



Preferred Option Key Issues

February 2012



Key issues to take forward from public consultation on Craven District Council's Core Strategy Preferred Option



The Preferred Option Key Issues Paper

Public consultation on Craven District Council's draft Core Strategy (or "Preferred Option") ran from 12th October to 23rd November, 2007. More than 1600 comments were made by over 100 individuals, organisations and businesses with a variety of perspectives and experiences. This paper attempts to pick-out the main points from those comments, so that any big problems, gaps or weak points in the Preferred Option can be worked on and sorted out before the next version is produced. In order to whittle-down many comments into something manageable and useable, the paper focuses mainly on objections and criticisms, summarises comments and puts similar comments together. The paper is divided into sections based on the Preferred Option chapters and standard response form. This is what people said...

Vision

The draft vision isn't *specific*, *distinctive* or *realistic* enough; it should look for *enhancement* of assets and not just their *protection*; it should look for an *absolute* reduction in carbon-dioxide (CO₂) emissions; should include *culture*; should recognise *differences* up and down the district, including different *CROSS-boundary* associations; and should include *quality of life* for all residents.

Objectives

The plan objectives should aim for *enhancement* of assets and not just their *protection*; they should aim for sustainable *transport* (including a *modal shift* of people and freight), *climate change* adaptation/mitigation and high standards of sustainable *construction*; they should aim to create *habitat* networks to help wildlife adapt; and they should include *cultural* objectives and give sustainable *communities* a higher priority.

Sustainable Infrastructure

The plan's approach to *renewable energy* should be wider, more positive and more encouraging. Policies should have a *local dimension* and shouldn't repeat national guidance. Strategy and policies aren't clear and should be *SMART*¹. The core strategy needs its own *spatial* priorities and delivery process and should let service providers plan service growth. The pros and cons of rural *car-use* and the strategy for sustainable *transport* aren't fully resolved. *Building codes* should be set by national regulations, not core strategies. Specific *targets* are needed to make policies effective (including a target for on-site renewables of above 10%). Developments should have a positive impact on *biodiversity*.

Settlement Strategy

Skipton is a sustainable location with potential to deliver growth and affordable housing, but is congested with little available space; it may be the focus for more development, but not substantially more. The appropriate scale of growth, infrastructure problems and outside/cross boundary influences all remain unresolved in *Glusburn/Cross Hills/Sutton*. *Settle* is a sustainable location with potential to deliver growth, a town centre in need of regeneration and sites nearby in *Giggleswick* for housing etc. High and Low *Bentham* have their own characters but function as one community, which needs low-cost housing for local people. Road links and opportunities for growth in *Ingleton* are better than in Bentham and there is a need for low-cost housing for local people. *Villages* need to grow in order to flourish and address their housing needs, but they're not the most sustainable locations and have limited capacity.

¹Specific, Measureable, Achievable, Relevant and Time-related

The three *Local Service Centres* are grouped together, but each is very different in character and capacity; they should serve local needs in rural areas and not take a “lead role in future development”. A *hierarchy* with only 3 levels would be more flexible. *Pressure* on the southern part of the district should be alleviated by the northern part; there is a danger of urban sprawl in South Craven & Skipton. More *housing* and *employment* is needed, but the absolute amount proposed is too large.

Green wedges, floodplain and green fields need *protection*. *Links* between urban areas and the countryside need to be enhanced.

Consultation cannot be meaningful if key decisions have already been taken (e.g. RSS² housing figure). An *Environmental Capacity Study* should inform the strategy, not be issued in draft at the same time. *Parish Plans* and Village Design Statements should be referred to.

A *joined-up* strategy is needed for Craven inside and outside the national park.

Housing

More housing, affordable housing and exception sites are needed and releasing land immediately will help control house prices. *Windfall* sites shouldn't be relied upon and a 15-year supply should be allocated. House-building and in-migration have been significant in recent years; a lot more will be *environmentally* unsound, will negate efforts to combat *climate change* and *habitat* fragmentation, will rely on *greenfield* allocations and will change the *nature of Craven*; the proposed *housing figure* needs rethinking and we need to focus on *local*, affordable needs.

The strategy should refer to *sustainability appraisal* not environmental constraints. Accommodating population growth and housing need without taking account of *capacity* and *sustainability* will promote growth in inappropriate places.

The distribution to *Skipton* is too low; the distribution to *South Craven* and 4th-tier *villages* is too high. The *Focus* on Skipton and South Craven will increase house prices and need elsewhere; a more balanced *spread* is needed. Distributions of housing and employment land don't *match*.

Shortcomings in *evidence* (SHMA³, SHLAA⁴) have a serious impact on policies. The core strategy should not promote *Skipton Developments*⁵, which should go through the normal plan process. We should not divide the district along the *national park* boundary when formulating affordable housing policy.

Policy requirements (e.g. affordable housing, infrastructure, building codes) must take account of *viability*; 60% affordable housing is unworkable and any high proportion of affordable housing will leave less for community infrastructure etc. Sites for *100% affordable* housing should be allocated.

A *mixture* of dwelling types should be provided on development sites; in some areas, large expensive houses are needed. The strategy fails to recognise *park homes* as affordable market housing.

Development should extend outwards with greenery in between, putting people in contact with *green space*. *Design* must be adventurous and *exciting*, and get more dwellings into small spaces. Affordable housing should still be in keeping with *local character*. It is preferable to develop farmland with low *biodiversity* than PDL⁶ with high biodiversity.

The strategy is too *detailed* and *prescriptive* in terms of the mix of affordable housing, people's ability to choose a home and the density of development, which should reflect the circumstances. *Flexibility* will allow the market to flourish and allow providers to deliver. *Densities* of 30-50dph⁷ are too high for villages and won't ensure good design that's in keeping. The development industry agrees to the *Code for Sustainable Homes*, but Lifetime Homes cannot be insisted upon. The *planning system* is already difficult and needs to be made easier and more positive.

²Regional Spatial Strategy; ³Strategic Housing Market Assessment; ⁴Strategic Housing Land Availability Assessment; ⁵Council-owned development sites; ⁶Previously Developed Land (“brownfield”); ⁷dwellings per hectare

Economy

Craven is already an *attractive* place to live, work and visit, and needs only small, gradual *adjustments*. It needs *quality* employment for local people and land for *small businesses* in order to avoid becoming a *dormitory* and retirement area, to slow down the *exodus* of young people, to reduce *commuting* and to provide opportunities for businesses to *grow locally* rather than relocate.

Thriving businesses are *thwarted* by a lack of opportunity to expand or relocate locally. *Small firms* don't need large sites. Firms relocating from *Leeds/Bradford* bring their workforce with them. The community mix is suffering from a loss of key workers and trades brought about by a lack of *affordable housing*. Broadband, post offices, schools and affordable homes are important to *rural communities* and second-homes are a problem.

Congestion should exclude *Cross Hills* as a strategic location for employment. The *Skipton—Cross Hills* corridor is being occupied by businesses (e.g. distribution) that use a lot of land, do not generate a great number of jobs and do little to solve the employment land problem. Demand in *Bentham* is lacking and we shouldn't attempt to create it artificially, but we need a better understanding of demand and whether it's affected by the supply; demand has improved and most sites now have tenants. *Bentham* needs land for small businesses and to support regeneration, its service centre role and housing growth; employment sites must be protected from more lucrative housing development. *Bentham* and *Settle* are gateways to Forest of Bowland and *Bentham* needs tourist accommodation and facilities. New businesses in *Bentham* should be mainly office or service-based with those involving large vehicles being located at *Ingleton*, which has better road links. *Ingleton* and *Settle* have good road links and need more land; existing sites are full. *Ingleton* has land available adjacent to the existing estate and needs more land than *Bentham*. The character of *villages* includes rural businesses, small businesses and self-employment, which need to be retained.

Most of the required *37.5ha* should go to Skipton in phase 1 and less should go to South Craven in phase 2, in recognition of the *RSS*² approach and capacity of infrastructure. Distribution using the *settlement strategy* places too much outside Skipton and Settle, which isn't sustainable or in line with the *RSS*. The draft *ELR*⁸ figure of 37.5ha to 2021 overestimates the need for land and is much higher than the *RSS* figure of *8ha*. The figure should be *recalculated* using *RSS* information on job growth and the amount and type of sites needed, otherwise there could be an over-allocation. The best employment sites must be *protected*, especially in Skipton. Sites that are surplus to industry and distribution should be *re-used* for small businesses.

The *landscape* can generate income; *agriculture* and *tourism* can be mutually beneficial; valleys need to be protected for *food* production; and there is new *potential* in agriculture, agri-industries, renewable energy and eco-businesses; but diversification shouldn't create high-intensity uses that *damage* the countryside. *Flexibility* for non-business class and recreational uses will help diversify the rural economy. The strategy is *lacking* on tourism, leisure, holiday caravan parks and hotels. A restored *Skipton-Colne* railway would increase tourism from the north-west.

Town centres, like *Settle*, are suffering. We need to promote *local products*. There is complacency in *Skipton* town centre, which must keep its market town appeal without being tatty. Town centres are *more* than shops and need leisure, recreation and culture. A desire for enhanced *quality* doesn't mean we need more retail space. *Skipton* is congested, car-parks are full and we need to preserve the town's individuality and character. *Bentham* needs to keep its range of local shops. Shopping *locally* is better environmentally and economically and makes for sustainable town centres. The strategy doesn't address the need for and appropriate scale of *retail* development.

The distribution of housing and employment needs to be brought into *alignment* to resolve a current disparity within the strategy. Low-paid jobs and a lack of high-paid jobs will increase *commuting* to and from the district. House prices and incomes need to be *balanced*.

⁸Employment Land Review

The strategy should do more to support *new forms of business* that can release potential in the local economy, including: cultural quarters, affordable workspace for creative industries, small scale workshops/conversions, flexible live/work space and serviced hubs, clusters of activity, home working, broadband infrastructure, farmers markets, farm diversification and waste technology/services. Given its *high-quality* education and environment, Craven is a good area for employment/self-employment in hi-tech, specialist, knowledge-based, skilled, professional sectors. Companies of the future are likely to be *smaller* and home-working requires no employment land or commuting, which could affect the strategy and land requirements. The *social care* sector may grow in Craven, providing opportunities for small home-based businesses and allowing the ageing population to remain at home.

The *canal* can contribute to economic objectives as a focus for regeneration, mixed use, leisure, housing and commerce. Bentham's *auction mart* is a thriving local business and it would be good to have a strategy to grow all local markets. Employment sites should be more like *Broughton* Business Park.

There are likely to be many local jobs filled by commuters from *outside* the district. The Crossings at *Cross Hills* attracted businesses from Keighley, which brought their employees with them, and created some high-quality jobs, but not in large numbers. We can provide employment opportunities for local people, but we can't control where employees actually come from. If significant development is likely to increase migration and *commuting* from outside, then the target should be lowered to RSS² level.

Environment and Design

Any distinction between the natural and built environment is *artificial*—there aren't two environments. Features aren't *isolated* aspects of importance and importance often has a historical aspect. Likewise, there should be no artificial *boundary* between settlements and countryside—landscape character is dependent on the two together. The appropriate style of development will depend on landscape *character*, not landscape quality. All landscapes need equal *respect* and *aspirations* for enhancement. The *cross-border* nature of landscape isn't drawn out in the strategy. Rural development shouldn't be *prohibited* by putting environmental objectives ahead of social and economic objectives.

Building on *open spaces* isn't good for our future—we need to create more. Habitats are isolated and fragmented—we need to build *connections* between them. Wetlands and moorland absorb carbon. The *strategy* needs to address issues relating to SINC⁹s, LNRs¹⁰, trees and woodland (especially veteran trees and ancient woodland), including their importance, protection and eligibility for grant assistance; it needs to explain hierarchies of policy and legal protection for landscapes and species; and it needs more on improving management, creating habitats and mitigating the effects of development.

The historic environment policy is *too detailed* to be strategic and needs to be an overarching policy for general protection and enhancement. Historic Parks and Gardens are a relevant national designation and need to be mentioned. Consideration should also be given to *non-listed* buildings of architectural merit and *local assets* should be identified, including those at risk. More *flexibility* is needed in reusing buildings within conservation areas for sustainable uses (e.g. workspace). The strategy should be clearer on protecting the district's *archaeological* remains (including those underground and the setting of remains) much of which isn't scheduled, yet may be of national importance. Conservation must be seen as *positive* action rather than a hindrance to development. *Education* and public *information* should be used to create understanding, appreciation and value.

Poor design is being allowed and “sense of place” needs to be put into practice. The police may be consulted, but crime-led design is too *prescriptive*, negative and based on a false presumption about the threat of crime in Craven. *Public art* should be covered in the strategy and in planning obligation requirements. Art is important to design and the environment, providing multiple benefits for residents, visitors and businesses.

Green Infrastructure should be added to the list of requirements. If open space is not well-used, the cause may be poor *maintenance* or lack of *access*, rather than an absence of need in the local

⁹Sites of Importance for Nature Conservation; ¹⁰Local Nature Reserves

community. Planning obligations should be used to mitigate the impact of development on adjacent open space. The open space assessment (PPG17¹¹) is out of date and will undermine the soundness of the core strategy. Biodiversity should be incorporated into new development and a network of green corridors should be created linking new and enhanced sites of natural and semi-natural open space. The strategy should promote the *canal* and facilities for users, including a new marina and moorings.

Building on *floodplain* should not occur and it is unlikely that a need for development in flood zones 2 and 3 could be justified on exceptional grounds. *SUDS*¹² should be required to prevent rapid run-off.

General

The document and background documents are *difficult* to use. There is *too much* to take on-board, too much repetition and statement of the obvious, and too much use of jargon and acronyms. It would be better to have one document with *short and simple* common-sense aims and policies, using the local plan format. The response form is also complex and *off-putting*. The *key diagram* doesn't provide the necessary visual representation of the strategy.

Consultation is in haste, at the last minute, a *fait accompli*, not good enough to attract younger people, too web focused (isn't available or suitable for everyone) and is at CDC's¹³ convenience rather than the public's (daytime events exclude many). The document deserves *better* publicity and consultation needs to seek better solutions to real problems.

The *settlement strategy* should have only 3 sections: Principal Town; Local Service Centres; Villages and Open Countryside. It isn't joined-up to exclude *national park* villages from the strategy (e.g. affordable housing needs). An allowance for *windfall* sites in the housing land supply isn't justified. The strategy over-emphasises *urban* areas, with little on *rural* areas and on differences between the two. The focus on Skipton and South Craven creates a *bias* and *divide* that doesn't help North Craven. The benefits of development should be *balanced* across the district allowing equal opportunities to grow gradually. Some areas have been *restricted* and deprived resulting in shop closures and house-price increases. Settle and Bentham are important *rural* service centres, whereas Glusburn/Cross Hills/Sutton is more *urban*, populated and aligned with cross-boundary economy and housing markets.

The strategy contains little on cross-border issues shared with *Lancashire*. The A56 and A65 feature in the North West *RSS*². Pendle and Craven share housing and employment *markets*. Liverpool and Blackpool *airports* are just as close to Bentham as Manchester and Leeds-Bradford. The existing *rail* link between Hellifield and Clitheroe isn't mentioned, but could offer opportunities for improved services.

The strategy doesn't address: the *canal* as a mode of transport or leisure facility; NYCC's¹⁴ *Rights Of Way* Improvement Plan; CDC's *Play* Strategy; the *arts* and cultural facilities, including developer contributions; the needs of the *elderly* (e.g. local care jobs, care homes, nursing homes etc); public and private *water supply*; remediation of *contaminated land*; protection and sustainable use of *water resources* (quality and quantity); the management of *waste*; and links to the delivery of other *strategies* outside planning.

A number of policies have not arrived via *sustainability appraisal* at the issues and options stage.

There is little reference to *locally driven* initiatives like Village Design Statements and Parish Plans. Local fine tuning is needed through close working with *parishes*.

¹¹Planning Policy Guidance 17: Planning for Open Space, Sport and Recreation; ¹²Sustainable Urban Drainage Systems; ¹³Craven District Council; ¹⁴North Yorkshire County Council



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