality, the March 2018 HRA confirms that traffic figures have been requested to assess flows on the A6068. It also confirms that additional evidence will be made available to confirm the flow of Heavy Duty Vehicles. What is the status regarding this additional evidence? Has it been completed, and if so, what does it demonstrate?”**

Council Response

- 5.11 The background evidence base, and relevant sections, to support paragraphs 5.12 to 5.16 below can be found within Submission Document HRA003, ‘HRA – AA Report (Iteration II) (March 2018)’ at Section 8.5 which can be accessed in the Submission library on the Craven Local Plan Examination webpage <https://www.cravencdc.gov.uk/planning/planning-policy/new-local-plan/craven-district-council-local-plan-examination/>
- 5.12 With regard to air quality, additional evidence has been now obtained from the Council’s transport consultants to demonstrate that the likely flow of Heavy Duty Vehicles from new development in the local plan is well below the 200 AADT threshold on the A59 route. This road, on one section, passes within 200 metres of the North Pennine Moors SAC & SPA on the route to Harrogate. The HGV calculation is based on the town of Skipton as this is the urban area for which traffic modelling work has been made available.
- 5.13 As part of their local plan submission process, Harrogate Borough Council is currently compiling their estimate of HGV flows to Craven along this route. The sum of both HGV flows expected in each plan is required, in order to assess if the total is below 200 AADT. In this regard, contact was made with the Planning Officer of Harrogate Borough Council on June 12th. It is expected that Harrogate’s HGV contribution arising from their preferred site allocations in their local plan will be sent to Craven District Council sometime before the end of the month of June.
- 5.14 From prior discussions with Harrogate’s transport team, it is expected that the sum of HGV traffic from both local plan housing provisions along this route should be well below 200 AADT. Craven District Council will provide this figure and update the HRA accordingly when the information is received from Harrogate District Council shortly.
- 5.15 Regarding the A6068 route, it does pass close to, but not within 200 metres of the South Pennine Moors SAC & SPA. It is hence somewhat less important than assessing traffic flows alongside the A59 route for the purposes of establishing air quality impact on a SAC. In addition, as the A6068 route does not directly connect to Skipton, the traffic modelling required to assess traffic contributions from the Craven local plan to this route is not available.
- 5.16 Nevertheless, contact has been made with representatives of Bradford Metropolitan District Council to establish if they may be able to provide traffic figures to assess future flows on the A6068 within the Craven local plan area resulting from their Core Strategy housing provisions. It is hoped that this information will be available prior to the Craven Local Plan examination, and if so, it will be included in the HRA evidence to establish adherence to the aforementioned traffic thresholds.

6. **Strategic Flood Risk Assessment**

- 6.1 **“It would be helpful to the examination if the Council could provide a list of sites allocated for development , which fall within Flood Zones 2 or 3. Has the Local Plan applied a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change? If so, where is this set out?”**

Council Response

- 6.2 A list of sites allocated for development which have areas which fall within Flood Zone 2 or 3, with related mapping of these sites is provided at attached Annex 3.
- 6.3 The Craven Local Plan has applied a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change. This is set out in the sustainability appraisal which forms the first part of the site selection process (Submission Document SA004 ‘SA of SHLAA Sites & Process Description’)
- 6.4 The general process description is also explained in Submission Document SA004. The following paragraphs describe the process description solely from a flood risk perspective.
- 6.5 There has been an initial screening within the sustainability appraisal to not consider any potential residential sites which provide less than 0.1 ha of Flood Zone 1 area. Sites which provide at least 0.1 ha of land in Flood Zone 1 are then assessed under the twenty sustainability appraisal criteria shown in the appraisals for each site presented in the SHLAA. One of these twenty sustainability appraisal criteria analyses flood risk.
- 6.6 There are five grades attached to the appraisal criteria, namely double positive, positive, neutral, negative and double negative. In the case of flood risk, these grades approximately correspond to the area and context of Flood Zones 1, 2 and 3 on each site. What grade is allocated also rests on the judgement of the planning officer based on available flood mapping utilised from the Environment Agency and the Strategic Flood Risk Assessment report and maps 2017 (Submission Documents FI001 and FI002) and the subsequent site visit and the site’s context within the settlement.
- 6.7 For example, a site with all Flood Zone 1 area would be allocated a double positive marking. A site with very low areas of Flood Zones 2 or 3 (generally less than 10-15%) would likely receive a positive. In contrast, sites with some areas of Flood Zone 1 but predominately Flood Zones 2 and 3 (generally 60% or greater) would most likely receive a double negative.
- 6.8 However, there may be some slight variation in marking based on the site’s context in the settlement, and the location and shape of the flood risk areas within the site. With residential sites selected for development, sites with some Flood Zone 2 and/or 3 areas, but which are sufficiently large with the majority of the site in Flood Zone 1, generally have green infrastructure areas assigned to the areas at risk of Flood Zone 2 and 3.
- 6.9 In summary, the evidence base for the local plan has applied a sequential, risk-based approach to flood risk in each settlement to the location of development to sufficiently reduce flood risk to people and property in the district and beyond.
- 6.10 All the Submission Documents referenced in the preceding paragraphs 6.2 to 6.9 can be found in the Submission library on the Craven Local Plan Examination webpage <https://www.cravenc.gov.uk/planning/planning-policy/new-local-plan/craven-district-council-local-plan-examination/>

7. Highways Infrastructure

- 7.1 **“Representations from North Yorkshire County Council (‘NYCC’) refer to on-going discussions regarding the “...detail and deliverability of the identified mitigation measures to address the cumulative impact of development in Skipton. The LHA seeks to continue to work closely with Craven District Council on this matter”. Please can the Council confirm if an agreed position has been reached with NYCC regarding any necessary mitigation in Skipton, and if not, what investigations are outstanding. If matters have been agreed, it would be helpful if a Statement of Common Ground could be prepared ahead of the hearing sessions.”**

Council Response

- 7.2 This response has been agreed with the local highway authority (LHA), North Yorkshire County Council (NYCC). At the time the Craven Local Plan was submitted to the Secretary of State on 27 March 2018, Craven District Council (CDC) had been working closely with the LHA on potential highway infrastructure requirements for Skipton for about 2 years. At the time of submission, the following had been agreed with the LHA:

- That the ‘Modelling Highway Impacts of Local Plan Developments in Skipton’ June 2017 (Submission Document In008) is a robust and proportionate evidence base which identifies the need to mitigate the cumulative impact of local plan development in Skipton.
- Based on the development inputs used in the modelling, the mitigation measures identified in Section 6 of Submission Document In008 are necessary to make planning permissions for these developments acceptable. (As stated in bullet 1, these measures are to mitigate cumulative impact. Other transport mitigation measures may also be necessary to make individual development sites acceptable in planning terms).
- Based on ‘high level’ estimates, the cost of these mitigation measures at four junctions in Skipton is estimated to be about £695,000 (paragraph 6.7.1 to 6.7.5 of Submission Document In008).
- It would be appropriate to negotiate for developer contributions from applicants in accordance with the Community Infrastructure Levy (CIL) Regulations 2010, as amended, through planning obligations in the form of Section 106 legal agreements introduced by the Town and Country Planning Act 1990.
- That the Council’s Local Plan Viability Appraisal (Submission Documents Ec004 and Ec005) had taken into account costs of up to £2 million for such highway infrastructure divided between those housing developments in Skipton of 100 dwellings and above. This represents ‘a worst case scenario’ regarding the cost impact on these larger sites in Skipton, but does not result in a challenge to their viability.
- Further assessment of traffic impact is likely to be required prior to the end of any public examination of the Local Plan if there are any changes to committed or Local Plan development details. (paragraph 8.5.3 of Submission Document In008).

- 7.3 The development proposals for Skipton contained in the Submission Draft Local Plan are different to those modelled in the June 2017 study. The Submission Draft contains a lower number of homes and employment land proposed for allocation compared to the development package used in the June 2017 study.

- 7.4 It has been decided, therefore, to undertake a further run of the traffic modelling for Skipton to reflect the latest Submission Draft development proposals. This is underway and the consultants, Jacobs, the LHA and CDC are working to complete this update and agree the required mitigation measures and costs, at a ‘high level’, by the middle of August 2018. This would allow CDC and NYCC to produce a Statement of Common Ground on this matter by the middle of September, in time for the commencement of the examination hearings in October

2018. Both Councils are committed to producing this Statement of Common Ground prior to the hearings.

- 7.5 Furthermore, the Council has asked its consultants to undertake some high level traffic modelling for Bentham and Settle and the results of this work will be available prior to the Examination hearings.
- 7.6 All the Submission Documents referenced in the preceding paragraphs 7.2 to 7.5 can be found in the Submission library on the Craven Local Plan Examination webpage <https://www.cravencd.gov.uk/planning/planning-policy/new-local-plan/craven-district-council-local-plan-examination/>
8. The Council trusts that the Inspector will find the above responses helpful in preparing for the examination of the Craven Local Plan. If the Inspector requires any further clarification or has any further queries on the above responses, the Council will be pleased to assist.

Yours sincerely

Mrs Sian Watson
Spatial Planning Manager