



**Draft Good Design  
Supplementary Planning Document (SPD)  
Consultation Statement – December 2021**

## Introduction

1. Craven District Council has prepared a draft Supplementary Planning Document (SPD) in relation to Good Design which provides further guidance on good design principles in the Craven Local Plan area. In accordance with the Town & Country Planning (Local Planning) (England) Regulations 2012 (as amended) and NPPF definitions of SPD's, it adds further detail to help explain the objectives relating to the following policies of the Craven Local Plan (Nov 2019) and, once adopted, forms a material consideration in the determination of relevant planning applications:
  - Policy ENV3: Good Design
  - Policy SD1: Presumption in favour of sustainable development
  - Policy SD2: Meeting the challenge of climate change.

## Purpose of the Consultation Statement

2. Regulation 12 (a) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) requires that, before adopting a Supplementary Planning Document, Local Planning Authorities (LPA) should prepare a Consultation Statement. This should include the following information:
  - (i) The persons the local planning authority consulted when preparing the supplementary planning document;
  - (ii) A summary of the main issues raised by those persons; and
  - (iii) How those issues have been addressed in the supplementary planning document.

Regulation 12(b) requires both the consultation statement and the SPD to be made available for the purpose of seeking representations on a draft SPD.

## Public Consultation

3. In line with Regulations 12 and 13 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), and the Council's [Statement of Community Involvement](#) (SCI) 2018, draft SPDs are subject to two rounds of public consultation. Regulation 12 requires LPAs to invite comments on a draft SPD during a period of public participation. Regulation 13 then requires LPAs to invite representations on a draft SPD over a period of not less than four weeks.
4. The first public consultation on the draft Good Design SPD ran for a period of four weeks from Monday 13<sup>th</sup> September until Monday 11 October 2021. The first draft SPD was published on the Council's website and comments were invited to be submitted in writing, no later than Monday 11<sup>th</sup> October 2021 either by post or email.
5. Following this first round of public consultation, representations are invited on a second draft of this SPD over a four-week period from 4<sup>th</sup> January to 1<sup>st</sup> February 2022. in line with Regulation 13 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

6. The Council has developed a comprehensive local plan consultation database which includes specific and general bodies and individuals for consultation purposes. The [Subscriptions](#) web page on the Council's website allows individuals and organisations to submit their details and be entered onto the local plan consultation database, via Mailchimp at any time. All contacts within the local plan consultee database were notified of the draft Good Design SPD consultation by either postal or electronic mailshot. Consultees include:

- Specific Consultation Bodies as defined in The Town and Country Planning (Local Planning) (England) Regulations 2012 and amended Regulations, including Town and Parish Councils
- General Consultation Bodies as defined in The Town and Country Planning (Local Planning) (England) Regulations 2012 and amended Regulations.
- Individuals that have subscribed to receive details of spatial planning consultations.

7. A press release was issued by the Council on 10<sup>th</sup> September 2021. This was subsequently published in the Craven Herald & Pioneer newspaper on Thursday 16<sup>th</sup> September 2021. The consultation was also promoted on social media (Twitter and Facebook). A copy of the press release is included at Appendix 1 to this report.

#### **What issues were raised & How have they been addressed?**

8. A total of 13 representations were received to the first public consultation. Table 1 below sets out who submitted the response, a summary of the main issues raised, the Council's response and how the issues raised have been addressed in the SPD together with details of any changes to the SPD, where appropriate.

Table 1: Summary of the issues raised by respondents, the Council’s response and recommended changes to the SPD

Respondent	Summary of Issues raised	Council’s Response and recommended changes to the SPD (shown in bold)
Marine Management Organisation	Standard advice regarding marine licensing, marine planning and minerals and waste plans and local aggregate assessments is provided.	The standard advice is noted. <b>No change to SPD required.</b>
Canal & River Trust	<p>Context Policy ENV3 Criterion (d) – Enhancing local distinctiveness</p> <p>The reference to distinctiveness and explicit examples given and referenced in paragraph 2.1.20 (and figures 1-3 and 9-11) have the potential to act as a strong mechanism to deter inappropriate developments in areas where consideration needs to be given to the impact on settings and character. We do advise, however, that the imagery chosen has the potential to be accidentally interpreted to promote pastiche design of alterations difficult to distinguish from true heritage value. As a result, we would suggest that additional text could be included which explicitly states that allowances for innovative design or strategies that make a material contrast to existing fabric can be allowed if a strong case-by-case justification is made and high-quality design and materials are proposed.</p> <p>Policy ENV3 Criterion (g) – External Storage Space Paragraph 2.2.3 relates to refuse storage. Often these areas can be highly visible from the public realm, including our towpath network, especially with regards to commercial units. Whilst we note that the paragraph refers to the need for bin storage to be sensitively designed and located, the text ‘where possible’ does add a significant caveat. In addition, the paragraph does not refer explicitly to the need to screen such facilities from the public realm. We therefore advice that the policy could be more effective if the caveat was removed, and if the paragraph text was expanded to state that “refuse facilities should be sited so that their prominence from the public realm is minimised”.</p>	<p>The point is noted relating to allowances for innovative design or strategies.</p> <p><b>Change to SPD as follows: Add the following new sentence to 2.1.21: “New and innovative designs would not include pastiche, which should be avoided, but may include designs that make an appropriate contrast to existing buildings, so long as they employ high quality materials and achieve good design overall.”</b></p> <p>The Council agrees that the policy could be more effective if the caveat ‘where possible’ was removed.</p> <p><b>Change to SPD as follows: Amend the first sentence of paragraph 2.2.3 as follows: “The bins described above should be accommodated within the boundary of each property with designated storage areas which are sensitively located and designed.” Add the following sentence: “Refuse facilities should be sited so that their prominence from the public realm is minimised.”</b></p> <p>Support welcomed.</p> <p><b>No change to SPD required.</b></p>

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	<p>Policy ENV3 Criterion (j) – Permeable Developments</p> <p>The Trust promote the use of our network for sustainable travel and leisure. The aspirations of paragraph 2.3.8, which promotes permeability within development, fits within our ambitions to promote connectivity from development to the canal corridor. Contextual analysis is key within the design process to recognise the canal's location and key access points for use as either a place of amenity, fitness, learning or sustainable vehicular free travel.</p> <p>Designing Out Crime</p> <p>The Trust encourages development to promote natural surveillance over our spaces, which can be a deterrent to crime, and can make our network more welcoming for use. Approaches within paragraph 2.5.1 to promote natural surveillance as a deterrent to crime could help achieve this aim.</p> <p>Pre-application discussions</p> <p>The Trust, in our role as statutory consultee, does offer Pre-Application advice to prospective applicants. For developments close to our network, this can allow us to provide specific advice upon our network, including opportunities for designed to integrate with our network where appropriate.</p> <p>We advise that section 3.1.0 should refer to the potential for applicants to consult with Statutory Consultees, as this could assist in the development of design.</p>	<p>Support welcomed.</p> <p><b>No change to SPD required.</b></p> <p>Support welcomed.</p> <p><b>No change to SPD required.</b></p> <p>Agree that Section 3.1.0 should refer to the potential for applicants to consult with Statutory Consultees.</p> <p><b>Change to SPD as follows: Add sentence after the first sentence of paragraph 3.1.1:</b>  <b>“Applicants are also encouraged to consult with Statutory Consultees as this can assist in the development of design”.</b></p>
<p>North Yorkshire Police</p>	<p>Pleased with section 2.5.0 on Designing Out Crime and it is hoped that this will be retained in any future version of this SPD.</p> <p>Suggest the following definition of defensible space is included within the second bullet point at paragraph 2.5.1: <i>“Defensible Space is described as something which is clearly defined,</i></p>	<p>Support welcomed.</p> <p><b>No change to SPD required.</b></p> <p><b>Change to SPD as follows: Add a sentence to start of the second bullet point in paragraph 2.5.1 as follows: “Defensible space is</b></p>

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	<p><i>clearly owned and has good natural surveillance and separates public from private areas and also separates one private area from another."</i></p> <p>In relation to the second part of the second bullet point at 2.5.1 regarding cul-de-sacs, although it acknowledges that this type of design feature can be highly secure, it goes on to suggest that in order to enable permeability that a compromise can be made by having footpath connections between cul-de-sacs. There are few reasons why the security of a development and the homes in it should be compromised, in particular to increase the permeability of a scheme, as this provides offenders with additional access/escape routes.</p> <p>Section 8.6 of Secured by Design's document Homes 2019, states: "<i>However, research that the benefit of a cul-de-sac can be compromised if one or more of the following undesirable features exists:</i></p> <ul style="list-style-type: none"> <li>• <i>Backing onto open land, railway lines, canal towpaths etc.</i></li> <li>• <i>Are very deep (long);</i></li> <li>• <i>Linked to one another by footpaths (leaky cul-de-sacs);</i></li> <li>• <i>Poorly lit.</i></li> </ul> <p>Section 8.7 of the same document states: "<i>Cul-de-sacs that connect by footpaths to other parts of a development, often referred to as "leaky cul-de-sacs", experience the highest levels of crime when compared to crime levels within a true cul-de-sac. Crime in this kind of design can be 110% higher than crime in a true cul-de-sac and therefore should be avoided."</i></p> <p>It is therefore request that consideration be given to removing the following wording from the SPD as it appears to encourage the linking of cul-de-sacs, which as outlined above, should be avoided. "<i>As cul-de-sacs reduce permeability, a compromise can be where dwellings are joined by networks of footpaths that are regularly used, with passive surveillance in evidence. This</i></p>	<p><b>described as something which is clearly defined, clearly owned and has good natural surveillance and separates public from private areas and also separates one private area from another."</b></p> <p>The comments on cul-de-sacs are noted. On order for the draft SPD to be consistent with the Secured By Design document 2019 there is a need to be clear that the specific undesirable features listed within this comment should be avoided in cul-de-sacs. The SPD is changed as follows - replace the fourth and fifth sentence in the second bullet point of paragraph 2.5.1 with the following text:  <b>"The publication, Secured By Design: Homes 2019 provides design guidance specifically relating to cul-de-sacs and states that the benefit of a cul-de-sac can be compromised if one or more if the following undesirable features exists:</b></p> <ul style="list-style-type: none"> <li>• <b>Backing onto open land, railway lines, canal towpaths etc;</b></li> <li>• <b>Are very long;</b></li> <li>• <b>linked to one another by footpaths (leaky cul-de-sacs);</b></li> <li>• <b>poorly lit."</b></li> </ul>

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	<i>layout promotes permeability whilst reducing anti-social activity."</i>	
Water Resources West	Advice has been provided in the preparation of new local plans or updates to local plans. Advice regarding water efficiency for residential development for local authorities is provided.	The advice on water efficiency measures is noted. It would appear to be advice relevant to the preparation of new local plans or updates to local plans, rather than the preparation of SPDs.  <b>No change to SPD required.</b>
The Coal Authority	As you will be aware within the Craven area there are recorded risk features present, arising from past coal mining activity, at surface and shallow depth including mine entries, shallow coal workings and reported surface hazards. These features pose a potential risk to public safety and surface stability.  It is noted that this current consultation relates to a draft Good Design SPD. The Planning team at the Coal Authority has no specific comments to make on this document.	It is noted that the consultee has no specific comments to make on this draft SPD.  <b>No change to SPD required.</b>
Yorkshire Wildlife Trust	<u>Green Infrastructure</u> Including nature rich areas within development is good for mental as well as physical health and we therefore support the references within the SPD to the Green Infrastructure Network. It is well established through research that contact with wildlife and the wild places yields benefits ( <i>Social return on investment analysis of the health and wellbeing impacts of Wildlife Trust programmes, 2019 Report</i> ). We also recognise the benefits that street trees can provide for both people and wildlife, which include slowing run-off, providing shade, improving air quality, storing carbon, and reducing urban heat-island effects. Any planting should ensure the right trees (or other planting) in the right place which usually means locally native trees of local provenance and in keeping with the surrounding natural habitat.  We welcome design which can take a multifunctional approach and deliver mutual	Support welcomed.  These comments relate to green infrastructure and biodiversity net gain. Whilst some of the general design principles set out in policy ENV3 and further detail provided by this draft SPD, link to the provision of green infrastructure and biodiversity net gain in the design of new developments this draft SPD specifically provides further guidance to policy ENV3: Good Design.  Where appropriate, applicants would need to have regard to the requirements of local plan policies ENV4: Biodiversity and ENV5: Green Infrastructure.  The Council is currently drafting a Green Infrastructure and Biodiversity

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	<p>benefits for people and wildlife, such as roof gardens and green roofs, green walls, SUDS and rain gardens.</p> <p><u>Building with Nature</u>  Yorkshire Wildlife Trust would also recommend inclusion of details of the 'Building with Nature' initiative within the SPD, which is a framework that enables developers to integrate high-quality multifunctional green infrastructure to create places in which people and nature can flourish.</p> <p>Building with Nature sets out standards to provide a benchmark to be used in addition to the Biodiversity Net Gain metric, in order to provide a qualitative assessment of a proposed development site. Yorkshire Wildlife Trust provides details of the Building with Nature (BwN) key themes, which relate to core, wildlife, water and wellbeing.</p> <p>Further information can be accessed via the website: <a href="https://www.buildingwithnature.org.uk">https://www.buildingwithnature.org.uk</a>.</p> <p><u>Biodiversity Net Gain</u>  In accordance with NPPF para 175d, the proposals should demonstrate a '<b>measurable</b>' net gain in biodiversity. The emerging Environment Bill which is expected to put a requirement for all proposals to achieve a 10% net gain in biodiversity; whilst not yet formally released, this level is already being implemented as good practice across the country and we would encourage the inclusion of a net gain target for Craven in the SPD.</p> <p>One of The Wildlife Trusts' strategic aims is to make it normal practice for all residential, commercial and infrastructure development to contribute positively to nature's recovery on land and at sea. Biodiversity Net Gain, implemented in the right way, is therefore an important mechanism to help achieve The Wildlife Trusts' ambition.</p>	<p>SPD, which will be subject to public consultation early in 2022. The Yorkshire Wildlife Trust will have the opportunity to provide a consultation response on this draft SPD in due course.</p> <p><b>No change to SPD required.</b></p>



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Strategic Housing team, Craven District Council	<p>1. Affordable housing design</p> <ul style="list-style-type: none"> <li>• The SPD deals mainly with housing in general, and doesn't generally distinguish between affordable and market-sale housing.</li> <li>• Strategic Housing is of the view that residents of affordable housing should expect their homes to be as well-designed as those of their neighbours living in market-sale homes. This is also reflected in the Local Plan, which argues that "<i>development proposals should be able to demonstrate that they will secure a good standard of amenity for <b>all</b> existing and future occupants of land and buildings</i>" (Policy ENV3 (f), p. 135, emphasis added).</li> <li>• However, it is not uncommon for applicants to seek to reduce costs by compromising design standards for affordable housing.</li> <li>• To comply with principles of good design, help create mixed communities and properly reflect the Local Plan, Strategic Housing believes that the SPD should explicitly state that all design standards it sets out apply equally to affordable and market-sale housing, within the transfer price agreed between the Council and Registered Providers in the district.</li> </ul>	<p>The Draft Good Design SPD provides further guidance to policy ENV3, which requires good design in all developments and not just housing. Therefore, the criteria included within the policy are relevant to proposals for all types of development, including affordable housing.</p> <p>Section 2.11.0 of the adopted Affordable Housing SPD provides specific guidance on the design, distribution and construction of affordable housing, and the specific requirements of policies ENV3, SD1, SD2, ENV1, 2, 4 &amp; 9. Paragraph 2.11.2 of the Affordable Housing SPD states that the principles of good design set out in policy ENV3 apply equally to both affordable and market housing and that affordable homes should be indistinguishable in design, character and appearance from market housing.</p> <p>It is considered that the links between the adopted Affordable Housing SPD and the draft Good Design SPD should be strengthened.</p> <p><b>Change to SPD as follows: Insert the following sentence after the first sentence of paragraph 2.1.23 as follows:</b></p> <p><b>"For example, the principles of good design should apply equally to both affordable and market housing. Section 2.11.0 of the adopted <a href="#">Affordable Housing SPD</a> provides further guidance on this and other relevant local plan policies."</b></p>

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	<p>2. Ventilation</p> <ul style="list-style-type: none"> <li>• The SPD makes no reference to the need for good ventilation.</li> <li>• Strategic Housing is of the opinion that the SPD should include a reference to the need for good ventilation. Paragraph 10.2 of Harrogate Borough Council's Affordable Housing SPD may provide some helpful wording here:</li> </ul> <p><i>"The National Design Guide states that well-designed homes provide good quality internal and external environments for their occupants, and are efficient and cost effective to run, helping to reduce greenhouse gas emissions by incorporating features that encourage sustainable lifestyles. Well-designed homes maximise natural ventilation, avoid overheating, minimise sound pollution and have good air quality, with a good standard and quality of internal space. This includes room sizes, floor-to-ceiling heights, internal and external storage, sunlight, daylight and ventilation."</i></p>	<p>There is agreement that the SPD can include a reference to the need for good ventilation.</p> <p><b>Change to SPD as follows: Add sentences to the end of paragraph 2.7.6 as follows:</b>  <b>"Well-designed homes maximise natural ventilation, avoid overheating, minimise sound pollution and have good air quality, with a good standard and quality of internal space. Specific elements to consider include room size, sunlight, daylight, floor-to-ceiling height, internal and external storage, and ventilation. These provisions reflect the requirements of the National Design Guide."</b></p>
Sport England	<p>Sport England notes that policy ENV3 is to ensure that growth in Craven results in positive change in design terms, which benefits the local economy, environment, and quality of life, including health and well-being.</p> <p>The reference to health and well-being in policy ENV3 provides an ideal opportunity to incorporate the principles of Active Design into the SPD possibly as a new chapter. Good design should contribute positively to making places better for people and create environments that make the active choice the easy choice for people and communities.</p> <p>Sport England in partnership with Public Health England, have produced the Active Design Guidance. This guidance builds on the original Active Design (2007) objectives of improving accessibility, enhancing amenity and increasing awareness, and sets out the Ten Principles of Active Design. The guide features an innovative set of guidelines to get more people moving through suitable design and layout.</p>	<p>The Council acknowledges the principles of Active Design as promoted in this submission, and agrees that the principles promoted can be included within the draft SPD.</p> <p><b>Change to SPD as follows:</b></p> <p><b>Add new paragraph after existing paragraph 2.3.8 under section of the draft SPD relating to Criterion j) 'Permeable Developments', as follows:</b>  <b>"The overall aim of policy ENV3 is to achieve good design that will help ensure that growth in Craven results in positive change, which benefits the local community, environment and quality of life, including health and wellbeing. Criterion j) specifically requires development to be permeable, by improving existing routes, by adding new ones and creating connections to enhance the local network. In meeting these policy</b></p>

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	<p>The Active Design Principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design. The guidance can be viewed on this link: <a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design">https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design</a></p> <p>Sport England would encourage you to consider reviewing the work undertaken by Wakefield Council in respect of Active Design to assist in drafting amendments to this SPD (this document is included in the appendix of submission).</p>	<p><b>requirements, the Council encourages applicants to consider Sport England and Public Health England's Active Design Guidance, which can be accessed via this link: <a href="https://www.sportsengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design">https://www.sportsengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design</a>.</b></p> <p><b>This guide features an innovative set of guidelines to get more people moving through suitable design and layout.</b></p> <p><b>The Active Design Principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design."</b></p>
<p>Chris Pitcher, architectural designer and Wigglesworth resident</p>	<p>Support for the Council's aspiration to improve the quality of design in Craven.</p> <p>Criticism of the National Design Guide's 10 characteristics, which attempts to simplify a complex subjective process. Good design is difficult to define. Design is far more than these 10 characteristics and there is a need to understand design in the broad context, by continually practicing it.</p> <p>To improve design outcomes, the Council should invest in design skills.</p> <p>Alternative guidance to the National Design Guide is suggested from Dieter Rams: <a href="https://www.vitsoe.com/gb/about/good-design">https://www.vitsoe.com/gb/about/good-design</a>.</p> <p>The respondent suggests that in order to enable meaningful pre application discussions with the Council, design should be the foundation. This should include a dedicated design professional alongside planning officers and a diverse range of people from the community. Pre application discussions should allow for innovation, respect a proper design process and the unique character of the Yorkshire Dales.</p>	<p>Support is welcomed.</p> <p>Craven District Council agree that there is a need for investment in design skills, at a national level.</p> <p>Recently the Government has given priority to design in new developments via an updated NPPF, has the launched the National Design Guide, National Model Design Code and the NPPF states that local planning authorities should prepare local design guides and codes. It is hoped that there will be the necessary investment in skills and resources by national government necessary to prepare such local guidance and codes and to ensure that good design is achieved in all developments. Paragraph 1.4.6 of the draft Good Design SPD refers to the role of the National Design Code and local design codes.</p> <p>Part 3 of the draft SPD promotes meaningful pre-application discussions</p>

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		<p>with design at the core, as the respondent advises.</p> <p>It is hoped that via investment by the government in design skills and resources, CDC or the new North Yorkshire Authority will include design professionals.</p> <p><b>No change to SPD required.</b></p>
<p>Tom Smart, Rural Solutions</p>	<p>The Basis of 'Good Design'</p> <p>Point 2.1.1 states that good design should respond to local context and distinctiveness and refers to the supporting text to policy ENV3. This is viewed as an appropriate starting context for the implementation of the policies relating to this SPD, which recognises the variety of 'place' in the Craven district, and the variety of factors that contribute to such. The district is notably diverse with varying settlements and landscape characters.</p> <p>Appropriate Landscaping</p> <p>Point 2.1.4 emphasises that landscaping is integral in order to enhance the surroundings of new development, and the physical and mental health of individuals. There is agreement landscaping should be considered from the beginning of developing any proposals.</p> <p>Suggestion that further guidance is given as to how the local authority will specify landscaping expectations from an early stage to comply with NPPF Paragraph 126.</p>	<p>Support welcomed.</p> <p><b>No change to SPD required.</b></p> <p>Support welcomed.</p> <p>Agree that further guidance can be given as to how the Council will specify landscaping expectations from an early stage to best comply with NPPF Paragraph 126.</p> <p><b>Change to SPD as follows: Add following sentence at the end of paragraph 2.1.4:</b></p> <p><b>“To comply with paragraph 126 of the NPPF, the Council encourages effective engagement between applicants, the Council, communities, and Statutory Bodies as appropriate, in order to identify landscaping expectations from an early stage.”</b></p>

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	<p>Noise Pollution</p> <p>Support for paragraph 2.1.6 which emphasises that noise emissions from proposed development must be as harmonious as possible, with special regard to local tranquillity. It is requested that the SPD provides an understanding that such would be more limited in urban centres such as Skipton and Gargrave. This would allow proposed development to better comply with NPPF paragraph 174.</p> <p>Design Styles and Features</p> <p>Object to the later part of paragraph 2.1.9 given that contemporary extensions to heritage assets are often completed within the borough and are supported by English Heritage.</p> <p>Guidance from English Heritage on extending heritage assets states: <i>"The exterior needs to be carefully designed. You should expect to use matching or complementary materials for walls and roof. However, cleverly chosen contrasting materials in a modern design may work well for some buildings, where the extension can then be clearly 'read' as different to the old house. But the effect should not be so different that the extension is more prominent than the main building."</i></p> <p>It is suggested that further guidance be given to more contemporary designs as areas with numerous contemporary style structures are found in the district. A contemporary design approach should be supported where proposals are appropriate.</p>	<p>Support welcomed.</p> <p>Paragraph 2.1.6 of the draft SPD states that <i>"proposed development should be as harmonious as possible in terms of both noise emissions and visual properties"</i>. Criterion a) of policy ENV3 requires proposals to be based on a proper understanding of environmental features, including natural and built elements such as tranquillity etc. This would include consideration of the existing level of tranquillity within different settings, for example urban and rural settings. Therefore, the wording provided in both ENV3 and the draft SPD provides the necessary flexibility in approach.</p> <p><b>No change to SPD required.</b></p> <p>Paragraph 2.1.9 provides further detail to criterion b) of policy ENV3 in terms of the requirement that designs should respect the form of existing and surrounding buildings. This paragraph states that <i>'by using common materials, it is possible to create harmony with existing buildings and the street scene whether this is part of a contemporary or more traditional design.'</i> In order for the SPD to recognise the role of more modern design and the use of contrasting or non-common materials paragraph 2.1.9 has been changed as follows:</p> <p><b>Amend the third sentence of para 2.1.9 as follows:</b></p> <p><b>"By using common, or contrasting materials, where appropriate, it is possible to create harmony with existing buildings and the street scene whether this is part of a contemporary or more traditional design."</b></p>

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	<p>2.1.10 states that locally sourced and high quality materials are appropriate in terms of being <i>“ideal in terms of reinforcing the local vernacular and reducing the carbon footprint of transported building products.”</i> While such is appropriate for designated heritage assets, some flexibility is needed – especially where this may affect the viability of developments including for example rural affordable housing provision.</p>	<p>The draft SPD provides further guidance to policy ENV3 but does not preclude the need for applicants to fully consider and comply with all other relevant local plan policies, including policy ENV2: Heritage, which to conserve and, where appropriate, enhance Craven's historic environment.</p> <p>The point is noted and the Council agree that the SPD should recognise and support the contemporary design, where appropriate. It is considered that this should be included within the section of Part 2 of the draft SPD that provides further guidance on criterion d) enhancing local distinctiveness.</p> <p><b>Change to SPD as follows: Add the following new sentence to 2.1.21: “New and innovative designs would not include pastiche, which should be avoided, but may include designs that make an appropriate contrast to existing buildings, so long as they employ high quality materials and achieve good design overall.”</b></p> <p>The second part of paragraph 2.1.10 states that the Council recognises that it may not always be appropriate to source high quality materials locally and if this is the case the SPD suggests that this should be justified in a Design and Access Statement. Policy ENV3 and the further guidance included in the draft Good Design SPD requires <u>all</u> developments to be founded on good design. Section 2.11.0 of the adopted Affordable Housing SPD provides specific guidance on the design, distribution and construction of affordable housing, and the specific requirements of policies ENV3, SD1, SD2, ENV1, 2, 4 &amp; 9. Specifically, paragraph 2.11.2 of the Affordable Housing SPD states that the principles of good design set out in policy ENV3</p>

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	<p>Support in principle for paragraph 2.3.4, which stresses the need for good standards of accessibility in any new development. However, request for further guidance on the conflict between design priorities – such as ramps and steps on Listed Buildings, or lighting in areas characterised by darkness.</p>	<p>apply equally to both affordable and market housing and that affordable homes should be indistinguishable in design, character and appearance from market housing. Therefore, the Council expects high quality materials to be used on all developments and where possible these should be sourced locally.</p> <p><b>No change to SPD required.</b></p> <p>Support welcomed.</p> <p>Criterion i) of policy ENV3 requires buildings and spaces to be accessible. Paragraph 2.3.4 states that there are numerous elements to be considered in order to successfully design and main good accessibility, both into, and within buildings. Therefore, the requirement is to achieve well designed places and spaces that are accessible to all. The consideration of the key elements listed in paragraph 2.3.4 of the draft SPD relating to public buildings should not be at the expense of good design. It is considered therefore that the draft SPD provides adequate guidance in this respect.</p> <p>The draft SPD provides further guidance to policy ENV3 but does not preclude the need for applicants to fully consider and comply with all other relevant local plan policies, including policy ENV2: Heritage and policy ENV1: Countryside &amp; Landscape. Criterion d) of policy ENV1 specifically relating to proposals which affect the Forest of Bowland AONB and its setting and the setting of the YDNP. Great weight will be given to conservation of their special qualities, including landscape, scenic beauty and intrinsically dark landscape (enjoyment of dark skies). Paragraphs 5.12 – 5.16 of the supporting text to this policy also</p>

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		<p>recognises the importance of dark skies outside these designated areas.</p> <p><b>No change to SPD required.</b></p>
CPRE North Yorkshire (CPRENY)	<p>Support for the draft Good Design Guide as it will be helpful in setting out the approach to be taken with regard to the specific criteria found in local plan policy ENV3. The Guide is an opportunity to encourage sustainable design and construction methods. This will ensure positive steps are taken in securing appropriate action across all new development to lower the district's carbon footprint and ensure mitigation and adaptation where possible – be that through the appropriate use of sustainable building materials and designing in energy efficiency at the initial conception stage, to appropriately located and scale renewable schemes to, ensuring a measureable net gain for biodiversity and carbon sequestration and storage.</p>	<p>Support welcomed.</p> <p>It should be noted that the Council is preparing a Good Design Supplementary Planning Document (SPD) and not a Good Design Guide. Once adopted, the Good Design SPD will represent an NPPF compliant design guide.</p> <p>The draft SPD provides further details to policies ENV3, SD1 &amp; SD2. SD2 specifically relate to meeting the challenge of climate change.</p> <p>Section 2.7.0: Sustainable Design and Construction provides further guidance relating specifically to criteria (s) and (t) of Policy ENV3.</p> <p><b>No change to SPD required.</b></p>
James Langler, Historic England	<p>Historic England has been unable to respond to the consultation on this occasion.</p>	<p>Noted.</p> <p><b>No change to SPD required.</b></p>
Frances Edwards, Environment Agency	<p>The National Model Design Code provides a good starting point to help LPAs achieve good design that can reduce flood risk, improve the water environment and promote good waste management in their local design guides and codes.</p> <p>Section 2.1.0 Context, ENV3 Criterion (a) encourages the recognition of a need to deliver blue as well as green infrastructure, as well as ensuring that development includes measures to</p>	<p>Noted. Amended paragraph 1.4.3 provides guidance on the National Design Guide and Code and explains the role of local guide and codes. The draft SPD states that while policy ENV3 predates the National Design Guide and Code, this policy and contents of the draft SPD are consistent with both these national design documents, providing the Craven perspective on achieving well designed places.</p> <p>Support welcomed.</p> <p>Criterion (a) of policy ENV3 requires development should be based on a</p>



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	<p>mitigate the impact of climate change and contributing towards biodiversity net gain, demonstrated through use of the Defra Biodiversity Metric.</p> <p>Recommend that an additional paragraph is included to recognise the need to consider the Humber River Basin Management Plan (RBMP) and the Water Framework Directive (WFD) for development adjacent to river environments.</p> <p>Section 2.7.0 Sustainable Design and Construction, ENV3: Criterion (t) - All developments should take appropriate measures to reduce flood risk and include flood resilience. Guidance should be incorporated in line with your Local Plan documents. Suggest the Council considers the ADEPT guidance on 'Preparing for a Changing Climate: Good Practice Guidance for Local Government', which is designed to assist local government with preparing for the impacts of change adaptation.</p>	<p>proper understanding of environmental features, including both natural and built elements, such as landscape, topography, vegetation, open space, microclimate, tranquillity, light and darkness. Paragraphs 2.1.3 to 2.1.7 provides further detail on each of these elements.</p> <p>The Council is currently drafting a Green Infrastructure &amp; Biodiversity SPD, which will provide the necessary further guidance to adopted local plan policies ENV4 &amp; ENV5, including guidance on BNG and the use of the metric. In addition, a draft SPD relating to Flood Risk &amp; Water Management is also being prepared, which provides further guidance to policies ENV6 &amp; ENV8. ENV8 specifically requires development to meet the requirements of the Water Framework Directive. Consultees, including the Environment Agency will have the opportunity to submit comment on these draft SPD during a period of public consultation scheduled for early 2022.</p> <p>The draft SPD provides further guidance to policy ENV3 but does not preclude the need for applicants to fully consider and comply with all other relevant local plan policies, including policy ENV4: Biodiversity, ENV5: Green Infrastructure, ENV6: Flood Risk and ENV8: Water Resources, Water Quality and GrENV2: Heritage and policy ENV1: Countryside &amp; Landscape.</p> <p><b>No change to SPD required.</b></p>

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