Core Strategy Issues & Options:
Vision, Strategic Objectives and Settlement Strategy
Consultation Paper 1: Response Form Summary

SECTION 2

A. LOCAL DEVELOPMENT FRAMEWORK VISION

Delegates of the "Shaping Places and Spaces" conference, held in June 2005, were asked to consider the importance of eight suggested objectives, which could form the basis of a Vision for the Local Development Framework (LDF). The suggested objectives were based around the following aims of The Community Strategy:

- A Prosperous Economy

- Sustainable Communities and Education & Skills For All

- Good Health and Social Well Being

- A Quality Environment

In response, delegates ranked the following objectives as the 5 most important in priority order:

Ranking	Objective	Aim
1	The need to conserve and enhance the high quality rural and urban environment.	A Quality Environment
2	To reduce the impact of society on the environment, for example by reducing waste, pollution and energy consumption and by promoting the use of renewable energy and the conservation of water supplies.	A Quality Environment
3	To develop vibrant and prosperous market towns with a range of good quality jobs, business and retail opportunities that meets the needs of local people.	A Prosperous Economy
4	To improve the quality of design of the built environment to make our settlements more attractive and safe places in which to live and work and that are accessible to everyone.	A Quality Environment
5	To build sustainable communities where people have access to employment opportunities, a range of housing of varying sizes and prices, training, healthcare, recreational and other services and facilities.	Sustainable Communities and Education & Skills For All

The objectives ranked the 5 most important relate to each of the 4 aims of the Community Strategy

In light of the above, delegates were also asked to consider how a vision might be formed or tailored specifically for the LDF. In response, delegates indicated that the LDF Vision should:

- Be locally specific

- Account for local distinctiveness and diversity within the area

- Address issues of connectivity and overall sustainability

A1 Forming a Vision for the LDF

Do you agree that LDF vision should be based on the aims and objectives of the community strategy, together with the issues identified at the conference relating to the LDF as set out above?

Yes **25** No **1** Don't Know **1**

The LDF Vision should be of a vibrant local economy with growth in key locations and sectors, balanced with and avoiding harm to the environment; involving communities in a bottom-up approach and sustaining their viability; better transport links, public transport and infrastructure; restricting traffic growth and private car journeys whilst encouraging, improving and facilitating sustainable modes of transport; energy efficiency, sustainable building and accessible locations.

B. SETTLEMENT STRATEGY OPTIONS

In forming a new settlement strategy for the plan area, a key issue to consider is whether the existing strategy within the adopted Local Plan should continue or whether to start anew. It is clear that although circumstances have changed since the existing settlement strategy was adopted in 1999, the overall approach remains sound. However, when taking account of the changes in circumstances there is now an opportunity to revisit the overall settlement strategy and to take account of new circumstances and changes in national and regional policy. The issue of sustainability underpins planning policy at all levels, thus any new settlement strategy for the LDF should reflect the 3 pillars of sustainability, these being economic, environmental and social sustainability. Moreover there is the opportunity to agree a settlement strategy that reflects the agreed Local Development Framework vision as referred to within this paper.

Settlement Strategy options are presented within this form for consideration, which have been informed by the existing national and regional planning context, which cannot be significantly varied.

- Option 1 sets out a do nothing approach (i.e. retain the existing settlement strategy in the adopted Local Plan).

- Options 2 – 4 place an emphasis on one specific pillar of sustainability i.e., allowing economic, environmental or social objectives to take the lead in achieving sustainable development. Whilst one specific pillar of sustainability can take the lead, it must be stressed that in accordance with the fundamental concept of sustainability all three pillars need to be properly represented**.**

- Option 5 aims to achieve sustainable development by placing equal emphasis on all 3 pillars of sustainability; or gives you the opportunity to combine varying aspects of sustainability; or allows you to start afresh.

Each option also provides an indication as to how one approach may vary from another in terms of resulting settlement hierarchies.

OPTION 1: Do Nothing Approach – Retain Existing Local Plan Strategy

The existing settlement strategy is contained within the adopted Craven District Local Plan and is set out below. As well as providing and option in itself, it provides a useful benchmark for presenting other spatial scenarios and policy approaches to deliver a new vision for the area.

Option 1 (or the "Do Nothing" option) would be to carry-on with the local plan approach and to adopt the existing settlement strategy and resulting settlement hierarchy described below.

### Figure 1 - Existing Settlement Strategy
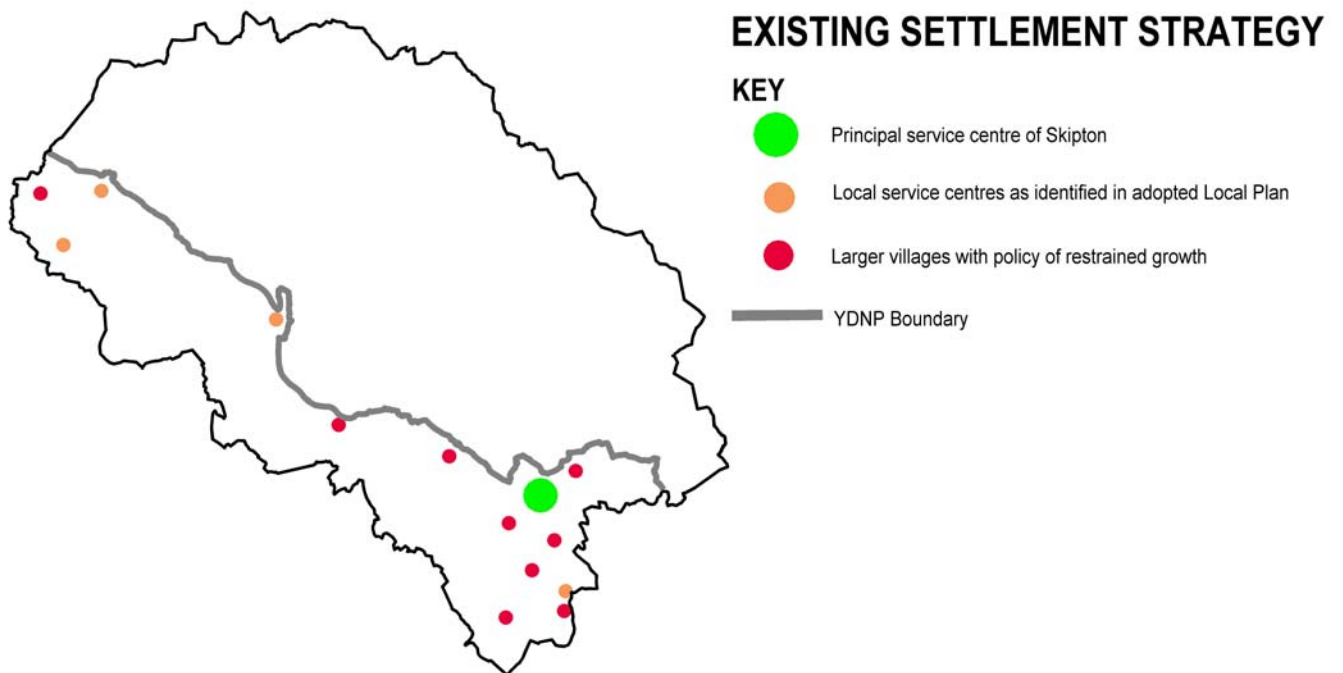
- Focuses:
  - The majority of new development in or around the district centre of Skipton;
  - A lower level of development in or around the market towns and service villages of Settle, Giggleswick, Hellifield, Ingleton, High Bentham, Gargrave, Cononley, Glusburn/Cross Hills, Sutton-in-Craven and Cowling.

- Restrains:
  - Growth in the larger villages of Bradley, Burton-in-Lonsdale, Carleton and Embsay specifically, and
  - All development in other/smaller villages.

- Restricts:
  - All development in the open countryside;
  - Especially in the Forest of Bowland AONB.

OPTION 2: Emphasis on Developing Existing Economic Strengths

- Prioritising the needs of economic markets and matching those needs with opportunities.

- Making economic markets the dominating factor in creating and sustaining communities.

- Supporting economic prosperity by providing access to a range of employment opportunities both within the area and the Leeds City Region, where it is economically advantageous to do so.

- Accepting the use of environmental assets as economic assets in order to sustain further growth.

- Preserving and enhancing the vitality and viability of market towns and service centres.

The following Option is based on an **economic approach** to a settlement strategy:

Figure 2:
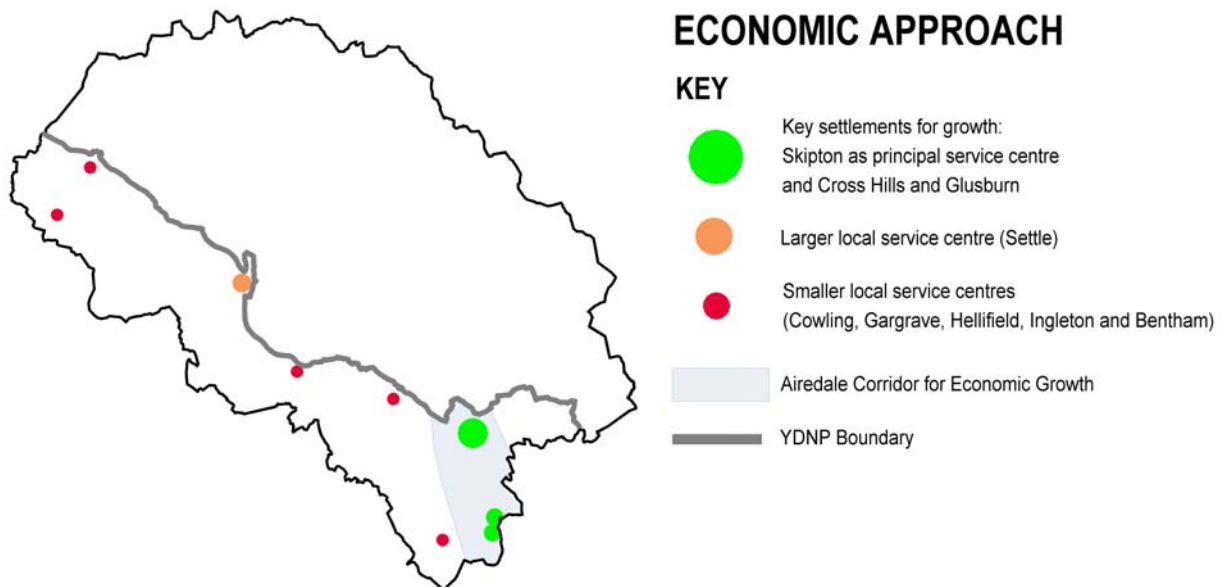
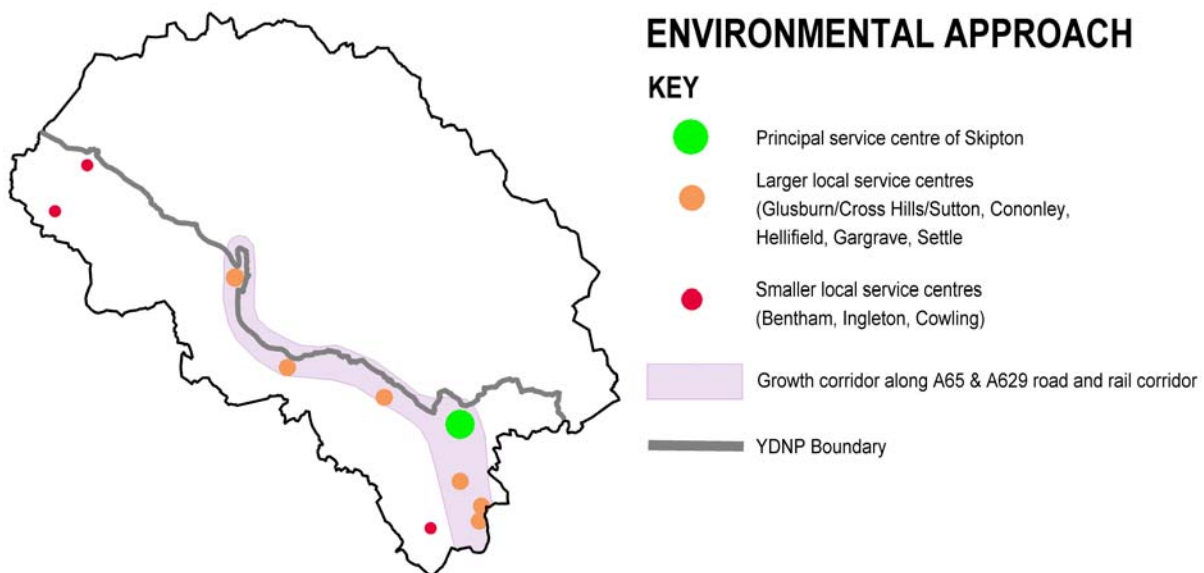This Option would result in the following settlement hierarchy:

- Focus most growth within the Skipton and South Craven area and potentially at settlements along the "Airedale Corridor", which is identified in the Regional Spatial Strategy as a key area for economic growth.

- Allow a level of growth at Settle sufficient to maintain and enhance the settlement as a local employment and service centre.

- Limit growth elsewhere to small scale development, which would ensure that economic development is focussed within the larger market towns and service centres of Skipton, South Craven and Settle.

OPTION 3: Emphasis on Protecting and Enhancing the Environment

- Focussing the majority of new growth in locations that are:
    - Accessible by a choice of transport modes;
    - Offer a range of services; and
    - Have a supply of previously developed land to bring forward for regeneration.
- Recognising and celebrating local distinctiveness, diversity and the characteristics that give localities a discrete identity.
- Matching the needs of communities in Craven with opportunity, only where it is environmentally sustainable to do so.
- Prioritising the protection of existing environmental assets over and above social and economic considerations.

The following Option is based on an **environmental** approach to a settlement strategy:

Figure 3:

This Option would result in the following settlement hierarchy:

- Focus most growth in Skipton – the most sustainable location.

- Distribute some growth at service centres along the A65 and A629 road and rail corridors, taking advantage of existing public transport links and the supply of previously developed land. This level of growth would be at Settle, Giggleswick, Hellifield, Gargrave, Cononley, Glusburn/Cross Hills.

- Restrict development outside of the main transport corridors and service centres, where locations are less environmentally sustainable (e.g. Ingleton, Bentham and Cowling).

OPTION 4: Emphasis on Sustainable Communities

- Prioritising the needs of all sections of communities in Craven and matching those needs with opportunities.

- Creating and sustaining mixed and balanced communities across the area.

- Enhancing the roles of larger service centres by focussing growth towards them.

- Restraining the role of the market by directing growth to match needs and to support community sustainability.

- Reviewing the roles of smaller service centres; identifying any groups in which smaller service centres have complementary roles; and exploring the potential for developing those roles and/or groups.

The following Option is based on a **sustainable communities** approach to a settlement strategy:

Figure 4:
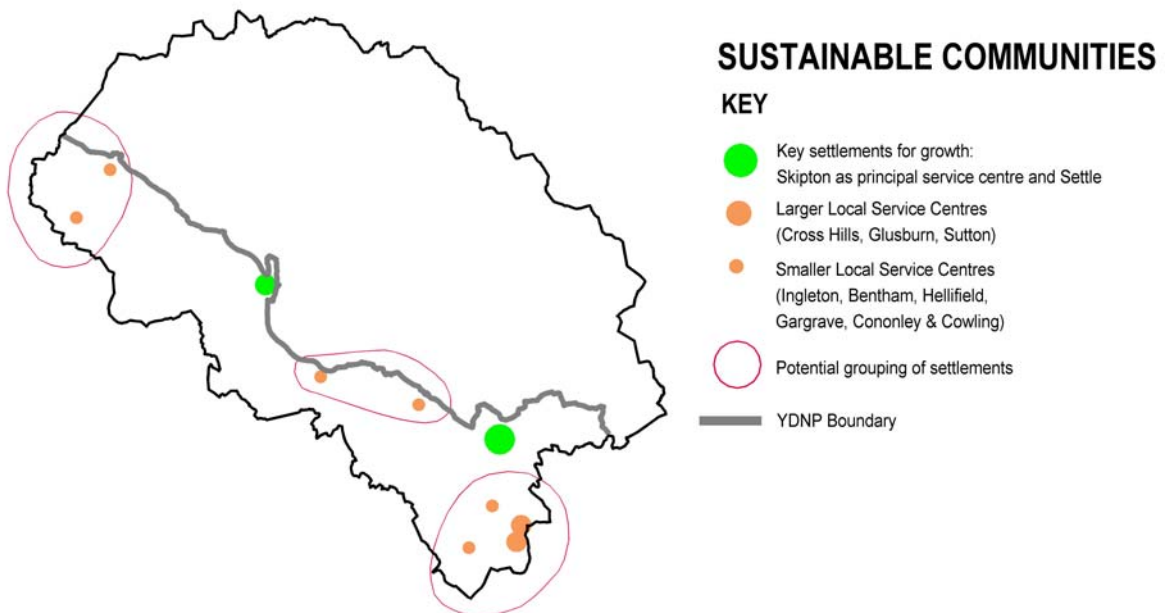
This Option would result in the following settlement hierarchy:

- Focus growth towards the market towns of Skipton and Settle, which provide a range of services to their population and wider communities.

- Identify clusters of smaller settlements that act as a community providing complimentary support and services and enhance their roles where possible. An example of one way in which settlements within the plan area could be clustered is illustrated at Figure 4 above. Other ways of clustering settlements may exist.

Clusters should be spatially as well as functionally realistic; therefore a variety of possible options for clusters could exist. This option provides you with the opportunity to cluster the smaller villages in the plan area in order to draw out the different links that may exist between different settlements.

OPTION 5: Another Way?

A.   A combined approach in which equal emphasis is placed on <u>all three</u> pillars of sustainability (as set out in Options 2 – 4 above):

- Focussing most growth towards market towns and larger service centres and maintaining their vitality and viability;

- Distributing some growth to other settlements along the A65 and A629 public transport corridors, where previously developed land exists;

- Identifying clusters of smaller settlements that provide complementary support and services, enhancing their roles where possible; or

The following Option is based on a **combined** approach to a settlement strategy with equal emphasis on all three pillars of sustainability:

Figure 5:
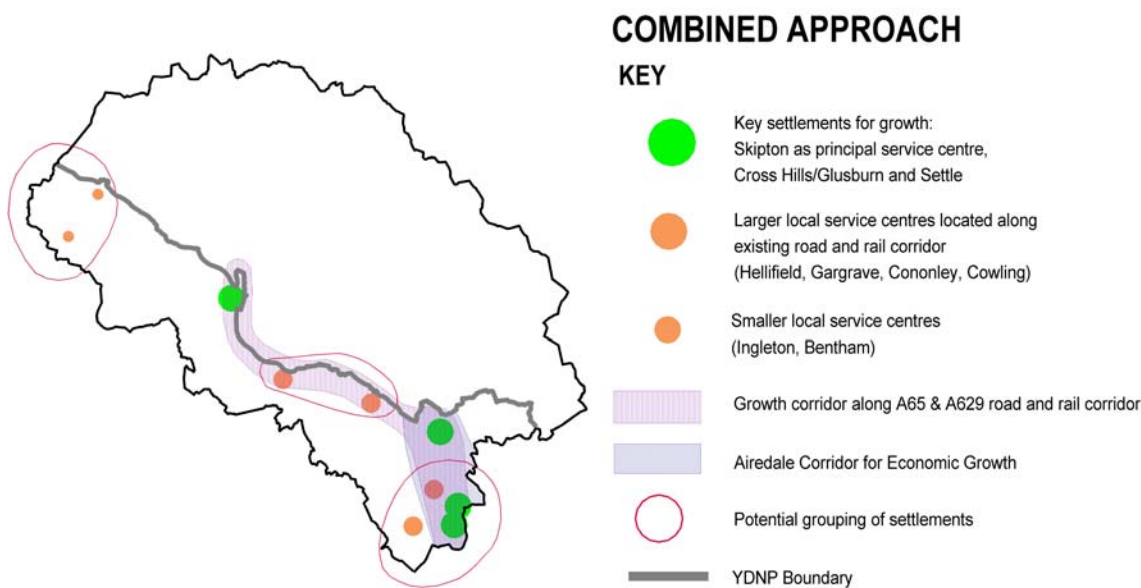
This Option would result in the following settlement hierarchy:

- Focus growth towards Skipton, Cross Hills/Glusburn and Settle in the interests of achieving <u>economic</u> objectives.

- Allow some growth in other settlements along the A65 and A629 road and rail corridors in the interests of achieving <u>environmental</u> objectives. This would include Hellifield, Gargrave, Cononley and Cowling.

- Review the roles of smaller settlements, identify clusters that act as communities and allow some growth to enhance their roles where possible, in the interests of achieving <u>sustainable communities</u>.

This is your opportunity to suggest a different settlement strategy. There are various combinations of Options 2 – 4 to consider; the one set out above illustrates only one combination. Alternatively you can come up with a completely new approach, i.e.:

B.   A combined approach in which equal emphasis is placed on <u>two</u> of the three pillars of sustainability; or

C.   A completely different approach – starting afresh.

Translating Options into Settlement Strategy

The above Options provide an indication of how a significant emphasis upon one aspect of sustainability, or achieving a combined approach that places equal or varying emphases on all three aspects of sustainability, could inform the spatial distribution of new growth. Given that the role of the Local Development Framework is to represent all three strands of sustainability, in reaching the right balance account should be taken of:

- National Planning Policy and emerging Regional Spatial Strategy;

- Differences within the plan area in terms of needs and circumstances; and

- The current roles of settlements and whether reinforcement or changes to these roles are sought.

In considering the Options for the Settlement Strategy it is useful to consider the following questions:

B1 Should the settlement strategy remain as in the **existing adopted Local Plan**?

Yes **4**   No **22**   Don't Know **2**

B1-1 Any Other Comments

A strong approach to countryside protection, which restricts all development in the open countryside and restrains development in villages, should be carried forward from the local plan and continued in the LDF. A range of communities should be allowed to develop, but growth should be focused on key strategic locations to take advantage of economic opportunities and to underpin viability and sustainability. Where development is allowed it should not be to the detriment of town and village environments and should maintain a high quality rural environment and wildlife habitats.

B2 If not, should a significant emphasis be given to <u>one</u> specific pillar of sustainability?

Environment	**4**		
Economy	**1**		
Sustainable Communities	**8**	**[All Three**	**1]**

Any Other Comments

Sustainability is all encompassing and each of the three pillars is important. However, in some locations one pillar may have a higher priority. Economic sustainability should ensure that the benefits of development are spread to most communities. Sustainable communities should be supported by improvements to public transport (to protect the environment) and by the encouragement of small local businesses. Economic growth should not be allowed to destroy the countryside, which is valued by local people, or to result in rural blight.

B3 Or, should a **Combined Approach** be used to form a settlement strategy?

Yes **16**   No **6**   Don't Know **0**

B3-1 If so, which aspects of sustainability should be emphasised in a combined approach?

Environment	**1**
Environment & Economy	**1**
Environment & Sustainable Communities	**1**
Economy & Sustainable Communities	**2**
All Three (Env, Econ, Sus)	**7**

B3-2 Any Other Comments
All three pillars of sustainability are equally important, but the balance of emphasis may vary according to local requirements and should be determined through consultation with local communities. Development should be focussed on main centres, which are typically the most sustainable, and development in other locations should be commensurate with the scale of the settlement and capacity of the transport network. A balance must be struck to ensure that settlements of whatever size gain opportunities for economic development and access to local services, which are vital to support local communities. However, development should not be overly dispersed resulting in increased traffic and harm to the landscape. Rural areas should combine agriculture and tourism in a quality landscape and promote local products. Towns and villages should not be developed beyond their environmental limits.

B3-3 C. A completely **different approach** – starting afresh. Please provide your comments below.

A completely different approach is probably not possible. However, the LDF should aim to enhance the vitality and viability of principle and local service centres within the plan area. Growth should be focused on Skipton, Crosshills/Glusburn/Sutton and Settle, and make the best use of brownfield land in existing urban areas and along main transport routes. It would not be beneficial for the majority of new development to take place in Skipton, as there is an inadequate supply of suitable land, and development in smaller settlements should be limited. More notice should be taken of parish councils, when considering new housing and business development, as they are more aware of local needs and the sustainability of possible new businesses.

C. SETTLEMENT STRATEGY QUESTIONS

In considering the Options for the Settlement Strategy it is useful to consider the following questions:

C1 With regard to a future role for Skipton, in which overall direction should the town go in respect of achieving long term prosperity?

Enhance the quality of shopping, tourism and culture for all age groups, including families, and preserve the individuality and character of the town and its rural setting. Key features, such as the castle, canal, High Street and historic buildings, should be maintained and used to their best advantage. Create a place where socially responsible people should want to live, where everything is of a good quality and has regard to the environment. Avoid the kind of car parking, housing and shopping development put forward in the RMT proposals, which proved to be unpopular and were subsequently withdrawn. Encourage small and possibly medium-sized businesses, including light industry, offices, e-businesses and services, and provide suitable accommodation, whilst also recognising the importance of tourism and cultural development. Understand the rural context and retain responsibilities towards other settlements, whose needs should be identified through consultation with local people and whose individual roles, such as offering local goods and services, should be maintained and enhanced. Ensure sufficient land is released in the centre, hinterland and Leeds/Bradford corridor for major balanced growth in housing and employment, but without compromising the town's semi-rural appeal. Support the redevelopment of previously developed sites that have good transport links and can be accessed by a variety of sustainable transport modes. Resolve existing and avoid further traffic congestion, consider park-and-ride and include bus station improvements and re-opening of the Skipton-Colne railway in the LDF. Finally, always consider the physical and environmental limits of the settlement and the character of the landscape, including protected areas.

C2   Elsewhere, how might the long term viability of key settlements be achieved?

Aim for mixed, self-contained and sustainable communities; support local decision-making and identify local development needs; maintain the special qualities of individual settlements; ensure access to good education and training, job centers (especially for young people), housing (including housing for the elderly), services and transport, in a quality environment. Encourage cottage

industry, small-scale business and the retention of existing employment land, premises and shops; allow development for economic regeneration whilst considering the surrounding environment; support tourism, small businesses relating to agriculture and the use of farmland and buildings for recreation; promote high quality local meat and diary products; recognise the decline in importance of agriculture and the growth in importance of tourism and home-working. Look to expand hi-tech and high value business sectors and rural broadband. Support the expansion and improvement of public transport and transport infrastructure (including a railway bridge or tunnel and station at Cross Hills) and give preference to the development of sustainable locations with access to facilities and public transport. Ensure sufficient land is identified for development and take into consideration the physical and environmental limits of each settlement.

C3   Should directing growth towards settlements where long term viability may be an issue e.g., Cross Hills and Settle be an appropriate response to achieving long term viability?

      Yes **13**   No   **4**   Don't Know   **3**

C3-1   Any other comments

Long-term viability can be an issue for any settlement, but there can be no rational reason for allowing some to decline. Growth should be directed to all settlements in order to sustain facilities and services, but that growth should be appropriate, steady and controlled and should not damage the environment or visual appeal of those settlements. The distinct roles of local centres should be maintained and they should provide the range of local services to the rural community. If these settlements are not allowed to develop they will die as they become dormitories for larger settlements; greater problems will arise in transport, education and just about everything else as residents are forced to travel to obtain even the smallest commodity. In allowing growth it is important to consider mixed modes of development (both in terms of housing and employment), capacity in the road and rail network, the avoidance of floodplain and a preference for the most sustainable locations (in terms of access to facilities and public transport provision). Whilst settlement patterns may have to change, forcing change will not necessarily succeed if others fail to react or support change with infrastructure and services. External factors, such as growth or restraint in neighbouring areas, will also influence the viability of settlements. Finally, some maintain doubts about the need for, benefits of and capacity for growth generally.

C4 Should the distinct roles of key settlements be enhanced or should the Local Development Framework seek to change the role of settlements? Or should the Local Development Framework accept that some centres may decline over the period of the Local Development Framework?

All settlements should be considered and supported and all communities should be sustained through the LDF. The role, function and uniqueness of settlements should be recognised and enhanced and decline should be resisted. The influence of market forces or eventualities that are beyond the LDF's control may result in change and decline, but this must be challenged through new approaches with settlements providing mutual support. Change may be inevitable but decline is not necessarily the outcome, especially if change is planned, integrated and based on an understanding of local circumstances and needs. Any attempt to impose artificial change in the role of settlements is unlikely to succeed.

GENERAL COMMENTS

NOT YET SUMMARISED

Bentham Town Council questions the accuracy of information used on 'Bentham', when referring to High Bentham only. All references to Settle seem to include Giggleswick as well, due to its close proximity. References to Bentham should therefore include both High and Low Bentham (population over 3000) – which would make this a larger town than Settle alone. There are several reasonable sized employers in the area – Kiddes, Turners, Robinsons, Taylors & Sedbergh Junior School, and many smaller business that serve the wider rural community from local retail outlets to medium sized businesses like Armstrongs, Woofs, Slingers, Faichneys & Wheildons which supply significant employment to locals. Bentham Auction Mart (Turners), for example, is an ongoing success post FMD, and now has both vendors and buyers travelling from all over the north of England and Scotland for the prices and quantity of stock available. Yet, constrained as it is, expansion is a problem. Bentham provides an important 'everyday' service centre for the immediate area, including Low Bentham and Burton in Lonsdale, but also for the smaller villages from a wider area such as Wennington, Wray, Hornby, Clapham, Newby and Austwick. Any option which severely limits development in the Bentham area will be unacceptable to both Bentham Council and local businesses alike. In order for Bentham to maintain its current vibrancy some development is necessary – not just house building. The community cannot afford to become a dormitory town to the larger settlements around, as this will result in money being both earned and spent outside Bentham. A suitable site for further industrial development is considered to be a key requirement for the town. The LDF appears to ignore the fact that North Craven has many links in both Lancashire and Cumbria, due to the closer proximity of Lancaster and Kendal than Skipton, the better public transport links, and because – to a large extent – this area has been set-aside by Craven in the greater scheme of things in the past.
On balance of all the options listed, option 2 – developing existing economic strengths appears the most suitable, as options 3, 4 & 5 seem to accept that communities the size of Bentham should be allowed to wither. The fact is that for relatively modest sums spent here far greater growth and improvement could be seen than for considerably larger developments elsewhere in the region. Once again the plan seems to be to maintain employment levels in Skipton, which in turn keeps industrial rents in the area low and encourages employers into the area – whilst ensuring that elsewhere in the region development is kept to a minimum. In the long term this will seriously affect transport strategy, as more and more journeys to Skipton will be required across a larger area within Craven as employment opportunities elsewhere diminish. What is sustainable about that?

What is the vision for Craven? Are we to develop on the back of Leeds? What will "improved services and infrastructure" really mean for the people living and working here or for those visiting? It's unclear how any of the proposals fit into the concept of sustainability.

While recognising that Option 2 tends to flow from the draft Regional Spatial Strategy we would support the Combined approach suggested in Option 5, which would allow for some growth in smaller communities to make them more sustainable.

We consider that this paper should have considered development strategy as a whole. As it is it is focused too much on housing and settlements. There is inadequate attention and consideration given to forms of rural development appropriate to the open countryside such as renewable energy. As such it is inconsistent with PPS22 and PPS7. Any policies that came forward on the strength of this approach would be unsound.
Section A:
We would fully support the development of a Vision for Craven based upon a combination of the four aims and objectives of the Community Strategy together with the issues identified at the LDF Conference. Given the importance of a high quality environment to the distinctive character of Craven, to its economic well being and to the quality of life of its community, we endorse the need for the Vision and Objectives to emphasise the need to protect and enhance its environmental assets and to ensure that the distinctive character of its towns and villages is safeguarded.
Section B:
Delegates at the recent LDF Conference considered that a high quality environment was the most important objective for the LDF to pursue. They also ranked the environment in the 3 of the top 5 objectives. There appears to be clear support by the community, therefore, for a strategy which is based upon protecting and enhancing the environmental assets of the area. Given the character of Craven and its considerable heritage resource, we would also favour a strategy along the lines proposed in Option 3 based upon

protecting and enhancing the environment. However as an alternative the Council might consider a combination of Options 3 & 4 (which would more closely reflect the strategy adopted in the emerging RSS). Whatever strategy is eventually adopted, given the clear steer to the Council by the community, the identification of settlements for growth should be based on an assessment of the capacity of those towns and villages to accommodate further development without harm to their character or landscape setting.

The Environment Agency as 'an environmental champion' would always favour Option 3 , which places emphasis on the protection and enhancement of the environment. In Section 3, no reference is made of PPG25 or draft PPS25 relating to development at flood risk or the requirement for Strategic Flood Risk Assessment to inform the allocation of development sites regardless of which option is selected. As Craven has been working jointly with other local authorities in North West Yorkshire on the production of SFRA, we would expect that reference to it should be made in the section dealing with the evidence base. The evidence base could also include reference to the Council's Biodiversity Action Plan as it is important to maintain green spaces, river corridors within towns as these form a green network that are important as a wildlife resource. Development proposals as well as seeking to protect and maintain areas of biological value should include measures and create opportunities to enhance and increase biodiversity.

[Regarding A1] Equal weight to be given to rural and urban areas, especially concerning the local economy.

1. [LDF Generally]
I would like to add that as Long Preston Parish is split between the Yorkshire Dales National Park and Craven District Council - with respect to the Local Development Frameworks - but remains on the A65 corridor, which evidently plays an important part within Craven District Council's LDF (for example, we have already been clustered together with Hellifield in the recent Housing Needs Survey), that it is vital that the needs and views of Long Preston residents are also taken into consideration. Obviously, although a large part of Long Preston Village lies within the National Park there are parts of the Parish that do not, and many areas of CDC's LDF refer to the A65 corridor which affect Long Preston as a whole. We hope that you will find our comments both constructive and useful when forming the Core Strategy for this area.
2. [Further to A1]
However, it should be noted that it is also important that communities are each treated individually for specific needs and characteristics which, to ensure their sustainability, may require maintenance and careful growth, tailored to match those needs and characteristics.
3. [Response Forms]
There was some difficulty in using the 'tick' boxes electronically on the response forms: expanding boxes to enter text, text then changing from one PC to another, etc and I would suggest that future forms need to be made foolproof against Microsoft Word's occasional erratic behaviour if you prefer responses to be sent this way.

We write to your planning authority on behalf of the Mobile Operators Association (MOA), which consists of:
- Hutchinson 3G UK Limited ("3")
- O2 (UK) Limited ("O2")
- Orange PCS Limited ("Orange")
- T-Mobile UK Limited ("T-Mobile") and
- Vodafone Limited ("Vodafone")
One of the main aims of the new Act is to slim down both the number and content of policies. We consider it important that there remains in place a telecommunications policy. It is noted that the Council's Core Strategy Preferred Options Papers do not contain any reference to telecommunications development. It is recognised that telecommunications plays a vital role in both the economic and social fabric of communities. National guidance recognises this through PPG8. PPG8 gives clear guidance as to the main issues surrounding telecommunications development. These include the legislative framework, siting and design issues, levels of consultation and issues surrounding electromagnetic fields (emfS). Clear guidance is also given regarding what should be included within local plan (now LDD) policy. This guidance states that local plans (LDD's) should set out criteria based policies to guide telecommunications development and that whilst regard should be had to siting and design considerations, operational efficiency should not be inhibited. PPG8 also makes clear that "criteria should be flexible enough to allow for the efficient development of the network and the demands imposed by the technology". Since the revision of PPG8 in 2001, the ODPM has produced, in conjunction with the industry, a Code of Best Practice. This builds on the Ten Commitments to ensure that the industry is alive to the concerns of local communities and consultation is built into the development process. As indicated above the formulation of policy does not exist in isolation and there are numerous documents, which will affect the formulation of any telecommunications policy, the most important

of these being PPG8. On this basis we would suggest that within the LDF there should be a concise and flexible telecommunications policy contained within one of the Council's statutory LDD's. This should give all stakeholders a clear indication of the issues which development will be assessed against. We should suggest a policy, which reads:

"Proposals for telecommunications development will be permitted provided that the following criteria are met:

1. The siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character and appearance of the surrounding area,

2. If on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building.

3. If proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the LPA.

4. If proposing development in a sensitive area, the development should not have an unacceptable affect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest.

When considering applications for telecommunications development, the LPA will have regard to the operational requirements of telecommunications networks and the technical limitations of the technology."

It will of course depend on your LDS as to which documents are produced, which documents have a statutory role in development control and which would be considered as material considerations. We would suggest that this policy be a stand alone policy within one of the main LDD's, with a separate LDD or what is currently termed Supplementary Planning Guidance (SPG). This could then be read with PPG8, the Code of Best Practice to give a comprehensive background to any proposed development. We would consider it appropriate to introduce the policy and we would suggest the following:

"Modern telecommunications systems have grown rapidly in recent years with more than two thirds of the population now owning a mobile phone. Mobile communications are now considered an integral part of the success of most business operations and individual lifestyles. With new services such as the advance third generation (3G) services, demand for new telecommunications infrastructure is continuing to grow. The Council is keen to facilitate this expansion whilst at the same time minimising any environmental impacts. It is our policy to reduce the proliferation of new mats by encouraging mast sharing and locations on existing tall structures and buildings. Further information on telecommunications can be found in LDD..."

In summary we recognise the early stage of LDF and the early stage of the consultation process at which we are being asked for comment. We are suggesting that a clear and flexible telecommunications policy be introduced in one of the main LDD's. This should be introduced by a short paragraph outlining the development pressures and the Council's policy aims. We have suggested text for both above. In keeping with the aims and objectives of the new legislation and background information should be contained within a separate LDD, which would not need to go through the same consultation process (like a current SPG).

PPS12 'Local Development Frameworks' notes that the core strategy development plan document should set out broad locations for delivering the housing and other strategic development needs such as essential public services. Paragraph 4.1 encourages early involvement of government agencies in the preparation of LDF's while paragraph B3 requires local planning authorities to develop a strategic approach to infrastructure provision (including community facilities) when preparing local development documents.

Circular 3/98 'Planning for Future Prison Development' highlights the continuing overcrowding within the prison estate and the need to replace outdated and inadequate facilities. Specifically there is a need to identify more sites for new prisons. The Secretary of State expects that local planning authorities will work together with the Prison Service to identify land for new prisons through the development plan process. The Circular advises that in order to enable authorities to make provision for prisons within their development plans the Prison Service will consult with authorities about likely areas of future need (paragraph 7). Circular 3/98 recognises at Paragraph 2 that there should be guidance in development plans on community facilities and infrastructure requirements and also that they should take account of the need for new prison developments, which should be identified through the planning system. The Circular notes that in identifying potential prison sites, the Prison Service has to take account of local and regional requirements for additional prison places, the court catchment areas served and the relationship of the site to nearby population centers. It goes on to specify a number of other site development considerations and also recognises that the objectives of sustainable development and in particular the need to reduce unnecessary travel should apply to site selection. Prisons should not be located too far from the centers of population they serve and there should be reasonably good accessibility to public transport services. The Circular also recognises that new prisons have potential for a substantial and beneficial impact on the economy of a local area. New jobs are created on site (both during construction and permanent jobs), goods and services are purchased in the community and extra local income is generated as a result of the disposable income of prison staff. In recent

years there has been a significant increase in the prison population. In the 1970's the prison population in England and Wales was in the order of 40,000; in July 2005 that figure had risen to 76,538. The prison estate is experiencing serious overcrowding. NOMS is doing everything it can to maximise capacity at existing prisons by bringing buildings back into use through refurbishment, new house blocks, temporary units and 'ready to use' units. However, many prisons are already operating at capacity and there is limited potential to significantly increase the number of places at existing prisons. The prison system is therefore heavily dependent on new prisons to provide the additional places.

While there are no specific proposals for new prison development in your district at present, nor specific sites identified, in line with Government guidance NOMS requests that you consider the inclusion of a criteria based policy to deal with a firm prison proposal should it arise during the plan period. I would be pleased to propose a detailed policy for inclusion in your Development Plan Document and would welcome your views on how this proposal should be taken forward.

The concept to focus development towards the District's larger, more accessible settlements and limiting development to "local needs" in the District's smaller and/or less accessible villages is supported. This national and regional policy on sustainable development reflects settlement strategies and transport.

The draft RSS for Yorkshire and the Humber identifies Skipton as the only Principle Service Centre within the Craven plan area, and it is therefore given that a significant proportion of growth will be directed towards Skipton. While we understand this policy approach cannot be challenged through the LDF we would comment that we endorse this sustainable urban focus. While we agree with the principle of prioritising the re-use of brownfield land, it is important in Craven to acknowledge that there is not an excessive amount of brownfield sites, with much of the supply arising form the closure of mill buildings. We consider the plan area would benefit from the allocation of more strategic sites, which could feasibly include sustainable greenfield sites, close to urban areas (i.e., Skipton). This would be in accordance with emerging National guidance PPS3, which moves away from a sequential approach, allowing greenfield sites in sustainable locations to be considered and come forward ahead of unsustainable brownfield sites.

SETTLEMENT STRATEGY OPTIONS

We support option 2 - economic strengths, which would focus most growth within Skipton and South Craven and potentially at settlements along the "Airedale Corridor". In achieving this we consider the Council would need to allocate greenfield sites on the edge of Skipton. Given the importance of the Airedale Corridor and its potential influence on the Leeds City Region, we feel this option of the most appropriate, enabling an urban concentration around the principal service centre of Skipton, in accordance with the Draft RSS and allowing Craven District to contribute to the growth of the Leeds City Region. This accords with emerging Regional guidance, which is referred to in the Issues and Options document "within the Leeds City Region area as a whole the spatial approach gives greater weight to growth and investment with a view to enhancing economic success within the sub area, together with associated transport and addressing housing issues". With this in mind Option 2 would seek to achieve this.

The Town Council's preferred option is option 5.

Please find enclosed comments on the LDF papers from StART. One overall comment that the Team wanted to pass on is that the process does seem prescriptive and lead to restrictive conclusions and asks that the process is carefully examined and that the final framework reflects the local situation and is not too bound by national policy. The Team recognises that good development control is required and hopes that the planners are not too restricted by the LDF and can aim for high quality developments and able to accept innovative solutions if they are presented.

United Co-operatives is the largest regional retail co-operative society in the UK. In the District of Craven, we operate food stores, petrol filling stations, funeral homes and, at present, a single pharmacy. The Society does not have a specific view on the alternative settlement strategy options. However, we do believe that there should be a defined hierarchy of centers. Development should then be directed to centers within the hierarchy according to the position they occupy within it. The Society is actively engaged in providing services to local communities and, in particular, local convenience retailing. The draft Issues and Options documents do not contain any specific policy options relating to local retailing and, in our view, such facilities are of sufficient importance to warrant inclusion in the Core Strategy. In evaluating alternative locations for new housing development, consideration should be given to the threshold populations required to sustain specific local services, including local retail facilities. In communities where the immediate population is too small to support local shopping, permitting such facilities to locate on through roads, where they exist, so that they might draw on passing trade, may create a viable opportunity. Where communities are recently served

by adequate local shopping, this should be protected. It is particularly important to safeguard the viability of existing food stores within local centers because these often generate the footfall upon which the centre, as a whole, relies. Waste management is a key issue for local authorities. The Issues and Options documents do not set out alternative policies for dealing with it.

United Utilities has to match the aspirations of local authorities and its customers with a heavily regulated funding environment and it should never be assumed that utility infrastructure capacity is available for significant developments. We should point out that utility infrastructure service capacity is more likely to be available on brownfield sites within existing settlements rather than at green field locations and the former may be considered more sustainable?

We welcome the references to the RSS and the summary that provides the context for this consultation paper. Whilst the RSS does not identify Local Service Centres, it might be helpful to refer to the Regional Settlement Study that identifies the following as Local Service Centres in the Craven District: Settle, Grassington/Threshfield, Crosshills/Glusburn/Sutton and Bentham. The RSS makes it clear that this Study was a starting point from which LPA's would need to identify the Local Service Centres in their areas - based, for example, on the more local studies that are summarised in these documents - that should provide a focus for limited housing and economic development. The objectives identified from the "Shaping Places and Spaces conference" would seem to provide an appropriate basis from which a Core Strategy could develop. It would perhaps be surprising if a spatial plan was supported that did not aim to meet all the objectives of sustainable development. As a minimum, an option should not be supported that would seek to undermine the achievement of these objectives - this is an analysis that the sustainability appraisal will clearly help with. Through the approach taken to setting the options, it is clear how different settlement hierarchies could be encouraged and how different settlement patterns could emerge as a result. It will be interesting to see what debate is generated from these options. At this stage, the assembly would wish to emphasise the need for the Core Strategy to reflect the key locational principles set out in existing RSS, which are developed further in the draft RSS Core policies YH1 to YH8. The aim of the existing RSS (Dec 2004) is to guide development to sustainable locations and to focus development in main urban areas, market and coalfield towns (Policy P1). This key strategic approach is reinforced in the Yorkshire and Humber Plan (Draft RSS Dec 2005), which is more specific about the desired location of development in Policies YH1 to 8. These clearly provide a policy context and direction that emphasises the need to concentrate development in Regional and Sub Regional Centres, provide for sufficient development in Principle Service Centres for them to fulfill their important role and to allow limited development in Local Service Centres, primarily to meet local need for affordable housing and to enable economic diversification. The overall aim is to reverse the trend of dispersal of development, encouraging a settlement pattern that helps to fulfill the RSS objectives. The particular circumstances of the Craven area mean that there is likely to be a need for development in centers smaller than those identified as Local Service Centres. In line with RSS policies, these developments would be specifically to meet local needs for affordable housing and to allow economic diversification. How these centers are identified within the settlement hierarchy will be important and the Preferred Options document will need to make it clear how local evidence has been used to generate the settlement hierarchy. RSS policies would point to accessibility by public transport, levels of service provision, availability of brownfield land, levels of local need, opportunities for economic diversity, need for environmental protection, as all being important factors to take into account. In relation to each of the options, the following brief comments are offered:
Option 1 might encourage too much of a dispersed settlement pattern.
Option 2 represents more of an urban focus than the other options but might pat enough attention to the need to meet local needs; there might also be concerns regarding the impact on natural resources.
Option 3 raises some issues regarding the (unintended) consequences on travel patterns
Option 4 raises some concerns about the impact on the natural and built environment.
Option 5 perhaps surprisingly also raises concerns regarding the level of dispersal of development that might result - perhaps this options is more of an aggregate of the other options so the concerns relating to each of them are aggregated.
Given the above the Assembly would encourage a Preferred Option to be developed that sets out a settlement hierarchy that reflects the locational principles of concentration, whilst meeting local needs, providing opportunities for economic diversification and minimising environmental impact. This is likely to be a combination of options 2, 3 and 4 based on a clear assessment of opportunities for the given settlements to be sustainable communities.

Yorkshire Forward would welcome a vision for the LDF which is based on the aims and objectives of the community strategy, is locally specific and encompasses both priorities identified by the local community and

wider sustainability issues. Yorkshire Forward therefore welcomes the suggested strategic objectives for the Core Strategy, particularly the focus on design quality, minimising environmental impact, enhancing the District's market towns and building sustainable communities. Given that the document identifies that the vision should 'address issues of connectivity and sustainability', it may be useful to add an objective which seeks to reduce the need to travel and improve accessibility and sustainability by directing new development to locations close to existing housing, employment and public transport networks. The Settlement Strategy for the District should provide a balanced approach to new development, ensuring that all aspects of sustainability are realised. It is important that the Core Strategy adopts an approach to new development that ensures all three aspects of sustainable development (economic, environmental and social issues) are all reflected, and managed where necessary, in line with the principles of sustainable communities as set out by the Egan Wheel.

Yorkshire Forward's preferred option for the Settlement Strategy would therefore be for a combined approach (option 5) which directs new development to the centers of the main settlements in the District, with a focus on Skipton, as the Principle Service Centre followed by the most accessible and sustainable Local Service Centres that offer a range of opportunities, services and facilities. Having said that, Yorkshire Forward recognises that, as Craven is primarily a rural district, it may be appropriate to allow some limited small-scale development in the District's smaller settlements to meet an identified local need for affordable housing or to support local economic diversification. But, any new development in the smaller settlements should be directed to the most accessible and sustainable towns and villages where other services and facilities are available. It is also important of course, to ensure that development does not have an adverse impact on the landscape, character and environment of the settlement or open countryside but is located close to existing housing, employment and services to help reduce the need to travel between home and work and maximise opportunities for travel by sustainable modes.

The Regional Economic Strategy 2006-15 (and draft RSS) recognise the importance of the regeneration of Airedale. As such, it is important that this regeneration priority is given adequate consideration and emphasis in the core strategy to support its delivery.

We are also pleased to see that the Issues and Options paper reflects the Renaissance Market Towns (RMT) investment in Skipton and Settle.

Yorkshire Forward is fully committed to the RMT programme across the region and it is important that the projects and priorities identified by each town team are fully reflected in the Core Strategy and other relevant LDF documents. However we would like to see all references to the Skipton and Settle Renaissance Market Towns Initiative changed to the Renaissance Market Towns Programme to avoid confusion with the Market Towns Initiative pilot, which preceded it.

To ensure development which takes place is sustainable we would support the inclusion of a policy in the LDF which ensures that new development is coordinated with the provision of essential infrastructure. Infrastructure for the supply of clean water and disposal and treatment of waste water should be listed as essential infrastructure. This would set out the need to investigate the existing infrastructure capacity of their sites at an early stage in the development process and improve the co-ordination of infrastructure and development. An example policy is set out below:

"Development will not be permitted unless infrastructure to service the development is available or the provision of infrastructure can be coordinated to meet the demand generated by the new development."

See YW detailed comments on Co-ordination of new development and adequate infrastructure & General comments on LDF's.