

Local Plan Publication Stage Representation Form

The Ryedale Plan: Local Plan Sites Document and Policies Map

For Office Use Only

Date received

Ref. No.

Acknowledged

Please return the completed form by 4.30pm on Friday 22 December 2017 to:

Jill Thompson
Specialist Place Team
Ryedale District Council,
Ryedale House,
Malton,
North Yorkshire,
YO17 7HH

This form can be filled in electronically and e-mailed to:
localplan@ryedale.gov.uk
we have also published an online form at:
www.ryedaleplan.org.uk/local-plan-sites-publication

This form has two parts:

- Part A – Personal Contact Details.
- Part B – Your representation(s). Please fill in a separate sheet for each representation.

PART A

1. Personal Details*

* If an agent is appointed, please complete only the Title, Name, and Organisation boxes below but complete the full contact details of the agent in 2.

2. Agent's Details

(if applicable)

Title		MR
First Name		RICHARD
Last Name		IRVING
Job Title (If relevant)		DIRECTOR
Organisation (If relevant)	KARRO FOOD GROUP	ID PLANNING
Address – line 1		9 YORK PLACE
Address – line 2		LEEDS
Address – line 3		
Address – line 4		
Postcode		LS1 2DS
Telephone		
E-mail address		

PART B - Please use a separate sheet for each representation

Name or Organisation KARRO FOOD GROUP

3. To which part of the document or map does this representation relate?

Please tick the document and indicate the specific policy, paragraph, table or map you are commenting upon.

Policy	SD3 - LAND EAST OF BEVERLEY ROAD, NORTON: DEVELOPMENT PRINCIPLES
Paragraph/Table	
Policies Map	

4. Do you consider the document is:
Please tick as appropriate

- | | | | | |
|--|-----|--------------------------|----|-------------------------------------|
| a. Legally Compliant | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> |
| b. Sound | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |
| c. Complies with the
Duty to Co-operate | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> |

Please see next page to fill in your comments

5. Please give details of why you consider the document is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the document or its compliance with the duty to co-operate, please use this box to set out your comments.

ADDITIONAL DEVELOPMENT PRINCIPLES REQUIRED TO FULLY ADDRESS
POTENTIAL CONFLICT BETWEEN THE PROPOSED RESIDENTIAL USE
& THE EXISTING KARRO FOOD GROUP SITE.

SEE REPRESENTATION STATEMENT ATTACHED FOR FULL RESPONSE

6. Please set out what modification(s) you consider necessary to make the document legally compliant or sound, having regard to the matter you have identified at question 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the document legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

AMENDMENTS & ADDITIONAL DEVELOPMENT PRINCIPLES PROPOSED
SEE ATTACHED REPRESENTATION STATEMENT FOR FULL DETAILS

Please Note: Your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and the suggested modification as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he / she identifies for Examination.

7. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the Examination?

No
I do not wish to participate at the oral part of the Examination

Yes
I wish to participate at the oral part of the

8. If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary:

TO SUPPORT THE REPRESENTATIONS MADE & ANSWER ANY QUESTIONS REGARDING THE OPERATION OF KARRO FOOD GROUP'S SITE.

Please Note:

The Inspector will determine the most appropriate procedure to adopt to hear who have indicated that they wish to participate at the oral part of the Examination.

Signature

If you are filling in this form electronically by typing your name in this box you are stating to the best of your knowledge all the above information is correct

Signature



Date

20/12/17

Data Protection:

Ryedale District Council is a registered data controller, with the Information Commissioner's Office, as defined by the Data Protection Act 1998. By submitting your details to the Council you are consenting to your information being used for the preparation of the Ryedale Plan Local Plan Sites Document and Policies Map. Please be aware that representations made at Publication Stage cannot remain anonymous. Your response, including your name and address will be made available to view on the website and as part of the examination in public. However, the Council will redact your email address, phone number and signature before your representations are made publically available. Ryedale District Council will need to share you details with the planning inspector appointed to examine the documents, however, the Council will not pass your information onto other third parties unless it has a legal obligation to do so (ie crime prevention). Please be aware that RDC officers may need to contact you as part of this consultation process and a Programme Officer assisting the Planning Inspector may need to contact you as part of the examination process. For further information or clarification on this matter please contact Jill Thompson on 01653 600 666 ext 327 .

December 2017



**Representations to the
Ryedale Local Plan Sites Document
Publication Version**

On behalf of

Karro Food Group

Prepared by

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1.0 Introduction and Site Description

- 1.1 These representations are made on behalf of Karro Food Group who operate from Hugden Way in Malton, which is the Group's headquarters and main production site within England. Karro Food Group is a major UK food business and leading producer of bacon, gammon, fresh pork, frozen sausage, ham and cooked meats. It is the largest employer in Malton and operates 24 hours from the site.
- 1.2 The Karro Food Group operates 24 hours a day, 7 days a week from its 18 acre Hugden Way site, supporting 1,600 local jobs and bringing in excess of £233m of business turnover per annum into the local economy. The site currently processes in excess of 20,000 pigs a week for supply to UK supermarket chains, processed food manufacturers, and for export with scope for a substantial increase as existing spare capacity is utilised.
- 1.3 The Karro site by the very nature of its operations in meat production, and through its geographic size, generates a certain level of noise, light, smells and substantial vehicle movements around the clock. The historic choice of location for the site, which has operated since 1936, was deliberately away from areas of residential occupation in order to minimise impacts on the local population.
- 1.4 Karro seeks to be a good neighbour, and has already taken steps to minimise impacts of its operations on its neighbours as far as reasonably economically possible. The impact of its activities on adjacent sites is minimal at present, as most of its neighbours are light industrial, or agricultural.
- 1.5 However, new occupants of the residential dwellings proposed as part of the adjoining allocation may be less tolerant of the site's operation without appropriate measures being put in place, particularly at the design stage of such a development.
- 1.6 The Local Plan Sites document identifies a proposed residential allocation immediately to the south of the production facility which suggests delivery of 600 dwellings. The land to the east of Beverley Road, Norton is proposed to be allocated under Policy SD2, which sets out the detailed proposals for the development of the site.
- 1.7 These representations do not seek to object to the principle of residential development of this site but it must be ensured the development principles for the site support the operation of the Karro Food Group site in its current manner and do not prejudice or compromise the ability of the company to grow in the future.
- 1.8 To ensure the plan is sound we consider further detail should be set out within the development principles for the site which are identified in associated Policy SD3. The proposed amendments will ensure any future residential development will not result in conflict with Karro's existing and future operations and ensure that the amenity of future occupiers of the

residential dwellings is fully addressed at the design stage, such that no complaints can be afforded against the company.

- 1.9 These representations provide comment on Policy SD3 (Housing Allocation – Land to the east of Beverley Road, Norton) in the context of the neighbouring Karro Food Group production and headquarters site to the north and seek to support the Council in preparing a sound Local Plan.

2.0 Representations to the Local Plan Sites Document Publication Version

2.1 Paragraph 182 of the NPPF states that for a plan to be sound it should be:-

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

Policy SD2 – Residential Land Allocations

2.2 Policy SD2 sets out the sites which are proposed to be allocated for residential development. In the Principal Town of Malton and Norton two proposed sites are identified:-

Land to the east of Beverley Road (24.29 ha) – 600 dwellings (540 in the plan period)

Land at Old Maltongate (Ryedale House Site) (1.44 ha) – 60 dwellings

2.3 The land to the east of Beverley Road (600 dwellings) lies adjacent to my client's food processing site. We have no objection in principle to the allocation of the land to the east of Beverley Road, subject to there being appropriate development principles set out which ensure my client's business operation will not be adversely affected as a result of the proposed construction of new residential dwellings. Of critical importance in this regard are the appropriate siting of dwellings, a buffer between the proposed dwellings and the site, along with noise and light attenuation in the site design and landscaping, and in the design and fabric of the dwellings most likely to be affected. We can confirm that discussions are in progress with the proposed developers of the proposed allocation. We will continue to work with them prior to the submission of a planning application and throughout the determination period.

Policy SD3 – Housing Allocation – Land to the east of Beverley Road, Norton: Development Principles

2.4 Policy SD3 sets out development principles for the proposed housing allocation at land to the east of Beverley Road, Norton. The policy sets out the following development principles:-

- A new road linking Beverley Road to Hudgen Way

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- Implementation of a MOVA system at the junction with Scarborough Road and Westfield Way
 - 2 ha of land for new primary school provision
 - A substantive landscape, visual and noise attenuation buffer between the housing development and the Malton Bacon Factory
 - A Neighbourhood Area for Play (NEAP)
 - Integrated site and boundary landscaping to include landscaped areas for play and fitness and to soften the visual impact of the scheme
 - Reinforcing existing connections and creating new connections to the school site and where possible, the existing built up area and the surrounding countryside
 - Well defined hierarchy of streets and spaces
 - Pedestrian and cycle only routes in and through the development to site access points, the school site and NEAP
 - Access from Beverley Road and the new link road
 - Maximise opportunities for green infrastructure, including 3 phase Sustainable Drainage Systems
 - Capability for electric vehicle charging through the provision of a 13 amp electrical socket for each property with a dedicated car parking space within its curtilage
 - Lighting scheme to minimise glare, reduce energy usage, and protect amenity.

- 2.5 The only point listed in the development principles that addresses the location of the proposed allocation being adjacent to Karro's meat production site is the fourth bullet point which seeks a substantive landscape, visual and noise attenuation buffer between the housing development and the Malton Bacon Factory.
- 2.6 Whilst this bullet point does seek to address potential conflict between the Karro site and the proposed residential dwellings by providing a buffer area, it is maintained this single point alone does not go far enough to give Karro certainty that the proposed development of this site for 600 dwellings will support the operation of the Karro Food Group site in its current manner and would not prejudice or compromise the ability of the company to grow in the future.
- 2.7 The existing buildings on Karro's site sit tightly up to the southern boundary of the site, with a car parking area to the south east of the main buildings. This necessitates a buffer between Karro's site and the siting of any residential dwellings, yet the development principle only requires a buffer, the location and extent of this is not set out at this stage and therefore provides no certainty for Karro Food Group.
- 2.8 As identified in the introduction to this representation statement, Karro Food Group operates 24 hours a day, 7 days a week from their Hugden Way site. The site currently processes in excess of 20,000 pigs a week for supply to UK supermarket chains, processed food manufacturers, and for export with scope for a substantial increase as existing spare capacity is utilised.

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- 2.9 The Karro site by the very nature of its operations in meat production, and through its geographic size, therefore generates a certain level of noise, light, smells and substantial vehicle movements around the clock. The historic choice of location for the site, which has operated since 1936, was deliberately away from areas of residential occupation in order to minimise impacts on the local population.
- 2.10 We are aware that the site promoter has requested an EIA scoping opinion for 600 dwellings. As part of this submission an illustrative masterplan has been submitted which shows a new car parking area for Karro Food Group with 780 spaces proposed and an adjacent area of public open space. However, Karro Food Group is not planning to take up this new car parking area, and this area will need to be redesigned, potentially to incorporate an acoustic bund, acoustic fencing and landscaping, as technical consultants determine appropriate. The proximity of a public open space area to Karro's operation is also questioned.
- 2.11 Given the allocation also seeks to deliver a link road which will connect to Hugden Way, it is essential the design of the road and the associated highways assessment takes into account and accommodates truck yard movements associated with the Karro site and a safe pedestrian crossing from the existing car park to the main factory site.
- 2.12 The Site Selection Methodology Assessment for the site (Q. 29) advises the site submitter has prepared a noise assessment which has informed the buffer shown on the indicative masterplan for the site. It should be a requirement of the allocation that the noise attenuation buffer is informed by an up to date noise assessment, carried out on a mid-week, full production activity day.
- 2.13 Question 30 of the Site Selection Methodology Assessment asks '*Is the development in an area where other factors are likely to cause nuisance to new users or is the development likely to generate forms of nuisance which may affect the amenity of existing users? These may include issues such as privacy, lack of sunlight, overbearing effects*'. This is a key issue for the proposed residential allocation at Beverley Road given it lies adjacent to Karro Food Group's meat production facility, which is a 24 hour operation. The assessment's response to gives the site a (+) green score stating '*it is considered that through siting, scale, massing and orientation of windows such issues could be addressed*'.
- 2.14 Whilst we do not object to the principle of the development of the site, matters such as layout, siting, noise, odour, lighting and landscape buffers will be critical to ensuring that the existing Karro operation will not impact on the amenity of new residential occupiers and to ensure the residential occupiers do not prevent any future expansion or change of operation at the Karro site.
- 2.15 For the plan to be effective it must be deliverable over its period. The Beverley Road site comprises the main allocation to deliver housing growth in Malton / Norton and therefore the Council is reliant on its delivery to meet the housing requirement for the area. The site's location alongside Karro Food Group's meat production facility and headquarters will have a direct impact on the
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detailed layout and siting of dwellings to ensure amenity issues for future residents and Karro Food Group's existing and future business operations are protected.

- 2.16 To ensure this allocation is deliverable when taking into account the neighbouring land use and therefore for the allocation to be sound, the development principles for the site should require a detailed Statement of Community Involvement in consultation with neighbouring occupiers including Karro Food Group and take into consideration comments made.

Amendments to Policy SD3 to make the plan sound

- 2.17 To make the plan sound the following amendments (shown in bold text) should be made to Policy SD3 (Land to the east of Beverley Road, Norton: Development Principles):-

- **Bullet Point 1 – A new road linking Beverley Road to Hugden Way which accommodates existing goods vehicles associated with the Karro Food Group site and safe pedestrian movements between the existing Karro Food Group car park and the main factory site.**
- **Bullet Point 4 – A substantive landscape, visual and noise attenuation buffers between the housing development and the Karro Food Group site and be subject to discussions with Karro Food Group in order that the nature of their operations can be fully understood. A noise assessment should inform the noise attenuation buffer.**
- **An odour report should form part of any planning application submission and should identify measures to ensure the design and layout of the scheme addresses odour associated with the Karro Food Group site.**
- **Any future planning applications, including reserved matters, must include a Statement of Community Involvement and in particular make reference to consultation with key stakeholders, including Karro Food Group.**

- 2.18 It is also noted that the extent of the allocation encroaches onto land that lies within the existing employment allocation (SP6). From reviewing the illustrative masterplan it appears this relates to part of the link road and we will be seeking further clarification from the council in respect of this particular matter.