

## **Matter 4: Economic development**

### **Main Issue: Whether the Council's strategy for accommodating economic development is sound?**

#### *Questions:*

- a) Would the approach of Policies SP4 (Priorities for Sustainable Economic Growth), EC1 (Established Employment Areas), EC2, EC3, EC5, DOS4, DOS5, DOS9 and DM14 provide flexibility and choice for employment land within the District in line with the Employment Land Review?**
- 4A.1 The Council prepared an Employment Land Review (ELR) (**Em\_Elr\_02**) in 2015 which forms a core part of the Local Plan evidence base. The ELR is split into three elements, firstly the review of the existing stock of allocated employment land (to ensure it was fit for purpose moving forward into the next plan period). Secondly projected job growth through the plan period and thirdly the modelling of future levels of employment land required to meet demand.
- 4A.2 In quantitative terms, the 2015 Employment Land Review (ELR) set out an expectation that further land would be required to meet future B1 Office needs, identifying a shortfall of 7.3 hectares in the district. With regard to industrial land the ELR highlighted a surplus of land for B2 & B8 uses within the district, taking into account the potential losses of land at the former TDG site in Carnforth and Lune Industrial Estate. The ELR noted a surplus of between 2.7 & 5.7 hectares of land for industrial uses.
- 4A.3 With regard to the expectations of the ELR, the Council have regarded the shortfalls as a 'minimum' in the context of national planning policy which seeks local plans to provide flexibility and choice for employment land and promote opportunities for economic growth in a realistic yet ambitious manner.
- 4A.4 Further to the quantitative requirements, the Council is well aware of the qualitative deficiencies that exist at some of the existing employment sites within the district, particularly in areas of South Heysham. Sites in this area (the Heysham Gateway) are strategically located in the context of the Port of Heysham, Heysham Nuclear Power Station and the recently completed Bay Gateway. However, many of these sites are of a poor quality and require investment and regeneration to bring the area back to more modern standards. Whilst there has been progress in the regeneration of this area over recent years, there is still work for both the City and County Councils to ensure that this area of the district can benefit from regeneration and economic growth.
- 4A.5 This has led to the Local Plan seeking to achieve both quantitative and qualitative improvements to its employment land portfolio in order to achieve flexibility and choice.

- 4A.6 Much of the economic growth proposed is focused in the main urban areas of Lancaster, Morecambe and Heysham which seeks to take advantages of the existing economic drivers, close proximity of the resident workforce and new housing growth and the improved connectivity derived from the Bay Gateway.
- 4A.7 Concerns have been raised over the lack of new employment land provided in the north of the district, in particular Carnforth. The Council feel that the very character of Carnforth as a historic industrial town that grew from its links to iron working and the expansion of the railways is a legacy which has left the town with a wide range of employment sites close to the railway and along the A6 corridor that, in the view of the Council, provides sufficient employment opportunities for a town of Carnforth's size. The Council believe that with the existing employment allocations in the town, which amount in the region of 23 hectares (including the former TDG site on Warton Road), provide sufficient employment opportunities for a town of Carnforth's size and role. This is highlighted further through recent applications for new industrial units on Carnforth Business Park and the regeneration of the former TDG site on Warton Road for which a planning application is currently being considered by the Council.
- 4A.8 Whilst the Council have considered opportunities for further growth in this area it is considered that in the context of the ELR, the quantitative and qualitative arguments means that future growth is better located close to the main resident population of the district, existing economic drivers and seeks to best utilise under-used areas of brownfield land.
- 4A.9 Accordingly the Council consider there is a sufficient geographical distribution of employment opportunities across the district.

Strategic Policies & Land Allocations DPD

- 4A.10 The allocations set out in the Strategic Policies & Land Allocations DPD seek to retain the most successful and sustainable employment sites within the district for long-term protection.
- 4A.11 The existing allocations that have been rolled forward from the current Local Plan to provide a wide range of employment opportunities across the district, including large urban estates (such as White Lund Employment Area) and smaller rural sites. The majority of existing estates provide flexibility over the types of employment use permitted, supportive of a range of B1, B2 and B8 type uses along with sui-generis uses that provide for significant on-site employment.
- 4A.12 It is important to note that not all previous allocations for employment have been rolled forward for specific employment purposes, the Council have de-allocated the following sites:

Former Thomas Graveson Site, Warton Road, Carnforth	The site has been re-allocated for environmental purposes under a development opportunity policy (Policy DOS10).
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Lune Industrial Estate, Luneside, Lancaster	The site has been re-allocated for future mixed use development (which should include employment uses) under a development opportunity policy (Policy DOS4)
Land at Lodge Quarry, Carnforth	The site is now mainly utilised for a Tesco foodstore with some small industrial units to the rear. The site has been deallocated from any specific development purpose and is now part of the wider settlement area.
Former TDG Site, Warton Road, Carnforth	The site has been re-allocated for a range of future uses (including employment opportunities) under development opportunity policy (DOS9)

**Table 4A.1:** Table to show the Employment Allocations set out in the Current 2004 Local Plan which have not been carried forward into the Strategic Policies & Land Allocations DPD as a formal employment allocation.

4A.13 Beyond the retention of existing allocations, the Plan also seeks to identify a number of new key sites which are considered to provide flexibility and opportunities for economic growth as outlined in Policy SP5 of the Strategic Policies & Land Allocations DPD, these include:

Site Name	Commentary
<b>Policy SG1:</b> Lancaster South Business Park	The Council will explore through the preparation of the Lancaster South Area Action Plan DPD the benefits of providing a specific employment site within the area of growth. The needs / requirements for such an allocation will be investigated in more detail through the preparation of that DPD.
<b>Policy SG2:</b> Lancaster University Health Innovation Campus (9.7 hectares)	The development of a high quality science and business park that has strong links to the adjacent Lancaster University and boost opportunity for growth of knowledge-based businesses. Phase One is currently under construction. It is important to note that this is a historic employment allocation which was considered by the ELR as part of the existing supply and therefore is <b>not</b> considered to be additional land as part of the emerging supply.
<b>Policy SG5:</b> Lancaster Canal Corridor, Central Lancaster	The regeneration of a large brownfield site directly to the east of Lancaster City Centre. This will be a mixed-use scheme that will include an element of commercial, office space and new retailing. The scale of business opportunity is still yet to be determined.
<b>Policy SG9:</b> Lancaster North Business Park (2 hectares)	The creation of a new office space to support the sustainable extensions to Lancaster to the north with strong access to the Bay Gateway.

<p><b>Policy SG14:</b> Expansion of Facilities for the Port of Heysham (7.5 hectares)</p>	<p>This allocation has been made specifically to allow for future expansion of operations at the Port of Heysham which is heavily constrained in terms of future expansion on land adjacent to it. Therefore a location with strong links to the Bay Gateway has been identified through dialogue with Peel Ports (operators and owners of the Port of Heysham). The Council acknowledge the ambitions and aspirations for growth at the Port of Heysham, highlighted by the recent investment in the Port to expand operating capacity to routes in the Republic of Ireland, Northern Ireland and the Isle of Man.</p>
<p><b>Policy SG15:</b> Heysham Gateway</p>	<p>The regeneration of existing employment areas in South Heysham to support economic growth associated with the Port of Heysham and also wider employment growth associated with the newly constructed Bay Gateway. Policy SG15 seeks to provide opportunities for further economic growth potential on previously used land.</p>
<p><b>Policy EC3:</b> Junction 33 Agri-Business Centre</p>	<p>To support the relocation of the Lancaster Auction Mart from its current position on Wyresdale Road in the East of Lancaster to a more accessible location off Junction 33 of the M6. The new business centre will provide the opportunity to deliver new small-scale rural business opportunities associated with the Auction Mart operations. It is important to note that the primary purpose of this allocation is to reposition an existing business use within the district to a more sustainable and appropriate location.</p>

**Table 4A.2:** Table to show the allocations for economic growth which are set out in Policy SP5 of the Strategic Policies & Land Allocations DPD

4A.14 In the context of the above opportunities, recognising long-standing employment allocations, the re-positioning of existing employment uses and taking into account the specific extent of some employment opportunities that will be defined further by future planning documents and/or applications, the following table sets out the new allocations made for employment purposes within the Local Plan.

Site Name	Size	Commentary
<p>Policy SG1: Lancaster South Business Park, South Lancaster</p>	<p>N/A</p>	<p>The need for further employment land growth will be explored in the Lancaster South Area Action Plan DPD. No notional site size available.</p>
<p>Policy SG2: Lancaster University Health Innovation Campus, South Lancaster</p>	<p>N/A</p>	<p>Existing allocation in the adopted plan and already considered within the existing supply by the ELR. Not considered to be a new allocation.</p>

Policy SG5: Lancaster Canal Corridor, Central Lancaster	N/A	The scale and nature of any employment growth will be determined through future masterplans for the site. No notional site size available until detailed masterplanning has taken place.
Policy SG9: Lancaster North Business Park, North Lancaster	2 ha	N/A
Policy SG14: Expansion of Facilities at the Port of Heysham, South Heysham	7.5 ha	N/A
Policy SG15: Heysham Gateway Regeneration, South Heysham	18 ha	N/A
Policy EC3: Junction 33 Agri-Business Centre, Galgate	N/A	This proposal involves the repositioning of the existing Auction Mart. Whilst this will create a new hub for new rural businesses this will be ancillary in nature to the Auction Mart.
<b>Total</b>	<b>27.5 hectares</b>	

**Table 4A.3:** Table to show the allocations for economic growth set out in Policy SP5 and commentary to whether they constitute new land allocations.

- 4A.15 The Council acknowledge a discrepancy in the submitted version of the Local Plan which relates to the proposed allocation of employment land at Middleton Road, South Heysham. The allocation is identified under Policy reference EC1.13 of the submitted plan. Policy EC1 relates to pre-existing allocations which have been effectively carried over from the current Local Plan. However, the proposed allocation is a new allocation which has not previously been identified for employment purposes. As a result the site at Middleton Road should be considered as a new employment allocation under Policy EC2 which would increase the proposed supply of employment land by a further 13.3 hectares, taking the total new employment supply to **40.8 hectares** of new employment land.
- 4A.16 The allocations described above provide a range of opportunities across the district for a range of different sectors. The Council believe this to be consistent with the evidence provided in the Employment Land Review (**Em\_Elr\_02**) and the latest version of the Lancaster District Economic Prospects Report (**Em\_Ep\_02**). The retained allocations and new allocations made provide, in the view of the Council, sufficient flexibility and choice over the course of the plan period and is consistent with the expectations of paragraph 21 of the 2012 NPPF.
- 4A.17 The allocations made put a specific focus on regenerating existing employment areas, particularly in the South Heysham area which can now benefit from improved access derived from the Bay Gateway and benefit from their close positioning to the Port of Heysham. The Council are actively engaged with public / private sector landowners in the Heysham Gateway

area, seeking to support opportunities for economic growth and the proactive re-use of brownfield sites in the Heysham area. With regards to this, the Council are currently working on the preparation of a new Economic Strategy which seeks to set out a clear action plan as to how the regeneration of the Bay Gateway area will be delivered.

- 4A.18 Accordingly, whilst the Council would accept that in quantitative terms the allocations made for employment growth exceed the shortfalls identified in the ELR, consideration must be given to the qualitative improvements proposed by the Plan. The Plan seeks to regenerate under-utilised brownfield sites which, given their location and historic use, cannot serve any other effective purpose other than employment uses. This direction is entirely consistent with national planning policy in relation to bringing back into use under-utilised land.
- 4A.19 The Council believe that the allocations, both in terms of the retention of allocations and new allocations, provide an appropriate geographic distribution of employment land across the district, drawing on the benefits of the newly constructed Bay Gateway and the strategic growth which is proposed around the main urban areas of the district.
- 4A.20 Beyond the allocation of land specifically for employment use under Policies SG1, SG2, SG5, SG9, SG14, SG15, EC1, EC2 and EC3 the Council have identified a number of development opportunity sites which are currently utilised for employment purposes and/or have been identified for future employment uses (at least in part). This includes sites such as Lune Industrial Estate (Policy DOS4) and Former TDG Site Warton Road (Policy DOS9).
- 4A.21 Whilst the Council support the ongoing use of these two sites for employment purposes, the scale of anticipated employment use in the future will be dependent on future applications made for the sites.

Development Management DPD

- 4A.22 With regard to the approach taken to employment land in the Development Management DPD, Policy DM14 of the DPD sets out the Council's approach to proposals which involve employment land or premises. The Policy sets out a positive and supportive approach towards proposals which seek to create employment uses outside of identified employment areas (subject to detailed criteria and other relevant policies).
- 4A.23 Policy DM14 is largely based on the existing adopted policy position set out in Policy DM15 of the 2014 Development Management DPD. However, it does include a number of other criteria which include an expectation that consideration has been given to the opportunities for proposals to be located on sites already allocated for employment purposes or whether redundant buildings with a history of economic use cannot be re-used for that purpose.
- 4A.24 Whilst this places an onus on the applicant to consider a range of sites for their purpose, the policy is not preclusive in nature and provided that evidence is shown that alternative sites have been investigated then the policy remains supportive of new employment sites being created.

- 4A.25 Policy DM14 also include a criteria in relation to ensuring good accessibility to the proposal which is considered to be entirely consistent with other elements of the Plan and national planning policy in general.
- 4A.26 With regard to proposals which involve the loss of employment land / premises, the Council are mindful that employment land is a finite resource and once it is lost to alternative uses, particularly residential uses, then the economic resource is lost permanently. As a result, Policy DM14 sets out an approach which will appropriately test the economic suitability of a site / premises for ongoing employment use. The approach taken in Policy DM14 largely replicates the direction taken in the adopted Policy DM15 of the 2014 DPD.
- 4A.27 The Council are mindful of paragraph 22 of the 2012 NPPF which states that local planning authorities should avoid the long-term protection of employment sites which have no reasonable prospect of coming forward for employment uses. The Council consider that the direction taken by Policy DM14 provides an appropriate balance between this national policy direction and to allow flexibility in alternative uses for sites which genuinely have no future role in economic growth for the district.

**b) Is monitoring adequate and what steps will be taken if sites do not come forward?**

- 4B.1 The Council will continue to monitor the delivery of employment land throughout the district through the preparation of the Annual Monitoring Report (**AMR\_2017-2018**) and the proposed Local Plan Monitoring Framework as described in Background Paper 9: Local Plan Monitoring Framework (**SD\_021**). The Council believe these to be effective and appropriate mechanisms to monitor the delivery of employment land across the district through the plan period.
- 4B.2 Should allocations not come forward for employment purposes then the Council will seek to investigate the reasons for why such opportunities are not being taken forward. These reasons may include changes in the market (either locally or nationally) or the presence of site specific constraints which are holding a site back from coming forward for its intended use. This can be investigated through ensuring that the evidence relating to economic growth and employment land delivery is maintained in a robust and sound manner and is regularly refreshed.
- 4B.3 Subject to the reasons behind why a site has not come forward for its intended use (or why it is not likely to come forward in a reasonable timeframe) a range of options will be available to the Council to address this. The Council could consider a direct and positive intervention to assist with its delivery through the purchase of land or through the provision of financial incentives or through permitting alternative uses on a site in the context of the most up-to-date national planning policy. Alternatively, the Council could seek to address the matter as part of the next Local Plan Review and seek to reallocate the site for a more appropriate purpose.

4B.4 Whilst a range of options are available to the Council in this regard, it will be dependent on the scale, nature and context of the site to which option is considered suitable.

**c) Are the impacts of Policies SG5 (Canal Corridor North, Central Lancaster) and TC2 (Town Centre Designations) on the retail function of Lancaster City Centre fully taken into account in the formulation of these policies?**

Lancaster City Centre – Canal Corridor / Canal Quarter

- 4C.1 Assessments have considered the future role and function of Lancaster City Centre and the future impacts of growth at the Lancaster Canal Corridor (now known as the Lancaster Canal Quarter) as identified under Policy SG5.
- 4C.2 In 2015 the Council published the Lancaster District Retail Review (**Rtc\_02**) which highlighted that there has been a consistent decline in the role and function of Lancaster City Centre over recent decades, with its market share – particularly for comparison retailing – gradually falling.
- 4C.3 Mindful of this, and in accordance with paragraph 23 of the 2012 NPPF which states that *'where town centres are in decline, local planning authorities should plan positively for their future to encourage economic activity'* the Council, through the Local Plan, have considered how this decline can be arrested.
- 4C.4 The Council has had a long-established aspiration to regenerate a significant area of brownfield land which is positioned directly to the east of Lancaster City Centre. This area has been previously described as 'Lancaster Canal Corridor' but more latterly is now described as 'Lancaster Canal Quarter.
- 4C.5 The area is made up of a number of derelict buildings (some of historical importance), a range of council-owned car parks and other buildings and uses, which include the Dukes Theatre. The majority landowners are the City Council with one other private land holder.
- 4C.6 There have been a number of attempts to regenerate this area with retail-led developments, which includes a joint proposal in 2008 between the City Council and developers Centros which was refused permission by the Secretary of State following a Public Inquiry.
- 4C.7 More latterly proposals have been advanced jointly by the City Council and developer partner British Land who had been seeking to prepare a masterplan for the site which, whilst more mixed use in character, still included a significant element of retailing to support the existing City Centre.
- 4C.8 The preparation of this masterplan remained the position at the point of Publication / Submission of the Local Plan in May 2018. However, there have been significant changes since the submission of the plan with the City Council withdrawing from their development agreement with British Land and British Land selling their land holdings within the Canal Corridor.



- 4C.9 Following the withdrawal of the development agreement, the Council have pushed forward with the plans for the area. This has included a rebranding of the site to 'Lancaster Canal Quarter' and the appointment of master planners to bring forward a more organic and diverse plan for the area. It is anticipated that future growth and development in the Canal Quarter can be delivered through a number of phases and allows for a greater range of potential uses rather than the heavy reliance on retail as previously indicated. To this regard the Council are currently working on a Supplementary Planning Document which will support future growth plans for the area.
- 4C.10 The Council would accept that there have been significant changes to the anticipated delivery of the Canal Corridor / Canal Quarter site following the withdrawal of British Land over the summer of 2018. The reasons behind their withdrawal and the subsequent changes in land ownerships will no doubt effect how this area will be regenerated in the future and the types of proposed uses that will come forward. This will include a more diverse offer of retailing, leisure, cultural, residential and commercial floorspace being delivered across the site in a more phased manner.
- 4C.11 The Council believe that Policy SG5 as submitted still provides a reasonable and effective basis for future regeneration of Lancaster Canal Quarter site. However, it recognises that in light of the changing circumstances for the site, amendments could be provided to make the policy more effective to reflect changes in land ownership and changes in the future direction to which regeneration could take. Should the Inspector agree with the Council that amendment would be beneficial, then the Council would be happy to assist in providing revised wording on this matter.

#### Town Centre Designations

- 4C.12 Policy TC2 of the Strategic Policies & Land Allocations DPD sets out a number of designations for Lancaster City Centre including a Primary Shopping Area, a town centre boundary and a series of primary and secondary frontages. Such designations have been made in the context of paragraph 23 of the NPPF which state that local planning authorities should '*define the extent of town centres and primary shopping areas based on a clear definition of primary and secondary frontages in designated centres and set policies that make clear which uses will be permitted in such locations.*'
- 4C.13 The Council have carried forward the 'Interim Town Centre Designation Plan for Lancaster City Centre' which is contained in Appendix G of the 2014 Development Management DPD (**DPD\_DM\_Dec14**) which the Council believes to be a robust basis for designation within the Strategic Policies & Land Allocations DPD. In carrying forward the interim plan the Council have formalised the recommendations made by WYG who prepared the interim plan for the Development Management DPD.
- 4C.14 Whilst the interim plan was designed to accompany the 2014 Development Management DPD, it was prepared on the basis that it would be formalised within a forthcoming land allocations document. The Council believe that there has been no material change in circumstance to suggest that the

conclusions made on town centre designations in 2014 are no longer valid or should be reviewed.

4C.15 The Council recognise that the town centre designations as proposed in Policy TC2 seek to reflect the current circumstances in terms of scope, role and function of the existing town centre and does not at this time seek to take account of the growth proposed as part of the Canal Corridor / Quarter regeneration. The Council believes it would be highly challenging to predict or presume changes to the PSA / town centre boundary or frontages in advance of formal masterplanning for the site and in the context that the regeneration of the site may come forward in a more flexible manner in the future.

4C.16 The Council therefore consider the town centre designations made for Lancaster City Centre via Policy TC2 to be based on robust and sound evidence and take into account, as best they can, the future regeneration of the Canal Corridor / Canal Quarter area.

Impacts on Retail Function of Lancaster City Centre

4C.17 In proposing regeneration of the Lancaster Canal Corridor / Canal Quarter the Council have been mindful of the project in the context of the wider City Centre in terms of its linkages and impacts.

4C.18 Policy SG5 as submitted seeks to ensure that proposals which come forward for the site take account of the relationship between the new uses proposed for the site and the existing uses which operate within the City Centre. It states that the Canal Corridor should '*form part of a sustainable extension to Lancaster City Centre*'. In terms of supporting linkages between the two areas of the City Centre, Policy SG5 sets out that proposals should '*Provide a positive integration between the proposal and the existing city centre in relation to the urban form and connectivity for all users.*'

4C.19 It is important to note that the Council anticipates future regeneration of the Canal Corridor / Quarter area to result in a greater diversity of uses than considered in the past, this expectation of diversity is well reflected in Policy SG5.

4C.20 Consequently, lowering the reliance on retail uses within the scheme should seek to reduce the impacts on the retail function of the existing centre and ensure that the regeneration of the site to capable of adapting to future changes. Notwithstanding this need for flexibility, it will be important that an element of retail is provided in order to address issues of market share and the need for modern fit-for-purpose retail units within an historic city centre.

4C.21 Mindful of the changing circumstances of the Canal Corridor / Canal Quarter project and the suggestion that modifications may be required to make the policy more effective in its delivery, the Council would be happy to ensure that any amendments made to Policy SG5 seek to clarify the matter of impacts on the existing City Centre.

**d) Would policies DM16 (Town Centre Development) and DM18 (Local Centres) recognise the function of new centres such as Bailrigg**

## **Garden Village and can the Council clarify how Retail Impact Assessments would apply in relation to policy DM16?**

### Application of Policies DM16 & DM18 of the Development Management DPD

- 4D.1 The Council consider that the direction provided by Policy DM16 of the Reviewed Development Management DPD relates primarily to main town centres only (as defined in the retail hierarchy set out in Policy TC1 of the Strategic Policies & Land Allocations DPD). Where development is proposed in a new local centre then the Council do not believe that the *general* direction of Policy DM16 would be applicable.
- 4D.2 However, it is acknowledged that the thresholds relating to retail impact assessment for both main town centres and local centres are set out in DM16, and this would be the only element of DM16 which would be applicable to development in local centres.
- 4D.3 Should the Lancaster South Area Action Plan DPD identify a district centre (or greater) then the Council would agree that the full direction of Policy DM16 would then apply.
- 4D.4 Where local centres are being proposed (as in the case of North Lancaster and East Lancaster) then the Council believe that Policy DM18 would be the more appropriate mechanism to apply to any future proposals within these centres, supplemented by the retail impact assessment thresholds contained in DM16.

### Retail Impact Assessments

- 4D.5 The Council would accept that the thresholds set out in Policy DM16 do not accurately reflect the evidence provided in the 2017 'Local Centres Study' (**Rtc\_04**) due to an editing error which occurred prior to publication.
- 4D.6 To clarify the role of the retail impact assessment and align with the recommendations of the evidence base minor amendments to Policy DM16 would be in the Council's view appropriate and beneficial. Should the Inspector agree with the Council that such amendments would be beneficial then the Council would be happy to assist in providing revised wording on this matter.

## **e) Would policy DM23 (Visitor Accommodation) preclude hotel development outwith a defined town centre?**

- 4E.1 The Council believe that Policy DM23 of the Reviewed Development Management DPD provides a realistic framework for future hotel development which is consistent with national planning policy.
- 4E.2 As hotel development is defined by Annex 2 of the NPPF as a '*main town centre use*' then it is important that the '*Town Centre First*' approach is taken towards such development. Where out-of-centre locations are proposed for hotel development then the sequential test should be applied in accordance with the NPPF to investigate where there are more suitable and appropriate locations for the proposal.

4E.3 The Council believe that paragraph 2 of Policy DM23 sets out sufficient flexibility to permit hotel development outside of defined town centres, but only where it has been clearly demonstrated that a sequential test has been applied and that the proposal is located in accessible areas which can be accessed by more than merely private car.

4E.4 The Council do not consider this to be a preclusive approach to proposals for out-of-centre hotel development but does ensure that more suitable and appropriate locations are explored first in accordance with national planning policy. The direction of Policy DM23 is consistent with the approach taken in Policy DM13 of the 2014 Development Management DPD.

**f) Is policy DM28 (Employment and Skills Plans) sufficiently clear as to how it would be applied in respect of *the size and scale of development*?**

4F.1 The Council believe that Policy DM28, the justification text to support it and the accompanying Employment and Skills Plans SPD adopted in 2018 (**SPD\_ES\_Aug18**) provide sufficient clarity in respect of the size and scale of development which may require Employment and Skills Plans.

4F.2 The Council's Economic Development Team will consider all developments over the threshold provision for their suitability to implement Employment and Skills Plans. As highlighted in consultation with the development industry as part of the preparation of the SPD, it is important that the policy has the capability to be applied flexibly to ensure that suitability can be taken into account on a case-by-case basis. Consideration can then be given to the scale, location and nature of development and whether the developer already provides any pre-existing training scheme.

**g) Could the Council clarify if paragraph 1 of policy DM51 (Holiday Caravans, Chalets, Camping Pods and Log Cabins) relates only to caravans?**

4G.1 The Council can confirm that paragraph 1 of Policy DM51 does specifically relate to static caravans and touring caravans only. The Council believes that generally the visual impact of such uses, particularly within open areas and designated landscapes (such as the Forest of Bowland) can have significant impacts on the landscape value of the AONB designation.

4G.2 The approach taken in Policy DM51 is entirely consistent with the approach in the Arnside & Silverdale AONB DPD (**OD.05**) which has recently been found sound at Examination. The Council believes that such an approach provides parity between the two designations.