

## **Strategic Environmental Assessment/Sustainability Appraisal of Issues and Options for Craven District Council Local Development Framework (Core Strategy)**

### **Comments received during the Core Strategy 'Issues and Options' six-week consultation period regarding the Strategic Environmental Assessment/Sustainability Appraisal carried out by Land Use Consultants:**

- Mr Robert Holland (*with regard to the Housing Paper*) - Strong support for recommendation in Land Use Consultants Sustainability Appraisal i.e. "All housing developments (should be) mixed in type, size and tenure" for reasons given in their report page 4 para 1.7. I suggest that releasing some land for 100% affordable housing does not support integration of different socio-economic sectors of society.
- Skipton Civic Society (*with regard to the Economy Paper*) - Skipton Civic Society supports the SEA's recommendation for "an employment land allocation that guides developments --- to where there is a need but also to where sites will have minimal impact on landscape and bio-diversity". We also support the SEA recommendation of "an economic development policy which prioritises support for the tourism industry and office based sectors --- These --- can be catered for with least land take and can enhance the natural and built environment".
- Skipton Civic Society (*with regard to the Housing Paper*) - The Strategic Environmental Assessment (SEA) states "Option 5 appears to be the most sustainable. However, the priorities for the plan area are unclear and it is therefore uncertain whether market forces, social need for housing or protecting the environment will take priority where they conflict". This stresses a vital point made in the SEA summary - "To be most effective, policy needs to state those unique characteristics of the District which are a priority to protect and which should be overriding factors when taking decisions on proposals where there is conflict between environmental, social and economic factors". Delegates at the "Shaping Places and Spaces" conference ranked "The need to conserve & enhance the high quality rural and urban environment" as the most important aim of the LDF.
- Skipton Civic Society (*with regard to the Environment and Design Paper*) - The Society agrees with the following statement of the SEA - "Measurable improvements in energy efficiency and the integration of micro-renewables into new development will only become a reality if the District enforces such measures through future planning applications relating to housing, public services and business developments".
- Energiekontor (*with regard to the Environment and Design Paper*) - Misleading Summary of PPS22 - We would like to point out that the summary of PPS22 provided on page 8 is misleading. It states that PPS22 encourages planning authorities and developers to 'promote the use of renewable energy.' (Our emphasis.) Paragraph 1 PPS22 actually states that '... local development documents should contain policies designed to promote and encourage, rather than restrict, the development of renewable energy resources.' (Again our emphasis.) As far as we are concerned your Authority is producing a Local Development Framework not a Local Use Framework. (Our emphasis.) There seems to be a reluctance on your Authority's part to fully embrace PPS22. If your approach does not

actively and whole-heartedly promote and encourage the development of renewable energy resources it will be inconsistent with PPS22 and therefore your Core Strategy will be unsound. If we see no change in your approach we will object to your Strategy at Preferred Options stage. This will be on the basis of advice at paragraph 4.23 (iv) of PPS12.

Flawed Sustainability Appraisal Methodology - This fundamental criticism also extends to your Sustainability Appraisal. We note that Table 6.2 of the LUC Scoping Report contains the following sub-objective and criterion for Appraisal: "To promote the use of renewable energy exploring innovative techniques. Will it promote the use of alternative renewable energy." We consider that your Appraisal methodology is inconsistent with advice in PPS 12 and PPS 1 and therefore is potentially unsound. Paragraph 3.18 of PPS12 states that: 'In carrying out the appraisal, local planning authorities should have regard to the specific objectives and principles of sustainable development as outlined in PPS1.' Paragraph 13 of PPS 1 states that: 'The following key principles should be applied to ensure that development plans and decisions taken on planning applications contribute to the delivery of sustainable development: (ii) Regional planning bodies and local planning authorities should ensure that development plans contribute to global sustainability by addressing the causes and potential impacts of climate change – through policies which .... Promote the development of renewable energy resources.' We would suggest that you revise your Appraisal methodology to focus on evaluating/measuring progress on the actual development of renewable energy generating capacity within Craven District.