



Craven Local Plan Examination

Matter 5

Statement by Craven District Council

Matter 5 – Residential Allocations (Policies SP5, SP6, SP7, SP8, SP9, SP10 and SP11)

Hearing Day 5—Wednesday 17th October 2018 (Week 1)

Issue 1 - Methodology

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

Council's Response

1. The process described below is also explained in full detail within document SA004.
2. The proposed residential sites put forward by landowners and developers for inclusion in the SHLAA have undergone a series of analyses to judge their suitability for housing allocation. In order to facilitate this process description, the analyses can be divided into three stages, as follows:
 - (a) Initial Screening Analysis of site (as part of the Sustainability Appraisal);
 - (b) Selection of site, or not, in the 'Pool of Sites' (also as part of the Sustainability Appraisal);
 - (c) From the available pool, selection of site, or not, into the list of Preferred Sites (as part of what is referred to as the District Level Analysis).
3. In the description of the sustainability appraisal process, the following sections detail the initial screening analysis, and selection of the sites for the 'pool of sites', and finally, from this pool, the selection of the preferred sites. Therefore, the initial paragraphs below describe the process where firstly the sites are taken from the original SHLAA list of sites and put through the preliminary screening appraisal. The remaining sites which emerge from the initial screening are then analysed under twenty sustainability objectives in the sustainability appraisal. Both of these processes are now discussed in more detail below.

Initial Screening Appraisal

4. All of the sites presented to the Sustainability Appraisal process from the set of sites contained in the SHLAA were included and recorded in the Sustainability Appraisal analysis sheets, in terms of their site number, address and size. To decide if these sites warranted further analysis, all of these sites put forward were then subject to the initial screening appraisal. This appraisal contained four criteria tests, which are considered the most essential criteria for the potential residential site to pass. If the site was deemed to fail at least one of these tests, it then did not go forward for further analysis under the Sustainability Appraisal process. The four test criteria are as follows:
 - The site is located within, adjoining or adjacent to a principal town (Tier 1), key service centre (Tier 2), local service centre (Tier 3) or service village (Tier 4) identified in the local plan settlement hierarchy;

- The site is at least 0.1 hectares in size and is capable of accommodating at least five dwellings;
 - The site has an initial advantage because it contains at least 0.1 hectares of land that is at the lowest risk of flooding (flood zone 1);
 - The site is located outside areas protected nationally or internationally for key habitats and plant and animal species (i.e. Sites of Special Scientific Interest, Special Areas of Conservation & Special Protection Areas).
5. The first test criterion involves the need for spatial sustainability in terms of the proposed site being within, or adjoining existing built up areas in the plan's settlement hierarchy. This approach therefore is aimed to avoid the negative landscape and accessibility effects of isolated developments in the predominately rural and countryside environs of the plan area. The local plan's settlement hierarchy consists of the principal town (Skipton), key service centres (e.g. Settle), local service centres (e.g. Ingleton), and finally service villages (e.g. Bradley). The settlement hierarchy is based on the role and function (including service capabilities) of each settlement.
 6. The second test looks at the size of the site and how many dwellings the site is potentially capable of delivering if it was selected. The site must have a suitable size threshold of at least 0.1 hectares and a capacity to deliver at least five dwellings in order to be considered for a local plan housing allocation. This allows for a mix of small, medium and large sites to be considered. Very small sites of below 0.1 hectares or yielding less than 5 dwellings may be developed for housing without being allocated, provided they satisfy policy criteria for non-allocated sites.
 7. The third test considers the level of threat from flooding. It requires that there must be at least 0.1 hectares of the site in Flood Risk Zone 1, so that the site can at least contain a minimum area that is suitable for residential development, related to the second test criterion above. One of the key objectives of this local plan's site selection process is to avoid building dwellings on areas of land where there are Flood Risk Zone 2 and Flood Risk Zone 3 designations in evidence, as the risk of flooding gets progressively higher under these zones. The designations of flood zone for each SHLAA site within the Craven Local Plan process are taken from the most up-to-date evidence from the Environment Agency's flood risk maps and the Council's 2017 Strategic Flood Risk Assessment, both of which are available online.
 8. Finally, the fourth test aims to ensure that all sites chosen are outside of areas of special biodiversity interest and importance. Key examples are Special Areas of Conservation (SACs) which help to preserve designated habitats of importance, and Special Protection Areas (SPAs) that assist to protect important wildlife species. Both SACs and SPAs in England are designated under European Union law in terms of the Habitat Directive. Sites of Special Scientific Interests (SSSIs) are of national importance in England, and also protect important biodiversity

interests. It is therefore highly preferable that no residential development under the local plan selection process is based within the boundaries of these special areas of environmental protection.

9. It must be noted that some sites put forward under the SHLAA since the beginning of the local plan period in 2012 gained planning permission for housing in the intervening time between 2012 and the analysis of the Sustainability Appraisal during 2016 and 2017. These sites were also included and recorded in the Sustainability Appraisal sheets in terms of site number, address, site size, and also the details of the planning application. In these cases, the site's individual row in the sheet was coloured orange to distinguish it from other studied SHLAA sites and the site was not taken forward, because the grant of planning permission negates the need for a local plan housing allocation.

The Pool of Sites

10. From the above paragraphs, it is seen that SHLAA sites that did not meet one or more of the aforementioned four test criteria remained at Level 1 of the Sustainability Appraisal, and they did not proceed further in terms of being a viable housing site option. The sites which passed all four of the tests were then subject to evaluation under the various social, environmental and economic elements of the sustainability objectives. These sustainability objectives were derived based on having an appropriate mix of socio-economic and environmental objectives.
11. Each site underwent a marking system in the Sustainability Appraisal, ranging from a double negative to a double positive, in terms of the influence or effect on each sustainability objective analysed. There are five marking possibilities, which means the remaining marking options in between are negative, neutral or positive. In the case of neutral, this means that the influence or effect on the sustainability objective in question is either negligible, or that minor positive and negative effects largely balance each other.
12. In general, a site that received a double negative marking, or an excessive number of single negatives ('excessive' depending on the discretion of the marker where positives also may need consideration), was judged not to be suitable for further advancement, and so it stayed at Level 2. Whilst the assessment exercise necessarily requires some balancing of positive and negative effects, it must be pointed out that some double negatives cannot be balanced out by positives elsewhere. An example would be where a double negative is received in terms of access to an adopted road, which means that access cannot be physically or safely achieved. In such circumstances, a site cannot be taken further forward.
13. Each site under analysis has commentary within the Sustainability Appraisal

discussing the key points relevant to the marking of the sustainability objectives in terms of influences or effects on them, with respect to that settlement. An adjacent column in the sustainability appraisal suggests any required mitigation measures and associated recommendations, numbered from a prepared list. These inform and feed into the development principles for the site if it is ultimately selected amongst the local plan's preferred sites.

14. It must be noted at this point that the degree to which individual sustainability objectives have a determining effect on site selection can sometimes vary, based on the settlement in question and what the pressures on it are. A good comparison in this respect is the relatively large settlements of Settle and Bentham (both key service centres in the settlement hierarchy). Both of these settlements under the hierarchy were apportioned a little over 10% of the overall housing growth and both settlements are subjected to heritage conservation pressures. However, Settle is also subjected to significant flood risk pressures, whereas Bentham is not. This means that the balance between heritage conservation and flood risk can be a strong determining factor in Settle, whereas, in Bentham, heritage conservation alone can be a strong determining factor. Historic England and the Yorkshire Dales National Park provided input to assist with this process, particularly in the balance of considerations leading to the determination of Settle's preferred site list (which is a stage beyond the scope of this SHLAA report).
15. Overall, the various analyses described up until now are aimed at producing a suitable list or pool of sites in each of the settlements. In general, a typical marking score for a site which advanced through the twenty sustainability objectives to the pool of sites might include two to three double positives, and the rest divided into a mix of positives, neutrals and some negatives. The inclusion of some negatives in appraisals of sites which made it through to the pool of sites stage is almost inevitable, as there can be conflict between social, economic and environmental objectives in particular cases. As referred to previously, where such conflicts produce one or more double negative markings, it may be difficult to justify the site to progress further to pool stage.
16. When a site reaches the pool of sites, it is referred to in the sustainability appraisal as 'Level 3 (Pass)'. The pool of sites is therefore a list of sites which are deemed satisfactory for site selection if required in the settlement. All of the above described work to get to a pool of sites in each settlement is referred to as the Settlement Level Analysis. There are some settlements in the hierarchy where there are sites deemed satisfactory for the pool of sites, but the percentage of housing growth allocated, combined with planning permissions since 2012, means that Preferred Sites are not required.
17. In many settlements, the number of sites in the pool is greater than the number of sites required to meet housing targets, based on a guideline average density applied to each site in the plan area. This meant there is a choice available to

determine what are deemed the best sites, or Preferred Sites, in each of these settlements. This stage is referred to as the District Level Analysis and is described in the Environmental Report accompanying the Local Plan.

District Level Analysis

18. If the residential site was deemed to be suitable for the pool of sites, the next step was to determine if the site in question would be a preferred site, in the event that there was a surplus of sites available in the settlement. This was based on four analyses, based on the following (each of which are explained in the process description within document SA004):

- Viability of Affordable Housing Provision
- Site Proximity to Designated Landscape Features
- Site Proximity to Designated Natural Environmental Features
- Site Position in relation to Health & Safety Executive (HSE) Zone

19. If the site passes on all four District Level Analyses, the site can be considered suitable as one of the Preferred Sites in this settlement. A narrative of the site analysis was given for each preferred site chosen, with a net developable area, number of dwellings generated, and development principles.

Q2. How was the spatial distribution of allocations determined? How do they relate to the housing strategy and settlement hierarchy under Policy SP4?

Council's Response

1. The spatial strategy developed in this local plan aims to identify the most appropriate spatial distribution for growth in the plan area. Sufficient land was allocated spatially to meet the distribution of housing growth under Policy SP4 and the settlement hierarchy, and the settlement hierarchy assisted to inform the spatial strategy. The aim was to allocate sites to meet the spatial distribution set out in the chosen spatial strategy option identified in the Sustainability Appraisal (SA004). Hence these elements are integrated in the determination of the spatial distribution of allocations. The spatial strategy identifies the most appropriate locations for providing new homes, employment, retail, community and visitor facilities over the period of the Plan. One of the objectives of an effective spatial strategy is that the distinctive settlement pattern within Craven is to be maintained and its character enhanced, whilst providing for and supporting new housing growth opportunities. In order to be effective for Craven, the spatial distribution of growth will be planned and delivered in order to promote development in sustainable locations as the basis to meet identified requirements. The spatial strategy is then compatible with the intentions of the housing strategy and settlement hierarchy of Policy SP4.

Q3. How did the guidelines for housing growth between settlements in Policy SP4 determine the number and size of sites?

Council's Response

1. The guidelines for housing growth between settlements in Policy SP4 indirectly determined the number of sites. For example, Bentham as a Tier 2 settlement, and with a proportion of housing growth of 10.9%, potentially requires more sites to meet this percentage requirement than Gargrave, which is in Tier 3 with a proportion of housing growth of 3.5%. The guidelines for housing growth between settlements indirectly determined the size of sites. The lower the proportion growth for a settlement, in general the less relatively large sites are required. However, even in a settlement with a low proportion of growth, it is possible that one large site may suffice instead of two smaller sized sites to fulfil the housing requirement for that settlement.

Q4. How were site areas and dwelling capacities determined? Are the assumptions justified and based on available evidence?

Council's Response

1. The original site areas were first obtained from those available in the Strategic Housing Land Availability Assessment. If the site was chosen as an allocation for housing, the original site area may be reduced to make the remaining area suitable for an allocation. Evidence from the sustainability appraisal which analysed the available sites (SA004) informed such reductions where necessary. Such considerations for site size reduction include a flood risk designation on a portion of the site, safe road access, potential impact on heritage conservation assets and/or viewpoints, recreational amenity protection and biodiversity enhancement. Evidence from the housing density and mix background paper (Ho001) provided a guideline average density that could be applied to each net developable area of each site, after taking account of any constraints mentioned in the sustainability appraisal.
2. The assumptions were justified and based on available evidence. Professional advice from organisations such as Historic England and the Highways Authority, in addition to documents such as the Strategic Flood Risk Assessment (FI001), provided the appropriate justification and evidence. In the document Ho001, evidence was gathered on a wide mix of previous housing developments in the local plan area which provided the justification for the dwelling capacities.

Q5. What is the justification for including a very specific, net site area for allocated sites? Is this sufficiently flexible to allow proposals for new development to be deliverable?

Council's Response

1. The justification for including specific, net site areas for allocated sites is to provide developers with clear direction on what size of areas are intended for built form, and in many cases what size of areas are required for green infrastructure provision, or to be left aside for protection of biodiversity and heritage assets. The net site areas are as accurate as possible for an estimate of development yield in each case, but the net developable areas can alter slightly in the site design, as the individual design of schemes can be flexible as long as they meet the development principles for the site. This approach is intended to be sufficiently flexible to allow proposals for new development to be deliverable, as the clear direction acts as development guidance to positively influence the design of the development layout from the applicant. It can allow such flexibility where an applicant can achieve a suitable design to match the requirements of the allocated site's development principles. It is considered that this approach to design flexibility could be made clearer within Policies SP5 to SP11, so a main modification is proposed to Policies SP5 – SP11, as follows:

Proposed Modification
<p>Policies SP5 – SP11 of the submission local plan – add following text in each policy:</p> <p><u>The net site area for allocated sites is for guidance purposes in relation to the net developable area, and green infrastructure provision where applicable. Detailed proposals can be discussed at the time of application to confirm suitability of site design, in order to ensure conformity with the site's development principles.</u></p>

Q6. What contingency arrangements does the plan include should some of the larger sites not come forward as expected?

Council's Response

1. Policy SP4 of the plan provides contingency arrangements should some of the larger sites not come forward as expected. This policy seeks to ensure that a settlement's planned growth over the plan period is still met should allocated sites in a settlement not come forward as expected. Under these circumstances, Policy SP4 I) a) supports the release of non-allocated sites adjoining the main built up areas of Tier 1 to 4 settlements, subject to the impact of the development being acceptable.

Q7. Are there any factors which indicate that a site(s) should not have been allocated for development? Are all of the sites developable within the plan period?

Council's Response

1. There are presently no factors which indicate that a site should not have been allocated for development. All of the sites are developable within the plan period.

Q8. Why do some allocations require a Landscape Visual Impact Assessment ('LVIA') to be carried out, but others do not, such as site references IN010, IN022, IN028, IN029 and IN035?

Council's Response

1. The site references IN010, IN022, IN028, IN029 and IN035 do require a Landscape Visual Impact Assessment to be carried out, and reference to this has been omitted in error from the development principles associated with these sites. A proposed modification is therefore suggested for Policy SP9 in respect of Sites IN010, IN022, IN028, IN029 and IN035 that an additional development principle setting out that an 'LVIA' is required to be carried out for the site be inserted as set out in the table below.:

Proposed Modification
Policy SP9 ,Pages 101, 102, 103 and 104 of the submission local plan - an additional development principle for the sites IN010, IN022, IN028, IN029 and IN035:
<u>'A Landscape Visual Impact Assessment (LVIA) is required to assess the likely effects of change on the landscape as a result of the development, specifically on views into and out of the Yorkshire Dales National Park. The LVIA will help locate and design the development so that negative landscape effects are avoided, appropriately reduced or offset.'</u>

Q9. How has the effect of allocations on the availability of the best and most versatile agricultural land been assessed?

Council's Response

1. The effect of allocations on the availability of the best and most versatile agricultural land has been assessed through the sustainability appraisal (SA004), specifically with the sustainability objective, SO10, which states *"Protect and enhance the natural and agricultural conditions to maintain soil quality and grow food within Craven"*. The local plan area does not contain any grade 1 or 2 agricultural land, which represents the most valuable agricultural land, and hence none of this land has been lost through site allocations in the local plan. The greenfield sites reviewed in the sustainability appraisal are either grade 3 or 4 agricultural land. Agricultural Land

Classification mapping does not sub-divide Grade 3 land into 3a and 3b. However the Natural England Map for Yorkshire and the Humber on the Likelihood of the 'Best and Most Versatile' (BMV) Agricultural Land 2017 indicates that there is low likelihood of BMV land across the plan area. Sites featuring grade 3 land received a single negative marking under SO10, and a neutral marking where grade 4 land featured. As a single negative was the limit that could be received (rather than a double negative), it was not an impediment to designating the site as a potential allocation if it received largely positive markings elsewhere in the sustainability appraisal process. Overall, through the SA process outlined above, a sequential approach has been followed, in which the emphasis has been on allocating Grade 4 land for development rather than Grade 3 land where possible.

Q10. 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 policies?

Council's Response

1. The effect of allocations on the local and strategic road network has been assessed through the sustainability appraisal (SA004), specifically with the sustainability objective, SO8, which states: *"Improve connectivity, reduce the need for travel, and ensure proposed developments have safe access"*. There are two parts to this objective – try to allocate sites within or as close as possible to town or village centres, and achieve safe access to the sites themselves. Information to assist this objective was obtained from the Highway Authority.
2. Yes, where specific mitigation has been identified, this is set out in the relevant policies. For example, Policy SP5, Strategy for Skipton, states in the development principles for some of the sites where a Traffic Impact Assessment will be required (e.g. SK060) or where access is to be gained to the site (e.g. SK061). This subject matter has also been analysed in the response to Q1, Issue 1, within Matter 11.

Q11. 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 biodiversity has been assessed through the Sustainability Appraisal (SA004), specifically with the sustainability objective SO13 which states: *"Protect, and where possible enhance, Craven's biodiversity and geodiversity, particularly protected habitats and species"*. The information to assist this objective for each assessed site was obtained from the Ecological Data Centre.

2. Geodiversity interests were also looked at under objective SO20 which states: *“Safeguard minerals resources and other natural material assets, and ensure the safe management of hazard risks of former mining activity where new development is proposed”*. Information to assist this objective for each assessed site was obtained from the website *Magic* which has mapping information for Craven on mineral and rock deposits.
3. Heritage assets are considered under sustainability objective SO12, which states: *“Conserve and where appropriate enhance the historic environment including heritage assets and their settings and areas of identified and potential archaeological interest.”* Information to assist this objective came from the advice of Historic England, and the evidence base of the local plan, including Craven Allocation Site Assessments August 2016 (He019) Conservation Area Appraisals (Documents He001 (Craven CA Appraisals Introduction August 2016), He002 (Burton in Lonsdale), He003 (Carleton), He004 (Cononley), He005 (Cowling), He006 (Eastby), He007 (Embsay), He008 (Farnhill), He009 (Gargrave), He010 (Ingletton), He011, (Kildwick), He012 (Kildwick Grange), He014 (Low Bradley), He015 (Settle-Carlisle Railway), He016 (Sutton in Craven), He021 (Giggleswick), He022 (Settle), He023 (Skipton), Craven Potential Conservation Area Designations He018 (Glusburn, High and Low Bentham) and Heritage Impact Assessments October 2016 (He020).

Q12. 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. The site selection process is considered robust in terms of selecting the most appropriate sites. An appropriate selection of sites was assessed from those available in an up to date SHLAA database, and appropriate criteria were taken into account in their analysis. The sustainability appraisal of the sites (SA004) is the first stage in selecting sites, and this is a settlement level appraisal, in that it focuses on criteria specific to the site and the settlement in which the site exists. It is the aim of the twenty sustainability objectives to produce a list of satisfactory sites for allocation. Where a choice of suitable sites existed in a settlement, the residential site selection process (SA005) considered these sites in the context of a district level analysis. This appraised the sites in terms of their potential impacts on environmental assets in the district and beyond. The sites which emerged from this second stage are considered the best sites available in each settlement, and the overall two stage process is considered sufficiently robust.

Q13. Are the allocations justified, effective and consistent with national policy?

Council’s Response

1. Yes, the allocations are justified, effective and consistent with national policy. Through the two stage process of the sustainability appraisal for site selection (SA004), and the residential site selection process (SA005), a set of the most appropriate sites available from the Strategic Housing Land Availability Assessment has been produced. The allocations are justified and effective because they are informed by evidence and professional advice from a range of statutory bodies including Historic England, the Environment Agency, Natural England and North Yorkshire Highways Department. They are consistent with national policy because the site selection follows National Planning Policy Framework advice for site selection. For example, when selecting sites, the evaluation of flood risk where it occurs on a site follows a sequential test.

Issue 2 – Strategy for Skipton – Tier 1 (Policy SP5)

SK013 – Land east of Aldersley Avenue and south of Moorview Way

Q1. The Craven Local Plan Residential Site Selection Process Background Paper (Ho007) states that there may be areas of archaeological significance beneath the site, which subject to the outcomes of site investigations, may possibly reduce the site's area. How has this determined the site area and dwelling capacity?

Council's Response

1. During the process of assessing sites for their suitability for residential allocation consultation was undertaken with a wide range of consultees, including NYCC Archaeology, which stated that certain archaeological constraints exist on this site and that any archaeological interest on the site will require pre-determination evaluation. In response to comments received from NYCC Archaeology a development principle has been included for this site requiring a ground work assessment to investigate areas thought to be of archaeological significance on the site.
2. A planning application for the erection of 98 dwellings on the site (63/2016/17313) was submitted to the Council in 2016 which was refused in February 2018 on the grounds that the proposed development would have an unacceptable impact on the privacy and amenity of existing residents adjoining the north-east boundary of the site. Consultations with NYCC Archaeology relating to this planning application agreed with the conclusion of the archaeological desk based assessment submitted by the developer that the site has archaeological potential, particularly for prehistoric to Roman remains, however the archaeological potential at the site cannot be confirmed without further site investigation. NYCC Archaeology also require a number of

conditions to be attached to any planning consent to ensure that archaeological evaluation work is completed prior to the commencement of development and that appropriate mitigation is agreed prior to implementation of any scheme. In the consultation response to this planning application NYCC Archaeology state that the archaeology expected i.e. domestic evidence from the prehistoric and Romano-British periods, would be unlikely to form a constraint on development, although this could not be ruled out entirely at this stage.

3. Planning application 2018/19146/FUL: Erection of 98 No. dwellings (resubmission of previous application 63/2016/17313 - amended scheme) is currently being considered by the Council. It is expected that this application will be considered by the Council's Planning Committee in October 2018.
4. Areas of green infrastructure have been identified on this site to provide a buffer to the open moorland to the south and east and to create a connection with the existing residential area at Aldersley Avenue and the play park to the north west of the site. The identification of these areas of green infrastructure and the developable area has not been influenced by any areas of potential archaeological significance, as at present the location of any archaeological significance is unknown. In order to ensure that any archaeological significance identified on the site is taken into account in terms of site area and dwelling capacity and to ensure that a yield of 100 dwellings is achieved on the site the following modification is proposed:

Proposed Modifications
<p>Page 60 of the submission local plan: The second development principle for site SK013 will be reworded as follows:</p> <p>'Development proposals for this site will incorporate <u>2.634ha of</u> green infrastructure in the west, south and south east of the site to provide a buffer to the open moorland to the south and east, enhance biodiversity and provide a new PROW connection with the existing residential area at Aldersley Avenue and the play park to the north west of the site. <u>The configuration of green infrastructure on this site will be subject to the outcome of any ground work assessment required to investigate areas thought to be of archaeological significance, provided the size and multifunctional use of the area of green infrastructure is maintained.</u>'</p>

Q2. Taking into account the possibility for archaeological remains, is the provision of 100 dwellings deliverable?

Council's Response

1. Yes, The proposed modification set out above in answer to question 1 would

ensure that the provision of 100 dwellings on the site is deliverable, through the provision of some flexibility in terms of where the 2.634ha of identified green infrastructure would be situated on site. It would be feasible to adjust the configuration of green infrastructure on site, subject to the outcome of any groundwork assessment required, as its identification was not dependent on mitigating severe constraints such as flood risk. Rather the green infrastructure was identified to provide a buffer to open moorland to the south and east and provide a new PROW connection with the existing residential area at Aldersley Avenue and the play park to the north west of the site. Both these relatively large areas of green infrastructure could be adjusted should the need arise following the possible identification of archaeological remains on the net developable area of the site.

3. The Housing Trajectory 2012 to 2032 (2018 Update for Submission) (SD004) estimates that this site will be delivered in years 3-6 (2021-2025) of the plan period.

SK015 – Cefn Glas, Shortbank Road

Q3. What is the justification for limiting the site area to 0.442ha, in contrast to the site area considered as part of the Strategic Housing Land Availability Assessment ('SHLAA') (Ho010)?

Council's Response

1. The western part of the SHLAA site SK015 which relates to the dwelling known as Cefn Glas and residential curtilage is considered suitable as one of the Preferred Sites in Skipton as this part of the site is considered to be in line with the existing built form of this part of the town. The eastern part of the SHLAA site is more rural in nature and intrudes into open countryside/moorland. The PROW running along the northern boundary of the site is the start of the Roman Road, which extends onto moorland and is both a heritage asset and landscape feature. It is considered that development of the eastern part of the SHLAA site would obscure this important feature and adversely impact on the significance of the heritage asset. As such this part of the site is not considered suitable as a preferred site in Skipton.

SK044 – Former allotments and garages, Broughton Road

Q4. What is the fluvial and/or 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 applies the sequential risk-based approach to the allocation of land for development and includes maps (SFRA) (FI002) which shows that just under half this site is located within Flood Zone 2. In terms of surface water flood risk, as identified by the SFRA assessment maps the eastern part of the site lies adjacent to an area at medium risk of surface water flooding.
3. Following application of the Sequential Test it was not possible, consistent with wider sustainability objectives for the development to be located in zones with a lower probability of flooding, so the Exception Test was considered appropriate to be applied. This is a town centre brownfield site with very good accessibility to key services and public transport and development of this site would maximise the opportunities for future occupiers to walk or cycle to most key services. The Council considers therefore that the wider sustainability benefits to the community in this case outweigh the flood risk.
4. Section A4 and table A.4-4 of the SFRA (FI002) identifies sites classified as Recommendation D, where development could be permitted if a site-specific Flood Risk Assessment shows the site can be safe and if it is demonstrated that the site is sequentially preferable. The SFRA (FI002) identifies site SK044 as one where development could be permitted subject to a Flood Risk Assessment. The first development principle for this site therefore 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 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 SK044 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).

Q5. Is it clear to decision-makers, developers and local communities what is required of proposals for new development, having particular regard to flood risk?

Council's Response

1. Yes, it is clear to decision-makers, developers and local communities what is required of proposals for new development, having particular regard to flood risk, through the requirement for a flood risk assessment and the incorporation of SUDS within any proposals on the site unless this is not possible. These requirements are set out in the first development principle for this site and would be assessed as part of the consideration of a planning application on the site.

Q6. Is the site deliverable within the plan period for 19 dwellings?

Council's Response

1. The capacity of this site has been calculated by applying 32 dwellings per hectare to the site allocation area of 0.591ha (justification for the application of 32 dwellings per hectare is justified in document Ho001). As a result the number of dwellings generated on this site would be 19.
2. The Housing Trajectory 2012 to 2032 (2018 Update for Submission) (SD004) estimates that this site will be delivered in year 1 (2019-2020) of the plan period.
3. The eastern part of this site has planning permission for the erection of 8 semi-detached dwellings (application number 2017/18656/FUL), phase 1 and work commenced on site in May 2018 and the dwellings are under construction. A planning application (2018/19444/FUL) on the site for the erection of ten semi-detached houses and twenty four apartments is currently being considered by the Council. Subject to approval of the current application, the number of dwellings potentially deliverable on this site is 42. This evidence indicates therefore that the site is deliverable within the plan period for at least 19 dwellings.

SK058 – Whitakers Chocolate Factory

Q7. What is the current status regarding the site, is it still actively used for employment purposes? If so, is the site available for development?

Council's Response

1. Land availability information relating to this site was received from the site owners in September 2018 which states that the site is now in two ownerships; Whitakers Chocolates Ltd and Clare Whitaker Ltd. The part of the site owned by Whitakers Chocolates Ltd is currently actively used for employment purposes in the form of the manufacturing of chocolates. Whitakers Chocolates Ltd has confirmed that part of the site in their ownership is available as a potential development site, which should be considered for inclusion in the draft local plan. Land availability information submitted by Clare Whitaker Ltd confirms that

the part of site SK058 within their ownership is not available as a potential development site and should not be considered for inclusion in the draft local plan.

- Given the receipt of this up to date information relating to land availability of site SK058 it is proposed to modify the plan by removing the part of the site owned by Clare Whitaker Ltd, which is not available. This modification would result in a modified site allocation area of 0.329ha. The capacity of this site has been calculated by applying 32 dwellings per hectare to the site allocation area of 0.591ha (justification for the application of 32 dwellings per hectare is justified in document Ho001). As a result the number of dwellings generated on this site would be 11. The following modifications relating to site allocation area and number of dwellings generated for site SK058 are proposed to Policy SP5: Strategy for Skipton – Tier 1.

Proposed Modifications

Draft Policy SP5: Page 58 of the submission local plan:

DRAFT POLICY SP5: STRATEGY FOR SKIPTON –TIER 1

Skipton is the primary focus for growth and provision is made for the following development areas to meet the housing needs, commercial and employment space in the town:

Housing Sites:

Site Ref	Location	Net Dev Area (Ha)	Yield
SK058	Whitakers Chocolate		
	Factory Site, Skipton	0.492 0.329	46 11

Proposed Modifications

Policy SP5: Page 62 of the submission local plan: Details relating to site allocation area and number of dwellings generated for site SK058 will be reworded as follows:

Site Ref.	Location	Uses
SK058	Whitakers Chocolate Factory Site, Skipton	C3 Residential

Site Allocation Area: ~~0.492~~ 0.329 hectares

Number of Dwellings Generated: ~~46~~ 11 dwellings [~~0.492~~ 0.329 ha x 32 dwellings per ha].

3. The Local Plan Policies Map (inset maps 1 & 3) will be amended to reflect the modified site allocation area.
4. The Housing Trajectory 2012 to 2032 (2018 Update for Submission) (SD004) estimates that site SK058 will be delivered in years 12 (2030-2031) & year 13 (2031-2032) of the plan period. The updated land availability information provided by Whitakers Chocolates Ltd for the modified site allocation does not indicate that the site would be delivered prior to years 12 and 13 of the plan period, therefore the modified site allocation is considered available for development with an expected timescale for delivery towards the end of the plan period.

Q8. How have the effects of residential development on designated heritage assets been taken into account?

Council's Response

1. Comments received from Historic England on the Pre-Publication Draft Local Plan 2017 resulted in a change to the first development principle for site SK058 to clearly reflect the findings of the Craven Conservation Areas; Skipton Draft Allocation Site Assessments produced by Alan Baxter (Aug 2016) (Ho019).
2. The Craven Conservation Areas; Skipton Draft Allocation Site Assessments produced by Alan Baxter (Aug 2016) (Ho019) considered that:- *“Overall, the existing buildings make a strong contribution to the character and appearance of the Skipton Conservation Area through the sensitive use of materials and the scale and massing of existing buildings.”* This assessment also considered that, if demolition of the existing buildings was proposed, then any replacement development should ensure that the Upper Union Street boundary walls are maintained and that the scale and massing of new development does not exceed that existing on the site. Historic England supports the retention of two villa-style houses on the site. The conclusions of this assessment and Historic England's advice were reflected in the first development principle included in the submission Local Plan for this site. As the part of the site owned by Clare Whitaker Ltd, including the two existing villa style houses is not currently available and it is proposed to modify the site allocation to exclude this part of the site, the following proposed modification is proposed to the first development principle for site SK058 as follows:

Proposed Modifications

Policy SP5, page 62 of the submission local plan: The first development principle for site SK058 will be reworded as follows:

‘Proposals for the redevelopment of this site, including the demolition of existing buildings will conserve the character and appearance of this part of the Skipton Conservation Area. Any redevelopment proposals will ~~retain and convert the two villa style houses,~~ retain the boundary walls on Upper Union Street, and will not exceed the scale and massing of the existing buildings on the site

Q9. Considering the requirement to retain the two villa-style houses and boundary walls on Upper Union Street, is the delivery of 16 dwellings feasible?

Council’s Response

1. The capacity of modified site allocation SK058 (see answer to question 7 above) has been calculated to exclude the part of the site owned by Clare Whitaker Ltd, which includes the two villa style houses. The proposed modification to the first development principle for site SK058 (see answer to question 8 above) excludes the requirement to retain and convert the two villa style houses but states that any redevelopment proposals will retain the boundary walls on Upper Union Street. The modified overall site yield has been calculated based on the application of 32 dwellings per hectare to a modified site area of 0.329ha, therefore Craven District Council consider that delivery of 11 dwellings on this site is feasible.

SK060 – Business premises and land west of Firth Street

Q.10 What is the current status regarding the site, is it still actively used for employment purposes? If so, is the site available for development?

Council’s Response

1. The site is currently in use by Merrit & Fryers Ltd, a Timber, Building, Plumbing, Hardware & Decorators Merchants. Information obtained via a Land Availability Questionnaire in 2017 confirms that the northern part of the site is immediately available and that the remainder of the site is available, however Merrit & Fryers Ltd is still operational. The landowner has indicated that an alternative site in Skipton would be required to continue trading. Craven District Council consider land identified in the local plan as Existing Employment Areas under policy SP2 and EC2 in Skipton provide possible opportunities for the relocation of this business.

2. The Housing Trajectory 2012 to 2032 (2018 Update for Submission) (SD004) estimates that this site will be delivered in year 11 (2019-2030), year 12 (2030-2031) & year 13 (2031-2032) of the plan period.
3. Planning Permission was granted on the northern part of the site in July 2017 for 5 dwellings (2017/18282/FUL).
4. The information provided by the landowner and the existing planning consent for residential development on part of this site, support the premise that the site is available for development with an expected timescale for delivery towards the end of the plan period. This approach is in accordance with paragraph 47 of the NPPF which states that in order to boost the supply of housing, local planning authorities should identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible for years 11-15.

Q11. How have the effects of residential development on designated heritage assets been taken into account?

Council's response

1. Comments received from Historic England on the Pre-Publication Draft Local Plan 2017 resulted in a change to the first development principle for site SK060 to clearly reflect the findings of the Craven Conservation Areas; Skipton Draft Allocation Site Assessments produced by Alan Baxter (Aug 2016) (Ho019) and the Heritage Impact Assessments (October 2016) (He020).
2. Both these documents consider the existing mill buildings and the stone walls on the site make a positive contribution to the character of the Conservation Area with the canal frontage being particularly important. The Heritage Impact Assessments (October 2016) (He020) specifically identifies four buildings for retention and conversion. The development principles for this site reflect this heritage evidence base for the local plan.

SK061 – Land west of Sharphaw Avenue

Q12. Policy SP5 states that the width of the existing Horse Close Bridge is currently restricted, and therefore would need to be widened (or a new bridge provided) to serve the allocation. What assessments have been carried out to determine whether such works would be feasible and viable?

Council's Response

1. This is a site within the Council's ownership. A planning application (re 63/2015/16162) was submitted in September 2015 accompanied by a full Transport Assessment report (Curtins) and a Bridge Options Report (Mason Clark Associates) and a design for the bridge was agreed with the Canals and

River Trust and Highways in 2015. The planning application however was refused on grounds that it had not been demonstrated that the reduced provision of affordable housing on the site was justified on financial viability grounds, and the proposal did not constitute high quality design or maintain a good standard of amenity in a manner consistent with the NPPF. A new design team working as part of the Joint Venture Partnership between Craven Council and Barnfield Developments is currently developing revised proposals. Grant funding of £2.3 m has been awarded by Homes England for the infrastructure works for this site. With previous cost estimates ranging from £440,000 - £770,000 for the bridge, the grant funding is sufficient to fully fund these works that will include the bridge and roadway access.

Q13. Taking into account the access constraints of the site, is the allocation deliverable?

Council's Response

- 1 Yes – With the support of the grant funding (details set out in answer to question 12 above) this site is viable. SK061 is included for housing development by the Joint Venture Partnership between Craven Council and Barnfield Developments. The joint venture partnership was formed in 2018 with the intention of developing CDC owned land using private sector funding and public sector land to bring new housing and employment to the district. A feasibility study is currently underway and plans have been drawn showing a development of 76 houses on the site, including the provision of 22 affordable homes of various sizes for local people. The proposal is being market tested and appraised. The initial review shows the development is viable.
2. The plans below show that vehicular access across the canal would be achieved via a new bridge. The bridge itself does not provide access directly into the site, instead it provides an improved vehicular access to this area of Skipton to the north of the canal.



expected to be made during 2019 with completion of the scheme in 2022 at an average construction pace of 3.6 units per month. All infrastructure and enabling works will be completed by March 2021 in line with the requirements of the Homes England funding offer.

Q14. Is the site expected to come forward in conjunction with, or alongside Site Refs SK101 and SK114/124, which also potentially require bridge widening and/or a new crossing over the Leeds & Liverpool Canal?

Council's Response

1. The Housing Trajectory 2012 to 2032 (2018 Update for Submission) (SD004) estimates that SK061 will be delivered in years 2-5 (2020/21 to 2023/24). The trajectory (SD004) estimates that site SK101 will be delivered in years 4 -6 (2022/23 to 2024/25) of the plan period and that site SK114/124 will be delivered in years 2-5 (2020/21 to 2023/24) of the plan period. As such SK061 is expected to come forward in conjunction with, or alongside sites SK101 and SK114/124.
2. The new Horse Close Bridge will ensure that sites SK061, SK101 and SK114/124 will not be constrained in terms of access to this part of Skipton via the Horse Close Bridge. As grant funding has been granted from Homes England for this infrastructure work to the bridge there would be no requirement for sites SK061, SK101 & SK114/SK124 to contribute to the cost of widening the bridge.

SK081, SK082 and SK108 – Land north of Gargrave Road and west of Park Wood Drive

Q15. What is the justification for allocating part of the site for a new primary school? How will this be delivered, by whom and when? Is it clear to decision-makers, developers and local communities what is required of proposals for new development?

Council's Response

1. North Yorkshire County Council's Children & Young People's Services (LEA) has identified the potential requirement for a new primary school on this site and support the size and location of the school as shown on the local plan inset map 1. The evidence which justifies the need for increased school places, potentially in the form of two new primary schools in the town of Skipton during the plan period, is provided in Appendix 2 (Annex 3) to the Council's examination hearing statement on Matter 12.
2. The proposed location of site within Sites SK081, SK082 & SK108 reserved for

education has been agreed in consultation with the LEA. This site has been identified as an area where the concentration of new housing will be at its highest, and where existing schools could not meet the additional pupil yield. Existing primary school provision is mainly located within the centre and south of the town. Water Street CP School is the community school currently serving the catchment area of sites SK081, SK082 and SK108. This school is already at its maximum capacity with no option to expand due its restricted site. As such an additional school within the northwest of the town would be required to serve the new housing developments here.

3. The responsibility for school place planning continues to sit with the LEA and as such North Yorkshire County Council has a statutory responsibility to ensure there are sufficient school places across all schools including Academies. Funding for additional school places is allocated to local education authorities, through the Government's 'Basic Need Capital Funding'. Through the use of the plan's proposed Policy INF6 developer contributions will be secured where increased need for places is a result of additional housing.
4. The Education Act 2011 changed the arrangements for establishing new schools and introduced Section 6A (the 'free school presumption') of the Education and Inspections Act 2006 which requires that, where a local authority identifies the need for a new school in its area, it must seek proposals to establish an academy (free school). The presumption process is the main route by which local authorities establish new schools in order to meet the need for additional places. The presumption process can be used to deliver all types of schools, including mainstream, alternative provision, special schools, and faith/church schools. Local Authorities are responsible for determining the specification for the new school, and will lead and implement the project to establish the school. Under the presumption route the local authority is responsible for providing the site for the new school, and also for meeting the associated capital and pre/post-opening revenue costs. All new schools established through the presumption process are classified as free schools.
5. The presumption process sits alongside the central mainstream Free School Programme. Some new schools in this programme have been directly funded by the Education and Skills Funding Agency. The next application wave (Wave 13) targets areas with the lowest educational performance, to put free schools in the places most in need of good schools. It is not known at this stage whether further application waves will be announced by the Department for Education.
6. Different delivery 'models' apply to different sites and school provision circumstances and not one model fits all. The LEA has dealt with a number of cases across the county where the construction of schools has taken place within larger residential development proposals. The LEA will draw on this experience and develop an approach/delivery model appropriate to this potential

primary school site to agree this with the developers of the site as soon as possible. The location of the safeguarded land within the overall land allocation does not present any constraint to the early commencement of the residential development.

7. The timescale for delivery of a new primary school will directly relate to the rate at which the new housing is built out. The LEA will continue to review pupil forecasts throughout the plan period using information provided by Craven District Council relating to planning applications and updated housing trajectories. These pupil forecasts will be used by the LEA to determine the point at which additional pupil yield from the development will lead to a deficiency of school places.
8. The response received from LEA to the Publication Local Plan in February 2018 supports the identification of land for new primary school provision in Skipton and suggests the following rewording of the first development principle relating to site SK081, SK082 & SK108: 'An area of land (1.8ha) in the north east corner of the site is allocated for the potential provision of a new primary school'.
9. On this matter, the LEA has explained to the Council that, whilst there is clear evidence that the local plan growth will generate additional school places to support two new primary schools in the town, how those school places can be met may still be the subject of further discussion by the LEA. For example, assessments for the restructuring of education provision are not solely related to growth proposals. The fitness for purpose and efficacy of existing stock is also a factor to be considered.
10. The Council appreciates this complexity of planning for education and therefore puts forward the following proposed modification, as agreed with the LEA.

Proposed Modifications

<p>Page 65 of the submission local plan: The first development principle for sites SK081, SK082 & SK108 will be reworded as follows:</p>
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<p><u>'An area of land (1.8ha) in the north east corner of the site is allocated for the provision of a new primary school unless this educational need is met elsewhere in the town. If this safeguarded area is no longer required for a primary school residential development will be acceptable provided any proposal meets the development principles set out for the remainder if this site at policy SP5 and accords with other relevant local plan policies'.</u></p>
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Q16. How has the suitability of the site to accommodate a new primary school been assessed?

Council's Response

1. An area of land to the north of Stirtonber and south of White Hills Lane, Skipton was reserved for educational purposes under saved policy SRC13 in the Craven District Local Plan (adopted 1999). The LEA has identified the potential need for a new primary school in this location of the town and has identified the need for 1.8ha of land to accommodate a school. Having assessed the suitability of the whole site for housing and understanding the need for level playing field provision associated with a school, the Council is satisfied that appropriate primary school facilities can be accommodated on the land to be safeguarded for primary school purposes. The LEA supports the safeguarding of this land to meet the educational needs of Skipton over the plan period.
2. The assessment of the suitability of the whole site for residential development through the residential site selection process concluded that there are no significant constraints in terms of access as a safe access can be achieved to the site from Gargrave Road, Parkwood Way, Park Wood Drive and White Hills Lane. The site is in close proximity to the Yorkshire Dales National Park and the Site of Importance for Nature Conservation (SINC). In order to mitigate against the negative effects development may have on these areas residential development should be set back from the north west boundary of the site, providing an opportunity to create a green infrastructure corridor linking the existing public right of way and green infrastructure network to the north, south and east of these sites. The Council's Landscape Visual Impact Assessment (La007) concludes that site SK081, SK082 & SK108 is visible from the YDNP, however any new development will form an extension to the existing built-up area to the east and west of the site.

Q17. What contingency plans does Policy SP5 put in place should the new primary school no longer be required?

Council's Response

1. The suggested modification to the first development principle, as set out above in the answer to question 15 safeguards the land to meet the educational needs for Skipton unless this need is met elsewhere in the town and sets out that if this safeguarded area is no longer required to meet the educational needs identified for Skipton over the plan period, residential development will be acceptable provided any proposal meets the development principles set out for the remainder of this site at policy SP5 and accords with other relevant local plan policies.

Q18. Taking into account the land required for a new school, is the provision of 324 dwellings deliverable?

Council's Response

1. The whole site is in the ownership of three organisations, CDC, Tarn Moor and Catholic Trust. Discussions are underway between all stakeholders with a view to jointly deliver a housing scheme on the site.
2. Work is currently underway, jointly by the three landowners with the aim of submitting an outline planning application, setting out the site layout including streets and housing plots. It is envisaged that the site will be developed over the ten years 2020 – 2030. The Housing Trajectory 2012 to 2032 (2018 Update for Submission) (SD004) estimates that this site will be delivered in years 5 (2023/24) to 13(2031/32) of the plan period.
3. The capacity of this site has been calculated by applying 32 dwellings per hectare to the net developable area of 10.119ha (32 dwellings per hectare is justified in document Ho001), which would generate 324 dwellings. This net developable area excludes 1.8ha of land required to be safeguarded for educational purposes. In calculating the net developable area for this site, existing site constraints have been taken in account as well as the need for green infrastructure in the north western part of the site.

Q19. What is the justification for including an area of green infrastructure running along the north and western site boundary?

Council's Response

1. Evidence for the identification of this area of green infrastructure is provided in the Landscape Visual Impact Assessment (Oct 2017), which states that development principles for this site should include measures to mitigate against and reduce the identified visual impacts through the creation of green infrastructure (GI) along the entire western boundary of the site to support biodiversity in the Site of Importance for Nature Conservation (SINC) located immediately to the north west of the site and to mitigation against landscape impact on the Yorkshire Dales National Park (YDNP), which is located to the north west of the site. This area of GI provides opportunities for new PROWs to be provided on the site through this proposed area of GI to link with the existing PROW network outside the site to the north via White Hills Lane and the existing residential area at Rockwood, Aireville Park and the Railway Station beyond.
2. The requirement for the creation of this GI corridor will help achieve the vision for the local plan, set out in section 3, page 24 of the plan, which states that ‘...new

homes are situated within and around market towns and villages (on previously developed land where it has been possible and appropriate), between extensive public open spaces, connecting people to the countryside and creating corridors for wildlife’. The creation of this GI corridor will also help to achieve plan objectives PO1 & PO2, as set out on page 27 of the local plan through promoting sustainable travel movements, health, well-being and quality and conserving and enhancing the high quality local environment including reinforcing the distinctive character of Craven’s towns, green infrastructure, biodiversity, ecological networks and cultural heritage. The aim of policy ENV4: Biodiversity is that growth in housing, business and other land uses will be accompanied by improvements in biodiversity. This policy identifies site SK081, SK082 & SK108 as one which will be accompanied by guiding development principles which will identify areas within the site where significant contributions to a net gain in biodiversity are to be made via the introduction of green infrastructure routes. The aim of policy ENV5: Green Infrastructure is to achieve growth in housing, business and other land uses which will be accompanied by an improved and expanded green infrastructure network and through the creation of new green infrastructure that will be managed and maintained. The creation of an area of GI on this site will contribute to achieving the aims of policies ENV4 & ENV5. It is therefore considered that the creation of this GI corridor within this site would help to achieve the overall vision of the local plan, specific objectives and help to achieve the aims of policies ENV4 & ENV5. As such the inclusion of an area of green infrastructure running along the north and western site boundary is justified.

Q20. 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. This site is the largest housing allocations in the local plan which is owned by three landowners, Craven District Council, Tarn Moor and the Catholic Trust. In order to deliver development of this allocation it is considered that a comprehensive masterplan for this site be produced, incorporating the development and design principles set out in the development principles for this site. Craven District Council would take the lead in preparing the masterplan for this site in agreement with the other landowners and the Barnfield Construction the Council’s development partner. Other key stakeholders would also be involved as required, such as NYCC Highways, Environment Agency and any other stakeholders with a statutory interest in the site.
2. Discussions are underway between all stakeholders with a view to jointly deliver

a housing scheme on the site. Outline planning consent setting out the site layout including streets and housing plots will be submitted and the site built out gradually over the ten years 2020 – 2030.

Q21. How will the necessary infrastructure be provided on the site? Should this be set out in the Plan?

Council's Response

1. In preparing a masterplan, as required by the development principles for this site, the involvement of key stakeholders would ensure that the necessary infrastructure requirements for the site are effectively planned. During the consideration of any proposal through the development management process, the detailed infrastructure provision of any proposed scheme, informed by the masterplan would be considered and agreed. Local plan site assessment work has not identified any constraints to development.

SK087 – Land north of A6131 and south of A65

Q22. What is the fluvial and/or 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). The Council's Strategic Flood Risk Assessment maps (SFRA, FI002) shows that this site is located within Flood Zone 1.
2. In terms of surface water flood risk, as identified by the SFRA assessment maps a small part of the site (north of the southern site boundary) is at high risk of surface water flooding. Any 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 sites 100% within Flood Zone 1 that are equal to or greater than 1 hectare in area must be accompanied by a site-specific Flood Risk Assessment to determine vulnerability to flooding from other sources as well as fluvial. It is therefore considered that

the allocation is consistent with paragraph 100 of the Framework. Details of the site selection process for SK087 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).

3. It should be noted that an outline planning application (ref 63/2018/18923) for 28 dwellings was approved subject to signing of S106 Agreement in respect of affordable housing provision and open space contribution in May 2018. The Council's Legal department drafted and sent the S106 Agreement to the applicant for signing in June 2018. Further negotiation on the provision of affordable housing and public open space has taken place between the Council and the applicant, and all outstanding issues have now been resolved. The S106 Agreement is expected to be completed and the decision notice issued imminently.

Q23. What is the justification for requiring a pedestrian link alongside the A6131 to the bus stop at Overdale Static Caravan Site?

Council's Response

1. During assessment of this site through the application of the residential site selection process NYCC Highways confirmed that an access of acceptable standards can be formed from the site onto the public highway. NYCC Highways have indicated that a footway link alongside the A6131 to the bus stop at Overdale Static Caravan Site is necessary as a minimum requirement.

Q24. What is the justification for excluding an area of Local Green Space around the periphery of the site? How will this affect the ability to provide a new access and pedestrian footway along the A6131, and have houses front onto the road as required by Policy SP5?

Council's Response

1. The area of proposed Local Green Space (LGS) together with site SK087 was assessed to establish if the site was suitable for LGS designation. The reason for this is due to the fact that all sites identified as protected road approaches to Skipton in the Craven Local Plan (adopted 1999) under saved local plan policy BE2: Protected Road Approaches to Skipton have been assessed to determine their suitability for LGS designation. The Council's Local Green Space Assessment (December 2017) (Lo002) concluded that part of this protected road approach to Skipton should be designated as LGS as it meets criteria relating to richness of wildlife.
2. The rest of the site is identified as a draft housing allocation. The area of

designated LGS falls outside the housing allocation boundary.

3. Proposed modification – final development principle relating of site SK087 should be amended to exclude reference to policy ENV10 as the area designated as LGS is not part of the draft housing allocation as follows:

Proposed Modifications
<p>Page 67 of the submission local plan: The last development principle for sites SK087 will be reworded as follows:</p> <p>‘Development proposals for this site must accord with local plan policies ENV10, H2, INF3 and INF6 (which set out requirements for contributions towards affordable housing) and all other relevant local plan policies’.</p>

4. The 8th development principle states that access to site SK087 is to be gained from Harrogate Road (A6131). This would require access across part of site SK-LGS51. Policy ENV10 protects land designated as LGS from incompatible development and sets out exceptions to incompatible development, including local transport infrastructure providing the development preserves the open character of the LGS and the local significance placed on such green areas which make them valued by their local community. Access to this site, together with the provision of a new pedestrian footway along the A6131 would be considered as local transport infrastructure under draft policy ENV10.

SK088 – Hawbank Fields north of Otley Road and south of A6131

Q25. What is the current status regarding planning application Ref 2017/18237/OUT?

Council's Response

1. Ref. 2017/18237/OUT relates to an outline planning application for a residential development of up to 140 dwellings with associated infrastructure and open space (access applied for with all other matters reserved) on land at Hawbank Fields. This application was considered by the Council's Planning Committee on 12th February 2018 and the Committee resolved to grant planning permission subject the signing of a S106 Agreement. The Section 106 Agreement is expected to be completed and the decision notice issued within the next 4-5 weeks.

Q26. What is the fluvial and/or 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 vast majority of Site SK088 is in Flood Zone 1 (just over 87%), with an area in the southern part of the site falling within Flood Zones 2 & 3a, which fall within the green infrastructure area identified within this site on the Submission Policies Map (inset Map 1). It is therefore expected that all the built development can avoid all areas of Flood Zone 2 and 3.
3. In terms of surface water flood risk, as identified by the SFRA assessment maps, an area of medium to high risk of surface water flooding is also located within the southern part of the site (along Skibden Beck) These areas also fall within the green infrastructure arear identified within this site on the Submission Policies Map (inset Map 1). It is therefore expected that all the built development can avoid all areas surface water flooding. In the context of Skipton and the Local Plan's spatial strategy, there are no reasonably available sites appropriate for the proposed development with a lesser risk of surface water flooding.
4. Any 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, 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, and any sites within Flood Zone 1 that are equal to or greater than 1 hectare in area and/or where surface water flood risk is considered to be significant enough as to require investigation, must be accompanied by a site-specific Flood Risk Assessment to determine vulnerability to flooding from other sources as well as fluvial. The development principle also requires the incorporation of SUDS within any proposals on the site unless this is not possible. It is therefore considered that the allocation is consistent with paragraph 100 of the Framework. Details of the site selection process for SK088 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).

SK089 and SK090 – Land north of Airedale Avenue and Elsey Croft

Q27. What is the justification for allocating part of the site for a new primary school? How will this be delivered, by whom and when?

Council's Response

1. North Yorkshire County Council's Children & Young People's Services (LEA) has identified the potential requirement for a new primary school on this site and support the location of a school on this site of the size stated in this policy. The evidence which justifies the need for increased school places, potentially in the form of two new primary schools in the town of Skipton during the plan period, is provided in Appendix 2 (Annex 3) to the Council's examination hearing statement on Matter 12.
2. Sites SK089 and SK090 have been agreed with the LEA as an appropriate location for a new primary school. It has been identified as an area where the concentration of new housing will be at its highest, and where existing schools could not meet the additional pupil yield. Existing primary school provision is mainly located within the centre and south of the town.
3. Sites SK089 and SK090 also sit within the catchment area of a school that does not have the potential for expansion and as such a new school would be required to meet the demand from additional pupil yield arising from these developments. Greatwood CP School is the only primary school within the town that has the potential to add capacity and would therefore serve the housing developments at sites SK061, SK101, SK114 and SK124.
4. The responsibility for school place planning continues to sit with the LEA and as such North Yorkshire County Council has a statutory responsibility to ensure there are sufficient school places across all schools including Academies. Funding for additional school places is allocated to local education authorities, through the Government's 'Basic Need Capital Funding'. Through the use of the plan's proposed Policy INF6 developer contributions will be secured where increased need for places is a result of additional housing.
5. The Education Act 2011 changed the arrangements for establishing new schools and introduced Section 6A (the 'free school presumption') of the Education and Inspections Act 2006 which requires that, where a local authority identifies the need for a new school in its area, it must seek proposals to establish an academy (free school). The presumption process is the main route by which local authorities establish new schools in order to meet the need for additional places. The presumption process can be used to deliver all types of schools, including mainstream, alternative provision, special schools, and faith/church schools. Local Authorities are responsible for determining the specification for the new school, and will lead and implement the project to establish the school. Under the presumption route the local authority is responsible for providing the

site for the new school, and also for meeting the associated capital and pre/post-opening revenue costs. All new schools established through the presumption process are classified as free schools.

6. The presumption process sits alongside the central mainstream Free School Programme. Some new schools in this programme have been directly funded by the Education and Skills Funding Agency. The next application wave (Wave 13) targets areas with the lowest educational performance, to put free schools in the places most in need of good schools. It is not known at this stage whether further application waves will be announced by the Department for Education.
7. Different delivery 'models' apply to different sites and school provision circumstances and not one model fits all. The LEA has dealt with a number of cases where the construction of schools has taken place within larger residential development proposals across the county. The LEA will draw on this experience and develop an approach/delivery model appropriate to this potential primary school site to agree this with the developers of the site as soon as possible. Early discussions with the developer of this site are in progress to ensure that an appropriate area of the site is reserved for a new primary school and playing fields which will allow the residential development to commence in advance of the delivery of the school.
8. The timescale for delivery of a new primary school will directly relate to the rate at which the new housing is built out. The LEA will continue to review pupil forecasts throughout the plan period using information provided by Craven District Council relating to planning applications and updated housing trajectories. These pupil forecasts will be used by the LEA to determine the point at which additional pupil yield from the development will lead to a deficiency of school places.
9. The response received from the LEA suggests the following rewording of the first development principle relating to site SK089 & SK090: 'A new primary school may potentially need to be provided on 1.8ha of the total area of sites SK089 & SK090 to meet the educational requirements for Skipton over the plan period'.
10. On this matter, the LEA has explained to the Council that, whilst there is clear evidence that the local plan growth will generate additional school places to support two new primary schools in the town, how those school places can be met may still be the subject of further discussion by the LEA. For example, assessments relating to the restructuring of education provision are not solely related to growth proposals. The fitness for purpose and efficacy of existing stock is also a factor to be considered.
11. The Council appreciates this complexity of planning for education and therefore puts forward the following proposed modification, as agreed with the LEA.

Proposed Modifications

Page 68 of the submission local plan: The first development principle for sites SK089 & SK090 will be reworded as follows:

‘A new primary school will be provided on 1.8ha of the total site area of sites SK089 & SK090 to meet the educational requirements for Skipton over the plan period unless this educational need is met elsewhere in the town. If a new primary school is no longer required on this site, residential development will be acceptable, provided any proposal meets the development principles set out for the remainder of the site at Policy SP5 and accords with other relevant local plan policies.’

Q28. Is it clear to decision-makers, developers and local communities where the proposed new primary school will be located?

Council's Response

1. The submission Local Plan does not identify the exact location for a new primary school. Having assessed the site for its suitability for housing, and understanding the need for level playing field provision as part of a new primary school; the Council is satisfied that the net developable area of the site can accommodate 1.8 hectares for primary school purposes. The LEA has informed the Council that this type of ‘agreement in principle’ to a primary school forming part of a proposed larger residential site is common across the county. Given these circumstances the exact location of the land to be used for primary school purposes is then determined following discussions with the land owner/developer and the local planning authority, and the approval of a planning application. There will therefore be on-going dialogue between the LEA and land owners of this site to establish the location before the final scheme is designed.

Q29. What evidence has been produced to demonstrate that a new school and 218 dwellings can be delivered taking into account site constraints such as the topography, existing infrastructure and land ownerships?

Council's Response

1. The net developable area (NDA) of the site is 6.807ha, including on site open space, and would yield a total of 218 dwellings at 32 dwellings per hectare. The requirement for open space within this NDA at 43m² per dwelling is 1.006ha, which could include the existing watercourse corridor, and land above the route of gas and water main. An area of green infrastructure has been identified in the west and north of the site to mitigate against the negative effects and pressure development may have on Yorkshire Dales National Park and the area

of Special Interest for Nature Conservation, which are in close proximity of the site. Land ownership is not considered a constraint as the site allocation is within the ownership of Craven District Council (CDC) and a private landowner who has made representations in support of the site's residential development (008/01/GEN/GC). There is sufficient land within the site allocation area to accommodate both 1.8ha of land for a new primary school and 218 dwellings.

2. Funding has been secured by CDC through Central Government's One Public Sector Land Release Fund to provide the infrastructure to the site releasing the land for development. A condition of the funding is that the infrastructure in place by December 2019.
3. The two landowners of site SK090 & SK089 are committed to on-going dialogue in order to deliver this site allocation. Representatives of Craven District Council and their joint venture partners, Barnfield Construction, have met with representatives of the private landowners of part of this allocation site to discuss the development of sites SK089 and SK090. Both parties have agreed to prepare a high level scheme covering both sites SK089 and SK090 and that development of each site would not be reliant on the other. Given the One Public Sector Land Release Fund that has been secured by the Council to provide the infrastructure to the site, it is likely that the Craven DC owned site (SK090) will come forward as a first phase. Craven DC has agreed to improve the junction of Airedale Avenue and Hurrs Road and build a site road to provide access to SK090 in 2019. The representative of the private landowner welcomes the provision of this access road from Airedale Avenue to site SK089, however they have indicated within a Highway Feasibility Assessment (Feb 2018) submitted as part of their representation to the publication Local Plan (008/01/GEN/GC) that access to the allocation site is viable from Airedale Avenue and an additional three points (Otley Road, Elsey Croft and Wensleydale Avenue).
4. Recent comments received from NYCC Highways state that access to the site from Otley Road would not be achievable without large excavations or realignment of the A6069. In order to reflect these comments and to provide clarity the following modification is proposed to the eighth development principle for site SK090 & SK090 relating to access:

Proposed Modifications

Page 69 of the submission local plan: The eighth development principle for sites SK089 & SK090 will be reworded as follows:

'Access to site SK089 & SK090 is to be gained from Wensleydale Avenue, <u>Airedale Avenue</u> , Otley Road and Elsey Croft.'

Q30. Taking into account the land required for a new school, is the provision of 218 dwellings deliverable?

Council's Response

1. See response to Q29.
2. The Housing Trajectory 2012 to 2032 (2018 Update for Submission) (SD004) estimates that this site will be delivered in years 5 (2023/24) to 13(2031/32) of the plan period. With the funding secured by the Council to provide the necessary infrastructure on the site required for development and the positive estimations for delivery by the private landowner, the site could be delivered ahead of the Housing Trajectory's schedule.

Q31. What is the fluvial and/or 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 applies the sequential risk-based approach to the allocation of land for development and includes maps (SFRA) (FI002), which shows that a very small area of Flood Zone 2 (0.24ha) lies in the western part of the site, which falls within the green infrastructure area identified within this site on the submission policies map (inset Map 1). It is therefore expected that all the built development can avoid all areas of Flood Zone 2.
3. In terms of surface water flood risk, as identified by the SFRA assessment maps the central and south east part of the site is in an area of medium to high risk of surface water flooding due to the existence of an existing watercourse running from the western to the southern site boundary. In the context of Skipton and the Local Plan's spatial strategy, there are no reasonably available sites appropriate for the proposed development with a lesser risk of surface water flooding.
4. A draft scheme prepared by the agent on behalf of the landowners for part of this site shows this existing watercourse incorporated as open space within the site.
5. Section A4 and table A.4-4 of the SFRA (FI002) identifies sites classified as

Recommendation D, where development could be permitted if a site specific Flood Risk Assessment shows the site can be safe and it is demonstrated that the site is sequentially preferable. The SFRA (FI002) identifies sites SK089 and SK090 as one where development could be permitted subject to a Flood Risk Assessment. Any flood risk on the site can be mitigated through design, layout, landscaping and SuDS. The second development principle for this site requires a flood risk assessment, as required by recommendation D, section A4 of the Council's SFRA (FI001), which states that all development proposals within Flood Zone 2 and any sites within Flood Zone 1 that are equal to or greater than 1 hectare in area and/or where surface water flood risk is considered to be significant enough as to require investigation, must be accompanied by a site-specific Flood Risk Assessment to determine vulnerability to flooding from other sources as well as fluvial. The development principle also requires the incorporation of SUDS within any proposals on the site unless this is not possible.

6. It is therefore considered that the allocation is consistent with paragraph 100 of the Framework. Details of the site selection process for SK089 & SK090 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).

SK094 – Land bounded by Carleton Road, the railway line and the A629

Q32. 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) show that Flood Zones 2 & 3 are present on the south and east of this site, which fall within the green infrastructure area identified within this site on the submission policies map (inset Map 1). It is therefore expected that all the built development can avoid all areas of Flood Zone 2 and 3.
3. In terms of surface water flood risk, as identified by the SFRA assessment maps, areas of medium to high risk of surface water flooding exist throughout the site.

In the context of Skipton and the Local Plan's spatial strategy, there are no reasonably available sites appropriate for the proposed development with a lesser risk of surface water flooding.

4. Any 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, 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, and any sites within Flood Zone 1 that are equal to or greater than 1 hectare in area and/or where surface water flood risk is considered to be significant enough as to require investigation, must be accompanied by a site-specific Flood Risk Assessment to determine vulnerability to flooding from other sources as well as fluvial. The development principle also requires the incorporation of SUDS within any proposals on the site unless this is not possible. It is therefore considered that the allocation is consistent with paragraph 100 of the Framework. Details of the site selection process for SK094 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). In terms of flood risk, this site is likely to benefit from the Skipton Flood Alleviation Scheme (see answer to question 33 below).
5. It should also be noted that two associated full planning applications (refs 63/2015/16300 and 63/2016/17465) for 39 and 67 dwellings respectively (106 dwellings in total) were granted planning permission on this site in May 2018.

Q33. What is the current situation regarding the Skipton Flood Alleviation Scheme? What is the scheme and what effect is it likely to have on the part of the allocation falling within Flood Zones 2 and 3?

Council's Response

1. Recent discussions with the Environment Agency have confirmed that construction of the Skipton Flood Alleviation Scheme (FAS) is almost complete. The Environment Agency's (EA) Flood Risk Management – Data and Evidence Team has scheduled to model the resulting impact of the FAS during the Autumn of 2018 and will be used to update the EA Flood Maps.
2. The Skipton FAS has been designed to reduce the risk from Eller Beck and Waller Hill Beck. The FAS involves the creation of two upstream storage areas to impound the water from the surrounding hills, and release it slowly to reduce the risk of Eller Beck and Waller Hill Beck from overtopping through the town centre.

3. Previous Modelling and Forecasting investigation conducted on behalf of the Environment Agency indicates that flooding on site SK094 is shown to occur by the backing up of flood water in Eller Beck, which flows along the western side of the site. The Skipton FAS scheme is designed to stop flooding from Eller Beck as it passes through the centre of Skipton and therefore is projected to have a significant impact on reducing the risk of flooding within the south western part of Skipton, including site ref SK094.

SK101 – Land east of Keighley Road and south of Cawder Lane

Q34. Policy SP5 states that the width of the existing Horse Close Bridge is currently restricted, and therefore would need to be widened (or a new bridge provided) to serve the allocation. What assessments have been carried out to determine whether such works would be feasible and viable?

Council's Response

1. This is a site within the Council's ownership. A planning application (re 63/2015/16162) was submitted in September 2015 accompanied by a full Transport Assessment report (Curtins) and a Bridge Options Report (Mason Clark Associates) and a design for the bridge was agreed with the Canals and River Trust and Highways in 2015. The planning application however was refused on grounds that it had not been demonstrated that the reduced provision of affordable housing on the site was justified on financial viability grounds, and the proposal did not constitute high quality design or maintain a good standard of amenity in a manner consistent with the NPPF. A new design team working as part of the Joint Venture Partnership between Craven Council and Barnfield Developments is currently developing revised proposals. Grant funding of £2.3 m has been awarded by Homes England for the infrastructure works for this site. With previous cost estimates ranging from £440,000 - £770,000 for the bridge, the grant funding is sufficient to fully fund these works that will include the bridge and roadway access.

Q35. Taking into account the access constraints of the site, is the allocation deliverable?

1. Yes – With the support of the grant funding for the replacement of the Horse Close Bridge this site is viable.
2. The plans below show that vehicular access across the canal would be achieved via a new bridge. The bridge itself does not provide access directly into the site; instead it provides an improved vehicular access to this area of Skipton to the north of the canal.



with the requirements of the Homes England funding offer.

4. It is therefore considered that given the access constraints of this site and how they will be overcome, the allocation is deliverable.

Q36. Is the site expected to come forward either in conjunction with, or alongside Site Refs SK061 and SK114/124, which also potentially require bridge widening and/or a new crossing over the Leeds & Liverpool Canal?

Council's Response

1. The Housing Trajectory 2012 to 2032 (2018 Update for Submission) (SD004) estimates that site SK101 will be delivered in years 4 -6 (2022/23 to 2024/25) of the plan period. SK061 will be delivered in years 2-5 (2020/21 to 2023/24). The trajectory (SD004) estimates that site SK061 will be delivered in years 2-5 (2020/21 to 2023/24) and that site SK114/124 will be delivered in years 2-5 (2020/21 to 2023/24) of the plan period. As such SK101 is expected to come forward in conjunction with, or alongside sites SK061 and SK114/124.
2. The new Horse Close Bridge will ensure that sites SK061, SK101 and SK114/124 will not be constrained in terms of access to this part of Skipton via the Horse Close Bridge. As grant funding has been granted from Homes England for this infrastructure works to the bridge there would be no requirement for sites SK061, SK101 & SK114/SK124 to contribute to the cost of widening the bridge.

SK114 and SK124 – Land north east of North Parade and Cawder Road garage

Q37. What is the current status regarding planning permission Ref 63/2016/15503?

Council's Response

1. Ref. 63/2016/15503 relates to a reserved matters application for the erection of 105 dwellings and associated infrastructure, MUGA sports pitch and areas of open space granted outline consent on 14 March 2013 (ref. 63/2012/13167) at land at North Parade Skipton. This application was approved in August 2016 and the Council's housing monitoring system identifies that development commenced during July 2018.

Q38. Is access to the site expected to be taken from Cawder Road and/or the existing reservoir track from Whinny Gill Road? At present is it clear to decision-makers, developers and local communities? Is the policy effective?

Council's Response

1. The seventh development principle for this site states that 'access is to be gained from the Cawder Road garage site located in the south west of the site. Alternatively there is the potential to access the site via the existing reservoir track from Whinny Gill Road, which provides access to a residential scheme with

planning consent to the north of the site (Ref. 63/2015/15503). The wording of this development principle has been further considered and as a result a modification is proposed in order to provide clarity in terms of access to this site. Access to the site via the existing track from Whinny Gill road is a possible additional access, rather than an alternative one to Cawder Road. When the residential scheme with consent (Ref. 63/2015/15503) to the north of this site is completed there is will be an opportunity for site SK114/24 to be accessed from this site. However access to site SK114/24 is not reliant on access from the track from Whinny Gill Road as access can also be achieved from Cawder Road. The proposed modification to the seventh development principle is set out below:

<p>Proposed Modification</p> <p>Page 71 of the submission local plan: The seventh development principle for sites SK114 & SK124 will be reworded as follows:</p> <p>Access is to be gained from the Cawder Road garage site located in the south west of the site. Alternatively there is the potential to A possible additional access point is access the site via the existing reservoir track from Whinny Gill Road, which provides access to a residential scheme with planning consent to the north of the site. Access to Keighley Road from Cawder Lane is via the existing Horse Close Bridge, which is currently restricted in terms of width. Development proposals for the site should therefore demonstrate how access to the site via Horse Close Bridge can be improved (by either widening the existing bridge or the provision of a new bridge) to serve the new housing. A traffic impact assessment will be required.</p>

2. It is considered therefore that this development principle as modified is clear that access to the site can be provided from both Cawder Road and Whinny Gill Road.

Q39. Policy SP5 states that the width of the existing Horse Close Bridge is currently restricted, and therefore would need to be widened (or a new bridge provided) to serve the allocation. What arrangements are proposed/approved for the site under planning permission Ref 63/2016/15503?

Council's Response

1. The planning permission ref. 63/2015/15503 does not propose arrangements relating to the widening of the existing Horse Close Bridge to serve allocated site SK114& SK124.

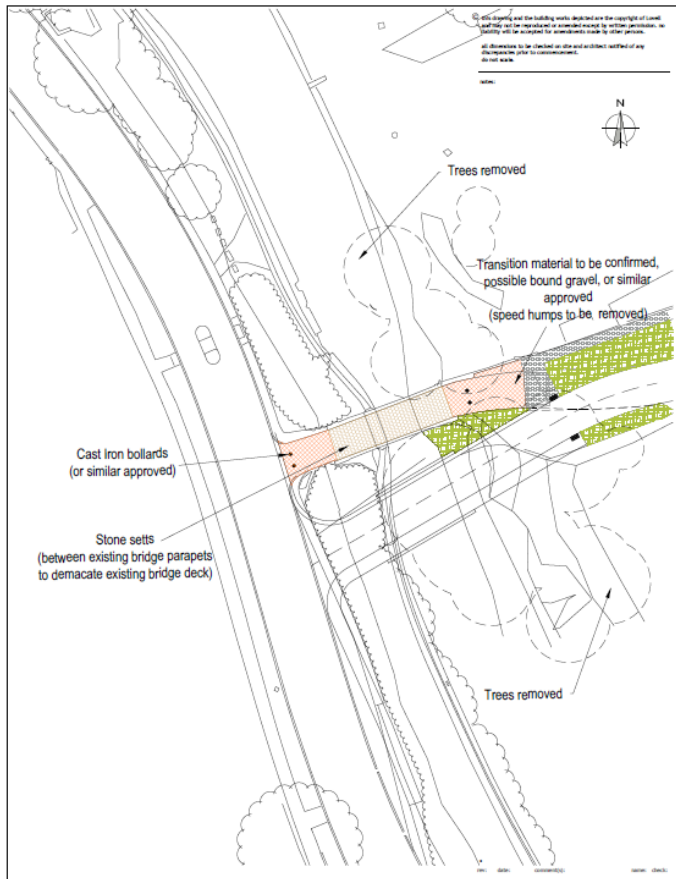
Q40. Taking into account the access constraints of the site, is the allocation

deliverable?

Council's Response

1. Yes. The site is considered deliverable as, in terms of access, both points are available and suitable. Information provided by the agent acting on behalf of the landowner in June 2017 states that the land is available for residential development.
2. The Housing Trajectory 2012 to 2032 (2018 Update for Submission) (SD004) estimates that this site will be delivered between year 2 (2020/21) and year 5 (2023/24) of the plan period. Monitoring of the Housing Trajectory 2012-2032 (SD004) will reflect the requirements of this site in terms of works to replace the Horse Close Bridge.
3. With the support of the grant funding for the replacement of the Horse Close Bridge this site is viable. The plans below show that vehicular access across the canal would be achieved via a new bridge. The bridge itself does not provide access directly into the site; instead it provides an improved vehicular access to this area of Skipton to the north of the canal.





4. All infrastructure and enabling works will be completed by March 2021 in line with the requirements of the Homes England funding offer.

Issue 3 – Strategy for Settle – Tier 2 (Policy SP6)

SG021, SG066 and SG080 – Land to north-west and south-west of Penny Green

Q1. Is it clear to decision-makers, developers and local communities what the heritage assets are for the purpose of Policy SP6? Is the policy effective in this regard?

Council's Response

1. Yes, it is clear to decision-makers, developers and local communities what the heritage assets are for site SG021, SG066, SG080 under Policy SP6. The Settle Carlisle Railway Conservation Area is specified in the first development principle for this site, and is shown on the accompanying inset map (4). The policy is effective as protection of this asset is afforded through a buffer of open, rising land and green infrastructure between the site and the conservation area.

Development on site will fall down the other side of the hill, away from, and partially out of sight of the heritage asset.

Q2. Is the site accessible from Penny Green, and if not, is it clear to decision-makers, developers and local communities what is required from access proposals taken from the B6480?

Council's Response

1. NYCC Highways have confirmed that the site is accessible via Penny Green (see eighth development principle). The eighth development principle also sets out (for clarity to decision-makers, developers and local communities) that access from B6480 will be screened with planting to minimise and mitigate any impact on the nearby conservation area and B6480, as a main road approach into Settle.

SG025 – Land south of Ingfield Lane

Q3. What is the current status regarding the planning application submitted to the Council in April 2017 (Ref 62/2017/18067)?

Council's Response

1. With respect to planning application ref. 62/2017/18067 the Council's Planning Committee considered and approved the application in July 2018 subject to the signing of a S106 Agreement to secure (a) the provision of 30% affordable housing, (b) surface water drainage proposals in conjunction with the implementation and completion of associated surface water storage mitigation scheme (Flood Meadow) (approved under planning application reference 62/2014/14929 and identified on site SG025 as the swathe of green infrastructure in the south-eastern section of the site), (c) off-site Public Open Space within Flood Meadow, (d) off-site highways works. At the time of writing the S106 agreement has not yet been executed.

Q4. What is the justification for specifying that proposals for development on the site must include tree blocks between clusters of dwellings? Does this provide sufficient flexibility to ensure that the site is deliverable?

Council's Response

1. The justification for tree blocks between clusters of dwellings is to ensure that the south-eastern edge of the development site is softened, as requested by the YDNP in their representation to the pre-publication draft local plan (14th June 2017) and the associated planning application 62/2017/18067. Specifically "*a reduction in the density towards the outer edge (south-east) is recommended; through a mixture of house sizes with more space and planting around them,*

avoiding the current continuous line of large house types. This will enable increased open gaps and spaces along the south-eastern boundary to enable meaningful areas of tree planting and open gaps.” The site layout on the current planning application achieves a softened south-eastern boundary edge and is therefore acceptable to the YDNP, thus aiding the site’s deliverability. The Housing Trajectory 2012 to 2032 (2018 Update for Submission) (SD004) estimates that this site will be delivered in years 2-6 (2020-2025) of the plan period.

Q5. What is the fluvial and/or surface water hazard identified in the supporting text to Policy SP6? 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). Site SG025 is in Flood Zone 1. Areas of surface water flood risk are identified in the Council’s Strategic Flood Risk Assessment maps (FI002), across the southern section of the site and can be mitigated through design, layout, landscaping and SuDS [including through the approval of a surface water storage mitigation scheme (Flood Meadow) to the south of the site]. Surface water drainage proposals for the site are to be agreed via S106 (see Q3 above) and relate to the implementation and completion of the Flood Meadow. This development principle complies with recommendation D, section A4 of the Council’s SFRA (FI001), which states that any sites 100% within Flood Zone 1 that are equal to or greater than 1 hectare in area and/or where surface water flood risk is considered to be significant enough as to require investigation, must be accompanied by a site-specific Flood Risk Assessment to determine vulnerability to flooding from other sources as well as fluvial. Therefore, the allocation is consistent with paragraph 100 of the Framework. Details of the site selection process for SG025 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).

SG027 and SG068 – Land south of Brockhole View and west of Brockhole Lane

Q6. How does site Ref SG027/SG068 relate to the adjacent parcel of land to the north-east which benefits from planning permission for residential development under Ref 62/2015/16414?

Council’s Response

1. The parcel of land to the north-east of SG027/SG068, which benefits from planning permission under ref. 62/2015/16414, does not form part of the allocation site, but is within the same ownership. This parcel of land is an existing commitment for 4 dwellings. As such it is not shown on the submission policies map which only shows committed sites of 5 dwellings and above.

Q7. What is the current status regarding planning application Ref 62/2016/17447?

Council's Response

1. With respect to planning application ref. 62/2016/17447, which covers the northern part of the allocation site, the Strategic Manager for Planning and Regeneration was granted delegated authority on 02/03/17 to grant planning permission subject to the signing of a Section 106 planning obligation to secure (a) the provision of 30% affordable housing, and (b) on-site public open space. The Section 106 Agreement for this planning application is outstanding.
2. Recent contact has been made with the agents of this site who have indicated that a new planning application, which would cover the whole of the allocated site, will be submitted later this year. The provision of affordable housing and on-site public open space will be agreed via a new S106 agreement negotiated and executed alongside any new planning approval for the whole allocation site.

Q8. How does the area of green infrastructure referred to in Policy SP6 relate to approved plans for the site?

Council's Response

1. The green infrastructure proposed for SG027/SG068 which overlaps with the approved plans under ref. 62/2017/17447 (i.e. the NW corner of the allocation site) is an elongated piece of land along the western boundary of the housing site. It currently overlaps with the back gardens for dwellings on an indicative site layout, which would result in no housing being lost on site. Importantly, the green infrastructure in this area of the site functions as a buffer to the PROW to the west of the site. NB. The planning permission is in outline (pending S106, see Q7 above), with access only agreed. As such the final housing layout of the site has not been approved.

Q9. What is the justification for specifying that proposals for development on the site must include tree blocks between clusters of dwellings? Does this provide sufficient flexibility to ensure that the site is deliverable?

Council's Response

1. The justification for tree blocks between clusters of dwellings is to ensure that the south-eastern edge of the development site is softened, to continue the approach taken on adjoining site, SG025, as requested by the YDNP in their representation to the pre-publication draft local plan (14th June 2017) (see Q4 above). In their response to the planning application (approved subject to the signing of the S106 agreement under ref. 62/2017/17447), which covers the northern part of the allocated site, the YDNP has indicated that *'landscaping along the southern and eastern boundaries is recommended. The site layout plan is annotated with trees indicating there will be some planting. Clumps of native tree species should assist in assimilating the development with the surrounding landscape. Planting which will also assist in distinguishing the lane and the barn from the development.'* Whilst the allocated site SG027, SG068 extends further south than the planning application boundary for 62/2017/17447, it is envisaged that a layout for the site will achieve a softened south-eastern boundary edge which is acceptable to the YDNP, thus aiding the site's deliverability. The Housing Trajectory 2012 to 2032 (2018 Update for Submission) (SD004) estimates that this site will be delivered in years 10-13 (2028-2032) of the plan period.

SG032 – Car Park off Lower Greenfoot and Commercial Street

Q10. 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 used for car parking. The site is Council owned and the CDC Property Department have confirmed that the site is available for development. There is an over provision of car parking space in Settle. In total there are 315 Council owned pay and display parking spaces across four car parks in Settle. Assuming each space will turnover twice a day and comparing the number of spaces this makes available (120 on Whitefriars, 266 on Ashfield) to the number of tickets sales across all car parks, there is the capacity to absorb the cars currently parking on Lower Greenfoot on to Whitefriars and Ashfield. There is also further parking provision at Sowarth Field and on the Market Place. As such there is sufficient car parking facilities elsewhere in Settle to accommodate residents and visitors.

Q11. How would the proposed allocation affect the attractiveness of Settle as a visitor destination?

Council's Response

1. Development principles for the site ensure that any development would be in keeping with the historic core of Settle town centre, specifically with regards to

conserving the heritage assets nearby. Other plan policies, ENV2: Heritage and ENV3: Good Design, help to achieve this, with the aim of retaining the attractiveness of Settle as a visitor destination. NB. Whitefriars and Ashfield car parks are both closer to the town centre and its main services and visitor destinations (140m and 180m metres approx. in walking distance to the market square respectively, as opposed to 240m approx. in walking distance to the market square from site SG032). Therefore the redevelopment of this car park is not likely to have a detrimental effect on visitors to the area and their ability to easily access visitor destinations, as closer car parks are available for their use.

Q12. Is it clear to decision-makers, developers and local communities what is expected in relation to the management of surface water run-off?

Council's Response

1. Yes, it is clear to decision-makers, developers and local communities that any proposals for this site must accord with 'all other relevant local plan policies'; as such the management of surface water run-off for the site would have to comply with Policy ENV6 (b) and (e) and accompanying Appendix D, which details specific standards set by the Environment Agency. Due to surface water flood risk on site SG032 the Council's Strategic Flood Risk Assessment (FI001) at section A4, recommendation D, states that developers should be required to undertake a site-specific FRA. As such the Council accepts that a development principle requiring a FRA should be included in the policy for site SG032 and propose a main modification to the local plan accordingly..

Proposed Modification

Page 82 of the submission local plan: Insert an additional development principle for site SG032 as follows:

"A Flood Risk Assessment is required. Proposals for development on this site will incorporate Sustainable Urban Drainage Systems (SUDS), unless this is not possible or feasible".

SG035 – F H Ellis Garage

Q13. How does the density of development relate to the housing mix set out in Policy SP3?

Council's Response

1. The density of development proposed on this site took into account pre-application discussions and a draft scheme for retirement living apartments which suggests that 32 dwellings could be achieved on site. This would equate

to a site specific density of 200dph. The density also took into account yields achieved on previous planning approvals for apartment-style complexes. It deviates from the density of 32dph set out in SP3, which is a general guide for achieving an appropriate overall housing density across the plan area and across all tenures. Paragraph 4.33 of the local plan states that 'schemes with lower or higher densities or mix proportions may be acceptable and justified where it is demonstrated that the proposal meets local plan objectives or delivers sustainable forms of development'. Importantly, this is a brownfield site, close to the town centre and as such is suitable for specialist accommodation for older people (see Q14 below).

Q14. What is the justification for restricting the site to specialist accommodation for older people?

Council's Response

1. The justification for restricting the site to specialist accommodation for older people originates from pre-application discussions and material submitted with the site at the SHLAA stage. The owners promote the site as a high density, town centre apartment complex which would be well suited to meeting the local housing needs of an ageing population. The Council's SHMA (Nov. 2017) (Ho013) also identifies that Craven has an ageing population which would benefit from a wider range of older persons' accommodation. This is a brownfield site, close to the town centre and as such is well suited to accommodate the needs of older people.

Q15. Is it clear to decision-makers, developers and local communities what the relevant listed buildings and conservation areas are under Policy SP6?

Council's Response

1. It is accepted that the policy could be clearer with regards to the specific heritage assets that are relevant for site SG035 under Policy SP6. Whilst the conservation area boundaries are present on the submission policies maps, and details on the proximity of listed buildings and conservation areas can be sourced via an enquiry to the Council and/or Historic England, it may be clearer to specify these heritage assets in the development principles for the site (via a main modification to the local plan). Additionally the Council could show the listed buildings on the submission policies map, along with the conservation areas which are already shown.

Proposed Modification

Page 83 of the submission local plan: An amendment to the first development principle for Site SG035 as follows:
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“Siting and design of development on the site to conserve the significance of heritage assets (~~listed buildings and conservation areas~~) on and adjacent to the site and their settings (the grade II listed buildings to the north west of the site: The Terrace, No. 3 Windyridge and The Croft; and Settle Conservation Area).”

Q16. Is it clear to decision-makers, developers and local communities what is expected in relation to the management of surface water run-off?

Council's Response

1. Yes, it is clear to decision-makers, developers and local communities that any proposals for this site must accord with 'all other relevant local plan policies'; as such the management of surface water run-off for the site would have to comply with Policy ENV6 (b) and (e) and accompanying Appendix D, which details specific standards set by the Environment Agency. The Council's Strategic Flood Risk Assessment (FI001) does not identify a need for a site-specific FRA on this site as it is entirely in flood zone 1, with minimal or no risk to surface water flooding.

Q17. What is the justification for requiring access to be taken from High Hill Grove Street to the rear?

Council's Response

1. NYCC Highways have stated that access onto Duke Street (the main road) is not acceptable due to the site not having a sufficient frontage to enable an access of acceptable standards to be formed onto the public highway. NYCC Highways have confirmed however that the site is accessible via High Hill Grove to the rear of the site.

SG079 – Land north of Town Head Way

Q18. What is the justification for the extent of green infrastructure proposed to the north and east of the site?

Council's Response

1. The area identified as a green buffer on the northern boundary of the site contributes to the rural setting of Barrel House Farm. The extent of this area has been agreed following a site visit with Historic England (16/10/17) and was designed to be sufficiently wide, north to south, not only to ensure that the setting of the farm buildings is not urbanised by the proposed residential development but also to give more of an impression of a paddock (as opposed to simply being a landscaping strip). As such, it would replicate, to some extent, the grassed area to the south of Barrel Sykes.

2. The western area is the highest part of the site and it is considered that development of this area would have an over-dominant impact upon the setting of the Listed Building, on views from the Settle-Carlisle Railway, and on views from, and the character of, the adjacent National Park

Q19. What is the justification for retaining the existing dry stone boundary walls and creating a new dry stone wall to enclose the field to the north?

Council's Response

1. Dry stone walls are a characteristic feature of the landscape in this part of the District. It was agreed following a site visit with Historic England (16/10/17) that the retention of these important landscape elements will assist the assimilation of any development into the wider landscape. The provision of a new stone wall to enclose the field to the north, again, will help to ensure that the northern edge of the development sits more-comfortably into this rural landscape, it will help to reinforce the impression of this open area being a field/paddock, and safeguard the setting of the Listed Barrel Sykes

Q20. What is the justification for requiring the layout of any potential future development to retain views of the Watershed Mill chimney, and to specifically "leave gaps" through the site from east to west?

Council's Response

1. The Mill Chimney is not only one of the defining landscape features of the approach from Langcliffe into Settle but also acts as a way-marker as one travels along the B6479. The requirement for development of this site to retain views of this chimney is to help establish a sense of place for the new development, anchoring it, visually, to the defining feature in the area. As such, this Development Principle accords fully with the advice in NPPF Paragraph 58. This was agreed following a site visit with Historic England (16/10/17).

SG042 – NYCC Depot, Kirkgate

Q21. Is it clear to decision-makers, developers and local communities what the relevant listed buildings and conservation areas are under Policy SP6?

Council's Response

1. It is accepted that the policy could be clearer with regards to the specific heritage assets that are relevant for site SG042 under Policy SP6. Whilst the conservation area boundaries are present on the submission policies maps, and details on the proximity of listed buildings and conservation areas can be sourced via an enquiry to CDC and/or Historic England, it may be clearer to specify these heritage assets in the development principles for the site (via main modification). Additionally the Council could show the listed buildings on the

submission policies map, along with the conservation areas which are already shown.

Proposed Modification
<p>Page 85 of the submission local plan: An amendment to the first development principle for Site SG042 as follows:</p> <p>“Siting and design of development on the site to conserve the significance of heritage assets (listed buildings and conservation areas) on <u>and adjacent to</u> the site and their settings (<u>the grade II listed buildings to the south of the site: Victoria Hall, Kirkgate; Bond End, Kirkgate; the grade II* listed building to the south of the site: Friends Meeting House, Kirkgate; and Settle Conservation Area and the Settle Carlisle Railway Conservation Area</u>).”</p>

LA004 – Land North of Barrel Sykes

Q22. What is the justification for requiring the layout of any potential future development to retain views of the Watershed Mill chimney?

Council's Response

1. The Mill Chimney is not only one of the defining landscape features of the approach from Langcliffe into Settle but also acts as a way-marker as one travels along the B6479. The requirement for development of this site to retain views of this chimney is to help establish a sense of place for the new development, anchoring it, visually, to the defining feature in the area. As such, this Development Principle accords fully with the advice in NPPF Paragraph 58. This was agreed following a site visit with Historic England (16/10/17).

Q23. What is the justification for restricting building heights to 2-storeys and specifying that houses should be front facing and set back from Langcliffe Road?

Council's Response

1. The restriction on building heights is, primarily, to safeguard views from those travelling along the Settle-Carlisle Railway of Watershed Mill, but it also serves to ensure that the rural approach to Settle does not become over-urbanised.
2. The open aspect of this site contributes both to the approach to Settle but also to the setting of the buildings at Watershed Mill. The requirement to set any development back from Langcliffe Road is to retain some of this sense of openness and to make the transition between the town and the open countryside beyond less stark.

3. The requirement for buildings to front onto Langcliffe Road (as opposed to allowing their rear gardens with, typically, all their associated domestic paraphernalia to face the highway) is to ensure that the approach into the town remains attractive and that the new development relates well to the non-designated heritage assets opposite.
4. These details were agreed following a site visit with Historic England (16/10/17).

Q24. What is the justification for retaining the existing dry stone boundary walls and creating a new dry stone wall to enclose the field to the north?

Council's Response

1. Dry stone walls are a characteristic feature of the landscape in this part of the District. It was agreed following a site visit with Historic England (16/10/17) that the retention of these important landscape elements will assist the assimilation of any development into the wider landscape. The provision of a new stone wall to enclose the field to the north, again, will help to ensure that the northern edge of the development sits more-comfortably into this rural landscape, and will help to reinforce the impression of this open area being a field/paddock, and safeguard the setting of the non-designated heritage assets at Watershed Mill. It also provides a clear definable edge to the development.

SG060 – Northern part of Sowarth Industrial Estate

Q25. Policy SP6 allocates the site for “commercially led including employment, retail, leisure and some residential uses”. Is it clear to decision-makers, developers and local communities what uses are permitted? In particular, how many dwellings are allocated on the site?

Council's Response

1. SG060 is not specifically allocated for new mixed used development, rather it is identified as a regeneration opportunity for the mix of uses currently present on site, with the opportunity to incorporate some residential uses if appropriate and in keeping with the residential areas to the north of the site. 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.

Q26. How does the Local Plan ensure that development of the site will come forward in a planned and coordinated manner?

Council's Response

1. The site is currently in use and is situated in the historic town centre of Settle. The policy for SG060 is to be utilised to retain the current uses on site and to guide future regeneration to ensure a high quality design in keeping with the nearby town centre. Redevelopment of the site will be approached in a planned

and coordinated way bringing together key stakeholders at the masterplanning stage (see Q27 below).

Q27. Is it clear to decision-makers, developers and local communities what “key stakeholders” would require involvement in any masterplanning exercise for the site?

Council’s Response

1. It is accepted that greater clarity should be given with regards to what key stakeholders would require involvement in any masterplanning exercise for the site. Ideally these would include the landowners, the Council, and any other key stakeholders with a statutory interest in the site. The Employment Land Review (Ec002 and Ec003) recommended the site for inclusion in the local plan as an aspirational site for regeneration and enhancement of the area. 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.

Proposed Modification
<p>Pages 87/88 of the submission local plan: An amendment to the ‘Masterplan’ section of the policy for SG060 as follows:</p> <p>“Masterplan A Masterplan for the regeneration opportunity area, including the incorporation of the development and design principles detailed above, shall be produced in collaboration with, and to the satisfaction of, the local planning authority and other key stakeholders <u>(i.e. various landowners, statutory bodies with an interest in the site)</u>. Development proposals will be expected to accord with the principles of the Masterplan. Regeneration should not occur on a piecemeal basis and a comprehensive approach to redevelopment is expected.”</p>

Issue 4 – Strategy for Bentham - Tier 2 (Policy SP7)

HB011 – Primary School east of Robin Lane and west of Lowcroft

Q1. What is the current status regarding the proposed High Bentham Conservation Area?

Council’s Response

1. The proposed High Bentham Conservation Area is recommended in the assessment of Potential Conservation Area Designations August 2016 (He018) and, once the Local Plan examination process has concluded, the Council intends to carry out public consultation on the proposed conservation area with a view to designation by the end of 2019.

Q2. Is it clear to decision-makers, developers and local communities what the relevant heritage assets are for the purposes of Policy SP7?

Council's Response

1. Yes – The policy directs people to the Assessment of High Bentham for Conservation Area designation (August 2016), which is part of document He018. This provides concise and user-friendly information about relevant designated heritage assets, non-designated heritage assets and the proposed conservation area, which includes HB011.

Q3. What is the current status regarding the playing fields associated with the former school? Is the allocation consistent with paragraph 74 of the Framework concerning the development of existing open space, sports and recreational buildings and land, including playing fields? How does the proposed allocation meet the tests set out in the Framework?

Council's Response

1. The playing fields associated with the former primary school are surplus to requirements, because they have already been replaced by better provision at the new primary school located on Low Bentham Road, approximately half a mile to the west. Therefore the allocation is consistent with paragraph 74 of the Framework and meets the tests set out therein.

Q4. How does the density of development relate to the housing mix set out under Policy SP3?

Council's Response

1. The relationship between the density of development and the housing mix set out under Policy SP3 is described in the supporting text for Policy SP3, at paragraph 4.33, which states that site specific requirements set out in the development principles for allocated sites will take precedence.

Q5. What is the justification for restricting the site to extra care dwellings?

Council's response

1. The justification for restricting the site to extra care dwellings is that: a) the site is being made available and promoted by the landowner, North Yorkshire County Council, for the provision of extra care housing to meet local needs identified by them in carrying out their statutory responsibilities for adult social care; b) the site is particularly suited to this use because of its ownership, viability and central

location within High Bentham; and c) the local community supports the provision of extra care housing within High Bentham and the site is their preferred location. On 12th February 2018, the Council granted planning permission to develop the site for extra care housing, comprising 64 apartments and 8 bungalows, with access off Robin Lane (decision no. 2017/18715/FUL).

Q6. Is it clear to decision-makers, developers and local communities where access to the site will be taken from?

Council's Response

1. Yes, because the Development Principles for the site state that access may be gained from (i.e. would be acceptable from) Robin Lane and Low Croft, which reflects advice from the local highway authority. On 12th February 2018, the Council granted planning permission to develop the site for extra care housing with access from Robin Lane (decision no. 2017/18715/FUL).

Q7. Is it clear to decision-makers, developers and local communities how the design will “take account of impacts on the Forest of Bowland AONB”?

Council's Response

1. Yes, it is clear that the design will be required to “take account of impacts on the Forest of Bowland AONB”, but exactly how the design will do this will not be known until the designer has undertaken further work to formulate detailed proposals for a planning application, in consultation with the Council at the pre-application stage. Document La005 – ‘Forest of Bowland Landscape Character Assessment (2009)’ contains ‘guidelines for managing landscape change’, which help to clarify how proposals may take account of impacts on the AONB. In addition, on page 36 of document La002 – ‘Forest of Bowland AONB Management Plan (2014 – 2019)’, Lancashire County Council’s AONB Unit states that it will provide advice to decision-makers, developers and local communities based on those guidelines.

Q8. Is it clear to decision-makers, developers and local communities what is expected in relation to the management of surface water run-off?

Council's Response

1. Yes, it is clear that no specific surface water hazard has been identified on the site and, therefore, that no special mitigation in relation to the management of surface water flood risk is likely to be required in order to enable development to proceed.

HB023 – Land north of Low Bentham Road

Q9. What is the surface water hazard identified in the supporting text to Policy SP7? 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). Site HB023 is in Flood Zone 1. An area of surface water flood risk is identified in the Council's Strategic Flood Risk Assessment maps (FI002), but is limited to the southwest corner of the site and can be mitigated through design, layout, landscaping and SuDS. Therefore, the allocation is consistent with paragraph 100 of the Framework. Details of the site selection process for HB023 are set out in Part e) of the Council's Final Sustainability Appraisal Report (March 2018) (PD007).

Q10. Is it clear to decision-makers, developers and local communities how the design will “take account of impacts on the Forest of Bowland AONB”?

Council's Response

1. Yes, it is clear that the design will be required to “take account of impacts on the Forest of Bowland AONB”, but exactly how the design will do this will not be known until the designer has undertaken further work to formulate detailed proposals for a planning application, in consultation with the Council at the pre-application stage. Document La005 – ‘Forest of Bowland Landscape Character Assessment (2009)’ contains 'guidelines for managing landscape change', which help to clarify how proposals may take account of impacts on the AONB. In addition, on page 36 of document La002 – ‘Forest of Bowland AONB Management Plan (2014 – 2019)', Lancashire County Council's AONB Unit states that it will provide advice to decision-makers, developers and local communities based on those guidelines.

HB024 – North of Lakeber Drive

Q11. How, and from where, will the site be accessed?

Council's Response

1. HB024 has a frontage onto Lakeber Drive and this is a potential point of access. The local highway authority advises that there is acceptable visibility westerly, based on an estimate that vehicle speeds are below 30 mph, and that there may be acceptable visibility easterly, provided that vehicles speeds can be proven to be less than 25mph, by means of radar speed checks. This makes Lakeber Drive a potential point of access, but not one that can be relied upon with certainty. Therefore, whilst the possibility of access from Lakeber Drive should not be ruled out, the Local Plan makes provision for access to be provided from the adjoining allocated site, HB052, as specified in that site's Development Principles. Such an arrangement would be in line with the local highway

authority's advice that the access point to HB052 from Robin Lane has acceptable visibility in both directions.

Q12. What is the justification for requiring a means of access for emergency vehicles to be taken through the allocated site into site Ref HB052? What about other vehicles and pedestrians/cyclists?

Council's Response

1. The local highway authority advises that HB052's potential yield of 118 dwellings means that a second point of access for emergency vehicles would be required and that this could be provided through HB024 from Lakeber Drive, if controlled by the use of retractable bollards. Use of the same point of access by other vehicles is potentially acceptable in principle, but this would need to be confirmed by radar speed checks (refer to the answer to Q.11, above). Retractable bollards would not prevent pedestrians and cyclists from using the access and pedestrians would continue to use the existing PROW from Lakeber Drive, which is dealt with in the site's second Development Principle.

Q13. Is it clear to decision-makers, developers and local communities how green linkages will be secured across sites HB024, HB044 and HB052?

Council's Response

1. Yes, it is clear how green linkages will be secured across sites HB024, HB044 and HB052, because this is set out as a Development Principle for each site, which describes in broad terms how PROWs and public open space will be used to enhance local green infrastructure and green infrastructure linkages. Inset Map No.5 shows the proposed location of Green Infrastructure Provision within HB052. The proposed area of green infrastructure adjoins HB024 and HB044, and these joining points are where PROWs and public open space within HB024 and HB044 will link to PROWs and public open space within HB052.

Q14. How does the Local Plan ensure that the three adjoining sites come forward in a consistent and coherent manner, having regard to emergency vehicle access and green infrastructure?

Council's Response

1. The Development Principles for each site are designed to work together to help ensure that the three sites come forward in a consistent and coherent manner. Development Principles set out a general plan, which lays the ground for details to follow, and the Council expects to engage pro-actively and co-operatively with developers, at the pre-application stage, in order to ensure that Development Principles are carried through into the detail of approved schemes. The Council commits to such positive engagement in Draft Policy SD1.

Q15. How does the Local Plan ensure that any potential delays in bringing forward the allocation does not prejudice the delivery of adjacent sites?

Council's Response

1. No potential delays in bringing forward the allocation have been identified and the landowner has confirmed that the site is available, Development Principles are deliverable and emergency access to HB052 can be accommodated (Representation 013). In the Housing Trajectory 2012 to 2032 (2018 Update for Submission) (SD004), development of the site is expected to be completed in years 3 and 4 following adoption of the Local Plan. Nevertheless, should a delay occur, a significant number of homes could be delivered on HB052 and served by the main access on Robin Lane before the need for a second, emergency access would arise. Once any delay has passed, HB052 and HB044 could progress to completion. It is also worth considering that, as the Local Plan housing allocations cover the entire plan period up to 2032, including years 6-10 and 11-15, as referred to in paragraph 47 of the Framework, the Local Plan is not reliant on all allocated sites coming forward within the first 5 years.

Q16. Is it clear to decision-makers, developers and local communities what is expected in relation to the management of surface water run-off?

Council's Response

1. Yes, it is clear that no specific surface water hazard has been identified on the site and, therefore, that no special mitigation in relation to the management of surface water flood risk is likely to be required in order to enable development to proceed.

Q17. Is it clear to decision-makers, developers and local communities how the design will “take account of impacts on the Forest of Bowland AONB”?

Council's Response

1. Yes, it is clear that the design will be required to “take account of impacts on the Forest of Bowland AONB”, but exactly how the design will do this will not be known until the designer has undertaken further work to formulate detailed proposals for a planning application, in consultation with the Council at the pre-application stage. Document La005 – ‘Forest of Bowland Landscape Character Assessment (2009)’ contains ‘guidelines for managing landscape change’, which help to clarify how proposals may take account of impacts on the AONB. In addition, on page 36 of document La002 – ‘Forest of Bowland AONB Management Plan (2014 – 2019)’, Lancashire County Council’s AONB Unit states that it will provide advice to decision-makers, developers and local communities based on those guidelines.

HB025 – Land east of Butts Lane

Q18. What is the surface water hazard identified in the supporting text to Policy SP7? 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). Site HB025 is in Flood Zone 1. Surface water flood risk is identified in the Council's Strategic Flood Risk Assessment maps (FI002), but is limited to an area along the eastern boundary of the site, which follows the line of a watercourse and can be mitigated through design, layout, landscaping and SuDS. Therefore, the allocation is consistent with paragraph 100 of the Framework. Details of the site selection process for HB025 are set out in Part e) of the Council's Final Sustainability Appraisal Report (March 2018) (PD007).

Q19. Is it clear to decision-makers, developers and local communities how the design will “take account of impacts on the Forest of Bowland AONB”?

Council's Response

1. Yes, it is clear that the design will be required to “take account of impacts on the Forest of Bowland AONB”, but exactly how the design will do this will not be known until the designer has undertaken further work to formulate detailed proposals for a planning application, in consultation with the Council at the pre-application stage. Document La005 – ‘Forest of Bowland Landscape Character Assessment (2009)’ contains 'guidelines for managing landscape change', which help to clarify how proposals may take account of impacts on the AONB. In addition, on page 36 of document La002 – ‘Forest of Bowland AONB Management Plan (2014 – 2019)’, Lancashire County Council's AONB Unit states that it will provide advice to decision-makers, developers and local communities based on those guidelines.

HB026 – Land north of Springfield Crescent and East of Butts Lane

Q20. What is the surface water hazard identified in the supporting text to Policy SP7? 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). Site HB026 is in Flood Zone 1. Surface water flood risk is identified in the Council's Strategic Flood Risk Assessment maps (FI002), but is limited to part of the site boundary, which touches an area of surface water flood risk that follows the line of a watercourse. This risk can be mitigated through design, layout, landscaping and SuDS. Therefore, the allocation is consistent with paragraph 100 of the Framework. Details of the site selection process for HB026 are set out in Part e) of the Council's Final Sustainability Appraisal Report (March 2018) (PD007).

Q21. What is the current status regarding applications for planning permission on the site?

Council's Response

1. There are currently no applications for planning permission on the site.

Q22. Is it clear to decision-makers, developers and local communities how the design will “take account of impacts on the Forest of Bowland AONB”?

Council's Response

1. Yes, it is clear that the design will be required to “take account of impacts on the Forest of Bowland AONB”, but exactly how the design will do this will not be known until the designer has undertaken further work to formulate detailed proposals for a planning application, in consultation with the Council at the pre-application stage.

HB036 – Land east of Robin Lane

Q23. What is the site currently used for? Is it surplus to requirements as overflow car parking for the golf club?

Council's Response

1. The site is partly used as an overflow car park by Bentham Golf Club – the Club's main car park being located at the clubhouse, approximately 100m to the south. According to the landowner, the overflow car park can be relocated elsewhere and potentially reviewed with existing car park arrangements. In 2013, provision of the overflow car park was an initiative promoted by the Club itself, rather than being a planning requirement, and there are no planning conditions requiring its retention. Today, it is regarded as non-essential and, therefore, surplus to requirements.

Q24. What effects will the allocation have on the availability of car parking for the golf club?

Council's Response

1. When the site is developed for housing, the current overflow car park will be removed. The Club's main car park will continue to be available and the Club may relocate the overflow car park or review existing car parking arrangements

within its grounds.

Q25. What are the “risks of groundwater emergence” identified in the supporting text to Policy SP7? 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). Site HB036 is in Flood Zone 1 and has no surface water flood risk. A medium (25-50%) risk of groundwater emergence is identified in the Council’s Strategic Flood Risk Assessment maps (FI002). This relates to potential actions of the local water-table and is a point of information mainly intended for potential developers. Any associated risk can be mitigated through design, layout, landscaping and SuDS. Therefore, the allocation is consistent with paragraph 100 of the Framework. Details of the site selection process for HB036 are set out in Part e) of the Council’s Final Sustainability Appraisal Report (March 2018) (PD007).

Q26. Is it clear to decision-makers, developers and local communities how the design will “take account of impacts on the Forest of Bowland AONB”?

Council’s Response

1. Yes, it is clear that the design will be required to “take account of impacts on the Forest of Bowland AONB”, but exactly how the design will do this will not be known until the designer has undertaken further work to formulate detailed proposals for a planning application, in consultation with the Council at the pre-application stage. Document La005 – ‘Forest of Bowland Landscape Character Assessment (2009)’ contains ‘guidelines for managing landscape change’, which help to clarify how proposals may take account of impacts on the AONB. In addition, on page 36 of document La002 – ‘Forest of Bowland AONB Management Plan (2014 – 2019)’, Lancashire County Council’s AONB Unit states that it will provide advice to decision-makers, developers and local communities based on those guidelines.

HB038 – Land south of Low Bentham Road

Q27. What is the justification for allocating part of the site for an expansion to the primary school? How will this be delivered, by whom and when?

Council’s Response

1. Towards the end of the plan period the LEA forecast that, taking into account the

existing population, the increase in residents from outstanding permissions for housing and local plan housing proposals within the catchment area of Bentham Community Primary School, an expansion of the school to accommodate additional pupils will be necessary.

- At present the school could accommodate up to 210 pupils, with some changes to room usage. At the end of the plan period in 2031/2032 the forecast total number of pupils will be 225. To enable the school to accommodate the additional 15 pupils and meet the Department for Education's requirements for outdoor play space and recreation areas, 0.3 hectares of land is required for the school's expansion. The forecast data is given below: (the first row represents pupil numbers from birth data only, the second row represents pupil numbers from birth data plus outstanding permissions for residential development and the third row is forecast pupil numbers from births, permissions and local plan housing allocations).

Year	18/19	19/20	20/21	21/22	22/23	31/32
Birth data	114	107	108	109	109	112
Outstanding Permissions	117	113	116	120	123	126
Local Plan housing	117	113	124	136	147	225

- This school expansion will be delivered by the LEA through the use of developer contributions and basic need capital funding. It will need to be delivered towards the end of the plan period.

Q28. Taking into account the land required for the primary school extension, is the provision of 19 dwellings deliverable?

Council's Response

- Yes – The Site Allocation Area of 0.891ha includes 0.3ha for an extension to the primary school and 0.591ha for new housing. Using a density guide of 32dph, the estimated yield of the site is 19 dwellings. The landowner supports the allocation and has confirmed that the site is available and deliverable, and that the Development Principles can be achieved (Representation 022).

Q29. Is it clear to decision-makers, developers and local communities how the design will “take account of impacts on the Forest of Bowland AONB”?

Council's Response

- Yes, it is clear that the design will be required to “take account of impacts on the

Forest of Bowland AONB”, but exactly how the design will do this will not be known until the designer has undertaken further work to formulate detailed proposals for a planning application, in consultation with the Council at the pre-application stage. Document La005 – ‘Forest of Bowland Landscape Character Assessment (2009)’ contains ‘guidelines for managing landscape change’, which help to clarify how proposals may take account of impacts on the AONB. In addition, on page 36 of document La002 – ‘Forest of Bowland AONB Management Plan (2014 – 2019)’, Lancashire County Council’s AONB Unit states that it will provide advice to decision-makers, developers and local communities based on those guidelines.

HB044 – Land west of Goodenber Road

Q30. How will access be gained to the proposed allocation? Is it deliverable?

Council’s Response

- 1 The local highway authority has advised that a point of access onto Barghs Meadow, to the south, would have acceptable visibility in both directions, but that there may be an intervening strip of land (a ‘ransom strip’) between the site and the highway, which is in separate ownership. This potential ransom strip creates uncertainty about the achievability of access onto Barghs Meadow. Therefore, the Local Plan makes provision for access to be gained via the adjoining allocated site HB052, by including such provision within the Development Principles for each site. If the landowner or developer is able to resolve the ransom strip issue, an acceptable access onto Barghs Meadow should be achievable: if not, the Local Plan makes provision for alternative access arrangements, which satisfy the local highway authority, and the allocation is therefore deliverable.

Q31. How does the Local Plan ensure that any potential delays in bringing forward site Ref HB024 does not prejudice the delivery of the allocation?

Council’s Response

1. No potential delays in bringing forward site HB024 have been identified and the landowner has confirmed that the site is available, Development Principles are deliverable and emergency access to HB052 (which will provide access to HB044) can be accommodated (Representation 013). In the Housing Trajectory 2012 to 2032 (2018 Update for Submission) (SD004), development of HB024 is expected to be completed in years 3 and 4 following adoption of the Local Plan. Nevertheless, should a delay occur, a significant number of homes could be delivered on HB052 and served by the main access on Robin Lane before the need for a second, emergency access would arise. Once any delay has passed, HB052 and HB044 could progress to completion. It is also worth considering that, as the Local Plan housing allocations cover the entire plan period up to 2032, including years 6-10 and 11-15, as referred to in paragraph 47 of the

Framework, the Local Plan is not reliant on all allocated sites coming forward within the first 5 years.

Q32. How does the Local Plan ensure that the three adjoining sites come forward in a consistent and coherent manner, having regard to vehicle access and green infrastructure?

Council's Response

1. The Development Principles for each site are designed to work together to help ensure that the three sites come forward in a consistent and coherent manner. Development Principles set out a general plan, which lays the ground for details to follow, and the Council expects to engage pro-actively and co-operatively with developers, at the pre-application stage, in order to ensure that Development Principles are carried through into the detail of approved schemes. The Council commits to such positive engagement in Draft Policy SD1.

Q33. What is the justification for requiring a Flood Risk Assessment to be provided?

Council's Response

1. The justification is provided by Recommendation D, Section A4, of the Council's Strategic Flood Risk Assessment (FI001), which states that any sites 100% within Flood Zone 1 that are equal to or greater than 1 hectare in area must be accompanied by a site-specific Flood Risk Assessment to determine vulnerability to flooding from other sources as well as fluvial.

Q34. Is it clear to decision-makers, developers and local communities how the design will “take account of impacts on the Forest of Bowland AONB”?

Council's Response

1. Yes, it is clear that the design will be required to “take account of impacts on the Forest of Bowland AONB”, but exactly how the design will do this will not be known until the designer has undertaken further work to formulate detailed proposals for a planning application, in consultation with the Council at the pre-application stage. Document La005 – ‘Forest of Bowland Landscape Character Assessment (2009)’ contains 'guidelines for managing landscape change', which help to clarify how proposals may take account of impacts on the AONB. In addition, on page 36 of document La002 – ‘Forest of Bowland AONB Management Plan (2014 – 2019)', Lancashire County Council's AONB Unit states that it will provide advice to decision-makers, developers and local communities based on those guidelines.

HB052 – Land North West of Bank Head Farm and South of Ghyllhead Farm

Q35. What is the justification for requiring a means of access for emergency vehicles to be taken through site Ref HB024? What about other vehicles and

pedestrians/cyclists?

Council's Response

1. The local highway authority advises that HB052's potential yield of 118 dwellings means that a second point of access for emergency vehicles would be required and that this could be provided through HB024 from Lakeber Drive, if controlled by the use of retractable bollards. Use of the same point of access by other vehicles is potentially acceptable in principle, but this would need to be confirmed by radar speed checks (refer to the answer to Q.11, above). Retractable bollards would not prevent pedestrians and cyclists from using the access and pedestrians would continue to use the existing PROW from Lakeber Drive, which is dealt with in the second Development Principle for HB024.

Q36. How does the Local Plan ensure that any potential delays in bringing forward site Ref HB024 does not prejudice the delivery of the allocation?

Council's Response

1. No potential delays in bringing forward site HB024 have been identified and the landowner has confirmed that the site is available, Development Principles are deliverable and emergency access to HB052 can be accommodated (Representation 013). In the Housing Trajectory 2012 to 2032 (2018 Update for Submission) (SD004), development of HB024 is expected to be completed in years 3 and 4 following adoption of the Local Plan. Nevertheless, should a delay occur, a significant number of homes could be delivered on HB052 and served by the main access on Robin Lane before the need for a second, emergency access would arise. Once any delay has passed, HB052 could progress to completion. It is also worth considering that, as the Local Plan housing allocations cover the entire plan period up to 2032, including years 6-10 and 11-15, as referred to in paragraph 47 of the Framework, the Local Plan is not reliant on all allocated sites coming forward within the first 5 years.

Q37. How does the Local Plan ensure that the three adjoining sites come forward in a consistent and coherent manner, having regard to vehicle access and green infrastructure?

Council's Response

1. The Development Principles for each site are designed to work together to help ensure that the three sites come forward in a consistent and coherent manner. Development Principles set out a general plan, which lays the ground for details to follow, and the Council expects to engage pro-actively and co-operatively with developers, at the pre-application stage, in order to ensure that Development Principles are carried through into the detail of approved schemes. The Council commits to such positive engagement in Draft Policy SD1.

Q38. What is the surface water hazard identified in the supporting text to

Policy SP7? 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). Site HB052 is in Flood Zone 1. A narrow area of surface water flood risk is identified in the Council's Strategic Flood Risk Assessment maps (FI002), but this is limited and can be mitigated through design, layout, landscaping and SuDS. Therefore, the allocation is consistent with paragraph 100 of the Framework. Details of the site selection process for HB052 are set out in Part e) of the Council's Final Sustainability Appraisal Report (March 2018) (PD007).

Q39. Is it clear to decision-makers, developers and local communities how the design will “take account of impacts on the Forest of Bowland AONB”?

Council's Response

1. Yes, it is clear that the design will be required to “take account of impacts on the Forest of Bowland AONB”, but exactly how the design will do this will not be known until the designer has undertaken further work to formulate detailed proposals for a planning application, in consultation with the Council at the pre-application stage. Document La005 – ‘Forest of Bowland Landscape Character Assessment (2009)’ contains 'guidelines for managing landscape change', which help to clarify how proposals may take account of impacts on the AONB. In addition, on page 36 of document La002 – ‘Forest of Bowland AONB Management Plan (2014 – 2019)', Lancashire County Council's AONB Unit states that it will provide advice to decision-makers, developers and local communities based on those guidelines.

LB012 – Wenning View, Low Bentham Road

Q40. Is it clear to decision-makers, developers and local communities what is expected in relation to the management of surface water run-off?

Council's Response

1. Yes, it is clear that no specific surface water hazard has been identified on the site and, therefore, that no special mitigation in relation to the management of surface water flood risk is likely to be required in order to enable development to proceed.

Q41. Is it clear to decision-makers, developers and local communities how the design will “take account of impacts on the Forest of Bowland AONB”?

Council’s Response

1. Yes, it is clear that the design will be required to “take account of impacts on the Forest of Bowland AONB”, but exactly how the design will do this will not be known until the designer has undertaken further work to formulate detailed proposals for a planning application, in consultation with the Council at the pre-application stage. Document La005 – ‘Forest of Bowland Landscape Character Assessment (2009)’ contains ‘guidelines for managing landscape change’, which help to clarify how proposals may take account of impacts on the AONB. In addition, on page 36 of document La002 – ‘Forest of Bowland AONB Management Plan (2014 – 2019)’, Lancashire County Council’s AONB Unit states that it will provide advice to decision-makers, developers and local communities based on those guidelines.

Q42. What is the justification for requiring an assessment of the site’s archaeological interest on this site, but not others within Bentham?

Council’s Response

1. North Yorkshire County Council’s archaeology service has advised that there may be some archaeological interest in the site and has recommended, therefore, that requirements for an archaeological assessment should be attached to any allocation. The archaeological service has provided advice on other sites within Bentham, but none are of similar interest. Therefore, no similar recommendation has been made with respect to any other site and no similar requirement has been attached to any other allocation.

Issue 5 – Strategy for Glusburn & Crosshills (Policy SP8)

SC085 – Land at Malsis

Q1.What is the current status regarding development proposals for the site?

Council’s Response

1. A full planning application (ref 32/2016/17097) for conversion and restoration of Malsis Hall to create care facility (use class C2) including demolition of existing extensions and construction of new extensions, upgrading and re-opening of former sports facilities and residential development of 67 dwellings within grounds (including conversion of listed lodge building to dwellinghouse) was granted consent on 14 August 2018. Works have commenced on site by the developer Seddon Homes.

Q2.It is clear to decision-makers, developers and local communities what is proposed for the site under the heading “an element of C2 institutional and/or C3 residential?

Council’s Response

1. Yes. From previous discussions with the developers of this site, there was a clear intention to incorporate a mix of C2 and C3 uses on the site. The planning consent for the site has established that the care facility (C2 use) will be within the main Malsis Hall and the C3 use will be the construction of 67 dwellings in the grounds of Malsis Hall.

Q3.In contrast to other allocations, why does Policy SP8 set out a minimum number of dwellings for the site? Is it clear how many dwellings will be permitted?

Council’s Response

1. Policy SP8 sets out a minimum number of dwellings for the site because the density is to be determined at planning application stage. The setting out of a minimum number of dwellings was also to allow the exact mix of C2 institutional and C3 residential uses to be similarly determined. In combination with site reference SC037(a), the stated minimum number of 33 dwellings in Policy SP8 would be sufficient to meet the housing growth guideline for Glusburn & Crosshills, as set out in Policy SP4.

Q4.How have the effects of residential development on the integrity of the South Pennine Moors Phase 2 SPA been considered, having particular regard to loss of habitat and recreational disturbance?

Council’s Response

1. In the development principles for this site, it is noted that the site is within the 2.5km buffer zone of the South Pennine Moors SAC & Phase 2 SPA. In order to relieve recreational pressure on the SAC & Phase 2 SPA, the site is to include extensive areas of green infrastructure, much of which will be usable to the future residents of these dwellings and also the general public. A Public Right of Way will be created through the site to link to existing Public Rights of Way on Malsis Lane to the south and High Corn Mill to the northeast. These linkages are specifically intended to sufficiently reduce recreational disturbance on the South Pennine Moors by providing walking opportunities of considerable distance both on and leading from the site as a viable alternative to recreational usage of the South Pennine Moors. The potential for habitat loss on this site was discussed as part of a meeting with a Natural England representative in February 2018.

There is not thought to be an impact of in terms of habitat loss, as no protected bird species from the SPA are believed to utilise this site for breeding or feeding purposes.

Q5.Has an assessment been carried out to determine whether or not foraging SPA species are using the site?

Council's Response

1. There has not been a requirement to carry out such an assessment for this site. As referred to in the Habitat Regulations Assessments, HR002 and HR003, the qualifying features for the South Pennine Moors SPA (Phase 2) are A098 *Falco columbarius*; Merlin (Breeding) and A140 *Pluvialis apricaria*; European golden plover (Breeding). As part of a meeting with a Natural England representative in February 2018, it was stated that neither bird species are thought to utilise this site as a feeding site, based on previous observations and assessments on the site. Natural England has hence not requested such an assessment to be undertaken in its representations as part of the draft local plan's progression.

Q6.Is it clear to decision-makers, developers and local communities what is required in the provision of "extensive areas of green infrastructure"? Is the policy effective in this regard?

Council's Response

1. Yes, it is clear to decision-makers, developers and local communities what is required in the provision of "extensive areas of green infrastructure", and the policy is effective in this regard. The provision of green infrastructure has numerous functions on this site. As set out in the relevant development principle, it is viewed that the site has the capacity to accommodate extensive areas of green infrastructure to sufficiently reduce recreational pressure on the South Pennine Moors SAC & Phase 2 SPA, and also to protect the parkland setting of the Grade II Listed Buildings on site. The further intention of the development principle is that the layout and design of the areas of green infrastructure is to be discussed with regards to the provisions of Policy INF3 and the Council's Playing Pitch Strategy, Open Space Assessment and Built Sports Facilities Strategy 2016 (In012).

Q7.What is the fluvial and/or surface water hazard identified in the supporting text to Policy SP8? 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 vast majority of Site SC085 (12.66ha) is in Flood Zone 1 (just under 91%), with a narrow area of Flood Zones 2 and 3a associated with a watercourse on the northern boundary of the site, which falls within the green infrastructure area identified within this site and as described within the development principles. It is therefore expected that all the built development can avoid all areas of Flood Zone 2 and 3.
3. The Council's Strategic Flood Risk Assessment (SFRA) (FI002) states that the site can consider layout and design to avoid flood risk areas. The site is greater than one hectare in area and hence by the recommendations of the SFRA, it requires a Flood Risk Assessment. A 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 SFRA, which states that all development proposals above one hectare 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 SC085 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).

Q8. Based on the constraints identified in the supporting text to Policy SP8, is the site deliverable?

Council's Response

1. Yes, the site is deliverable. This is clearly evidenced by the planning permission currently being implemented on the site.

SC037(a) – Land at Ashfield Farm

Q9. Is the allocation a brownfield or greenfield site? How was this taken into account in the site selection process?

Council's Response

1. The allocation is a brownfield site, but is not . From the relevant sustainability appraisal assessment for this site (SA004), it is stated that "the site is on the edge of the settlement on brownfield land". There are existing buildings on the

site. The original size of the submitted SHLAA site was significantly larger (13.06 ha) than the size of the allocated site (0.79ha). The size of the original SHLAA site was reduced to the extent of the allocation site because it is the only part of the site that is within Flood Zone 1.

Q10.Is it clear to decision-makers, developers and local communities what is expected in relation to the management of surface water run-off?

Council's Response

1. Yes. The management of any surface water run-off is to be in accordance with standard building regulations for all allocated sites in the local plan area. There is no reference to the management of surface water run-off in the development principles for this site, in terms of particular requirements over and above what is required elsewhere. The sustainability appraisal assessment for this site (SA004) states that "the site boundary excludes areas of Flood Zone 2 and 3a but has a small area at risk of surface water flooding around the existing farm buildings". This assessment was based on the original site size submitted to the Council. The Strategic Flood Risk Assessment (FI001) states on page 9 that the percentage area of surface water flood risk on the reduced site size is zero.

Issue 6 – Strategy for Ingleton (Policy SP9)

IN006 – CDC Car Park, Backgate

Q1.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 current use of the site is for car parking, but the Council's Property Team report that it is severely underutilised. This site is one of two car parking areas in Ingleton, and hence it is not considered that the proposed allocation will have a detrimental effect on the availability of car parking in the area. The other much larger public car parking area at the Ingleborough Community Centre has 118 spaces and The Property Team report that this is not used to its full capacity. The Backgate car park has 43 parking spaces.

Q2.Is it clear to decision-makers, developers and local communities what the relevant listed buildings and conservation areas under Policy SP9?

Council's Response

1. It is accepted that the policy can be clearer with regards to the specific heritage assets that are relevant for site IN006 under Policy SP9. Whilst the

conservation area boundaries are present on the submission policies maps, and details on the proximity of listed buildings and conservation areas can be sourced via an enquiry to the Council and/or Historic England, it may be clearer to specify these heritage assets in the development principles for the site (via a main modification to the local plan). Alternatively the Council could show the listed buildings on the submission policies map, in addition to the conservation areas which are already shown.

Proposed Modification

<p>Page 101 of the submission local plan: An amendment to the first development principle for Site IN006 as follows:</p>
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<p>Siting and design of development on the site to conserve the significance of heritage assets (conservation area and listed buildings) on and adjacent to the site and their settings <u>(the grade II listed building to the west of the site: Panwell Cottage, Back Gate; and Ingleton Conservation Area).</u>"</p>
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Q3.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 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. All of the site lies within Flood Zone 1. The allocation is consistent with paragraph 100 of the NPPF. 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). An area of medium surface water flood risk is identified in the council's strategic flood risk assessment maps (FI002), and it can be mitigated through design, layout, landscaping and SUDS. A development principle for this site (page 101 of the submitted local plan) states that: *"a flood risk assessment is required, as a fluvial and/or surface water hazard has been identified within part of the site area. Proposals for development on this site will incorporate Sustainable Urban Drainage Systems (SUDS), unless this is not possible or feasible"*. Details of the site selection process for IN006 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).

IN010 – Caravan Park, north of River Greta

Q4. Is it clear to decision-makers, developers and local communities what the relevant listed buildings and conservation areas are under Policy SP9? Does the site fall within a conservation area?

Council's Response

1. It is accepted that the policy can be clearer with regards to the specific heritage assets that are relevant for site IN010 under Policy SP9. Whilst the conservation area boundaries are present on the submission policies maps, and details on the proximity of listed buildings and conservation areas can be sourced via an enquiry to the Council and/or Historic England, it may be clearer to specify these heritage assets in the development principles for the site (via a main modification to the local plan). Alternatively the Council could show the listed buildings on the submission policies map, in addition to the conservation areas which are already shown. The Ingleton Conservation Area Appraisal document (He010) shows that the site is not within the conservation area.

Proposed Modification

Page 101 of the submission local plan: An amendment to the first development principle for Site IN010 as follows:

Siting and design of development on the site to conserve the significance of heritage assets ~~(conservation area and listed buildings)~~ on and adjacent to the site and their settings (the grade II listed bridges to the south and north of the site: Ingleton Viaduct and Bridge to the north east of Broadwood Cottage, Bridge End respectively; and Ingleton Conservation Area)."

Q5. Is it clear to decision-makers, developers and local communities what the provision of "social infrastructure" would entail for the purposes of Policy SP9? Is the policy effective in this regard?

Council's Response

1. It is proposed to remove the development principle in this case, because there is no green infrastructure on this site. A main modification is proposed as follows:

Proposed Modification

Page 101 of the submission local plan: The following development principle for site reference IN010 to be deleted:-

~~Opportunity to incorporate social infrastructure related to community parks and other green infrastructure~~ The development principle for site reference IN010 in relation to

social infrastructure is to be removed.

Q6.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 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). The original SHLAA site was 0.63ha and just under 20% was in Flood Zone 3a. The site area allocated is 0.35ha and the Council's Strategic Flood Risk Assessment maps (SFRA) (FI002) shows that just under 96% of the site is within Flood Zone 1 with a small area (just over 4%) within Flood Zones 2 and 3a. It is therefore expected that all the built development can avoid all areas of Flood Zone 2 and 3.
2. Any flood risk on the site can be mitigated through design, layout, landscaping and SuDS. The third development principle for this site requires a flood risk assessment and the incorporation of SUDS within any proposals on the site. This development principle complies with recommendation C consider site layout and design in section A4 of the Council's SFRA (FI001), which states that where less than 10% of any residential site is within Flood Zone 3a should undergo a review of site layout and/or design at the development planning stage and a site specific FRA would be required to inform on site layout and design. It is therefore considered that the allocation is consistent with paragraph 100 of the Framework. Details of the site selection process for site reference IN010 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).

Q7.How was the effect of residential on the character and form of the settlement been considered, having particular regard to the provision of new housing on the western side of the River Greta?

Council's Response

1. The site currently detracts from the visual built character of Ingleton on a prominent site underneath the viaduct and its redevelopment provides an

opportunity for improvement to the character and form of the settlement. One of the development principles for this site considers the effect of residential on the character and form of the settlement. It states: “the site is in a prominent location. Development proposals should 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”. Development of this site would relate well to the current form of the settlement. The site is surrounded on three sides by the built form, with a road on the boundary of the fourth side to the west. It is hence a brownfield site which can be improved by sensitive and appropriate design.

IN028 – Land between Ingleborough Park Drive and Low Demesne

Q8.Is it clear to decision-makers, developers and local communities what the relevant listed buildings and conservation areas are under Policy SP9?

Council’s Response

1. It is accepted that the policy can be clearer with regards to the specific heritage assets that are relevant for sites under Policy SP9. Whilst the conservation area boundaries are present on the submission policies maps, and details on the proximity of listed buildings and conservation areas can be sourced via an enquiry to the Council and/or Historic England, it may be clearer to specify these heritage assets in the development principles for the site (via a main modification to the local plan). Alternatively the Council could show the listed buildings on the submission policies map, in addition to the conservation areas which are already shown

Proposed Modification

Page 102 of the submission local plan: An amendment to the first development principle for Site IN028 as follows:

Siting and design of development on the site to conserve the significance of heritage assets ~~(listed buildings and conservation area)~~ near the site and their settings ~~(the grade II listed buildings to the north-west and west of the site: Police Station, High Street and Panwell Cottage, Back Gate respectively; and Ingleton Conservation Area).~~”

Q9.Is it clear to decision-makers, developers and local communities what the provision of “social infrastructure” would entail for the purposes of Policy SP9? Is the policy effective in this regard?

Council Response

1. It is proposed to remove the development principle in this case, because there is no specific area of green infrastructure identified on this site and the development principle for proposals on this site to accord with Policy INF3 in respect of sport/open space is sufficient to ensure that open space requirements for the site are met. A main modification is proposed as follows:

Proposed Modification
Page 102 of the submission local plan: Policy SP9 , Site Ref IN028 -The following development principle for site reference IN028 to be deleted:-. Opportunity to incorporate social infrastructure related to community parks and other green infrastructure

Q10.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 plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property?

Council Response

1. The site is 100% within Flood Zone 1 and there is no surface water risk identified. The development principle for a Flood Risk Assessment was included because the site was originally larger than 1 ha. However the site area was reduced to mitigate impact on nearby heritage assets and is now below 1 ha. It is proposed therefore to delete the part of the development principle related to a flood risk assessment in this case, as it is not necessary. The allocated site is also below 1 hectare in area. A main modification is therefore proposed as follows:

Proposed Modification
Page 102 of the submission local plan: Policy SP9, Site Ref IN028 -The development principle for site reference IN028 in relation to flood risk assessment to be deleted:-. “ A Flood Risk Assessment is required, as a fluvial and or surface water hazard has been identified within part of the site area. Proposals for development on this site will incorporate Sustainable Urban Drainage Systems (SUDS), unless this is not possible or feasible”

Q11.What is the area of biodiversity value in the western part of the site? How has this been assessed to determine the suitability of the site for new

residential development?

Council Response

1. There is an area of biodiversity and landscape character value in the western portion of the original submitted SHLAA site area. It is a scenic area of rough grassland which holds small areas of standing water at times, and may attract amphibian and bird life. This area has not been included in the allocated site area. A precautionary approach has therefore applied in requesting a Biodiversity Appraisal for this site.

IN029 – Land east of New Village and South of Demense

Q12.Is it clear to decision-makers, developers and local communities what the relevant listed buildings and conservation areas are under Policy SP9?

Council's Response

1. It is accepted that the policy can be clearer with regards to the specific heritage assets that are relevant for sites under Policy SP9. However in this case it is considered that site IN029 is too far away from Ingleton conservation area to the north to warrant a development principle conserving this heritage asset in the policy. In addition the intervening built form between the site and the conservation area boundary further lessens the impact any new development would have on the setting of this heritage asset. There are no listed buildings near the site.

Proposed Modification
Page 103 of the submission local plan: Policy SP9 , Site Ref IN029 -The following development principle for site reference IN029 to be deleted: “Siting and design of development on the site to conserve the significance of heritage assets (listed buildings and conservation area) near the site and their settings.”

Q13.Is it clear to decision-makers, developers and local communities what the provision of “social infrastructure” would entail for the purposes of Policy SP9? Is the policy effective in this regard?

Council's Response

1. Social infrastructure in the case of site IN029 relates to the provision of a green infrastructure area through the centre of the allocated site to allow connection with the local Public Right of Way network. To make it clearer, it is proposed to alter this development principle as follows:

Proposed Modification
Page 103 of the submission local plan: Policy SP9 Site Ref IN029 -The development principle in relation to social infrastructure is modified to state the following: “Opportunity to incorporate social infrastructure related to community parks and other <u>the provision of a green infrastructure area through the centre of the allocated site to allow connection with the local Public Right of Way network.</u> ”

Q14.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 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). The Council's Strategic Flood Risk Assessment maps (SFRA) (FI002) shows that there is approximately 11% of the original SHLAA site area of 15.05ha within FZ3a. The site allocation area of 1.196ha is entirely within Flood Zone 1. Any flood risk on the site can be mitigated through design, layout, landscaping and SUDS. The third development principle for this site requires a flood risk assessment and the incorporation of SUDS within any proposals on the site. This development principle complies with recommendation D, section A4 of the Council's SFRA (FI001), which states that any sites 100% within Flood Zone 1 that are equal to or greater than 1 hectare in area must be accompanied by a site-specific Flood Risk Assessment to determine vulnerability to flooding from other sources as well as fluvial. It is therefore considered that the allocation is consistent with paragraph 100 of the Framework. Details of the site selection process for site reference IN029 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).

Q15.How has the effect of new residential development on the character and appearance of the area been considered through the allocation process, having particular regard to landscape sensitivity?

Council's Response

1. A substantial section of the original site has not been included in the final site allocation because this excluded southern part of the site extends further into

open countryside. It is also noted in the development principles that the allocated site is in a prominent location, and that development proposals should 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.

IN049 – Former Playing Fields, Ingleton Middle School

Q16. Is it clear to decision-makers, developers and local communities what type of housing is proposed on the site?

Council's Response

1. North Yorkshire County Council has indicated to Craven District Council that they are looking at this site for potential Extra Care housing provision in Ingleton. Craven District Council has not received an update from the County Council to date on a confirmation that this site is definitely been pursued for Extra Care provision. Hence, the number of dwellings generated is based on non-extra care residential housing, but it is also acknowledged at present that the site provides potential for the provision of extra care accommodation.

Q17. What is the current status regarding the playing fields associated with the former school? Is the allocation consistent with paragraph 74 of the NPPF concerning the development of existing open space, sports and recreational buildings and land, including playing fields? How does the proposed allocation meet the tests set out in the Framework?

Council's Response

1. The playing fields are not currently in use. Yes, the allocation is consistent with paragraph 74 of the NPPF. This is because the loss of recreational area resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location. As detailed in Inset Map No. 6 for Ingleton, there are extensive areas proposed for open space, civic space, sport and recreation facilities proposed adjacent to this site. The Craven Playing Pitch Strategy (In013) has declassified this playing pitch as it is deemed surplus to requirements based on evidence produced in this document. As the current playing fields are surplus to requirements, the proposed allocation hence meets the tests set out in the NPPF.

Q18. Is it clear to decision-makers, developers and local communities what the relevant listed buildings and conservation areas are under Policy SP9?

Council's Response

1. It is accepted that the policy can be clearer with regards to the specific heritage assets that are relevant for sites under Policy SP9. Whilst the conservation area boundaries are present on the submission policies maps, and details on the proximity of listed buildings and conservation areas can be sourced via an enquiry to the Council and/or Historic England, it may be clearer to specify these heritage assets in the development principles for the site (via a main modification to the local plan). Alternatively the Council could show the listed buildings on the submission policies map, in addition to the conservation areas which are already shown.

Proposed Modification

Page 103 of the submission local plan: An amendment to the first development principle for Site IN049 as follows:

Siting and design of development on the site to conserve the significance of <u>the heritage assets (listed buildings and conservation area) near the site and their settings (the grade II listed building to the west of the site: The Laurels, Laundry Lane).</u>
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Q19. Is it clear to decision-makers, developers and local communities what the provision of “social infrastructure” would entail for the purposes of Policy SP9? Is the policy effective in this regard?

Council’s Response

1. It is proposed to remove the development principle in this case, because there is no specific area of green infrastructure identified on this site and the development principle for proposals on this site to accord with Policy INF3 in respect of sport/open space is sufficient to ensure that open space requirements for the site are met. A main modification is proposed as follows:

Proposed Modifications

Page 103 of the submission local plan: Policy SP9, IN049 - The following development principle for site reference IN049 to be deleted:-.
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Opportunity to incorporate social infrastructure related to community parks and other green infrastructure

Q20. 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 the 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 the site is within Flood Zone 1. The SFRA assessment maps a small area of high risk of surface water flooding in the western part of the site. The flood risk on the site can be mitigated through design, layout, landscaping and SuDS. The third 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 that is 100% within Flood Zone 1 where surface water risk is considered to be significant enough to require investigation through 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 IN049 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 7 – Strategy for Gargrave (Policy SP10)

GA009 – Land off Eshton Road

Q1.What is the justification for the proposed site boundary, which excludes certain parcels of land to the rear of Eshton Road, but includes others?

Council's Response

1. The site area put forward in the Strategic Housing Land Availability Assessment (SHLAA) is an irregular shape because it is the land that has been made available for development by the landowner, which in this case is North Yorkshire County Council, the parcels of 'excluded' land to the rear of Eshton Road are not available for development.

Q2.What is the justification for identifying the site for extra care units?

Council's Response

1. North Yorkshire County Council has previously informed Craven District Council that this site is in their ownership and the one that they wish to proceed with for extra care provision in Gargrave. North Yorkshire County Council has looked at

other potential sites in Gargrave and has confirmed that this site represents the most suitable option available to them.

Q3.How has the accessibility of the site by non-car modes been taken into account?

Council's Response

1. The site is close enough to the village centre to justify walking and cycling to and from the site. Walking to the site boundary from the village centre takes approximately 10-12 minutes, and cycling would take approximately 4-5 minutes. There is a well maintained footpath along Eshton Road connecting to the site entrance. There is a bus stop within 10 minutes walking distance of the site, which can connect passengers to Skipton and onwards.

Q4.What is the current status regarding the Gargrave Neighbourhood Plan? Is the site identified for residential development in the NP?

Council's Response

1. Gargrave Parish Council formally submitted the Gargrave Neighbourhood Plan to Craven District Council in June 2018, under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012. The neighbourhood plan was subject to public consultation between June/ August 2018. Representations were invited and received during this six week public consultation period. The neighbourhood plan will guide new development proposals in the neighbourhood area up to 2032. The neighbourhood plan is to go under its examination at a yet unspecified date later in 2018.
2. The site is not identified for residential development in the neighbourhood plan, however there is recognition of the site as a preferred site for Extra Care provision in the Craven Local Plan. The site is identified in the neighbourhood plan's policies map as a "Craven Draft Local Plan Site Allocation Extra Care Homes". In Section 6.1.28 of the neighbourhood plan, the following is written: *"the emerging new Craven Local Plan identifies a site south of Eshton Road (GA009) as a housing allocation specifically to provide extra care accommodation. North Yorkshire County Council have indicated to Craven District Council that this scheme would be delivered within the next 5 years (between 2017 and 2022). However, as the site did not come forward during or through the preparation of the NDP it has not been included as a specific site allocation in the Gargrave NDP."*

Q5.Is it clear to decision-makers, developers and local communities what the relevant listed buildings and conservation areas are under Policy SP10?

Council's Response

1. It is accepted that the policy can be clearer with regards to the specific heritage

assets that are relevant for sites under Policy SP10. Whilst the conservation area boundaries are present on the submission policies maps, and details on the proximity of listed buildings and conservation areas can be sourced via an enquiry to the Council and/or Historic England, it may be clearer to specify these heritage assets in the development principles for the site (via a main modification to the local plan). Alternatively the Council could show the listed buildings on the submission policies map, in addition to the conservation areas which are already shown.

Proposed Modification

Page 106 of the submission local plan: An amendment to the first development principle for Site GA009 as follows:

<p>“Siting and design of development on the site to conserve the significance of the heritage assets (conservation area) <u>on near the site and their settings (the grade II listed bridge to the east of the site: Ray Bridge No. 173, Leeds and Liverpool Canal; and Gargrave Conservation Area).</u>”</p>
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Q6.Is it clear to decision-makers, developers and local communities what the provision of “social infrastructure” would entail for the purposes of Policy SP10? Is the policy effective in this regard?

Council’s Response

1. Social infrastructure in the case of site GA009 relates to the possible provision of community recreational facilities adjacent to the Leeds & Liverpool canal which can be utilised by extra care residents. This provision would relate to Policy ENV11 (The Leeds & Liverpool Canal). Part (c) of Policy ENV11 states that development adjacent to, adjoining or which is likely to impact upon the character of the Leeds & Liverpool Canal will be expected to improve access to, along and from the waterway, including for wheelchair-users, people with limited mobility and people with other disabilities, and improve the environmental quality of the waterway corridor. As some of the residents of the Extra Care units may have limited mobility, it is the contents of Part (c) of Policy ENV11 which are relevant as part of a main modification which seeks to make it clear to decision-makers, developers and local communities what the provision of “social infrastructure” would entail on this site for the purposes of Policy SP10.

Proposed Modification

Page 106 of the submission local plan: Policy SP10, Site Ref GA009 - The development principle in relation to social infrastructure is modified to state the following:

“Opportunity to incorporate social infrastructure related to a community parks facility for extra care home residents and other green infrastructure adjacent to the Leeds & Liverpool Canal. These community facilities will be expected to improve access to, along and from the waterway for people with limited mobility, and contribute to the improvement of the environmental quality of the waterway corridor.”

Q7.What is the fluvial and/or surface water hazard identified in the supporting text to Policy SP10? Is the allocation consistent with paragraph 100 of the NPPF, 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). The Council’s Strategic Flood Risk Assessment maps (SFRA) (FI002) shows that the majority of this site is located within Flood Zone 1, with an estimated 17.4% of the site in Flood Zone 3a (the southern section on the boundary of the Leeds-Liverpool canal) which falls within the green infrastructure area identified on the site. It is expected that all built development on the site can be accommodated within Flood Zone 1. Any flood risk on the site can be mitigated through design, layout, landscaping and SuDS. In this case, an area of green infrastructure is designated to cover the flood risk area. The third development principle for this site requires a flood risk assessment and the incorporation of SUDS within any proposals on the site, where possible. This development principle complies with recommendation D, section A4 of the Council’s SFRA (FI001), which states that any sites 100% within Flood Zone 1 that are equal to or greater than 1 hectare in area must be accompanied by a site-specific Flood Risk Assessment to determine vulnerability to flooding from other sources as well as fluvial. It is therefore considered that the allocation is consistent with paragraph 100 of the Framework. Details of the site selection process for site reference GA009 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).

GA031 – Land West of Walton Close

Q8.How has the accessibility of the site by non-car modes been taken into account?

Council’s Response

1. The site is close enough to the village centre to justify walking and cycling to and from the site. Walking to the site boundary from the village centre takes approximately 10-12 minutes. Cycling to the village centre from the site takes approximately 4-5 minutes. There is a bus stop with bus services to Skipton and beyond within 15 minutes walking distance of this site.

Q9.What is the current status regarding the Gargrave Neighbourhood Plan? Is the site identified for residential development in the NP?

Council's Response

1. Gargrave Parish Council formally submitted the Gargrave Neighbourhood Plan to Craven District Council in June 2018, under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012. The neighbourhood plan went under public consultation between June/ August 2018. Representations were invited and received during this six week public consultation period. The neighbourhood plan will guide new development proposals in the neighbourhood area up to 2032. The neighbourhood plan is to go under its examination at a yet unspecified date later in 2018.
2. Yes, the site is identified for residential development in the neighbourhood plan. It is referred to as site allocation G2/4, Land to the west of Walton Close. The site has an area of 1.38 hectares and a capacity of 44 dwellings, which are the same details as in the Craven Local Plan for the site. The neighbourhood plan states that "this site provides a major development opportunity for Gargrave and is the largest site allocation in the NDP".

Q10.Is it clear to decision-makers, developers and local communities what the relevant listed buildings and conservation areas are under Policy SP10?

Council's Response

1. It is accepted that the policy can be clearer with regards to the specific heritage assets that are relevant for sites under Policy SP10. Whilst the conservation area boundaries and scheduled ancient monuments are present on the submission policies maps, and details on the proximity of ancient monuments, listed buildings and conservation areas can be sourced via an enquiry to Craven District Council and/or Historic England, it may be clearer to specify these heritage assets in the development principles for the site (via a main modification to the local plan). Alternatively the Council could show the listed buildings on the submission policies map, in addition to the conservation areas and scheduled ancient monuments which are already shown.

Proposed Modification
Page 107 of the submission local plan: An amendment to the first development principle for Site GA031 as follows: “Siting and design of development on the site to conserve the significance of heritage assets (conservation area and scheduled ancient monuments) near the site and their settings <u>(the scheduled ancient monument to the west of the site: Moated site west of Paget Hall; the grade II listed building to the north-west of the site: Milton House, Marton Road; and Gargrave Conservation Area).</u> ”

Q11.Is it clear to decision-makers, developers and local communities what the provision of “social infrastructure” would entail for the purposes of Policy SP10? Is the policy effective in this regard?

Council’s Response

1. It is proposed to remove the development principle in this case, because there is no specific area of green infrastructure identified on this site and the development principle for proposals on this site to accord with Policy INF3 in respect of sport/open space is sufficient to ensure that open space requirements for the site are met. A main modification is proposed as follows:

Proposed Modification
Page 107 of the submission local plan: Policy SP10 , Site Ref GA031 -The following development principle for site reference GA031 to be deleted:- Opportunity to incorporate social infrastructure related to community parks and other green infrastructure

Q12.What is the fluvial and/or surface water hazard identified in the supporting text to Policy SP10? Is the allocation consistent with paragraph 100 of the NPPF, 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). The Council’s Strategic Flood Risk Assessment maps (SFRA) (FI002) shows that the 100% of the site is within Flood Zone 1 with no risk of surface water flooding identified. The third development principle for this

site requires a flood risk assessment and the incorporation of SUDS within any proposals on the site. This development principle complies with recommendation D, section A4 of the Council's SFRA (FI001), which states that any sites 100% within Flood Zone 1 that are equal to or greater than 1 hectare in area must be accompanied by a site-specific Flood Risk Assessment to determine vulnerability to flooding from other sources as well as fluvial. However, it needs to be made clearer in this development principle that there is no actual flood risk identified on this site, and a modification to that effect is proposed below. It is therefore considered that the allocation is consistent with paragraph 100 of the Framework. Details of the site selection process for site reference GA031 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).

Proposed Modification

Page 107 of the submission local plan – Policy SP10, Site Ref GA031 - the development principle relating to flood risk is to be changed to read:
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<p>“A Flood Risk Assessment is required, as a fluvial and/or surface water hazard has been identified within part of the site area <u>specifically as the site is over 1 hectare in area.</u> There is currently no fluvial or surface water risk identified on the site. Proposals for development on this site will incorporate Sustainable Urban Drainage Systems (SUDS), unless this is not possible or feasible.”</p>

Issue 8 – Strategy for Tier 4A and 4B Villages (Policy SP11)

BU012 – Richard Thornton's CE Primary School, Burton-in-Lonsdale

Q1. What is the justification for restricting new build development to the rear of the site? Is this clear to decision-makers, developers and local communities?

Council's Response

1. Justification for restricting new build development to the rear of site BU012 lies in the need to conserve the significance and setting of the grade II listed building on site (the main school building) and the Burton in Lonsdale Conservation Area. Site development principles one, three and five, which relate to the conservation of the heritage assets on site provide clarity for decision-makers, developers and

local communities as to why any new build should be restricted to the less sensitive areas of the site.

BR016 – Land West of Gilders, Langholme Skipton Road, Low Bradley

Q2. How has the site area been defined, and how will it create a strong boundary to the north of the settlement?

Council's Response

1. The site area for BR016 has been identified from a larger SHLAA site which performed satisfactorily during sustainability appraisal (SA004) and the residential site selection process (SA005). The Conservation Area Appraisal for Low Bradley identifies the land to the north of the proposed allocation site as making a strong contribution to the character and setting of the conservation area. As such the site boundary was drawn to keep away from this more sensitive area of land to the north. It is agreed that for clarity and to ensure that a strong boundary to the north of the settlement is created, an additional development principle should be included in the policy for the site requiring would be developers to retain existing stone boundary walls and provide new stone boundary walls along the northern and western boundaries of the site.

Proposed Modification

Page 110 of the submission local plan: Policy SP11, Site Ref BR016 An additional development principle as follows:

"The existing dry stone boundary walls will be retained. New dry stone boundary walls will be created along the northern and western boundaries of the site to help establish a definitive new urban edge to the village".

SG014 – Land at Lords Close, Giggleswick

Q3. Is the allocation consistent with paragraph 74 of the Framework concerning development on existing open space, sports and recreational buildings and land, including playing fields? How does the allocation meet the tests set out in the Framework?

Council's Response

1. Site SG014 has been allocated for residential development to contribute to the housing requirement for Giggleswick. The benefits of developing the site for housing will be to help deliver a new 3G AGP provision in the district, which is identified as a shortage in the Council's Playing Pitch Strategy 2016 (In013). The site is owned by Giggleswick School, and constitutes a small part of one of their 8 playing pitches within the settlement. The school has aspirations to develop a full size 3G AGP on the western edge of the settlement for which will

also be available for community use. The funding of this needed site will be addressed by the release of part of Lord's Playing Field, SG014. As such the allocation of this site is consistent with paragraph 74 of the Framework and meets its tests in that it will not result in an overall loss of playing fields in Giggleswick; rather it will enable the development of a 3G AGP which will benefit the wider community. Sport England has not objected to the release of this part of Lord's Playing Field for housing.

Q4. Based on the answer to question 3 above, is the site deliverable?

Council's Response

1. In their response to the publication draft local plan Giggleswick School have expressed confirmation that the Lords Close site (SG014) is available for residential development. They state that "the land is entirely within the ownership of the School, which is a 'willing landowner' that has expressed an intention to sell the land for development. The land is not subject to any legal or ownership problems, such as ransom strips or tenancies, which might present an obstacle to the early delivery of the development. As such, the land is available for development in the short term. Subject to the allocation of the land within the adopted development plan, the Schools intention is to secure outline planning permission for its residential development. The School will thereafter market and sell the land to an appropriate housebuilder. Mindful of the scale of the development, it is envisaged that the new homes can be delivered in a single phase within two to three years." The School have also stated that "the development of new homes at Lord's Close will provide the financial resources required to deliver improvements to the School's campus. This could entail improvements to the School's sports facilities, including the provision of a 3G AGP".
2. As such the Housing Trajectory 2012 to 2032 (2018 Update for Submission) (SD004) estimates that this site will be delivered in years 2-3 (2020-2022) of the plan period.

CN006 – Station Works, Cononley

Q5. What is the current status regarding redevelopment proposals for the site?

Council's Response

1. The Station Works Mill building had been largely vacant for several years before the planning application was submitted in 2016 and the few remaining businesses relocated shortly after. Full planning permission was granted in January 2018 (with executed S106 Agreement on affordable housing and open space contributions). Work commenced on site in March 2018. A planning

application amending the approved scheme was approved in July 2018 (Ref 2018/19329) increasing the total number of dwellings on the site to 94. At September 2018, the conversion and extension of the Mill building is well underway and construction of the new build dwellings on the site is also in progress. Completion of the scheme is expected within 5 years. The inclusion of this site in the Housing Trajectory for delivery within 5 years is therefore justified.

Q6. Is it clear to decision-makers, developers and local communities what uses are permitted across the site and where they are to be located? Is the policy effective in this regard?

Council's Response

1. Yes it is clear to decision-makers, developers and local communities what uses are permitted across the site as the policy specifically sets out C3 uses will be generated, along with the provision of 1,445sqm of B1 commercial floorspace, which can be co-located. It is acknowledged that the policy is less clear with regards to where the residential and employment elements of the site are to be located; however it is considered that their location within the sites is a matter for the developer as a commercial decision. The current scheme that is being implemented on the site retains the Mill and is converting and extending it for C3 use. The B1 industrial use is being provided to the rear of the Mill, adjacent to the railway line, and the provision of 46 dwellings will be located on the remainder of the site.

Q7. How has the total number of dwellings been determined, taking into account the necessary retention of the mill buildings?

Council's Response

1. The total site area is 2.168ha. An area of 1,445sqm for B1 use provision was subtracted from the total site area, leaving a remaining site area of 2.02ha for housing. A density of 46 dwellings per hectare (dph) was applied, this being a higher density than the 32dph set out in Policy SP3: Housing Mix and Density, to take account of the retention and redevelopment of the mill buildings. The density of 46dph was derived from the approved (31/01/18) and implemented scheme which gives the Council an accurate reflection of what can be achieved on site.

Q8. What assessments have been carried out to determine the feasibility and viability of converting the mill buildings? Is the site deliverable?

Council's Response

1. As part of the approved and commenced planning application for the site (under planning ref. 21/2016/17019), a flood risk assessment, transport assessment,

design and access statement, heritage statement, landscape and visual impact assessment, contamination report, travel plan, ecological report, and tree report have all been carried out by the applicant to determine the feasibility and viability of redeveloping the site, including the conversion and extension of the mill buildings. The assessments carried out by the applicant in support of the site show that it is viable and feasible. The site is clearly deliverable as it is under construction and progressing. As such the Housing Trajectory 2012 to 2032 (2018 Update for Submission) (SD004) estimates that this site will be delivered in years 1-3 (2019-2022) of the plan period.

Q9. What is the fluvial and/or surface water hazard identified in the supporting text to Policy SP11? 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). The Council's Strategic Flood Risk Assessment maps (SFRA) (FI002) show that the majority of this site (just over 88%) is located within Flood Zone 1, with a small area of Flood Zone 3a running along the eastern boundary of the site (5%) and pockets of Flood Zone 3b (4.4%) in the north-eastern and south-eastern corners. In terms of surface water flood risk, as identified by the SFRA assessment maps the small sections in the middle part of the site are at a low risk of surface water flooding. The flood risk on the site can be mitigated through design, layout, landscaping and SuDS. Therefore this development principle complies with recommendation D, section A4 of the Council's SFRA (FI001), which states that all development proposals within Flood Zone 2 or Flood Zone 3a, and any sites within Flood Zone 1 that are equal to or greater than 1 hectare in area and/or where surface water flood risk is considered to be significant enough as to require investigation, must be accompanied by a site-specific Flood Risk Assessment to determine vulnerability to flooding from other sources as well as fluvial. As such, it is considered that the allocation is consistent with paragraph 100 of the Framework. Details of the site selection process for CN006 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).

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

