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# Draft Craven Local Plan

Progress and areas for action, February 2015

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## Craven District Council

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## About this report

- 1.1 The following report gives details of progress and areas for further action, following consultation on the first draft of the Craven Local Plan (22/9/14 version). It provides a lot of information about planned further work, including establishing an up to date evidence base and preparing a second draft of the local plan around summer 2015.

## Background

- 2.1 The report is essentially the same as one considered by the Craven Spatial Planning Sub-Committee on 25<sup>th</sup> February 2015, but has been reformatted for a wider audience. The original version is available from the sub-committee web-page, along with other items from the same agenda, and further related information is available from the planning policy team's New Local Plan web-page.

## Introduction

- 3.1 The Local Plan is important in enabling the Council to provide a framework for making decisions on proposals to ensure new development is located appropriately and is of a suitable type and scale. The Local Plan when adopted will provide greater certainty for the community, developers and businesses in the face of the changing needs of Craven over the lifetime of the Plan.
- 3.2 In 2012, the publication of the National Planning Policy Framework (NPPF), replaced previous national policy and put in place a 'presumption in favour of sustainable development,' this represented a shift in emphasis from previous national policy. The National Planning Practice Guidance (NPPG), which provides guidance to the NPPF, was produced in March 2014. Councils including Craven have now had time to digest these changes and this has resulted in a more stable base for the production of Local Plans nationwide.
- 3.3 On 18<sup>th</sup> August 2014, the Spatial Planning Sub- Committee endorsed proposals for community engagement/consultation on a draft Craven Local Plan, which was held over a period of six weeks from 22<sup>nd</sup> September to 3<sup>rd</sup> November 2014
- 3.4 It is important to recognise that the consultation related to a first draft of the Local Plan, an early milestone in the plan's overall preparation. The engagement/consultation provided an excellent medium for generating constructive feedback from the local community, developers, voluntary bodies and statutory organisations, which will make a valuable contribution to progress the local plan to adoption.
- 3.5 A high level of response was received to the engagement, with 368 respondents making comments, of which nearly three quarters (269) were residents. Other responses were received from landowners, businesses, planning consultants, statutory bodies, neighbouring local authorities, parish councils, ward members and other individuals, organisations and groups.
- 3.6 The first draft of the Craven Local Plan, identified 'draft preferred sites,' for housing, employment or mixed uses and as may be expected there were a significant number of comments which related to sites (411 of the 864 comments received).

Comments received on sites will contribute positively to progressing allocations within the local plan and will help to refine, alter and establish development principles for each site. However, it is important to be mindful that in progressing site allocations, it is likely to be necessary to consider these within the context of a higher overall housing requirement (see paragraphs 3.13 to 3.21).

- 3.7 Whilst the responses received on sites are of significant importance in the progression of the local plan, this report aims to focus more on the important steps that need to be taken to progress and improve the “soundness” of the local plan including work related to the overall strategy of the plan; the evidence base; and objectively assessed need for housing and employment land requirements.
- 3.8 This report follows the structure of the chapters in the draft Craven Local Plan and has been set out under the main headings of:
- Evidence Base
  - Housing
  - Spatial Strategy
  - Environment
  - Economy
  - Infrastructure
- 3.9 Under most of the headline topics is a series of sub-topics. The report concludes with a summary of actions that are required in order to progress towards the second draft consultation local plan around summer 2015.

## Evidence Base

- 3.10 As recognised above, the engagement on a first draft local plan has proved fruitful in the quality of responses received. However, it was recognised that as an early draft, the plan was far from being a finished document. One of the most significant areas for work going forward is to ensure that policies within the plan are supported by up-to-date and relevant evidence. Preparing an evidence base is well recognised as a time-consuming exercise but nevertheless essential.
- 3.11 With the introduction of the NPPF in 2012 and the NPPG in 2014, areas of evidence that were prepared for the Craven Local Plan have become out of date as they do not accord with their requirements. For example, the Strategic Housing Market Assessment prepared in 2011, no longer accords with the latest national guidance which renders it vulnerable to challenge that it does not provide a robust basis for producing an objectively assessed need for housing in Craven. Indeed, several respondents to the consultation on the draft local plan made this particular point.
- 3.12 In light of this, significant work has been undertaken in recent months to procure consultants to undertake background studies that will underpin the Local Plan with adequate, up-to-date and relevant evidence on matters including housing, employment, retail, heritage, infrastructure, sports facilities and open space. Much of this work is anticipated to be completed by late spring 2015, enabling the production of robust evidenced based local plan policies that are able to withstand scrutiny at examination.

# Housing

## Objectively Assessed Need for Housing (OAN)

- 3.13 As a result of changes brought about through the Localism Act 2011 and the abolition of Regional Spatial Strategies, local planning authorities are now required to identify their own housing requirements. Paragraph 47 of the National Planning Policy Framework requires local planning authorities “*to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the Policies set out in this Framework.*” For Craven, this means bringing forward a Local Plan which includes a housing requirement for the plan area with specific identified sites to meet the housing requirement for at least 15 years from the date of the adopted plan (anticipated to be in 2017) i.e. up to 2032/33.
- 3.14 Many councils across the country have found housing provision to be one of the most significant obstacles in adopting a local plan and there have been several instances where councils have been required to increase their local plan housing requirement to meet their objectively assessed needs (OAN) during the Examination in Public, with inspectors taking a firm line on promoting growth. More recently the outcomes of examinations on local plans have become more consistent on the matter of housing provision, aided by the introduction of the National Planning Practice Guidance (NPPG) in March 2014. The Planning Advisory Service also provided useful guidance in June 2014 (Objectively Assessed Need and Housing Targets Technical Advice Note). As a result the Council is now in a better position of understanding the requirements for developing a suitable and robust housing requirement that can withstand challenge and scrutiny at examination.
- 3.15 The approach to the emerging housing target for the draft Craven Local Plan which identified a potential housing requirement of 160 dwellings per annum (with an additional 20 dwellings per annum being apportioned to the Yorkshire Dales National Park ) needs to be revised in light of updated national guidance on objectively assessed housing need together with new emerging demographic projections.
- 3.16 A number of respondents to the draft local plan commented that the housing target figure is not based upon Craven’s full objectively assessed need for housing and does not take into account the latest available population/household projections. Respondents also commented that were the Council to progress further with a housing requirement figure of 160 dwellings per annum, it is likely to be found unsound at examination as it does not accord with national policy and guidance on a number of grounds, including a failure to significantly boost supply; not addressing local affordable housing needs and the level of housing provision not aligning with future jobs growth and the plan’s employment strategy.
- 3.17 The NPPF (paragraph 159) states that local authorities should have a clear understanding of housing needs in their area by preparing a Strategic Housing Market Assessment (SHMA). In the context of “housing needs” the NPPF is clear that this includes market demand for housing. The Council’s existing SHMA 2011 predates the NPPF and NPPG which was highlighted by a number of respondents to the draft local plan. Given the importance of the SHMA as part of the evidence base to the local plan, an updated SHMA has been procured (Arc4 appointed with Edge Analytics providing updated demographic analysis and forecasts). The

updated SHMA (completion expected in March 2015) together with the work produced by Edge Analytics will help the Council to identify its OAN taking account of important factors including market signals (house price trends, trends in private rentals, previous supply etc.), updated affordable housing requirements and economic growth forecasts.

- 3.18 Whilst the purpose of this report is not to discuss a new housing requirement figure for the plan area, it has become very clear from the experience of other authorities and from comments made during consultation on the draft local plan that the figure of 160 dwellings per annum will need to be uplifted to pass scrutiny by the Planning Inspectorate at examination. Indeed the starting point for any discussion on a housing requirement for the district is the latest available household projections. At present these are the 2011 based interim household projections (the 2012 based projections come out later this year), which shows a figure of 193 dwellings per annum for Craven, this is before other considerations including market signals, affordable housing and employment forecasts are factored in.
- 3.19 Another key influence on the consideration of OAN will be Craven's ageing population. By 2037 if current trends continue 77 people will be of retirement age (65 and over) for every 100 people of working age (16-64), an increase from 39 people per 100 in 2012. Whilst there is debate over the potential impacts this may have locally, one of the main issues is that this may lead to a decline in the local workforce which could impact on the ability of local businesses to recruit and retain staff. Whilst, it is inevitable that Craven's population will age over the plan period, if we are seeking to retain a healthy economy where local businesses can recruit the right staff, it will be important to align our aspirations for jobs growth within the local area by providing housing of the right quantity and of the right type in the right locations to attract people of working age, including families, into the area, as well as enabling older people to move into accommodation that suits their aspirations. This is a consideration the inspector is likely to look carefully at during examination.
- 3.20 Another key matter for the Local Plan to resolve will be the apportionment of part of the district's overall housing requirement within the Yorkshire Dales National Park. Under the current emerging requirement of 180 dwellings for Craven overall, it was suggested that 20 dwellings per annum be apportioned to the Yorkshire Dales National Park. Consultation responses raise the matter of formal clarification through the Duty-to-Cooperate that CDC and the National Park Authority are addressing their cumulative objectively assessed need for housing.
- 3.21 Following completion of the updated SHMA and other key evidence, the Planning Policy team intend to prepare a discussion paper on reaching a revised housing requirement for the plan area, which will consider the matter of Craven's objectively assessed need for housing alongside other key factors. Informal engagement on the discussion paper is proposed to enable the Council to achieve a locally determined housing requirement figure taking account of national policy and guidance and Craven's economic aspirations.

### **Affordable Housing**

- 3.22 In November 2014, the Government introduced new policy on affordable housing in order to reduce the burden on housing delivery for small scale developers. The policy introduces a minimum threshold before affordable housing contributions can be required by local authorities. The policy means that unless an area (normally

parish) is classified as a 'designated rural area,' a minimum threshold of ten dwellings applies before affordable housing contributions can be required. In the case of 'designated rural areas' commuted sums can be sought for off-site provision for schemes of six to ten dwellings. Not all parishes in Craven are "designated rural areas". Skipton and most of the South Craven parishes are not "designated rural areas". The draft Local Plan sought affordable housing contributions on schemes of five dwellings or more across the whole plan area. This policy therefore needs to be revised to accord with new national policy.

- 3.23 Further matters for consideration include allocations of small sites where affordable housing delivery may be affected. Options may include retaining these sites with the quantum identified in the draft local plan, seeking to increase delivery on site to bring them within the thresholds of national affordable housing requirements, or removing them from the allocations process altogether.
- 3.24 The viability of affordable housing is also an important consideration. The draft local plan proposed a policy for 40% affordable housing on schemes of five dwellings or more (this was based on a range of 30% to 40% being identified as a suitable range to enable maximum provision whilst retaining viability on development schemes – Peter Brett Associates, Affordable Housing and Community Infrastructure Viability Study, August 2013). In light of national policy changes and responses received to consultation on the effects a 40% requirement may have on viability when factoring in offsite infrastructure contributions, a review will need to be undertaken to ensure an appropriate requirement is set out in the Local Plan.

### **Ashfield Farm (Cross Hills)**

- 3.25 Potential allocation of Ashfield Farm as a strategic site for delivery of housing has been considered throughout the plan preparation process. The site presents significant constraints being located within flood risk zones 2 and 3, with a large part of the site being functional flood plain (flood zone 3b). For this reason the site performed poorly in initial sustainability checks undertaken by the Council in early 2014.
- 3.26 Housing developers, Harron Homes submitted a planning application for the north western corner of the site in 2014 for residential development. The application was withdrawn on advice from the Council. During the consultation on the draft Local Plan but not as a direct response to it, Harron Homes came forward promoting the potential of the site to include residential development but also for the provision of a road bridge across the railway line to link with the A629. This would provide the benefit of enabling the level crossing to be closed and potentially enable the delivery of a new rail station at Cross Hills. These opportunities could be significant in reducing congestion within Cross Hills and enable better access between North Yorkshire, east Lancashire and West Yorkshire.
- 3.27 It is important to recognise in light of the likely need to provide an uplift in the housing requirement in the Local Plan that where strategic development opportunities may exist that they are given full consideration.

# Spatial Strategy

## Spatial Options for Growth

- 3.28 In developing a spatial strategy for Craven, the context points towards an evidenced based strategy focused on the impacts of changing demographics and the protection of the natural and built environment rather than an agenda for regeneration.
- 3.29 Whilst significant work has gone into identifying a sustainable strategy for the distribution of growth, engagement and local evidence gathering (eg: parish profiles) have not realised much feedback in terms of alternative distribution proposals other than proportionate growth based on settlement population. Refinements have been made to the proportionate approach, through adjustments to some settlements i.e. lower growth strategies for Hellifield and Cowling (balancing out relatively high recent growth) and Settle and Giggleswick (environmental and geographical constraints), whilst distributing an increased level of development to Skipton (as a result of previous low proportionate growth rates).
- 3.30 Engagement undertaken with stakeholders in autumn 2012 and with the community in summer 2013 helped develop the evidence base in the context of limited available secondary evidence (largely attributed to Craven's relatively small population). This evidence base is important in shaping a strategy for the distribution of growth. Subsequently in autumn 2014, a preferred spatial strategy was presented in the draft Local Plan. However, a sustainability appraisal comparison with genuine spatial distribution alternatives that are realistic, deliverable and reflect evidenced issues is an ongoing process that is integral to preparing a sound local plan.
- 3.31 The NPPG provides guidance on what constitutes a reasonable alternative, i.e. that they are 'different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable.'
- 3.32 Strategic alternative options for growth are still being considered for Craven to ensure that the most sustainable strategy is carried forward in the Local Plan. This will form part of the discussion paper for consultation referred to in paragraph 3.21. Consultation outcomes from this paper will help work towards further refining a preferred strategy.

## Duty to Co-operate

- 3.33 As well as a responsibility to objectively determine and plan for the amount of new homes and employment sites needed, Craven has a duty to cooperate on wider strategic issues with other local authorities. Craven has migration and commuting relationships with its neighbours and Leeds; this has shaped the Local Plan.
- 3.34 Examinations are scheduled for both Pendle and Bradford's emerging core strategies during spring 2015. Planning officers have engaged with Pendle Council on their Core Strategy that aims to claw back net out commuting to other districts, although it is understood that the strategy for change is focused on their relationship

with other Lancashire local authority areas, rather than with Craven. Bradford Council's emerging Core Strategy plans to meet its own housing need and for new employment sites in the Aire Valley south of Craven. Evidence indicates a growing working age population in Bradford District. To date Craven and Bradford have been generally supportive of their neighbours emerging planning strategy. Craven have not made a formal representation to Bradford's Core Strategy. It is important that further work on Craven's emerging local plan has regard to the outcome of the Bradford core strategy examination, in particular for planning for changing commuting patterns between the two local authority areas.

## Environment

### Policy amendments

- 3.35 A number of respondents made comment on the wording of policies within the environment section of the plan. These representations are currently being reviewed and where necessary amendments will be made to policies to ensure that they are justified, effective and consistent with national policy. However, a number of responses also related to the need to carry out further work as part of the local plan evidence base. The key areas where these circumstances exist are identified below.

### Habitat Regulations Assessment

- 3.36 EU law (Habitats Directive 1992) seeks to assure the long-term survival of Europe's most valuable and threatened species and habitats through a network of designated nature protection sites known as Natura 2000 sites. These sites include Special Areas of Conservation (SAC's) and Special Protection Areas (SPA's) (which are concerned with the protection of bird species under the Birds Directive 1979). As part of preparing a Local Plan, the UK Habitats Directive (which transposes the requirements of the EU Habitats Directive into UK legislation) requires local authorities to undertake a Habitats Regulations Assessment (HRA) to determine the adverse 'likely significant effects' of the plan on the integrity of these designated areas (as well as Ramsar sites). HRA is a four stage process, where the first stage involves screening for 'likely significant effects,' (either alone or in combination with other plans and projects) through the preparation of a Screening Report. Where this identifies 'likely significant effects' further stages are required which include the preparation of an Appropriate Assessment.
- 3.37 A Screening exercise is currently being undertaken by the Planning Policy team to determine whether an Appropriate Assessment will be required. The Bradford Core Strategy Local Plan is of note, as during the preparation of the Core Strategy, the HRA process in considering the scale of growth for the district together with the proximity to designated sites (including the South Pennine Moors SPA/SAC) has necessitated in modifications to the distribution strategy to limit potential impacts.

### Heritage

- 3.38 In producing an up to date evidence base to support the Local Plan but also to ensure consistency on planning applications that may come forward within Craven, English Heritage have requested that work is undertaken to develop a better understanding of the historic environment within Craven. Subsequent to a meeting

between officers of CDC and English Heritage in January 2015 it has been agreed that the following work will be undertaken by consultants, funded by a grant from English Heritage:

- Developing conservation area appraisals for 21 conservation areas that do not have an up to date appraisal within Craven
- Developing an understanding of the impacts that potential allocations may have on the historic environment including conservation areas, listed buildings and areas of potential archaeological interest
- Making an assessment as to whether conservation areas should be designated within the settlements of High and Low Bentham and Glusburn.
- A brief has been prepared and a tendering process is underway. An appointment is expected to be made prior to the end of February.

3.39 In respect of site allocations within the local plan, the assessment of draft preferred sites will enable informed judgements to be made as to whether these sites should continue to be progressed within the local plan, whether mitigation is necessary or whether they should be removed from the allocations process.

### **Flood Risk**

3.40 In bringing forward a local plan strategy and site allocations, regard should be had to minimising flood risk to people and property, managing any residual risk and taking account of climate change. It is important that development is directed to areas of lowest risk i.e. where possible flood risk zone 1, through what is known as a 'sequential' approach. Where necessary an exception test may also be required (as detailed in paragraph 100 of the National Planning Policy Framework (NPPF)).

3.41 It is necessary that the sequential test is carried out and evidenced prior to the allocation of sites. This sequential approach has recently been carried out by the Planning Policy team taking account of up to date flood risk zones produced by the Environment Agency. In total there are 12 draft preferred sites which are located within flood risk zones 2 and 3. If these sites continue to be progressed as allocations in the local plan, it will be necessary to demonstrate why these sites are sequentially preferable to any alternatives in lower flood risk zones.

3.42 The Planning Policy team will be preparing a background document with assistance from the Environment Agency on the Sequential test to ensure that sites are not allocated in areas of higher risk where there are other lower risk alternatives that are sequentially preferable.

3.43 The Environment Agency within their comments on the draft Local Plan made specific reference to sites SK049 and SK051 which will rely on the Skipton Flood Alleviation Scheme (FAS) for their implementation, and will be unable to be brought forward until its completion. Whilst funding has now been secured for the FAS, the phasing of development may be affected by the timescales of its delivery.

## **Economy**

### **Employment Evidence**

3.44 In preparing its local plan, the Council has a responsibility to undertake its own objective assessment of the amount of new housing and employment land required

over the life of the local plan. Consultants are currently being commissioned to undertake an employment land review and local economy study in relation to the Craven local plan area. This will provide more robust evidence on the extent to which existing industrial estates and employment sites are meeting the requirements of local businesses. It will also provide greater clarity on what types of new employment sites and premises are needed.

- 3.45 The employment land review and local economy study will also support the local plan approach to relating housing growth to job growth. This is an area which has proved problematic at local plan examinations for rural districts elsewhere in England. The relationship between evidence informing the amount and location of new homes needed and the amount and spread of new employment sites required can be particularly complicated in rural districts.
- 3.46 As an attractive district for older people to live, a significant amount of new housing in Craven is required before any growth in the number of local jobs is factored in. This is largely attributed to a locally ageing population. Some new homes are required because more local people are living alone and household sizes are falling. Some new homes are required just to stabilize the resident labour force because an increasing proportion of existing homes are occupied by older age groups.

### **Town Centre Uses**

- 3.47 In preparing the Local Plan there are a number of requirements relating to town centres in the interests of retaining their vitality against a rapidly changing market. Craven is fortunate to offer attractive centres, including Skipton, which was voted the prestigious award of UK Street of the year in 2008 by the Academy of Urbanism. However, in the face of an ever increasing ability by customers to undertake shopping online, retaining vitality, low vacancy rates and a strong mix of uses is increasingly challenging.
- 3.48 The Council last undertook a Town Centres Healthcheck in 2004. In light of the changing nature of town centres, and requirements of the NPPG introduced in 2014, an up to date evidence base and analysis is required. Officers are currently working on the preparation of a brief for a new retail study, which will focus on existing performance and undertake an assessment of future need and capacity. It is expected that an invitation to tender will go out in March 2015, with expected completion of the study by late Spring 2015.

### **Settle Employment Growth**

- 3.49 When the draft local plan was consulted on in Autumn 2014, there were insufficient sites to provide alternative options for suitable development locations in and around Settle. New sites recently made available by landowners now makes it possible for the appraisal of the most appropriate strategy to grow jobs and homes in the town. This appraisal will consider local geography and up to date demographic and employment land studies and will need to be subject to public consultation.

### **South Skipton**

- 3.50 South Skipton is recognised as being the most significant development opportunity for employment growth within Craven over the lifetime of the plan and is identified as a priority for the Council within the Council Plan 2014-2018. The draft local plan

identified a site for a 16.4ha mixed use development including 9.5 ha of employment land together with approximately 160 units for residential development. There have been ongoing discussions between officers of CDC and Henry Boot who have a development interest in the site (and submitted a planning application for a mixed use development of B1, B2, B8, C1, A3, A4 and A5 uses, which was refused in April 2014 reference 63/2013/14114). Background work will continue to progress this site within the Local Plan as an important location for strategic growth to meet the future employment needs of the area.

## **Tourism**

- 3.51 A number of responses were received as part of the consultation on the draft Local Plan. In progressing the Local Plan, consideration is being given as to whether there is potential for tourism allocations within the Plan. Additionally whilst Bolton Abbey is an important tourism location within Craven, in response to comments received and in considering the day-to-day facilities that exist within the village, its role within the settlement hierarchy is being explored further.

## **Infrastructure**

- 3.52 To enable the provision of new homes and employment land to meet the objectively assessed needs of the area, it is necessary to ensure that supporting infrastructure is in place or can be implemented. This includes sewerage, schools, telecommunications, highways infrastructure and community facilities amongst others. A number of consultation responses were received from statutory undertakers relating to infrastructure needs within the area to accommodate growth.
- 3.53 The Planning Policy team continue to work closely with infrastructure providers and developers to ensure that necessary infrastructure is in place to support growth within the area, this includes working with bodies including Yorkshire Water, United Utilities, the Local Education Authority (North Yorkshire County Council), Natural England and the Environment Agency amongst others. These bodies have their own plans and programmes and continued cooperation will be important.
- 3.54 The phasing of new development is an important infrastructure consideration over the lifetime of the plan. This issue has been highlighted by Yorkshire Water in their response to the draft Local Plan, making reference to villages within South Craven, which rely on the Aire Valley trunk sewer. Yorkshire Water intend to prepare an Aire Valley Strategy and Drainage Area Plan (DAP) to ensure growth within Craven and Bradford is able to be accommodated within the capacity of the sewer system. The Planning Policy team will consider the outcomes of these plans and how they will affect the phasing of sites in the plan area.
- 3.55 The Planning Policy team are currently undertaking work to understand the infrastructure needs of the area, which will lead to the preparation of an Infrastructure Delivery Plan. Infrastructure providers in responding to the draft local plan have recommended that additional/revised policies be included in the local plan. The Planning Policy team are reviewing these responses to understand necessary alterations.
- 3.56 North Yorkshire County Council acting in their role as the Local Education Authority (LEA) for Craven, have made reference to the need for additional school places within the area as a result of new development, potentially through extensions to

existing schools in a number of villages within Craven or in the case of Skipton the need for new primary schools. In light of the physical limitations of delivering new housing development through strategic sites within Craven, this makes the delivery of new schools more challenging (either through land provision or financial contributions). Liaison is ongoing with the LEA to understand how best to deliver new education provision.

### **Transport Infrastructure**

- 3.57 In order to progress with the Local Plan strategy and allocations the local highway authority (North Yorkshire County Council) need to be satisfied that growth can be accommodated within the highway network. There has been ongoing engagement between officers of CDC and NYCC, with transport consultants Jacobs appointed to undertake highway modelling. It has been agreed that modelling will take place along key junctions on the A629 but also at Skipton, Settle, Glusburn and Cross Hills and Gargrave to develop an understanding of how new housing and employment could be accommodated. Modelling is due to commence in March 2015.
- 3.58 There is ongoing work to assess the viability of a new train station at Cross Hills. A recent report (New Railway Stations in North and West Yorkshire Feasibility Study) by Atkins on behalf of the West Yorkshire Combined Authority identified that a new train station at Cross Hills could be one of only four locations within the Leeds City Region where a new station is feasible. However, delivery is likely to rely on the closure of the level crossing at Cross Hills, which will require a road bridge over the railway line. Further work for the Local Plan includes developing an understanding of costs and the need for associated growth to accommodate infrastructure as well as the potential for safeguarding of land.
- 3.59 The vulnerability of local bus services is an important matter for planning within rural areas. With cuts in public subsidies operators have found it difficult to provide a profitable service and often make losses. This has been recently evident in Craven, with Pennine Motor Services who for many years were an important local public transport provider, went out of business. Whilst Kirkby Lonsdale Coach Hire and North Yorkshire County Council have begun replacement services, a real threat exists within rural communities over the potential loss of vital transport links. This has an important impact on the distribution of housing and employment within the plan area to ensure that services are protected and residents are not left isolated.

### **Sports Facilities and Open Space**

- 3.60 Promoting health and well-being forms an important objective of Craven District Council and is reflected in the draft local plan objectives. The NPPF identifies that *'access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.'* Strategic local plan policies can implement a strategy for wellbeing through seeking to provide for the area's needs for open space, sports and recreation. However, such policies must be based on up to date robust evidence which identifies specific needs and quantitative or qualitative deficits or surpluses in the local area.
- 3.61 Sport England in response to the consultation on the draft local plan, advised that an evidence base for sport and recreation should be prepared in the form of an up to date playing pitch strategy and an up to date built sports facilities strategy in

accordance with their approved national methodology. The Council has engaged with Sport England to determine the requirements of these strategies. Additionally an open space strategy is important in providing for and protecting open spaces across Craven. Open spaces include facilities such as allotments, children's play areas, parks, natural and semi-natural green spaces and cemeteries. Sport England does not have a defined methodology for the assessment of open space, providing the Council with more flexibility to devise a methodology suitable for Craven.

- 3.62 The Council is currently preparing a brief for these strategies in order to appoint an experienced consultant. It is expected that this brief will go out to tender by the end of February 2015.

## Summary of areas of work/action required to progress the Local Plan

- 3.60 A summary of work/action that is required in order for the Local Plan to reach a second draft of consultation is set out below. As can be seen there is a significant amount of work required to establish a full evidence base to support the Local Plan. **This is not an exhaustive list and focuses on the main areas only.** It should also be noted that this list of work/action does not go beyond the point for the next informal consultation on the second draft of the Local Plan. In respect of timescales it is unlikely that consultation will take place prior to summer 2015.

### **Housing and Employment**

- Finalisation of SHMA
- Employment Land Review and Local Economy Study
- Retail Study
- Preparation of discussion paper on revised housing requirement figure, employment strategy, review of spatial options and distribution strategy.
- Potential call for sites (should spatial strategy or the requirement for additional housing allocations require new areas of land)

### **Heritage**

- Conservation area appraisals
- Recommendations for designating new conservation areas
- Recommendations on draft preferred sites and any required mitigation

### **Flood Risk**

- Sequential test report on draft preferred sites

### **Biodiversity**

- Habitat Regulations Assessment

### **Local Plan content**

- Review of policies in the November 2014 draft based upon responses received
- Formal assessment of saved policies from 1999 Local Plan document
- Monitoring Framework
- Preparation of development principles for land allocations

**Infrastructure**

- Position statement on school provision
- Highways impact study
- Playing Pitch and Built Facilities Strategy
- Open Space Assessment
- Infrastructure Delivery Plan

**Sustainability Appraisal**

- Developing, evaluating and refining options
- Preparation of interim environmental report
- Reviewing site selection methodology and consultation with stakeholders
- Appraising sites for employment

**Duty to Cooperate statement**

- Carry out ongoing duty-to-cooperate
- Prepare draft report

**Engagement work**

- Full review of consultation responses from November 2014 consultation
- Second draft local plan consultation