



The countryside charity
North Yorkshire

PO Box 189
York
YO7 9BL

www.cprenorthyorkshire.co.uk

Tel: 07983 088120
Email: info@cprenorthyorkshire.co.uk

Branch Chair
Jan Arger

Authority: Craven District Council

Type of consultation: Planning Application

Full details of application/consultation: 2021/23148/REM - Reserved matters application for residential development of 41 houses (submitted pursuant to approved planning reference 62/2017/18064 that authorises an employment led mixed-use development on the site).

At land at: Anley Crag Business Park, West of B6480 (Skipton Road) Settle

Type of response: Objection

Date of Submission: 27th August 2021

All responses or queries relating to this submission should be directed to the Secretary for the Trustees at the contact details shown above on this frontispiece.

All CPRE North Yorkshire comments are prepared by the charity using professional planners whose research and recommendations form the basis of this response in line with national CPRE policies.

External planning consultants used in this response:



KVA Planning Consultancy
Katie Atkinson, BA (Hons), PGDip TP,
MA MRTPI

Comment

CPRE North Yorkshire (CPRENY) welcomes the opportunity to comment on this new application detailing Reserved Matters for the residential part of the overall development at land at the Anley Crag Business Park.

CPRENY objected to the development of this site in open countryside and within the setting of the Yorkshire Dales National Park (YDNP) previously when the proposals were submitted in outline in 2017. They also objected to the allocation of the site (reference SG064) in the newly adopted Craven Local Plan. However, it is understood that the principle of development at this site has been established through the award of outline planning permission and subsequent allocation for mixed use in the Local Plan. However, whilst that was accepted, CPRENY also objected to the previous application in April 2021 to a reserved matters application for the employment phase of the overall site. Despite receiving objections from ourselves, the Town Council, Craven Heritage Trust and Natural England and other statutory consultees requesting more information the proposal was approved following officer recommendation on 5th July 2021.

Given the fact that the adopted Craven Local Plan is still relatively new, CPRENY were surprised that the Council approved the application without receiving and being satisfied with the information required by the Local Plan Policy SP6. Simply because the site is allocated should not mean that the applicant is not required to meet the policy requirements.

CPRENY were previously concerned about the employment proposal in relation to the submission of insufficient information by the applicant – specifically regarding a lack of evidence of net gain for biodiversity, lack of information regarding any increased provision of green infrastructure across the site, lack of hydrological investigation and bird survey in relation to the impact on the Long Preston Deeps SSSI, lack of a heritage assessment in relation to Anley House and the Settle to Carlisle Railway Conservation Area, and the lack of an up to date flood risk assessment.

CPRENY object to the current proposals in the strongest possible terms. The current proposal seeks to gain planning consent for 41 dwellings across the remainder of the site. This is more than double the amount allocated via the new Local Plan and that approved at the outline stage and as such, is totally inappropriate for a rural countryside setting, with no services and facilities leading to unsustainable development which is contrary to the aims of the revised NPPF and also to the adopted Local Plan.

The applicant's Design and Access Statement (DAS) directs the reader to the landscape and visual impact assessment (LVIA) associated with the outline permission submitted in 2017. That LVIA did not consider a proposal of 41 residential units across the whole site. It considered the development of the site with circa 19 residential units, including open space provision. Due to the increased provision of proposed housing, there is now no open space provision across the residential site at all. Also, proposed screening via existing trees to the eastern perimeter of the site have been removed, meaning that the views both to and from the Yorkshire Dales National Park (YDNP) have been altered and should be reconsidered. Without such information, is it not possible to determine that this proposal will not detrimentally impact the setting of the YDNP and if not provided should be refused.

The applicant has not provided a comprehensive landscape plan for the entire site, including those requirements set out in the development brief for the site in Local Plan Policy SP6. Neither has information pertaining to increased green infrastructure been submitted including opportunities to deliver recreational walking opportunities relieving pressure on the Ingleborough Complex Special Area of Conservation. A landscape Masterplan should be submitted prior to determination of the proposals in order to ensure those required aspects are delivered alongside opportunities to ensure that adequate mitigation has been provided for the site. CPRENY believe that the increased size of the site and removal of trees alongside the lack of provision of green infrastructure and open space has lessened any perceived mitigation to such an extent that

a detrimental impact will occur as a result of the proposals. The revised (2021) NPPF now requires applications to incorporate biodiversity net gain across all development and advises on the need for trees both within and across sites (including tree lined streets) and as such, the current proposal fails in this regard.

In a similar vein, the increased built development will have a greater impact on the heritage assets in the vicinity, including Grade II Listed Anley House and the Settle to Carlisle Railway Conservation Area and their respective settings. This has not been considered at all in the applicants DAS and no updated heritage assessment has been considered.

Further, whilst providing a guide within the DAS, the applicant has suggested a flexible scheme where purchasers are able to select either a two or three bed layout. CPRENY feel this is inappropriate that should be led by an up-to-date assessment of local need which the Council are in control of.

There is also no discussion in the applicant's DAS regarding the provision of affordable units across the site. The Craven Local Plan Policy H2 provides that on greenfield sites, development of 11 dwellings or more will provide not less than 30% of new dwelling as affordable as well as discussion of size, type or tenure. The policy goes on to set out that *'development proposals that seek to provide a lower level of affordable housing contribution, either on or off site, will not be acceptable unless it can be clearly demonstrated that exceptional circumstances exist which justify a reduced affordable housing contribution.'* There have been no exceptional circumstances submitted to justify the provision of no or reduced affordable provision. No planning statement has been presented in any event to justify the increased number of units on this rural greenfield site.

The proposed finish to the dwellings is not considered to be in keeping with those dwellings in the surrounding settle area as three elevations are proposed to be rendered as opposed to stone. It is considered that this is contrary to Local Plan Policy ENV3 as good design sympathetic to local distinctiveness has not been fully considered.

The applicants submitted 'Sustainable Design and Construction Methods Statement' pays lip service to matters involved with sustainable design but does not offer any real information to conclude that the development will achieve a reduced carbon footprint and as such offers nothing to the planning proposal. For example, the paragraph entitled 'energy' states that the proposed buildings will be insulated. It provides no information regarding the type or level of insulation to be provided. There are multiple ways of reducing the carbon footprint of dwellings and none of these have been explored. The applicant has not even provided detail regarding whether a specific level of energy efficiency will be achieved in the provision of new building or meet a specific design code (e.g. BREEAM 'Very Good' as a minimum). Neither has the provision of Electric Vehicle Charging Points been detailed in the drawings, DAS or Sustainable Design Statement submitted in support of the proposal. Policy ENV3 requires 'sustainability' to be *'designed in so that development takes all reasonable opportunities to reduce energy use, water use and carbon emissions and to minimise waste, ensure future resilience to a changing climate and wherever possible to generate power through solar or other means in accordance with building regulations.'* Furthermore, as set out above, the application has changed and the outline LVIA is out of date. It is therefore not sufficient for the applicant to rely on that document within this statement in terms of the provision for biodiversity across the site. The proposal is completely contrary to the provisions of this policy.

The Council should be proactive in requiring the policy requirements (as a minimum) to be delivered when trying to achieve net-zero by 2050 in line with Government targets. Especially when the Council has declared a Climate Emergency and aims to be carbon-neutral by 2030 which is an even more ambitious target.

In conclusion, for the reasons set out in this representation, CPRENY strongly object to the proposal for 41 new residential units being delivered as part of this mixed-use site. The applicant has not provided

information relating to the provision of affordable housing or adequate information relating to achieving sustainable design. The proposal is reliant on out-of-date surveys and assessments and has not met the policy requirements of the newly adopted Local Plan or the revised NPPF.

Without reliable up to date information it is not possible for the Council to adequately determine that this proposal will not detrimentally impact the YDNP, Anley House or the Settle-Carlisle Railway Conservation Area. Nor is it possible to determine, as previously mentioned, whether a measurable net gain for biodiversity or sufficient green infrastructure has been achieved given the lack of information, increased built footprint and lack of amenity open space and reduction of tree perimeter screening.

CPRENY consider this site to be located at a key gateway into the YDNP which is afforded the highest level of landscape protection in the country in planning terms and any development in this location should be small scale and sympathetic of this given that development within the setting of a designated asset (including landscape) can drastically impact the experience of that asset. It is believed that this proposal, especially in its current guise will considerably alter the character of the gateway to the NP.

Despite having objected to the allocation of this site and the proposal at outline stage, CPRENY recognise the principle of development at this site has been established. However, regardless of the allocation or outline permission previously granted, the proposal must satisfy the development brief and other policies of the development plan. As set out above, the application is not supported by sufficient evidence to warrant the granting of planning permission at this stage. The Council should require a significant amount of further information to be submitted prior to determination in line with the above or the proposal should be refused or withdrawn until such time that the appropriate studies and assessments have been undertaken.

CPRENY reserve the right to comment further should additional information be submitted in support of this application.