

Craven Local Plan (Draft 22/9/14) Consultation

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Response Summary for Section 1: Introduction

Section 1: Introduction

- The introduction is clear, reasonably concise and sets out the background to the requirement to produce the plan.
- It is recommended that the Council consider producing a background paper upon the duty to co-operate prior to the next stage of consultation on the Local Plan. This paper should identify the issues of cross boundary significance, the engagement which has taken place and the material actions taken which have effected plan preparation. It is noted that within section 1 (page 6) of the plan it is stated that the ‘...plan has been prepared in co-operation with neighbouring councils and agencies that work across council boundaries, to ensure that no opportunities are missed to work together on issues that are —bigger than local’. Whilst this statement is encouraging it is unclear what co-operation has been undertaken and how this has led to specific actions in the preparation of the plan. It is therefore unclear whether the legal requirements of the duty have been adequately satisfied. The Duty to Cooperate is not a duty to agree. However, the duty requires more than consultation and meetings. It is the efficacy of the engagement throughout the plan making process and the outcomes which flow from such engagement which determine whether the duty has been met. The importance of identified actions resulting from fulfilment of the duty is clearly articulated within the National Planning Practice Guidance (NPPG). The NPPG states ‘it is unlikely that this (the duty) can be satisfied by consultation alone’ and that ‘inspectors will assess the outcomes of the co-operation and not just whether local planning authorities have approached others’. The NPPF requires ‘...a continuous process of engagement from initial thinking to implementation’ (paragraph 181). It is therefore essential that engagement over cross-boundary issues such are addressed early and considered through the evidence gathering phases. The HBF is particularly concerned with housing provision and how the Council has dealt with the associated cross-boundary implications in determining its own housing requirement. This must take into account the actions of neighbouring authorities. This is particularly pertinent within Craven given the cross-boundary nature of the sub-regional housing market areas identified within the 2011 North Yorkshire Strategic Housing Market Assessment (NYSHMA) and the provision proposed to be apportioned to the Yorkshire Dales National Park.

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Response Summary for Section 2: Context

Section 2: Context

- The sentence “Skipton is the largest settlement in Craven with a population of 14,677, equivalent to 32% of the District total. The neighbouring settlements of Cross Hills and Glusburn provide services for South Craven” reads as though Crosshills and Glusburn are the major providers of services to South Craven. This sentence should be amended to read “Skipton is the largest settlement and the major service centre in Craven with a population of 14,677, equivalent to 32% of the District total. The neighbouring settlements of Cross Hills and Glusburn also provide services for South Craven...”
- Pg. 12: There should be a comment that the area has good access for cycling with the National Cycle Network passing through Clapham and Ingleton and within about 1km of Bentham.
- Pg. 14: It should include a comment that there are lots of cycling opportunities in the area, including two National Cycle Network routes crossing in Giggleswick
- Pg. 16: It should include a comment that compared to the rest of the region, access to the National Cycle Network is poor but that there are still several opportunities to join the NCN in South Craven, at Gargrave and Embsay.
- The draft Plan states that Craven has extensive rail network coverage. Disagree. Rail links from Skipton to Leeds and Bradford are excellent. However trying to travel in any other direction the rail links from Skipton are either very poor (i.e. north of Skipton – to Settle and Carlisle) or non-existent. There is no rail link from Craven to several nearby large towns in East Lancashire (despite the fact Colne, Nelson etc are only twelve miles away). Need a rail link connecting Skipton and Settle with Clitheroe. Need to re-open Skipton to Colne line. Improved transport and economic links to Lancashire are essential for businesses in Skipton to thrive. Also need improved road and rail links to central Manchester, and in particular fast rail links to Manchester Airport. The route from Skipton to the M65 is also difficult and needs addressing. These would be highly advantageous for many Craven businesses. In particular it would give Skipton access to national/international conference and exhibitions in central Manchester, and a good range of international flights from the Airport.
- Add annotation to Map 2 – North Sub Area - to show the link / influence with South Lakeland to the north (e.g. Kendal and Kirkby Lonsdale). Reflect this addition in accompanying paragraph.
- Context section should be broadened to include national strategic factors and those of the wider northern region (such as impact on Craven of future development of Leeds, Bradford, Manchester; impact on HS2; analysis of IT infrastructure such as superfast broadband and 4G; impact on rise in tourism in future). Plan needs to analyse these factors and assess the risks and opportunities they might present to avoid appearing too inward looking.
- Amend seventh paragraph of Context section as, apart from providing little more than a few figures about the Plan area, there is little to describe what elements make Craven particularly distinctive or, more importantly, what contribution they make to the quality of life and economy of the Plan area (which is found elsewhere in the plan). The 2013 edition of “Heritage Counts” has the following figures for that part of Craven which lies outside the National Park:- Listed Buildings – 888; Scheduled Monuments – 31. (English Heritage comment)
- Section 2 – Key Issues, An outstanding local environment, add the following to the end of this Section:- “There is a need for the Plan to reconcile the community’s need for development with the protection of its natural and historic assets”. The plan needs to reconcile meeting its assessed development needs with the appropriate protection of its outstanding environment. In the case of Craven’s historic environment, without evidence to the contrary, it seems likely that a number of the areas that are being proposed as potential

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Response Summary for Section 2: Context

development sites would result in harm to the significance of the District's heritage assets. The resolution of this potential conflict is a Key Issue which the plan will need to tackle and, as such, should be referred to within this section. (English Heritage comment)

- Given that the brevity of the portrait of the District's heritage assets on Page 7, one might have expected some amplification within the detailed descriptions of the Sub-Areas. However, this Section contains virtually nothing about the historic environment of this part of the plan area. For example:
 - The historic communication routes between Yorkshire and Lancashire are a key feature of the Northern Sub-area. Castle Hill in Burton in Lonsdale (which is a fine example of a motte and bailey castle) emphasises the importance of this route.
 - In the Mid Sub-area: Buildings and structures associated with Settle-Carlisle Railway; The attractive Historic Market Town of Settle notable for the survival of its many 17th and 18th century buildings, its steep lanes and narrow 'ginnels'.
 - In the South Sub-area: The historic Market Town of Skipton with its medieval castle and church, its textile mills, chimneys and terraced housing; Buildings, bridges, locks and other and structures associated with the Leeds- Liverpool Canal and Thanet Canal; Evidence of prehistoric settlement and concentrations of carved rock on the Moors to the south-east of Skipton; 18th and early 19th century spinning mills, found along watercourses along with locally-distinctive housing designed to accommodate hand looms; Local settlement pattern based on linear settlements along the valley floors. This includes textile mills surrounded by stone terraces of housing on the hillsides and mill chimneys that are often prominent in the landscape; The Waterwheel at Dale End Mills is the largest of its kind; Historic Parks and Gardens - Broughton Hall (is considered to be the best surviving example of work by William Andrews Nesfield); Gledstone Hall (features a planting scheme by Gertrude Jekyll). (English Heritage comment)
- The Council should set out the reasons for identifying Sutton-in-Craven as an area for development by sharing which sites in Skipton they have already considered and dismissed and on what grounds.
- The sentence "it is apparent that the local housing market is inaccessible for many households" should be amended to read "it is apparent that, as is the case nationally, the local housing market is inaccessible for many households". This would show that the problem is not unique to South Craven.
- Support expressed for the Context section: This section is clear and succinct, giving an excellent appreciation of the issues to be addressed in the Local Plan.
- Map 1 shows the local authorities with which Craven shares a common boundary, but does not highlight that Lancashire County Council, North Yorkshire County Council and the National Park Authority are also considered to be 'neighbouring authorities'. It would be beneficial to list all neighbouring authorities within the opening paragraphs of the Context.
- The proposal to construct a bypass between Colne and Foulridge is identified in the East Lancashire Highways and Transport Masterplan (Lancashire County Council, 2014), with construction work due to commence in 2020/21 (Page 53). The delivery of the by-pass is a priority for the Lancashire Local Enterprise Partnership (LEP) and is recognised in the LEP Delivery Plan. This proposal is supported in Policy ENV4 of the Pendle Core Strategy (Pre-Submission Report) (Pendle Council, 2014), as is the potential re-instatement of the former Colne to Skipton railway line. Improved connectivity between the two boroughs will help to improve cross-boundary access to housing and employment opportunities and this should be recognised (and supported) in the Craven Local Plan.
- The sentence "These good transport links make commuting to and from the south sub area

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Response Summary for Section 2: Context

easy, however there are localised transport infrastructure pressures around Crosshills and” should be amended to read “These good transport links make commuting to and from the south sub area possible, however there are major localised transport infrastructure pressures around Crosshills and”. The sentence, read in its original form, overstates the effectiveness of the transport links.

- Plan needs to provide a map of Craven detailing all conservation areas, landscape, biodiversity and heritage designations. Include all designations on individual inset maps to highlight relationship to proposed development. Protection of these assets is imperative to maintain Craven's "unique and outstanding local environment".
- Context Section: Housing & Income – Bentham does have a high level of affordable housing need, but not for 1 and 2 bed properties following the development of Bargh’s Meadow (not shown on maps). The real need in High Bentham is for 3 and 4 bed properties to accommodate the growing families already living in the new 1 and 2 bed properties.
- Context Section: Health – the services provided at Castleberg are so limited it is hardly worth a mention. Residents in Bentham use RLI and Westmorland General in Kendal.
- The draft plan needs to be reconsidered with a view to recognising that Clapham looks south rather than west. Clapham would therefore be better allocated to the Mid Sub-area alongside Settle (rather than the North Sub-area_. Transport links between Clapham and Bentham and Lancaster are poor and inadequate. There is no direct bus service between Clapham and these centres, the roads are narrow winding and dangerous and the rail services are inconveniently timed. Road and rail transport links between Clapham and Settle, Skipton and Airedale Hospital are far better, safer and are more heavily used by local residents.
- The local plan should be redrafted to recognise Clapham as a principal gateway to the Forest of Bowland (via the road to Slaidburn), a gateway with an enormous but largely ignored potential for exploitation for leisure and leisure employment. Indeed, half of Clapham parish is in the AONB, the boundary of which runs through the parish along the A65. The road from Clapham to Slaidburn runs through spectacular moorland scenery over Bowland Knotts, through Gisburn Forest to Stocks Reservoir and Slaidburn and thence to Tatham, Tosside, Chatburn etc. The area is popular with photographers, birdwatchers, cyclists and walkers.
- The Context section describes GP practices in mid and south sub area as being Bradford District CCG, they're actually Airedale Wharfedale Craven CCG.
- The plan mentions the Kildwick Level Crossing but proposes no action. A relief road and bridge in Cross Hills would ease traffic flow and could run from the junction east of the industrial estate, bridging the Aire and meeting the Aire Valley road in a roundabout.
- The plan makes no mention of the lack of a station at Cross Hills. A station serving a population of 10,000 would reduce traffic. There were 2 former stations in Cross Hills; one of the sites could be used.
- Pg. 7: The list of designations lacks information on the number of Sites of Special Scientific Interest (SSSI’s) found in the district. Theses should be included in the final paragraph of this section.
- Broughton Hall Estate welcomes the reference to Broughton in the context of Tourism. The Estate has a significant role in drawing in visitors (as day visitors and stay visitors) to Craven and its importance must be noted in the context of the future potential; Broughton also play a significant role in raising the regional and national profile of Craven in the extensive filming (advertisements, mainstream films) that takes place across the estate and as a consequence of the success of the Business Park. The early Local Plan reference to Broughton and tourism is not followed through in subsequent policy concerning the Estate (SP15) or at Section 6, Economy and the Tourism policy. Recommendation: it is

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Response Summary for Section 2: Context

recommended that SP15 broadens its reference to also include the sustainable growth of the existing tourism offer at the Broughton Hall Estate.

- Natural England welcome the strong and positive emphasis regarding the districts landscape and environmental assets running through the Context, Vision, Objectives and Spatial Strategy chapters.

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Response Summary for Section 3: Strategy – Vision

Section 3: Strategy: Vision

- The vision and objectives are generally welcomed and considered fit for purpose. The only exception is paragraph 2 (page 18) of the vision which indicates; ‘New homes will be situated on previously developed land and on the fringes of market towns and villages.....’ This appears to indicate a prioritisation of previously developed land. This would be contrary to paragraph 111 of the NPPF which specifically relates to encouraging its use. This is particularly relevant in Craven where it is noted that most available land for new housing is likely to be composed of greenfield sites (page 23 of the plan). It is therefore recommended that paragraph 2 of the vision be amended to reflect this.
- The vision section for south Craven (p20) needs to be changed as it fails to sufficiently prioritise and value existing green space on the margins of Skipton when considering the need for new housing.
- For transparency reasons and to strengthen trust from residents it would be helpful if you could demonstrate how the local services such as schools/GP practice will manage the extra residents based on the number of homes involved.
- Page 20. The section entitled "South Area". There should be a line after, "...and Manchester conurbations". It should say something like, "There will be a focus on ensuring good, off road, cycle infrastructure to enable active travel and reduced carbon travel in the district." It also fails to acknowledge linkages with Pennine Lancashire and/or the Central Lancashire City Region. Good transport links between Pendle and Craven are needed if there is to be mutually beneficial growth. Whilst the section on ‘Links with areas outside Craven’ (Page 15) specifically mentions the A682 as a conduit into Pendle, the corresponding section in the South Sub Area (Page 17) fails to mention the A56 or the A6068, which are arguably more important traffic arteries from Skipton and Cross Hills/Cowling respectively.
- Vision for Mid Area (p19) - there is no mention of the adverse impacts of quarry lorry traffic on Settle and its residents. The transfer of quarry traffic from road to rail should be included as an aim (in order to improve the environment in Settle for residents and visitors).
- The vision for the plan area up to 2030 and the spatial strategy’s sub-area approach to development and the wider growth aspirations in the Ingleton / Bentham area are supported.
- The proposed Vision is supported, especially the intention that:-
 - The District will be a distinctive and attractive place to live
 - New development will have respected the distinctive character and heritage of their surroundings
 - Craven’s high-quality landscapes and treasured environmental assets will have been protected and will be enjoyed by everyone.

However the following amendments are suggested:

1. Vision, second Paragraph, line 7 should be amended to read “.. and waste, have respected and helped to reinforce the distinctive character and heritage ...”.
2. Vision, fourth Paragraph should be amended to read “... treasured environmental assets will have been protected, enhanced where appropriate, and will be enjoyed by everyone”
3. Vision, Mid Area, second Paragraph fourth line should be amended to read “Despite its growth, the town will have retained both its intimate feel and its distinctive character which, together with the large number of facilities for its size, will make it particularly popular ... etc”
5. The legacy of buildings and structures associated with the area’s textile industry are a distinctive feature of the settlements of this subarea. There are many examples across the District where these have been successfully converted to alternative uses. One of the

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Response Summary for Section 3: Strategy – Vision

intentions of the Plan should be to maximise the potential of this resource not only to help meet the housing and employment needs of the area but also help to retain the local distinctiveness of Craven. (Statutory Body)

- There is a worrying lack of detail within the Vision. At least include footnotes which reference the relevant low level documents.
- P18 1st Paragraph: There will be a greater equality amongst its communities in terms of housing choice, better paid local job opportunities, for pursuing a healthy and active lifestyle, more opportunities for access to arts, heritage, sport, active recreation and play which support a healthy lifestyle and access to services.
- P18 2nd Paragraph: The location, design and sustainable construction of these new homes, along with business premises and other commercial enterprises will have reduced carbon emissions, fuel poverty and waste; they will and respect the distinctive character and heritage of their surroundings, enhancing the quality of, and creating, a 'sense of place'.
- The Plan states the South sub area is the primary area for growth yet there is a very sizeable business area (Crosshills Business Park) not included. The vision should also indicate the possibility of business development in cooperation with Bradford area.
- It is agreed that Skipton should be the main focus for growth in Craven and that it should offer a broad range of employment opportunities. In terms of the long term future vitality and viability of Skipton Town centre it is however considered that the Council's Vision will not be achieved without first addressing the issue of the District's ageing population through active measures to retain and attract families and the economically active to the District e.g. through the delivery of new family housing and employment opportunities in sustainable locations.
- The strong and positive emphasis regarding the districts landscape and environmental assets running through the Context, Vision, Objectives and Spatial Strategy chapters is welcomed, together with objective P02 to "conserve and enhance the high quality local environment including open spaces, ecological networks and cultural heritage". However it is suggested that landscape character and the setting of protected landscapes should be similarly conserved and enhanced, either as part of this objective or separately. The reference to ecosystem services in the Spatial Strategy in line with para 109 of the NPPF and the principles of the 2011 Environment White Paper, The Natural Choice: securing the value of nature is also welcomed.
- The draft vision suggests that a fulfilling and vibrant community life will not be achieved in Clapham until 2030 ignores that fact that it already enjoys a community life which at times seems over-full and over-vibrant.
- The vision has a stated aim of using brown field sites for development where ever possible. Given that Rathmell's proposed plans suggest half of the required to take place on a green field site goes against that aim. 100% brownfield sites ought to be the aim.
- The council should amend the wording of policy SP9 and paragraph 2 of the Vision such that the re-use of brownfield sites is supported but not prioritised, to ensure that the plan complies with the Framework.
- There appears to be a general disconnect between the vision and aims regarding heritage, which are admirable, and actions or commitments in the body of the plan. Even the language used in general is very non-committal, e.g. the use of "should", not "must". It is really not clear how heritage assets are to be protected.
- It is considered that the Plan lacks an adequate 'Vision' is in its response to the issue of the District's ageing population and that such a passive approach to an aging population will not allow the District to achieve the other key elements of its 'Vision' such as steady and sustainable growth, greater housing choice, better job opportunities etc. as there will simply

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Response Summary for Section 3: Strategy – Vision

be insufficient young families and economically active residents in the District to deliver sustainable economic growth, sustain local service, and deliver a vibrant community life. Increased commuting into the District may help to deliver the economic vision, in part, but it will fail to deliver the wider social and environmental vision for the District.

- It is suggested that the South sub area section of the vision is split into two new sub areas – one centred on Skipton and one centred on Glusburn/Crosshills. Glusburn, Cross Hills, Sutton, Kildwick & Farnhill has a large population & if included within the Skipton sub area gives a very uneven distribution of population in comparison to the Bentham & Settle sub areas. This would then lead to a basic lack of infrastructure provision in the South Craven area. A significant number of residents in the South Craven villages do not find services in Skipton easy to access nor do they go to Skipton on a regular basis.

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Response Summary for Section 3: Strategy: Planning Objectives

Section 3: Strategy: Planning Objectives	
Planning Objective	Comment
PO1	<ul style="list-style-type: none"> Whilst we support the thrust of this Objective, given that one of the aims of the Plan is to ensure that Craven's high quality environment is not harmed, this Objective should also refer to the intention to make certain that the patterns of development also safeguard the character and landscape setting of the District's towns and villages. Amend PO1 to read:- "...that make the best use of available resources, safeguard the character and landscape setting of Craven's settlements, nurture high quality environments ... etc"
PO2	<ul style="list-style-type: none"> We support the intention to conserve and enhance the high quality of the local environment. However, this Objective should also include the intention to reinforce local distinctiveness. Amend PO2 to read:- "Conserve and enhance the high-quality local environment and reinforce the distinctive character of Craven's towns, villages and landscapes including its open spaces ... etc Natural England welcome objective PO2 to "conserve and enhance the high quality local environment including open spaces, ecological networks and cultural heritage". However we would like to see landscape character and the setting of protected landscapes similarly conserved and enhanced, either as part of this objective or separately. Aireville Park can contribute toward is "PO2 – Conserve and enhance the high quality local environment including open spaces, ecological networks and cultural heritage".
PO3	<ul style="list-style-type: none"> Support for this objective expressed by the HBF.
PO4	<ul style="list-style-type: none"> Improve local housing choice in terms of house type, size, tenure, price and location, taking into account the needs of young people and low income groups. Support for this objective expressed by the HBF.
PO5	<ul style="list-style-type: none"> Could some possible tie-in with infrastructure improvements be suggested along with this strategy?
PO6	<ul style="list-style-type: none"> PO6 should be altered to read: "...high quality local environment, the tourism economy and recreation/entertainment opportunities." Support for this objective expressed by the HBF.
PO7	<ul style="list-style-type: none"> No comments made.
PO8	<ul style="list-style-type: none"> PO8 should be altered to read: "Encourage renewable forms of energy particularly on a micro-generation scale, and design out and reduce carbon emissions; waste; and water use arising during and after local development. PO8 omits the key issue of reducing noise and congestion, which is a major negative factor in terms of achieving the proposed Plan vision. PO8 could be strengthened to read "Reduce carbon emissions, waste and water use, noise and congestion arising from current and future local development".
PO9	<ul style="list-style-type: none"> No comments made.

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Response Summary for Section 3: Strategy: Planning Objectives

<p>General</p>	<ul style="list-style-type: none"> • Although elements of walking, cycling and sustainable transport modes for non-motorised users may be embodied in PO1, PO6 & PO8, there is no specific reference to these means of access which can significantly improve health, personal well-being, air quality, the environment, social interaction, road safety, healthcare costs, reducing obesity etc. Create PO10 applicable to the entire district declaring a firm commitment to pursue and encourage people out of cars and to walk or cycle whenever possible and practical. Commit to build infrastructures within developments which positively cater for walkers, cyclists and non-motorised users. • There is no Planning Objective for 'Infrastructure Improvements'. Add an additional PO which declares an aspiration to achieve infrastructure improvements by a combination of engaging with other authorities and pooling section 106/CIL contributions. • The Parish Council is in agreement with the Plan Objectives as described in PO1 to PO9. • At present the "local" plan objectives and strategic policies feel very generic in nature and detail. There is mention of sub-regional green infrastructure strategies and aspirations providing links outside the district but there is a distinct gap in the plan to include existing green infrastructure corridors and multi-functional hubs, particularly in our largest settlement and key visitor destination, Skipton. In particular, we feel that Aireville Park needs to be identified and specifically included in the Local Plan. • In terms of improving the overall understanding of how different aspects of the Local Plan fit together it would be helpful to identify the Strategic Policies that are linked to and help deliver each of the identified Plan Objectives. This could be done with a simple table or action plan and in a 'snap shot' would clearly show the Local Plan priorities and how to achieve them. • The plan has good objectives but the strategies to achieve the stated aims are too weak to be effective, i.e. SP4, 5, 6, 8, 10. • There is no mention of green infrastructure/permeable development/focus on increasing walking and cycling in the Plan Objectives. Elevate the status of cycling in order to improve sustainable transport. • A strategic objective supporting improved connectivity (transport and/or broadband) both within and outwith Craven would be beneficial. • Need an additional objective on balancing ageing population in order to define how the Council intends to positively address and reverse the underlying issue of the fundamental imbalance in the age profile of the District's population. There is an urgent need to put in place through the Plan measures to retain and attract families and the economically active in the District to support a sustainable economy and the delivery of the full range of services necessary to maintain sustainable communities. Without such an objective it is difficult to see how the Plan could be considered to meet the 'soundness' tests of being 'positively prepared' and 'effective'.
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Response Summary for Section 3: Strategy – Spatial Strategy and Sub-Area Growth

Section 3: Strategy. Policy SP1: Spatial Strategy and Sub-Area Growth

- We welcome the recognition of the contribution that the historic environment makes to the attractiveness of the Market Towns as places to live and work. We also support the intention that the spatial strategy looks to build on the existing and individual roles of these places rather than fundamentally alter their role which could threaten their individual character and identity.
- Include a commitment to maintain the separate identities of the South Craven villages.
- Need to define 'small', 'medium' and 'large' in the following context (pg. 24): "it looks to accommodate new development primarily through a pattern of small and medium/large sized sites".
- Omit the following sentence from pg. 24: "The need for some Greenfield development sites would also help to avoid areas with flooding problems". Surely brownfield sites, by virtue of the fact that they were originally developed when land availability was greater, will be sites which are not on flood plains?
- Add an additional sentence which justifies this statement (pg. 24): "Generally, Greenfield sites provide a greater opportunity to secure funding for supporting infrastructure and affordable housing provision"
- Amend the following statement: "Whilst the redevelopment of Brownfield sites will be prioritised and supported, the limited availability of Brownfield land, together with the small size of many sites, means that each of the market towns and the identified villages will need to expand beyond their current built up areas. Greenfield land will be required to accommodate new housing and employment over the Plan Period" to read "The redevelopment of Brownfield sites will be prioritised and supported". The current paragraph contains too many statements which could be used by developers as justification for building on inappropriate sites.
- Sutton is not suitable for more development, the housing figures are wrong. Sutton has had more than average (i.e. Greenroyd Mill – properties still available in the mill). People living in Sutton would like it to remain a pleasant village, not become part of a conurbation. The village has reached saturation point and the services, schools, surgeries, roads are not coping with the population level as it stands now. The population of Sutton is not increasing. Shift the proposed housing northwards.
- The infrastructure in Cross Hills, Glusburn and Sutton cannot support further development.
- The penultimate paragraph on pg. 24 regarding 'carbon storage' needs some explanation. Explain or give an example.
- The vision for the plan area up to 2030 and the spatial strategy's sub-area approach to development and the wider growth aspirations in the Ingleton / Bentham area are supported.
- Pg. 22: This page fails to note that Craven has very poor transport links with East Lancashire. The main A56 road across from Skipton to Colne is incredibly poor for a major A road, especially one that links Skipton to the nearest major motorway.
- Pg. 23: There is plenty of brownfield land to develop in East Lancashire that would alleviate this housing problem in Craven.
- Pg. 23: In the longer term the proposed economic and population growth might provide an important opportunity to provide additional major infrastructure projects. This is, after all, a long term plan.
- Pg. 24: There is a need for infrastructure investment to aid businesses in this area and therefore help to drive economic growth.
- Reduce the number of houses planned for Rathmell by factoring the amount of planning permission already granted meaning 20 new homes plus the 10 granted would give you the

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Response Summary for Section 3: Strategy – Spatial Strategy and Sub-Area Growth

30 but would still mean an approx. 80 per cent increase.

- Need to stop the policy of greenfield site development as it is non-sustainable. Address the problem - not the symptoms of the problem. Put policies in place to limit overpopulation. It would be a good start to limit any development to brownfield sites. Further degrading greenfield sites (sometimes green belt sites) and encouraging urban sprawl is not a solution.
- Pg. 23: Clarity of wording. Most of the available housing land within the plan area is greenfield, but there is also some brownfield land and additional brownfield land may become available in the form of 'windfall site's. It appears from these words that only brownfield sites may be windfall sites? Page 48 implies that windfall sites can be greenfield. Could assurances be given in the document that the plan be reviewed and updated at say 5 year intervals extending the development period by a further 5 years.? In addition, if then by chance a 'community limit' is met by windfalls, could it state that it possible the 'approval' for an initially agreed site can be removed from the plan?
- In terms of spatial distribution of housing, there are various sub-regional housing market areas within the Craven district. Each of these distinct areas will have its own requirement for housing and this should be reflected in the spatial distribution of housing supply within the local plan. This decision should be based on the findings of the evidence base and should not be a politically-driven spatial strategy to build a disproportionate amount of housing in areas where people do not wish to (and will not) live. If the spatial distribution does not reflect the need/demand as shown by the evidence base, housing will not be delivered and the plan will not be implemented.
- SP1 (Spatial Strategy and Sub-Area Growth) sets out how Craven's future development requirements will be distributed and accommodated in line with the spatial strategy and based upon a hierarchy of sub-areas. The policy states that outside identified settlements, development will be restricted to that which fulfils a set of criteria. General support is expressed of the council's overall approach to direct development to major and key centres, and support is expressed for the concept that growth should be distributed to key settlements with established facilities, services and infrastructure (in accordance with the promotion of sustainable development running through the Framework), however, this should not preclude development in lower order, sustainable settlements, which could also help to sustain existing facilities and services. Indeed, the level of growth directed to each settlement should be reviewed in light of meeting a higher housing requirement in the district. This policy is amended to be worded more positively, so that it is line with the requirement of the Framework (paragraphs 14, 157 and 182) to positively seek opportunities to meet the development needs of the area.
- Support expressed for the identification of the 'South Sub-Area' as the 'Primary Area for Growth', and the identification of Skipton as the 'Primary Focus for Growth' within the 'South Sub-Area'. Support also expressed for the identification of Skipton on the Key Diagram as a 'Strategic Area for housing and employment growth'.
- Support expressed for the overall Spatial Strategy for the District. It is clearly a sustainable strategy to direct the majority of new housing and employment development in the Borough to the three market towns in the District (Skipton, Settle and Bentham) with Skipton in particular being the focus for most new development because of its larger size, greater accessibility and the wider 'service' function that it provides to the whole of the District. The acknowledgment that, in response even to the limited stated objectives of the Plan, that Market Towns such as Skipton will need to expand beyond their current built up areas to accommodate the new development that is needed to meet projected development requirements over the Plan period, and that this will necessarily involve the release of greenfield land, is also welcomed.

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Response Summary for Section 3: Strategy – Spatial Strategy and Sub-Area Growth

- Some confusion is expressed about the following statement on pg. 24: “An important element of this spatial strategy is that it looks to accommodate new development primarily through a pattern of small and medium/large sized sites spread within and around each of the market towns and the identified villages as opposed to relying on the delivery of one or more major strategic sites’ or major urban extensions capable of accommodating a significant proportion of Craven’s development requirements in a limited number of locations. If Craven was to be dependent on major strategic site or major urban extensions to deliver the development requirements identified in this Plan, it is considered that there would be risks to the delivery of the Plan if it were to rely on such a pattern of development. Strategic sites will demand significant investment in infrastructure to ensure that they can be delivered.” This statement appears to conflict with the identification of Skipton on the Key Diagram as a ‘Strategic Area for Housing and Employment Growth.” and Draft Policy SP17 Strategic Employment Site. Support expressed for the identification of its land south of Skipton as a Strategic Employment Site under Policy SP17 and also as a large scale housing site under Policy SP11/SP12 (sites SK049 and SK051) (see separate representations) and as a result consider that the Council’s statement on page 24 needs to be amended to reflect the particular circumstances in Skipton where such large scale ‘strategic allocations’ are appropriate and deliverable. It is also considered that the Plan would benefit from an explicit Strategic Land use Allocation for the South Skipton Area covered by Policy SP17 and Housing sites SK049/SK051 that explicitly promotes a balanced mix of both employment and residential uses in this location. The Council is aware that, because of high infrastructure costs associated with this site, the delivery of employment uses on this site needs to be ‘enabled’ though the delivery of higher value residential development. In such circumstances a site specific allocation would give greater certainty to delivery and incorporate greater guidance about the mix and type of use and delivery mechanisms.
- Strategy (pgs. 22-25) – could be strengthened by including references to cross-boundary implications, where appropriate.
- There should be a greater focus in this section (pg. 24) on how the positioning of a development can affect its environmental impact. It should be mentioned that positioning of developments can minimise detrimental impacts on biodiversity and protected species through the avoidance of protected areas such as SINC’s and ancient woodland, as well as through locating areas with high opportunity to increase connectivity and biodiversity. This can then be used to determine how developments can help to achieve this through avoidance, mitigation or compensation. Avoidance of areas that are of importance for flood mitigation, including both downstream flood zones and upland catchment areas to reduce the rate of runoff should also be included in this section.
- In order to provide plan-led certainty for Bolton Abbey over the plan period Chatsworth Estate request that the following three changes are made to the emerging Craven District Local Plan:

 1. The amendment of the Plan’s Spatial Strategy to include Bolton Abbey as an ‘Identified Village’ and ‘Secondary Focus for Growth’ in the South Sub-Area, for the reasons outlined in this response.
 2. An allocation of the 3.5 ha site shown on the attached site plan in the Local Plan. An allocation would be predicated upon the sensitive and sustainable development of the site being brought forward by a comprehensive Masterplan that is delivered in consultation with stakeholders.
 3. Policy references to the above site being brought forward through a sensitive heritage and landscape based Masterplan. Chatsworth Settlement Trustees wishes to see the following policy references included within the Local Plan: - A policy reference to be provided as a

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footnote to policy 'SP1: Spatial Strategy and Sub-Area Growth' and linked to the inclusion of Bolton Abbey as both an 'identified village', stating: "Mixed use development of a commensurate scale to be brought forward on the single allocated site at Bolton Abbey via a sensitive heritage and landscape based Masterplan."

The National Park Authority has acknowledged Bolton Abbey's key role as a Service Village and included it in its settlement hierarchy as a suitable place for new development. However, given that the village straddles the National Park boundary there is a clear acknowledgement by Chatsworth Settlement Trustees that new build development of the type require in the village should be directed outside of the National Park. It is considered that the amendment of the Yorkshire Dales National Park Local Plan provides a clear rationale for Craven District Council to acknowledge the reassessment of National Park Officers, based on the information presented to them and the formal change in the plan's settlement hierarchy when revisiting the role of Bolton Abbey, as a cross-boundary settlement, in the Council's Local Plan.

- Hellifield has seen astronomical growth over the last 20 years and now needs a period of integration for the old and new parts of the village. Hellifield Parish Council agree that there are benefits to being classed as a secondary village in the draft Local Plan, as it allows them to be involved in the allocation of a site for development, rather than having to accept windfall development on an ad hoc basis. However, they take the view that the development of 30 houses in Hellifield should be phased for the latter part of the plan period (nothing for the first 5 years of the local plan) to allow for the necessary integration.
- Pg. 24, 2nd paragraph. The statement about CIL threat to affordable housing is not clear without some explanation. Provide further explanation.
- Growth in Clapham-cum-Newby: Clapham is in the Plan's Northern Sub-Area and is an "identified village". On both counts it is therefore seen as an area for "secondary growth". The nature of "secondary growth" is not made clear but this designation rings alarm bells in Clapham. The Draft notes that Clapham has experiences higher than average (about 25%) housebuilding in the period 1991-2011 (p46) and the recent Dalesview development would add an estimated further 25% to the local village population in a short period, with the inevitable increased pressure on local school and other services. The Draft Plan notes that a further 2 houses are expected to be built in the years up to 2030 (p.46) but it is not clear whether these are expected to be in addition to the Dalesview development or whether that development has not been taken into consideration. Slow, gradual, organic growth should be stated within the Plan as a firm policy objective in respect of all upland Dales villages where the Dales vernacular is predominant, including Clapham and Newby. In addition the consent for the Dalesview development should be reconsidered and reduced in scale when the consent comes up for renewal and/or full consent.
- There seems to be a tactic admission that development on greenfield sites would be acceptable in some circumstances (pp.24-25). At the same time it is recognised that the countryside is also important (p.25). It would help if the Plan specified more clearly the criteria for developing on greenfield sites, together with an order of priority for the consideration of these criteria. Building on greenfield sites should take place only in the most exceptional circumstances of overwhelming need.
- Spatial Strategy - 'Exceptions to the Development Plan' (pg. 25). 'Windfall housing' (pg. 48): The spatial strategy as drafted in relation to development exceptions and windfall housing effectively give "carte blanche" to potential developers. This makes a mockery of the purpose of the entire Plan, which seeks to set out where development should and shouldn't be focussed. Failing to do this will risk achieving the vision, objectives, strategy and plan outlined in the draft Plan. This section needs to be re-drafted to make it clear that

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exceptions to the development plan should be limited to small developments, giving an example of developments of one or two dwellings.

- Spatial strategy – ‘transport and other infrastructure’ (pg. 23-24): It focuses on new highway capacity and roads, and fails to recognise the already existing pressures on services such as schools, primary healthcare facilities, and heavy traffic at peak commuter times e.g. through Crosshills. The infrastructure section on p23-24 should be strengthened to address these issues. The Plan will have to change to achieve the Vision set out in the draft plan, and so any future development should serve to address these issues.
- Public transport in Bentham does not provide a realistic alternative to the car. Those working outside of the town are unlikely to be able to use public transport to travel to work. There is no direct bus to Skipton or Kendal, the bus service to Lancaster offers poor opportunities to return home after work and the train schedule is limited.
- Natural England welcome the reference to ecosystem services in the Spatial Strategy in line with para 109 of the NPPF and the principles of the 2011 Environment White Paper The Natural Choice: securing the value of nature.
- SP1 should be worded more positively. In particular the section ‘In all other villages, hamlets and in the open countryside’ indicates that development will be restricted to that complying with the relevant criteria. Such a policy wording is considered contrary to the NPPF which seeks a positive framework for meeting the needs of the area (paragraphs 14, 157 and 182). It is therefore recommended that the policy wording be amended to: ‘In all other villages, hamlets and in the open countryside development will be supported which...’

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Response Summary for Section 3: Strategy – Sustainable Development

Section 3: Strategy. Policy SP2: Sustainable Development

- Need a clearer definition and means of enforcement of sustainable. This term is widely used but is usually "green wash". Because unless firm steps are taken (backed by national legislation would be a bonus) we will be building slums for the next century which will be unaffordable/expensive to run (i.e. inferior building of the 1960's tower blocks and council estates).
- Craven could lead North Yorkshire in building well insulated draught proof housing at little extra capital cost (despite what "traditional" builders say). Code for Sustainable Homes has consistently been watered down by builders, and has now gone. The Code for Sustainable Homes Levels 5 or 6 or the Passivhaus Standard should be used by allowing homes reaching these standards to pass through the Planning process quickly. Draughty (i.e. houses that do not need a well-designed ventilation system) and poorly insulated (i.e. current minimum standards that still need heating in spring and autumn) should have to be redesigned to meet these established higher standards in order to be truly sustainable and get through the planning process.
- Should make land available for self-builders who usually build to higher standards than companies.
- The Parish Council believes that the National Planning Policy Framework (NPPF) is somewhat vague in its definitions of 'sustainable development' and appears to leave the way open for local Planning Authorities to develop a local definition. This section of the draft Plan contains little detail and the Parish Council feels that attention needs to be paid to expanding this part of the Plan. It should, particularly, include greater references to employment, infrastructure and landscape.

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Response Summary for Strategy Section 3: Strategy – Neighbourhood Planning

Section 3: Strategy. Policy SP3: Neighbourhood Planning

- The Localism Act and the NPPF make it clear that plan making must be a process which is driven at neighbourhood level, if a neighbourhood has expressed its intent to do so. CDC must overcome its misgivings about Neighbourhood Planning where ample evidence of funding and intent are available. CDC has a clear duty of positive engagement and proactivity in this regard.
- CDC, and Parish Councils including Gargrave, could be open to challenges from outraged individuals, landowners and developers. For example since CDC has delegated planning authority to Gargrave Parish Council (GPC) in acknowledgement of the development of a site-specific Gargrave Neighbourhood Plan (GNP), and this authority has already been fully exercised in regard to the new car park at Gargrave station, it would seem extremely unwise for CDC now to consult over sites in Gargrave which may not be preferred as an outcome of the GNP. The NPPF warns against this situation (clauses 184/185) and requires the Local Authority to avoid duplication, implicitly where to fail to do so would lead to duplication, confusion and the possibility of challenges. Also since other settlements may decide to develop Neighbourhood Plans future challenges could eventuate. CDC would be wise to stop consulting on the non-strategic policy parts of its LP i.e. sites in settlements, and in particular where NPs are in development and to only consult on the strategic policy parts of its LP.
- The list of proposals that can be included in the neighbourhood plan should include the ability of neighbourhood plans to identify and implement local green infrastructure projects, as well as to protect and buffer local wildlife sites and identify opportunities for the creation of wildlife corridors.
- Policy SP3 refers to Craven's parishes being encouraged to adopt neighbourhood planning. How does CDC plan to achieve this bearing in mind that proposals for such things as conservation area appraisals, local lists and design guides need specialist expertise?
- Skipton Town Council recognises the importance of Neighbourhood Planning and, once the final Draft of the Local Plan is confirmed, will be considering the preparation of a Neighbourhood Plan for Skipton. We are aware that a small number of other Parishes have commenced work on similar plans but, given that any Neighbourhood Plan must reflect the strategic elements of the agreed Local Plan, it seems appropriate to wait until the final wording of the Local Plan is known. The Council notes that no reference is made in the Plan to the Community infrastructure Levy and its links with both overall Planning Policy and, in particular the increased localised 'benefits' should a Neighbourhood Plan' be in place. Consideration could usefully be given to including reference to the levy in this section of the Plan.
- SP3: Reference to 'Allotments': Bentham still has no allotments. This is the only mention of allotments in the document and Bentham needs active encouragement (more than just guidance and support) to provide land for people to grow vegetables/ allotments. Many people don't have gardens and it is a cheap way of eating healthily and taking exercise. Include strategy for encouraging space for growing veg/allotments as part of development land or on existing brownfield sites that are not included for housing, e.g. land around old scout hut off Duke St.
- Amend last bullet point of SP3 to read "Community projects for arts, heritage, sport, recreation, tourism and biodiversity".

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Section: Environment	
Policy	
SP4 Countryside and Landscape	<ul style="list-style-type: none"> • Introductory text for SP4 needs amending as follows: <ul style="list-style-type: none"> ○ The landscape appraisal is not only an important tool for drawing-up new proposals but also in determining the appropriateness of any schemes which do come forward for consideration. This aspect should be referred to. ○ The intention to use the North Yorkshire and York Landscape Character Assessment as one of the sources for managing change to the landscapes of the plan area is welcomed. ○ Designated landscapes: It would be helpful to users of the plan to include reference to the two Historic Parks and Gardens in the plan area – which are also “designated landscapes”. • Subject to the amendments set out below, support is expressed for SP4 which should help to ensure that development proposals safeguard the distinctive landscapes of the plan area: <ul style="list-style-type: none"> ○ Policy SP4, second bullet-point: the restoration of degraded landscapes should also seek to achieve the plan’s heritage objectives where appropriate. ○ Landscape Character, first paragraph, line 9 amend to read:- “ ... in drawing up and in determining the appropriateness of proposals for new development.” ○ Designated landscapes, add an additional paragraph along the following lines:- “There are also two Registered Historic Parks and Gardens within the Plan area. Proposals affecting these two designated landscapes are dealt with under Policy SP5.” ○ Policy SP4, second bullet point amend to read:- “.. in ways that also help to achieve biodiversity and heritage objectives”. • Reference should be made to the Council's legal duty of regard under the CROW Act 2000. The precious quality of the district's countryside and landscapes can be further enhanced by reference to the CROW Act 2000 where a duty of regard is enshrined. A positive commitment to implement the Rights of Way Improvement Plan (RoWIP) will bring enormous social benefits such as reducing obesity, improved general health, along with catering for leisure, recreation and tourism needs. As a Section 94 body under the CROW Act 2000 the council should actively engage with Local Access Forums in the Yorkshire Dales National Park and at county level with the North Yorkshire Local Access Forum. • SP4 should include better recognition of the statutory duty for local authorities relating to AONBs 'to conserve and enhance the natural beauty of the landscape'. This section should include reference to the Forest of Bowland AONB Landscape Character Assessment 2009. • Change text in first paragraph under 'Designated Landscape ' to "...including its heather moorland, blanket bog and rare birds and is also important for its upland hay meadows, ancient semi-natural woodlands and tranquillity" • The AONB is supportive of the Council's proposals to develop policies relating to 'Dark Skies' for Craven area. This accords with actions

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Response Summary for Section 4: Environment

	<p>within the AONB Management Plan 2014 – 2019. Change text in second paragraph under 'Designated Landscape ' to "AONBs and National Parks are national landscape designation afforded the highest protection for their landscape and scenic quality".</p> <ul style="list-style-type: none"> • The list of heritage assets on p. 34 includes no mention of vernacular Dales buildings as a heritage asset. The draft needs to be re-thought and policies need to be included, to show how this invaluable resource will be sustained and enhanced over the next 15 years and beyond. The Dales vernacular needs to be recognised as an enormously valuable heritage asset. • The draft plan needs to take more responsibility for the protection of the landscape in the absence of a Special Landscape Area policy (which hasn't been saved). The Landscape Appraisal requires, in many places, both 'protection' and 'restoration', yet there is no evidence since its inception 2002 that this has happened, though biodiversity loss has occurred. The appointment, therefore, of a qualified and proactive Environmental/ Conservation Officer is a priority. Investigations should be made prior to submission of any planning application as to its effect on local biodiversity and landscape rather than leaving protection to Reserved Matters or chance later. • Carefully outlined Zones 1,2,3,4, from the completely Dark Skies of open and remote countryside to the completely but appropriately lit cityscapes, could and should be created with intermediate graded Zones between. Biodiversity, quality of life, sensitive tourism, Council savings, lowered carbon emissions would all benefit from a sensible reduction in night lighting. Dark skies section needs more detail to ensure that any future developments can support the clear, uninterrupted view of stars (i.e. the use of down lighters for all outside lighting etc). • Need to preserve existing footpaths and rights of way, especially when identifying large blocks for housing. Need an idea of the proportions that will be required for new footpaths, which need to preserve the present sense of interpenetration of town and countryside. • SP4 should include support for farmers and landowners who wish to encourage biodiversity and a sustainable-wildlife rich environment through farming. It should also include details as to how this will be achieved. • Support expressed for fourth bullet point in SP4: “Enabling settlements to grow in ways that harmonise with the character of the immediate setting and wider landscape, by supporting well-conceived proposals for infill, rounding off or extension; important considerations will include creating the right transition between built-up areas and the surrounding countryside; creating connections between built-up areas and the countryside; allowing the countryside to permeate built-up areas; and maintaining gaps between settlements in order to preserve their separate identities” • Natural England welcomes this policy which we consider to be in line with NPPF paras 113 and 115. In particular, we welcome the first criterion addressing the setting of the Yorkshire Dales National Park
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	<p>and the setting, significance and special qualities of the Forest of Bowland Area of Outstanding Natural Beauty (AONB). We also welcome the references to the National Character Areas, dark skies and tranquillity in the supporting text.</p>
<p>SP5 Heritage</p>	<ul style="list-style-type: none"> • Plan should include a map or listing of conservation areas and heritage assets. The term ‘heritage asset’ should be defined to include aspects of the built environment which are not currently statutorily protected but are nonetheless of significance in the social, economic and historic context of Skipton i.e. many overlooked aspects of the town’s industrial past and associated architecture. Tourism is vital to Skipton and attention must be given to the surviving 18th to 20th century elements of its industrial development in addition to the ancient core. • Archaeological surveys should form part of planning approval wherever there is the likelihood of the archaeological record being obliterated by development. This should be included in planning policy. • English Heritage suggests re-wording of supporting text for the policy with regards to referencing the correct regulations which govern each type of heritage asset. They also suggest that even though not all designated heritage assets are protected by law the supporting text should point out that these non-designated heritage assets make a very important contribution to the distinct identity of the various parts of the plan area. Wording of supporting text should use similar terminology to that used in the NPPF and make use of the advice set out in the NPPG. • Neighbourhood Plans are only one way in which non-designated heritage assets might be identified. It may be the case that, over the lifetime of the Plan, either the Council or other local amenity groups develop a programme to identify those assets which are important to the character of the local area. It is also important to make it clear that, in the absence of a Neighbourhood Plan, it is the Local Plan which will be used to provide a framework for the management of change to these assets (English Heritage comment). • The Policy is extremely generic providing no indication of whether there are any aspects of Craven’s historic environment which are of especial importance to the distinct identity of the District (and thus, which ought to warrant particular attention). Neither does it provide any spatial dimension. Indeed, as drafted, the Policy is so general it could apply to virtually any authority in the Country (English Heritage comment). • Once this plan is adopted, Policy SP5 will be the only one against which proposals affecting the historic environment will be assessed. In the NPPF there is an expectation that, with a compliant plan in place, there will be no need for those using it to have to look again at the NPPF in making decisions on development proposals. However, with the Policy as currently drafted, it is clear that, in determining many proposals affecting Craven’s historic environment, reference will, despite an adopted plan being in place, still need to be made back to the NPPF. As a result, it does not really accord with the plan-led

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	<p>approach being advocated within the NPPF and is particularly concerning, in the case of those areas where the NPPF provides very little specific guidance (such as the approach which will be taken to applications affecting non-designated archaeological remains). (English Heritage comment)</p> <ul style="list-style-type: none"> • There is little difference in the approach proposed for applications affecting designated heritage assets to those affecting non-designated heritage assets. (English Heritage comment) • English Heritage states that Policy SP5 does not comply with the following requirements of the NPPF:- <ul style="list-style-type: none"> ○ It is not clear how the presumption in favour of sustainable development (in terms of the management of the historic environment) will be applied locally [NPPF Paragraph 15]. ○ It does not provide certainty about how applications on planning proposals will be determined [NPPF Paragraph 17]. ○ It does not provide clear policies on what will or will not be permitted or provide a clear indication of how a decision-maker should react to a proposal [NPPF Paragraph 154]. • As a result of the above comments English Heritage have suggested the following re-wording of the supporting text for SP4: <ol style="list-style-type: none"> 1. Heritage, second Paragraph, line 4 - amend the final sentence to read:- “The NPPF makes it clear that great weight should be given to the conservation of these assets when considering development proposals” 2. Heritage, second Paragraph, bullet-points - Amend accordingly 3. Heritage, third Paragraph, line 1 amend to read:- “However, the designated heritage assets represent only a fraction of the heritage resource of the District. Indeed, it is the wealth of non-designated elements which help to give Craven’s towns, villages and countryside their distinct identity. These non-designated heritage assets are a vital part of the social and cultural identity of the District helping to provide distinctiveness, meaning and quality to the places in which its communities live, providing a sense of continuity and a source of identity and are valued by local people as part of the familiar and cherished local scene. Many non-designated ... etc” 4. Heritage, fourth Paragraph, line 1 delete the first sentence and replace with:- “This plan needs to maintain and manage change to these heritage assets in a way which sustains and, where appropriate, enhances their significance. This can be achieved ... etc” 5. Heritage, delete fifth Paragraph and replace with:- “In order to sustain the long-term future of a heritage asset, it may be necessary for it to be put to a use for which it was not originally designed. This can help reduce the threat of neglect and decay and the number of assets being identified as being at risk. However, this should always be to the optimum viable use for that asset (i.e. the one that will cause least harm to its significance)” 6. Heritage, sixth Paragraph delete all but the final sentence and
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	<p>replace with:- “Any harm to or loss of a heritage asset - through destruction, alteration or development within its setting – will require clear and convincing justification. Proposals which would result in harm to the significance of a designated heritage asset will be weighed against the public benefits of that proposal. Where substantial harm or total loss is likely to occur, it would have to be demonstrated that the harm is necessary to achieve substantial public benefits. Where any heritage assets or parts of heritage assets are likely to be lost, the assets should be properly surveyed and recorded beforehand.”</p> <p>7. Heritage, seventh Paragraph, line 1 insert the following before the first sentence:- “Local communities and amenity groups have an important role to play in helping to identify those non-designated heritage assets in their area which they consider important to the character of their area. The impact of a development upon such assets will be taken into account in determining the appropriateness of any proposals”.</p> <ul style="list-style-type: none"> • English Heritage have suggested the deletion of existing draft Policy SP5, to be replaced with:- <p>“Craven’s historic environment will be conserved and, where appropriate, enhanced and its potential to contribute towards the economic regeneration, tourism and education of the area fully exploited. This will be achieved through:-</p> <ul style="list-style-type: none"> ○ Paying particular attention to the conservation of those elements which contribute most to the District’s distinctive character and sense of place. These include:- <ol style="list-style-type: none"> 1. The legacy of mills, chimneys, and terraced housing associated with the textile industry 2. The buildings and structures associated with Settle-Carlisle Railway 3. The buildings, bridges, locks and other and structures associated with the Leeds-Liverpool Canal and Thanet Canal 4. The historic market towns of Skipton and Settle ○ Ensuring that proposals affecting a designated heritage asset (or an archaeological site of national importance) conserve those elements which contribute to its significance. Harm to such elements will be permitted only where this is outweighed by the public benefits of the proposal. Substantial harm or total loss to the significance of a designated heritage asset (or an archaeological site of national importance) will be permitted only in exceptional circumstances. ○ Supporting proposals that would preserve or enhance the character or appearance of a Conservation Area, especially those elements which have been identified in a Conservation Area Appraisal as making a positive contribution to its significance ○ Ensuring that proposals affecting an archaeological site of less than national importance conserve those elements which
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	<p>contribute to its significance in line with the importance of the remains. In those cases where development affecting such sites is acceptable in principle, mitigation of damage will be ensured through preservation of the remains in situ as a preferred solution. When in situ preservation is not justified, the developer will be required to make adequate provision for excavation and recording before or during development.</p> <ul style="list-style-type: none"> ○ Supporting proposals which conserve Craven’s non-designated heritage assets. Developments which would remove, harm or undermine the significance of such assets, or their contribution to the character of a place will only be permitted where the benefits of the development would outweigh the harm. ○ Supporting proposals which will help to secure a sustainable future for the Craven’s heritage assets, especially those identified as being at greatest risk of loss or decay.”
<p>SP6 Good Design</p>	<ul style="list-style-type: none"> ● The environmental negatives under SP6 are not sufficiently taken into account and the target for house-building not sufficiently scrutinised and challenged. Its position as the sole large conurbation in south Craven leaves Skipton unduly targeted to meet national house building targets which may not be appropriate in environmental or infrastructure terms. The Local Plan should reflect better this pressure and the responsibility of the local authority to balance housebuilding with SP6. ● Whilst United Utilities acknowledges the Government’s intention to abolish the Code for Sustainable Homes as a result of its ‘Housing Standards Review’ consultation, we recommend that Policy SP6 is revised to include the following additional bullet point regarding water efficiency measures and the design of new development: “The design of new development should incorporate water efficiency measures. New development should maximise the use of permeable surfaces and the most sustainable form of drainage, and should encourage water efficiency measures including water saving and recycling measures to minimise water usage”. ● Include a principle in SP6 regarding access to high quality natural environment and wildlife rich green spaces. Good design principles are proposed to create developments with a healthy environment for the people living and working in them. There is evidence that connecting people with wildlife and nature has a whole suite of benefits for both health and overall wellbeing. ● Support expressed for the consideration of tranquillity and light and darkness, which link back to Policy SP4. Such design considerations can be important for development in proximity to protected species such as Bats. ● Unclear with regard to the term “Pastiche”. If it implies that buildings shouldn’t be built to traditional designs in local stone and slate, then it should be omitted. ● Developers should contribute a percentage for creative and arts development to meet the needs of the community. The value of the

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	<p>arts and creative arts development to meet the needs of the community is often not recognised or even understood. It needs more emphasis to ensure it is understood and taken into account.</p> <ul style="list-style-type: none"> • Ensure careful consideration of field boundaries and footpaths is taken into account and where ever possible don't include fields with footpaths in the marked areas for housing development. • Support planning applications that do not use fields with footpaths for housing. If there is no choice, try to ensure there is a way that the footpath can be moved into another suitable field. • Include accessible footpaths and/or cycleways through new housing by ensuring a green tongue of land of varying width, not accessible to vehicles and including other benefits such as trees and wildflower areas is provided. • Use varying lines of boundary against the adjacent housing (rather than straight lines) and a varying width of green space to create a friendly atmosphere. Boundaries to housing or gardens could be planned to be defined in a variety of ways rather than simply with one type of fencing. In this way, and at no significant expense, footpath access can be attractively retained while also providing a beneficial green lung and habitat corridor within new housing. • Second bullet point of SP6 would benefit from the addition of the following words at the end: "...and other areas of public realm with links to the existing public rights of way network". Connectivity would thereby be positively featured as an important good-design requirement. Ensure this aspect is included as part of the Council's design policy for development. • Support expressed for SP6 as it should help to ensure that development proposals safeguard, and help to reinforce the distinctive character of the settlements and landscapes of the plan area. • The public realm is where we can wander without entering any strictly private space – it adds to the look, feel and enjoyment of places. Art and design should be encouraged in the public realm as they can add to a sense of place and local distinctiveness. • The Aireville Park Master Plan identifies a number of routes for new paths and connections that would better connect the Broughton Road community to the Park and safe walking routes to the Leisure Centre and Skipton Academy. Identified routes would also provide improved all weather safe walking connections from the community around Gargrave Road and Skipton Girls' High School with both the Park and the train station. There is also scope to include the Aireville Park Master Plan as part of a standalone Aireville Park Supplementary Planning Document or as part of a Skipton Green Infrastructure document.
<p>SP7 Biodiversity</p>	<ul style="list-style-type: none"> • Objection to SP7 based on the following: Whilst new development should seek to avoid harm to biodiversity and where possible contribute towards improving biodiversity there is concern that it may be difficult if not impossible for all forms of development to: "make a positive contribution to achieving a net gain in biodiversity" on site or off site. The approach outlined in this draft Policy is therefore not

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	<p>NPPF compliant and would lead to an additional and unreasonable burden on developers in terms of trying to justify ‘exceptional circumstances’ for allowing development to proceed where there is no positive contribution or ‘net gain’ in biodiversity.</p> <ul style="list-style-type: none"> • The phrase ‘wherever possible’ complicates this policy and reduces its strength. It should therefore be removed from the first paragraph. Having a clear aim of securing a net gain through all development proposals is much clearer and places the onus upon the developer to deliver ecological benefits. • Providing a net gain in biodiversity cannot be considered mitigation, and should instead be considered as enhancement. If creating a net gain is considered mitigation, then it follows that net gain should be proportionate to the mitigation needed to counteract the impacts of the scheme. Then it is all too easy to consider mitigation for loss as provision of gain. This is not correct. Enhancements and creating a net gain should be decoupled from mitigation. It would be more accurate to say that net gain should be commensurate with the scale of the development, in a similar vein to the provision of affordable housing or open space. Logic would suggest that, on balance, larger schemes have more opportunities to incorporate enhancements easily into their design. So what could be considered net gain for a small development may not be appropriate for a larger one. • Currently the draft local plan relies on the Craven BAP for the identification of biodiversity indicators; however the current BAP was produced in 2008 and so may not have the most up to date information regarding the targets of conservation importance highlighted. During the period of time that this local plan covers the Craven BAP will need to be updated to provide the best possible biodiversity information to inform planning decisions. • There needs to be a policy within SP7 which encourages appropriate management of Sites of Importance for Nature Conservation (SINC) and Ancient Woodland and outlines the level of protection that they have from development. In addition to this there needs to be an up to date map showing the locations of the protected sites made available that can be used to inform development decisions as well as identification of buffer zones around SINC sites where development is restricted. • The wording of SP7 needs to be strengthened to highlight the obligation of the Local Plan to enhance biodiversity through development as set out in the NPPF (Paragraph 114) where local authorities should ‘set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure..’ The wording of SP7 should be changed to “recovery and enhancement of ecological networks, habitats and species populations” • Areas with high current or potential biodiversity within Craven need to be identified and the location of these biodiversity opportunity areas need to be made available to interested parties. The creation of a biodiversity opportunities map or GIS layer which is made available to
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	<p>interested parties (developers etc.) will highlight areas where the improvement of biodiversity and connectivity will have the greatest effect on the overall biodiversity of the Craven area. This will bring the local plan into line with the NPPF (paragraph 117) which states that planning policies should "identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation" The opportunity areas should take designated areas into consideration, as well as local knowledge and should include information on the species and habitats of the greatest importance in each area. This will be useful for informing the best location for development and the most effective mitigation and enhancement strategies associated with developments and help the development control system.</p> <ul style="list-style-type: none"> • For the avoidance of doubt and total clarity the Local plan should be more specific that sites identified through the Biodiversity Action Plan are unavailable for development and are protected. • Query as to whether the Council would consider looking at 'biodiversity off-setting' mechanisms where off-site mitigation is required. This is something the AONB has been exploring with the Environment Bank Ltd. • Should include clear criteria based policies protecting wildlife and geodiversity sites, distinguishing between the hierarchy of international, national and locally designated sites so that protection is commensurate with their status in line with para 113 of the NPPF. (Natural England comment) • Objection to SP7 as it implies that only developments which enhance biodiversity, unless there are exceptional circumstances, will be approved. As such schemes which fail to deliver an improvement in biodiversity or those which result in a 'loss' - even if that loss is minor - will be refused. This establishes a very high bar against which development proposals will be tested. The key test in the NPPF in respect of biodiversity is to prevent "significant harm"; its sets out that planning permission should only be refused where significant harm cannot be avoided, mitigated or compensated for (paragraph 118). This means that schemes which result in some biodiversity harm can still be permitted and considered sustainable. This is particularly the case because planning is a balancing exercise. This means that harms in respect of one issue – such as biodiversity – should be weighed against benefits in respect of other issues, such as housing need. The result is that a scheme which has an adverse impact on biodiversity might still be considered sustainable where it delivers other benefits. • Growth in housing, business and other land-uses will have a serious, negative impact on biodiversity (unless growth is on brownfield sites).
<p>SP8 Green Infrastructure</p>	<ul style="list-style-type: none"> • The local plan should specifically mention Aireville Park (including a Master Plan) and its importance to the town as a green amenity and specifically state that no industrial or housing development will be allowed on any part of the park for the foreseeable future. The skate

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	<p>park needs to be reintroduced, and the playground needs updating. It is very old and has no comparison to improvements made to parks in local villages. The district wide significance of Aireville Park is reflected in the fact that it is a registered community asset and Craven District Council now have an agreed Master Plan for the park, developed after widespread stakeholder consultation. Aireville Park is an important multifunctional green infrastructure hub not only to existing and new residents across the whole of Skipton, but it also provides a destination site for residents in outlying rural locations and even visiting tourists. Its location is also of strategic importance with close links to the train station, the Leeds-Liverpool canal green infrastructure corridor, Stepping Stones II project, Gawflat Meadow and Craven Swimming Pool and Leisure Centre. This combination creates a potential to enhance Skipton's "honey pot" status within Craven District to invest in and enhance the biodiversity, heritage, formal and informal recreation, cultural, sporting and leisure offer of the Park as a destination within Skipton for residents and visitors alike. The Park Master Plan identifies a number of existing facilities in need of improvement and new facilities to attract new visitors to the park including a new skate park, revamped children's play area, pump track, new paths and climbing boulder. In addition to this the Park has a wider potential for associated economic benefits for Skipton and Craven. The park clearly provides a key mechanism to help achieve part of the vision for Skipton.</p> <ul style="list-style-type: none"> • Plan needs a robust up to date assessment of future sporting needs, allocation of land to meet this identified future need and a means of providing this, such as scheme for the community infrastructure levy. A specific chapter should be introduced into the Local Plan to deal with the need for new formal playing pitch provision in Skipton. Specific locations should be identified for the provision of new formal playing pitches. These should be identified as part of proposed development allocations so that the delivery of the pitches is directly linked to increased demand arising from new development proposals. • Green spaces impact positively on the health and wellbeing of a community and should be designated for preservation. Local walks and footpaths are a vital amenity. • SP8 indicates that planning permission for schemes which result in harm to or the loss, disruption or fragmentation of the green infrastructure network will be refused, even where the 'loss' is minimal, unless there are exceptional circumstances. SP8 also sets out where the exceptional circumstances do exist, proposals should provide compensatory measures of equivalent quality or value. There should be some flexibility in this policy to account for circumstances where there may be a surplus of green infrastructure in the local area such that, in those cases, compensatory provision is unnecessary to make the development acceptable in planning terms. • Support expressed for SP8 which should help to safeguard the Green Infrastructure of the District. Several elements of Craven's Green Infrastructure network are either designated heritage assets in their
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	<p>own right or contribute to the setting of its historic buildings and structures. The protection and effective management of this resource will not only help to safeguard many elements which contribute to the distinctive character of the area but also to deliver the plan's Objectives for its historic environment. (English Heritage comment)</p> <ul style="list-style-type: none"> • The word "footpaths" should be replaced by "public rights of way" as this latter description covers higher rights of access such as horse riding or cycling with is more inclusive. The rights of way network makes a vital contribution to green infrastructure and should be seen as an essential element within the wider context. Implementation of Section 106 agreements or CIL contributions associated with any development will enable the council to achieve the best access goals for the benefit of society. • The plan should support better off-road cycle paths. This would capitalise on the enormous success of the Tour De France and bring extra much needed tourism to the area. • Raikes Road Burial Ground should be specifically identified as a protected area on the Skipton Inset Map as it is an important component of the green infrastructure of Skipton. • Query as to who would be responsible for the maintenance of 'strategic open space' that is identified on various preferred sites. • Draft plan should identify and map components of the local ecological networks for habitat restoration or creation including areas identified by local nature partnerships. Plan Area Map should include international, national and locally designated sites of importance for biodiversity as well as the wildlife corridors and stepping stones that connect them in order to support the delivery of policies SP7 and SP8. Should work with neighbouring authorities to deliver cross boundary landscape scale ecological networks. (Natural England comment) • Draft plan should protect and enhance public rights of way and access including by adding links to National Trails and seeking opportunities to provide better facilities for users. The routes of the Pennine Way and Pennine Bridleway National Trails run through Craven and the draft plan should include policies for the protection and enhancement of public rights of way and where appropriate improving connectivity with the National Trails. (Natural England comment) • The AONB is supportive of the Councils policy to make links between GI and the Forest of Bowland AONB, in particular strategic link routes from urban/village centres into the AONB. • Local Plan documents generally lack positive policies for formally dealing with such sporting events - because the use is temporary, the forward-looking planning processes is essentially incapable of recognising, acknowledging and safeguarding that temporary use as a valuable recreation asset. Occasionally some events do require planning permission and this tends to be where permitted development rights do not apply, or that the events have taken place more than 14 or 28 days per year and therefore exceed their permitted development rights. Policy SP8 should therefore recognise other sports that take place in the district, and not just the sport
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	<p>facilities that serve the local community, but those sports that also serve visitors to the district. (Sport England comment)</p> <ul style="list-style-type: none"> • The Wilderness should be specifically identified as a protected area on the Skipton Inset Map in the Local Plan for the following reasons: <ol style="list-style-type: none"> (a) Heritage - it is an important part of Skipton's history. Before Skipton's first grammar school, Ermysteds, moved to its present site on Gargrave Road in 1876, what is now The Wilderness was the headmaster's garden and it contains a unique shell grotto dating back to that time (the late 18th century). (b) Biodiversity - The Wilderness has a rich flora and is home to several old trees, including small-leaved lime and horse chestnut, with ash, elm, holly and sycamore adding to the mid-storey diversity. The site also provides important habitat for birds and other fauna, including the locally rare Least Black Arches moth (<i>Nola confusalis</i>) recorded in SW Yorkshire (VC63) only eight times in total. (c) Education - The Wilderness is a valuable and valued resource, much appreciated by the local nursery and primary schools. Their visits form an important part of their learning programme. (d) Health - as a tranquil green space The Wilderness provides a therapeutic resource for many individuals who seek such space for quiet reflection. They often express their appreciation that such a space exists in the heart of Skipton. (e) Thoroughfare - The Wilderness is used by families and workers as a route between home, school and workplace, as well as a short cut for shopping. This keeps them off the main roads and away from traffic and the information boards they encounter en route (on Wildlife and Heritage) provide a valued reference for anyone passing through. • There is no mention of green infrastructure/permeable development/focus on increasing walking and cycling in the Plan Objectives. Skipton (and other areas across the district) need more cycle routes connecting communities to surrounding countryside, or to employment and services. This would be of benefit to resident cyclists and encourage tourism. Canal towpath could be better utilised and improved for cycling between Gargrave and Cross Hills/Sutton/Glusburn – this would help to encourage an increase in sustainable work places along the canal. Traffic-free route to Broughton Hall Business Park would also be beneficial, as would an uphill cycle lane on the Bailey footpath in Skipton, and improved cycle links to Skipton Station. • Developments must maintain genuine contact between urban areas and the surrounding countryside. Where fields with footpaths enter towns those fields should be retained as farmers fields, providing genuinely rural tongues of land entering the built-up areas. Simply retaining a narrow strip of footpath does not provide the same utility. Where additional areas of green space are provided the spaces should be required to include natural features such as trees, ponds and wildflowers, and they should be designed to encourage their
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	<p>boundaries to be drawn as naturally as possible, rather than providing a rigid containment within straight lines of fences, walls and tarmac. It would be better if development reached slightly further out into farmland rather than infilling an equivalent area which penetrates into the town.</p> <ul style="list-style-type: none"> • SP8 promote the adoption of green walls, roofs and soft borders. Green roofs can significantly improve the environmental performance of buildings by: <ul style="list-style-type: none"> ○ Reducing the quantity of surface water run-off and the risk of flooding ○ Improving the quality of surface water run-off ○ Improving air-quality and reducing urban heat island effect ○ Improving biodiversity ○ Creating higher visual qualities <p>As any green roofs would be located on new developments which would require planning permission, a green roof policy would provide the planning department with a stronger stance in requesting green roofs.</p>
<p>SP9 Flood Risk, Water Resources and Land & Air Quality</p>	<ul style="list-style-type: none"> • United Utilities recommends that Policy SP9 is split into at least two separate policies, one of which should be dedicated to flood risk management alone. The wording of the flood risk section of Policy SP9, should be revised to include the following text within the body of the policy, to deal specifically with surface water management. "Surface water should be discharged in the following order of priority: <ol style="list-style-type: none"> 1. An adequate soakaway or some other form of infiltration system. 2. An attenuated discharge to watercourse. 3. An attenuated discharge to public surface water sewer. 4. An attenuated discharge to public combined sewer. <p>Applicants wishing to discharge to public sewer will need to submit clear evidence demonstrating why alternative options are not available. Approved development proposals will be expected to be supplemented by appropriate maintenance and management regimes for surface water drainage schemes. On large sites it may be necessary to ensure the drainage proposals are part of a wider, holistic strategy which coordinates the approach to drainage between phases, between developers, and over a number of years of construction. On greenfield sites, applicants will be expected to demonstrate that the current natural discharge solution from a site is at least mimicked. On previously developed land, applicants should target a reduction of surface water discharge. Landscaping proposals should consider what contribution the landscaping of a site can make to reducing surface water discharge. This can include hard and soft landscaping such as permeable surfaces. The treatment and processing of surface water is not a sustainable solution. Surface water should be managed at source and not transferred. Every option should be investigated before discharging surface water into a public sewerage network. A discharge to groundwater or watercourse may require the consent</p>

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	<p>of the Environment Agency.” (United Utilities comment)</p> <ul style="list-style-type: none"> • There is a need to emphasise the need to encourage new development to explore all methods for mitigating surface water run-off. Wherever possible, developers should look at ways to incorporate an element of betterment within their proposals as a means to reduce further the risk of flooding within the area. This approach is wholly in accordance with para 103 of the NPPF. (United Utilities comment) • For any strategic sites within its area of operation, Unites Utilities would be interested to know whether the site is within fragmented ownership. If ownership is fragmented, we would strongly encourage the Council to establish, prior to publication of the Local Plan, how the landowners intend to work together to ensure the coordinated delivery of infrastructure in the most sustainable fashion. We believe that coordinated delivery of infrastructure can only be secured on strategic sites in fragmented ownership where there is a clear legal agreement between the landowners. This legal agreement would ensure the coordinated site-wide delivery of infrastructure in the most appropriate way, alongside an associated site-wide mechanism for drawing down land value between landowners on all development parcels, whilst also making proportionate contributions to key infrastructure as the delivery of the site takes place. (United Utilities comment) • Flood risk: We are pleased to see that you have adopted a sequential approach to flood risk and have promoted the use of SuDS. As well as ensuring that development does not increase flood risk by ensuring that surface water run-off rates for greenfield sites are not increased, you should seek a betterment from developers to help mitigate future flood risk. This could involve restricting new development on greenfield sites to the existing run-off rate from a lower order storm event, e.g. a 1 in 1 year storm, and providing attenuation storage up to and including a 1 in 100 year storm event, plus an appropriate allowance for climate change. You should state that development on brownfield sites should offer a 30% reduction in surface water run-off. For brownfield and greenfield sites the following standards of attenuation storage should be provided, and included as part of the policy to give greater strength to planning conditions: Sufficient attenuation and long term storage should be provided to accommodate at least a 1 in 30 year storm. Any design should also ensure that storm water resulting from a 1 in 100 year event, plus 30% to account for climate change, and surcharging the drainage system, can be stored on the site without risk to people or property and without overflowing into a watercourse. (Environment Agency comment) • Water resources: In order to differentiate, we suggest splitting this section into the following three sections: <ul style="list-style-type: none"> - Water resources - Water quality - Groundwater and contaminated land <p><u>Water resources:</u> Given the capacity issues with sewerage</p>
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	<p>infrastructure in areas such as in the Aire Valley, we are pleased that you have pointed out that new development may be dependent upon upgrading and enlarging the existing sewerage infrastructure. We recommend that you look at our Catchment Abstraction Management Strategy (CAMS) licensing documents. These provide an overview of water abstraction availability at a catchment scale, and information on how abstraction licensing is managed. These are available online at: https://www.gov.uk/government/collections/water-abstraction-licensing-strategies-cams-process#yorkshire-map-area</p> <p><u>Water quality:</u> Whilst we support the plan's overall approach of safeguarding water resources from pollution, we are concerned that the plan does not refer to new developments meeting the Water Framework Directive's (WFD) requirements. In England and Wales, WFD compliance is achieved through meeting the relevant River Basin Management Plans' (RBMP) requirements. Specifically, the Humber river basin management plan requires the restoration and enhancement of water bodies to prevent deterioration and promote recovery of water bodies. As such, any development shall ensure that it does not: Cause a deterioration of water quality to a lower WFD status class; Cause deterioration or prevent the recovery of a protected area as required by WFD. Instead, development should safeguard water resources and protect and improve water quality with an overall aim of getting water bodies to 'good' status as defined by the WFD. The plan should ensure this WFD objective is clearly stated.</p> <p><u>Groundwater and contaminated land:</u> In order to protect surface and groundwater from potentially polluting development and activity, the plan should follow the approach advocated in the National Planning Policy Framework (NPPF) in ensuring land is suitable for the intended use. We may recommend the refusal of a planning application where we judge the risk of groundwater pollution is too high or it has been inadequately assessed. We support the approach of reusing previously developed land and encouraging the restoration of contaminated land. Preliminary site investigations should be undertaken for development proposals prior to permission being granted. We require sources of groundwater supply within and adjacent to the district to be protected using the Source Protection Zones (SPZ) that we have identified. We use SPZs to identify those areas close to drinking water sources where the risk associated with groundwater contamination is greatest. SPZs are an important tool for identifying highly sensitive groundwater areas and for focusing control or advice beyond the general groundwater protection measures applied to aquifers as a whole. As there are a limited number of SPZs within the plan area, it is unlikely many developments will intersect with an SPZ. Nevertheless, where this occurs, the developer will be expected to follow SPZ guidance. (Environment Agency comment)</p> <ul style="list-style-type: none"> • There needs to be an addition to the second point in the "Flood risk" section "Development will minimise the risk of surface water flooding, safeguard waterways and benefit the local environment (aesthetically and ecologically) by incorporating sustainable drainage systems
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	<p>(SuDS)“ that requires developers to monitor the outflow from the drainage system to ensure that there are no pollutants entering waterways or groundwater. The use of SUDS is very important to slow the rate of water flow towards waterways and reduce the risk of flooding; they can also be very beneficial to improving the overall biodiversity of a site if managed effectively. However one also needs to be careful when using SUDS that pollutants are not allowed to leave the system and damage local watercourses.</p> <ul style="list-style-type: none"> • There should be a policy in SP9: Flood Risk, Water Resources and Land & Air Quality which requires new development to avoid areas with potential to increase flood resilience and improve the water retention capacity of these areas. Identification and protection of those areas that provide the greatest water retention in upland areas and slow the flow of water into streams and rivers will help to reduce the flood risk in the more populated downstream areas. • Policy SP9 states that development will reduce the need for water consumption, wherever possible, by incorporating water efficiency measures into the design. However, the Housing Standards Review, recently published, confirmed that water management is to become part of the Building Regulations, and that where councils wish to impose further, optional requirements, these must be based on solid evidence. This policy should be revised to align with current Government rationale. • The Local Plan should give appropriate weight to the roles performed by the area’s soils. These should be valued as a finite multifunctional resource which underpin our well-being and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver. • Land Quality – The policy relates to the prioritisation of previously developed land. This is contrary to paragraph 111 of the NPPF which seeks to encourage its re-use, not prioritise its use. It is recommended the policy wording be amended to indicate that the re-use of previously developed land will be supported. Plan could have policy which specifies a Brownfield FIRST. Policy could replace Greenfield sites as and when new Brownfield becomes available. • To is too general to say that ‘Development will avoid the plan area’s best agricultural land (grade 3) wherever possible—exceptions may be made where the need for and benefit of development justifies the scale and nature of the loss’. This statement should be changed to read ‘Development will avoid the plan area’s best agricultural land (grade 3)’. • Given the significant legacy of past mining activity within Craven and in particular the correlation between the presence of legacy and the focus for development in the Ingleton/Bentham area and the Skipton area, The Coal Authority considers that the Local Plan should incorporate the following: <ul style="list-style-type: none"> - A reference to the range of potential public safety issues relating to the legacy of coal mining within the Craven area. Potential hazards
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	<p>include: collapse of shallow mine workings; collapse of mine entries; gas emissions from coal mines; transmission of gases into adjacent properties; coal mining subsidence; and water emissions from coal mine workings. These hazards may currently exist, be caused as a result of development, or occur at some time in the future; and</p> <ul style="list-style-type: none"> - Appropriate policy criteria requiring new development proposals to take account of any risks associated with former coal mining activities and, where necessary, incorporate suitable mitigation measures to address them. (Coal Authority comment) <ul style="list-style-type: none"> • In identifying any new development sites through the Local Plan, The Coal Authority would request that you use recently provided GIS data to undertake a due diligence check to identify whether there are coal mining features present within the site, which would require remediation or stabilisation prior to development. Unfortunately the Local Plan has not positively addressed this issue and no policy content is set out for unstable land despite this being a locally distinctive issue within Craven. (Coal Authority comment) • The Coal Authority considers that Section 4: Environment (page 42) could be amended to address this issue by the addition of a fourth paragraph under the sub heading “Land Quality.” The paragraph could read as follows: “Unstable Land: Mining legacy in Craven is a sizable and locally distinctive issue. Plan users should be aware that unstable land is an important issue that requires consideration as part of development proposals. Development that complies with other relevant policies will be permitted where it can be demonstrated, that in the case of unstable land, a land remediation scheme can be secured which will ensure that the land is remediated to a standard which provides a safe environment for occupants and users. The Coal Authority would also expect the applicant to afford due consideration to the prior extraction of any remnant shallow coal as part of any mitigation strategy, in line with the requirements of the NPPF. Prior extraction of remnant shallow coal can prove to be a more economically viable method of site remediation than grout filling of voids.” As a result, Policy SP9: Flood Risk, Water Resources and Land & Air Quality (page 43) should be amended as follows: “Land Quality and Unstable Land: Growth in Craven will help to safeguard and improve land quality in the following ways: <ul style="list-style-type: none"> - Development will avoid the plan areas’ best agricultural land (grade 3) wherever possible-exceptions may be made where the need for and benefit of development justifies the scale and nature of the loss; - The re-use of previously developed (brownfield) land of low environmental value will be preferred and prioritised; - The remediation of contaminated and unstable land will be encouraged and supported, taking into account what may be necessary, possible, safe and viable.” <p>Reason – To ensure that the significant legacy of past coal mining activity in Craven and the resulting potential for unstable land is highlighted through planning policy to enable the issue to be considered at an early stage in the development process; ensuring that</p>
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	<p>developers take account of the risks associated with unstable land as part of development proposals in the interests of public health and safety. This will also bring the plan in line with National Planning Policy set out in paragraphs 109, 120, 121 and 166 of the NPPF, and the advice in section 45 of the Planning Practice Guidance. (Coal Authority comment)</p> <ul style="list-style-type: none"> • Flood Risk: SP9 requires that developments minimise, inter alia, surface water flood risk by incorporating SUDS. Agree with the objective of this policy; however, there are circumstances when the use of SUDS is not feasible or appropriate. As such, this policy should incorporate flexibility to use other means of flood prevention and water management. • Land Quality: SP9 states that the use of brownfield land will be "...preferred and prioritised...", essentially creating a 'brownfield first' approach to housing land delivery. We agree in principle with the objective to re-use previously developed land. However, the creation of a brownfield first test is inconsistent with the NPPF. The NPPF encourages the re-use of brownfield land, but it does not prioritise it. Instead, the overriding objective is to meet housing needs, whether on brownfield or greenfield land. Unless CDC is able to produce clear and robust evidence that the supply of brownfield land is readily deliverable, the approach to the use of brownfield land in Policy SP9 should be revised. • Air Quality: SP9 states that development will "...avoid the creation or worsening of traffic congestion...". This means that applications will fail this test unless the level of highway congestion is exactly the same as that which existed pre-development. This approach is inconsistent with the NPPF, which states that planning permission should only be refused where the resultant traffic impact would be severe; in all other cases, planning applications should be approved.
<p>SP10 Renewable and Low-Carbon Energy</p>	<ul style="list-style-type: none"> • There is no place for so-called micro-wind turbines in Craven's beautiful countryside. Policy encouraging for blanket development of so-called micro-wind turbines in Craven should be altered. These are large industrial machines and their presence on every hill and in every open view will ruin the area for leisure amenity and tourism. Craven is visible from much of the Yorkshire Dales National Park and the high visibility of these machines will be in direct conflict with the reasons for the existence of the National Parks as set out in law by parliament. • Broughton Hall Estate is continuing to invest heavily in sustainable forms of energy production and energy conservation. The Estate does not wish to invest in wind energy and requests that the Council cautions its approach to this form of energy production given the significant landscape impact that arises. • There must be a solid plan for avoiding cumulative impacts of numerous small scale renewable energy projects. While the Yorkshire Wildlife Trust encourages the development of renewable energy projects, it can be difficult when there are multiple small scale projects to ensure that they all follow the mitigation hierarchy and that both the impacts of each individual project and the overall impacts of all

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	<p>projects in the area are mitigated or compensated for especially in the case of, for example, large individual wind turbines. Consider the addition of a specific policy outlining how cumulative impacts of small scale projects will be mitigated for.</p> <ul style="list-style-type: none"> • Support for renewable energy projects has to accept that there will be some unpopular changes to the landscape in all of our long term interests. Residents may be unwilling for their communities to take responsibility for generating some of the electricity we use, rendering meaningless your support for renewables. Delete: Taking account of how the location, scale and design of proposals may have specific impacts on an area - for example, by causing visual clutter or conflict, disrupting the skyline or fragmenting the landscape, including any cumulative or combined impacts when other existing or planned developments are taken into account. • The Plan should include a recommendation to the appropriate utility companies that these eyesores, essentially as the facilities are, should be put underground, clad in stone and/or screened by more adequate tree planting to enhance the area. At the same time there should be in the Plan a commitment to work for such an outcome at the earliest opportunity (i.e. at Clapham). • SP10 should reference the Forest of Bowland AONB Renewable Energy Positions Statement 2011 (Revised) appropriately. • Should plan include a reference to the target 'Code for Sustainable Homes' which we are aiming for? i.e. – code 5? or (unlikely) code 6? • Policy SP10 should be more assertive in protecting assets mentioned in the Introduction and Vision, rather than the rather vague reference set out in the first bullet-point (i.e. ensuring that the benefits of the development are not outweighed by the negative impacts). Consequently, the Policy should give a more positive message similar to that in the third bullet-point for the designated landscapes. Amend second bullet-point of SP10 to read:- "Avoid developments which may detract from the natural, built and historic assets of the area and ensuring that developments harmonise with the local environment, and respect the character of the immediate setting and wider landscape". (English Heritage comment) • The plan should, as indicated in SP20, make the reduction of energy, and therefore the promotion of renewable energy sources, a priority. That means identifying suitable areas for renewable energy schemes, and emphasising that this not only benefits energy reduction (costs and pollution) and goes toward tackling climate change and the decline of bio-diversity, but also could provide jobs in a "green" economy. • SP10 refers to the need to safeguard and avoid negative and unsustainable environmental impacts on 1) Landscape, 2) Heritage, 3) Biodiversity, 4) People's homes/ nearby residents. However there is no provision for the safeguarding of heritage and biodiversity. This needs to be incorporated into the SP10. • The first bullet point of SP10 needs to include the following: "Supporting well-conceived projects and infrastructure proposals that
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	<p>offer a good balance of economic, environmental and social benefits, which are not outweighed by one or more negative impacts that include, but are not limited to, negative and unsustainable environmental impacts on: landscape; heritage; biodiversity; and people's homes.”</p> <ul style="list-style-type: none">• The renewable energy policy is weak and lacking in vision. It pays lip service to the need for renewable and low-carbon energy sources but is so hedged around with caveats that it is in effect a NIMBY policy. If all planning authorities formulate such policies it will effectively prevent the widespread introduction of renewable and low carbon energy sources. Craven must play its part in providing these energy sources. SP10 should be changed by removing many of the reasons for rejecting renewable and low carbon energy sources and providing more positive support for such schemes even if they do have certain undesirable impacts.• It is important to consider the long-term future of new homes, business premises and existing buildings that are to be re-used, in terms of their sustainability and their ability to perform economically, efficiently and on an environmentally friendly basis both when building and during use. These buildings should not just be affordable, but should also be energy efficient by use of green (re-cycled) energy resources, green insulation and installation of solar panels. The buildings also need to take into account climate change provision and risk of flooding on any sites allocated for new or renovation of existing buildings.
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Draft Policy SP11: Housing Growth	<ul style="list-style-type: none"> • The RSS figure of 250 dwellings per annum was an appropriate figure which derived from robust and credible evidence. Having regard to the NPPF the annual target should be higher than the RSS figure with an aim to boost the housing supply as opposed to setting targets which are significantly lower. • Overall the document is welcomed as very readable, clear and comprehensive. • 3 houses/year for Burton is a little excessive when compared to other communities (2/year being a more realistic target) I support the stated intent of small scale growth for Burton in Lonsdale over many years. • Concerned that the 'limit' of 45 Houses (+10% windfall) over 15 years could be met if no development occurs for a decade and then suddenly a large developer builds bland urban housing despite Craven Council's best intent! • One of the Skipton's unique points is its sudden contained appearance. This should not be lost by development. • The figures relating to population projections and housing need do not match up. The data is not sufficient to allow a full understanding of the housing need. Further information is required on impact of existing services e.g., education, water supply etc. • Information on the phasing of sites should be provided. Suggestion to include clear colour coding to show which sites can be developed when, including sites with existing permission & sites under construction in first phase. It should be made clear that conversions of existing buildings to residential use will be included in the housing requirement. • This policy should contain an allocation for Lothersdale or the supporting evidence to the plan should make clear why this is not considered appropriate, with a robust justification beyond reliance on an arbitrary threshold. • This policy identifies a requirement figure of 5 dwellings per annum within Sutton in Craven. This figure is considered to be too low. • Given the information provided by the Council, the requirements of the NPPF and advice contained within the NPPG it is considered that the proposed housing requirement falls significantly short of the objectively assessed housing needs of the area. It is recommended that the Council plan for a housing requirement which not only meets its affordable housing requirement but also stimulates economic growth. • This policy states that windfall houses are in addition to the planned development for a settlement. Why can't they be included in the overall housing requirement? • The allocation of houses could be spread a little wider so that even the smaller villages could have a few house built. eg 3-4 houses over the time period. Suggestion that 2 dwellings per year would be a more appropriate for Embsay as it is felt that there is not a need for 45 houses over the next 15 years but there may be a need for 30. Is there likely to be a new Housing Needs Survey in the near future?

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	<ul style="list-style-type: none"> • Brownfield sites and small infill sites rather than greenfield sites should be the focus of new housing in Hellifield. • Include a footnote of the form: “Note that this figure of 160 new houses per annum is based on recent data and therefore represents a rebaselined value. All historic shortfall figures for the region are now considered to be irrelevant.” • The future requirement for Giggleswick should be increased, particularly in the context of the overall scale of housing delivery required across the entire District. • There should be no new developments in Rathmell, look for areas that can support families, offer amenities and employment. • CDC are encouraged to: <ul style="list-style-type: none"> (a) Prepare an up-to-date evidence base which uses current evidence and complies with the requirements of both the NPPF and PPG; and (b) Revisit Policy SP11 to ensure that the housing requirement proposed will be effective at meeting housing needs. <p>In this regard, it is our strong view that the CDLP housing requirement will need to significantly increased if it is to be found sound following examination.</p> • Only relatively small scale housing developments should be permitted, as close to the centre of Settle as possible either on windfall or brown sites to preserve the character of the town and for ease of access for the increasing number of elderly residents envisaged. • There is an imbalance between the housing requirement proposed for Settle and Giggleswick, given the fact that the population of Settle is only 2.6 times that of Giggleswick. If both Settle and Giggleswick are considered together, a long term solution would be to develop an industrial estate adjacent to the Settle bypass , and encourage industry and businesses to relocate there. As it would be more prominent, it may encourage fresh light industry to move into the area, providing much needed work opportunity for local people. The vacated land on Sowarth could then be used for new housing, which would be well placed for the amenities in the town centre. This would also help to relieve the already problematic congestion in the centre of Settle. • The number of houses to be built should be 500 hundred a year and the amount of affordable houses on any one site should be a maximum of 25% • The proposed growth, particularly housing and employment development, will support the sustainability of Ingleton as a service centre for the wider area. Ingleton and Kirkby Lonsdale will continue to perform complementary roles. The new homes and jobs provided will have benefits for the wider Upper Lune Valley and Western Dales area – which includes parts of the Craven LPA area, Lancaster District and parts of South Lakeland inside and outside the Yorkshire Dales National Park. • Sutton has provided over 320 new dwellings over past years, therefore it is questions whether there is an undersupply of housing in Sutton. • The Local Plan should make it clear that the Mill development site in
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	<p>Cononley can be developed to the full 45 capacity over a shorter timescale (3 yrs ?) in order to encourage a developer to take it on. In Cononley, brownfield sites should be classed for priority as potential sites for development and type of housing should be indicated.</p> <ul style="list-style-type: none"> • If additional information in respect of development sites is provided (often only available at the planning application stage) Yorkshire Water?? will be able to better understand the potential impacts of development on infrastructure and, as a result, it may be necessary to coordinate the delivery of development with the timing for delivery of infrastructure improvements. We suggest that this should be included as a detailed development management policy. Statutory consultee has suggested a policy wording for the Council to consider. Many of the rural areas of the District will be supported by infrastructure which is proportionate to its rural location. Yorkshire Water would like to emphasise that disproportionate growth in any settlement, particularly smaller settlements, has the potential to place a strain on existing water and wastewater infrastructure. • NYCC Health and Adult Services is currently planning on developing extra care housing in High Bentham and Ingleton. The site of the former Ingleton Middle School has been put forward to the CDC for consideration. This service notes that the site in High Bentham - HB011 - has been proposed for housing which is supported {as extra care is a housing model, carrying C3 planning class and providing at least 40% affordable units). • NYCC Children and Young People's Service have stated that were the likely allocations identified in this consultation to go through in their respective areas, the following schools would likely to need additional accommodation, given NYCC current forecasts although some of them have some current capacity and we would need to reassess the position when the timing of any development is clearer: - Bradleys Both - Carleton Endowed - Embsay CE - Gargrave CP - Bentham - Ingleton - Settle CE - Glusbum CP - Cowling CP Some of these schools are on sites where further development may be difficult. The number of additional dwellings in Skipton town could potentially create a need for places equivalent to 2 x single form entry primary schools or 1 x 2-form entry primary school. Given that the proposed sites are scattered across the town in relatively small developments no one site would appear to create the opportunity to call for land or a contribution sufficient to allow the development of wholly new school provision so this would be challenging especially given the constraints on a number of existing school sites in Skipton town. • The draft Local Plan proposes very low concentrations of development outside of the main market towns, which might impact negatively on the sustainability of communities. This is made in the context of NYCC having had to close a number of small primary schools in the rural parts of Craven in recent years due to reducing number of families with young children living in these areas. NYCC Children and Young People's Service would expect developer contributions to assist in providing this essential additional infrastructure and would urge
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	<p>Craven District Council to work with us to develop a Section 106 or CIL charging policy for education contributions.</p> <ul style="list-style-type: none"> • It is considered that housing requirement split of 50% in Skipton and 70% in South Sub Area are appropriate 'splits' given the scale of development proposed and the comparative scale and importance of Skipton and the South Sub-Area to the District as a whole. It is also recognised that these are 'minimum' figures. • It is considered that a 'policy-on' figure closer to the SHMA figure 310 dpa, would be a more appropriate target particularly bearing in mind the SHMA requirement to deliver 218dpa affordable dwellings in the District (including National Park) over the period 2011-2016 that the Council relies upon elsewhere in the Draft Local Plan to justify policy SP13 and a 40% affordable housing target on local plan sites. The SHMA figures is favoured over the RSS figure of 250dpa as it is more up to date. It is understood that the overall housing figure will need to be updated by the 2011 Census based population and household projections and an updated SHMA. • If Low Bentham attracts any more development (which it is believed that it should not be a focus of increased housing growth in the future), it should attract the requisite funding for the provision of genuine infrastructure. • Broughton Hall Estate wishes to explore a small scale housing allocation in order to meet the Estate's and Parishes local needs. Such an allocation could provide for: affordable rented housing; housing to meet the needs of the ageing population within the parish; housing to meet the needs of the estate workers. • It is considered that the role of Bolton Abbey, as a service village, should be recognised in the Local Plan and new development should be directed to it accordingly in order to enhance the service offer of the village. • The selected 160 dwellings per annum housing requirement figure is an underestimate which will not meet the social and economic needs of the District across the plan period due to the need for a better balance between homes and jobs in Craven, it is not possible to meet the full quantum of affordable need as stated in the SHMA (2011) it is highly desirable that both market and affordable housing provision is enhanced; and the need to take into account up to date population and household population projections. There is a need for a more up to date and robust evidence base to calculate Craven's objectively assessed housing need. • The housing requirement should be significantly higher in order to meet objectively identified needs. • There is support the identification of the South Sub Area as the Primary area for growth and the listed villages in the second tier of the settlement hierarchy as the secondary focus for growth in this sub area. • The plan period needs to be made clear as it is the basis for calculating the housing requirement and supply; paragraph 157 of the Framework suggests a 15-year plan period.
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	<ul style="list-style-type: none"> • Determination of the objectively assessed need, should be undertaken with full regard to the duty to co-operate, as set out in section 110 of the Localism Act. The draft Local Plan does not make clear what co-operation has taken place nor the actions that resulted from it and, without such explanation, cannot be deemed to have met the legal requirements of the duty. It is recommended that the council makes explicit how it has worked to identify and resolve cross-boundary issues so that it can be determined whether or not the legal requirements of the duty to co-operate have been met. • P.43 of the document mentions avoiding building on good agricultural land. However, the inset map for Settle shows building plans for housing at SG025, SG027 and SG068, all of which are green field sites. • The information on population projections appears to contain some contradictions. On P.45 it states that there will be a decrease in the population of those aged under 45, including children. If this is the case, why the plans for building so many new homes that are likely to be primarily aimed at this age group in the Settle area? • There appears to be a lack of 'joined up thinking' re. population, housing needs and jobs. • A large part of the purpose of the plan revolves around proving affordable housing for local people and local job creation. However, this important aim could be completely negated if people are encouraged to commute from outside (as hinted at on P.58) or people are attracted to living in the town simply to commute and spend their money elsewhere. • There are too many houses proposed for Settle, Giggleswick and Rathmell, which would destroy the character of these settlements and also place increase pressure on existing services e.g., GP Surgeries and schools. • The allocation of additional housing stock in Bentham (83 dwellings) and Cowling (100 dwellings) is illogical and requires justification. • Bradley has had a large number of houses currently on the market for a considerable amount of time. Considering what Bradley can offer in terms of services and amenities is there a demand for the number of houses proposed and for the category of residents envisaged? • Development of 30 houses in Hellifield should be phased for the latter part of the plan period (nothing for the first 5 years of the local plan) to allow for the necessary integration.
<p>Draft Policy SP12: New Homes</p>	<ul style="list-style-type: none"> • It is recommended that the policy is amended such that development of sustainable windfall sites is not restricted. This policy is contrary to paragraph 14 of the NPPF, which contains a presumption in favour of sustainable development, and does not align with proposed policy SP11, which states that the housing requirement is a minimum. • It is acknowledged that, in principle, the inclusion of a windfall allowance over and above the housing requirement may represent an appropriate approach to ensuring that the Local Plan includes an element of flexibility, which is itself a key requirement of the NPPF. However, the NPPF is clear that a windfall allowance must be made on the basis of: "...compelling evidence that such sites have consistently

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	<p>become available in the local area and will continue to provide a reliable source of supply..." (paragraph 48). As such, it is considered that evidence should be assembled regarding the scale of windfalls which have been achieved in the past and the amount which is anticipated to delivered in future years. This will enable the windfall allowance to be justified.</p> <ul style="list-style-type: none"> • The policy is not considered sound as it is not justified by robust evidence. The permissible windfall requirements set out within the fourth, fifth and sixth bullet points of the policy are arbitrary and not founded upon evidence. There is no justification to refuse permission for a sustainable windfall site where it would exceed the percentage figures outlined in the policy. This would not only be contrary to Policy SP11 which suggests that the plan requirement is a minimum but also the NPPF which has a presumption in favour of sustainable development. It is therefore recommended that this part of the policy be deleted. • Explanation of technical terms such as "windfall sites" and the comparison of an average Craven house price with the median house price for each sub area. • Consideration should be given as to how the Plan might reflect the imbalance between the perceived need for larger quantities of smaller homes against the likely demand, from developers, for larger homes (presumably with greater profit margins) in an area of recognised high demand from the 'executive' market. • At present, this policy is vague regarding the mix of properties required and so does not represent an effective strategy for meeting needs. The definition of "housing need" 3 covers not just the scale of housing required, but also the mix of housing and the range of tenures which households need, and where those needs exist. • This policy includes four considerations for windfall homes (location, number, design and green infrastructure). However, these considerations are vague in setting out the issues which will be taken into account. It does not set out how the "value" of a green space or the ability of a dwelling to "belong" and "show progress" will be judged. • The Plan should include an Appendix which sets out the detailed considerations which would need to be taken into account in the development of all the sites that are allocated under the provisions of this Policy for housing. (Statutory consultee) • An additional bulletpoint should be added to the Section of Policy SP12 which deals with New Homes built on Local Plan sites along the following lines:- "be required to accord with the development principles set out in Appendix x", (statutory consultee) • Could assurances be given in the document that the plan be reviewed and updated at say 5 year intervals extending the development period by a further 5 years.? In addition, if then by chance a 'community limit' is met by windfalls, could it state that it possible the 'approval' for an initially agreed site can be removed from the plan? • Bentham needs more smaller developments not a few large ones. We
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	<p>need some more 3/4 bedrooms low cost properties so that those young expanding families currently in 1/2 bedrooms provision can move up and free the 1/2 bed provision for others starting family life.</p> <ul style="list-style-type: none"> • The plan needs to give more thought/guidance on how to provide social and sustainable housing and a framework to ensure developers will meet peoples needs, provide appropriate housing and still make a profit. • More detail on density required, to ensure it is good for health, wellbeing and environment. • The new homes and jobs provided will have benefits for the wider Upper Lune Valley and Western Dales area – which includes parts of the Craven LPA area, Lancaster District and parts of South Lakeland inside and outside the Yorkshire Dales National Park. • For greater clarity it is suggested that Policy SP12 also contains a list of those sites, shown on the Inset Plans in Section 8 that the Council intends to allocate for housing, together with their suggested dwelling capacities. • It is considered that the inclusion of the second bullet point referring to affordable housing is superfluous and somewhat contradictory to Policy SP13. The reference in Policy SP12 confusingly only refers to local plan allocations and appears to indicate that the amount of affordable housing sought will be variable based upon evidence of need, local wage levels and economic viability at the time of application. In contrast Policy SP13 sets out a specific target and threshold for affordable housing requirements in all new developments. Whilst the actual requirements are debated further below the policy stance to set targets and thresholds in SP13 is the correct approach. The NPPF is clear that local standards should be set out within the plan, including those for affordable housing (paragraph 174). It is not possible to create a variable target which will be altered outside of the local plan. It is therefore recommended that the second bullet point of the policy be deleted. • The local plan should spell out what new local housing for and for whom. That is young families, low cost home ownership. Not for second home owners. • The policy needs to identify which figure in the National Census it relates to as it is difficult to assess what numbers will be produced from this if it is not made clear how they will be calculated. • The plan should reflect a continuing need for some larger properties in the Settle area in order to maintain an appropriate balance in the housing stock. • The Local plan should aim to redress the concerns of residents by stating the position of sites already with planning permission, and those in the process of obtaining permission, in relation to the Housing requirement established in the plan. • CDC should address the growing interest for self building and make provision within the Local Plan, for example through the Government's Right To Build Scheme. • The summary is in danger of sounding target driven instead of need
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	<p>driven. We don't need more houses just for the sake of it.</p> <ul style="list-style-type: none"> • The Local Plan should include a reference to the emerging North Yorkshire County Council, City of York Council and North York Moors National Park Authority Minerals and Waste Joint Plan. It should also set out what policies that plan will determine that will then influence decision making in Craven, including the need to consider the impact of mineral sterilisation. (statutory consultee) • The Local Plan should clearly set out what factors have been utilised in the site allocation selection methodology (for all allocations). The Sustainability Appraisal or Appendix to the Sustainability Appraisal should then set out all the relevant allocation methodology results to allow parties to comment on the acceptability or not of the proposed allocations. (statutory consultee)
<p>Draft Policy SP13: Affordable Housing Policy</p>	<ul style="list-style-type: none"> • The Council appears to have no commitment to fulfilling the housing requirement. A reassessment of their policy (based on the Harrogate model) is needed when in some cases the Bradford and Leeds system/policies are more appropriate. • More social housing needs to be built, especially for young people and families. Private landlords are asking too high rents, which means that Housing Benefits are going in the private landlords pockets. • The number of houses to be built should be 500 a year and the amount of affordable housing on a site should be a maximum of 25%. • The North Yorkshire SHMA is out of date. CDC should reassess affordable housing needs as part of a general update to the evidence base to ensure that the Local Plan is justified and effective. • The figure of 160 houses to be provided per year is less than the identified affordable housing requirement as evidenced in the 2011 SHMA. (HMRC). • HMRC would support policies and site allocations to consider the needs of older people and those in rural communities. HMRC also note the identified housing requirements of young people and the Gypsy, Roma and Traveller communities in Craven. • The draft Affordable Housing and Community Infrastructure Viability Study (Aug 2013) identified that an affordable housing target of 40% was viable, however it is considered that a target of 35% is more appropriate in order to provide flexibility, which is stated in the 2013 Peter Brett Associates report "Affordable Housing and Community Infrastructure Viability Study". Clarification is needed from CDC regarding the selection of a 40% target. • The threshold for affordable housing should be raised to a minimum of 10 units. • The second bullet point of the policy should be deleted as para 174 of the NPPF makes clear that affordable housing standards should be set out within the plan and this cannot be variable outside the plan. • The Council should note guidance set out in the Government's "Assessment of Housing and Economic Development Needs". • Self-building has been suggested as an alternative way of providing affordable housing. • More thought should be given on how to provide social and

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	<p>sustainable housing and a framework to ensure developers will meet people's needs i.e., young people and young families, provide appropriate housing and still make a profit.</p> <ul style="list-style-type: none"> • Craven has a significant need for affordable housing, largely as a result of a mismatch between house prices and local income. • Concern about the apparent anomaly between affordable housing demand and the provision of housing numbers proposed by the plan. • The proposed housing requirement of 160 dwellings per annum is not adequate as it does not deliver the number of new housing shown to be required by various models (Edge Analytics Report) and it will not deliver the required affordable housing. It will lead to negative job growth and will not address the problem of the ageing population. • The Council should consider larger exception sites in high demand areas in order to meet the identified need. • There is a proposal to take a precise financial contribution in addition to units where the 40% contribution does not result in a whole number. Does CDC have the resources to deal with the likely volume of cases of viability challenge? It might be better to adopt the Harrogate Council approach to round up or down depending on whether the proportion is up to or over 0.5 of a unit. Standardising the process should mean that work can continue to be done "in house" rather by the District Valuer, which may result in protracted timescales, greater cost to the developer and a less satisfactory result for the Council. • Financial contributions from small sites below the onsite policy threshold should be based on market value less transfer value multiplied by the number of homes and affordable percentage. • There is concern that the overall housing target may be too low, but support for the 40% affordable housing target. This will not fully address housing need, but, subject to site specific financial viability, is a pragmatic and achievable target. • There is some concern about the approach to exception sites as the proposed policy is likely to result in a large amount of work for the Council in dealing with viability. Increasing market housing to a point where affordable housing is viable would fuel land prices. The reality of this approach is that 100% affordable housing is financially viable on greenfield sites that only have agricultural value. • There is confusion and inconsistency in the policy text around affordable housing tenure etc. • Concern was raised about the 40% requirement for affordable housing specifically relating to the Skipton South site, as this requirement, along with other site existing costs would make the site unviable. • This policy suggests parishes without housing allocations would be allowed windfall homes up to 0.5% a year, on average, to the number of existing homes in the parish. It is not clear whether this policy would be applicable to Lothersdale. The policy could contain a list of settlements, or reference to such a list in an appendix, for avoidance of doubt.
SP14: Gypsies,	<ul style="list-style-type: none"> • The community prefer to be referred to as Gypsies, Travellers,

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Travellers & Showpeople	<p>Showmen and Roma. The policy should be amended to reflect this.</p> <ul style="list-style-type: none"> • This policy could go further and clearly state that sites within flood zone 3 would be not supported, as this zone is inappropriate for this type of development due to the associated flood risk and vulnerability classifications (as stated within the NPPF and its associated Planning Practice Guidance. • It is suggested that planning conditions should be applied to new sites, and facilities provided by the Council to ensure that they can be maintained in a good state. This should include temporary toilet and waste disposal facilities for temporary sites.
General comments	

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Response Summary for Section 6: Economy

Section 6: Economy	
Policy	
SP15 Business Growth	<ul style="list-style-type: none"> • Transport connectivity improvements (both public and private) could enhance economic links between Craven and opportunities and skills in Lancashire and Greater Manchester – i.e. through improvements to the A56, and through reinstatement of the former Colne to Skipton railway line. • Support for sustainable growth of Broughton Hall Business Park. Clear support for the adoption of SP15 which supports the growth and diversification of the employment base in Craven to ensure that Broughton Hall Business Park remains competitive in the tough local and regional office markets. • The language in the draft plan over emphasises economic growth and there is a danger of the plan area becoming too commercialised. • The loss of employment generating sites (such as Glusburn Mill, Cononley Mill, Skipton South site being allocated as housing/mixed use) may outweigh the benefits of developing a brownfield site for housing. These sites should be treated as windfall sites and not included within the Plan. • South Craven is identified as a major employment provider but there are no allocations in the South Craven settlements. • Need to adequately address the issue of the inevitable increase in traffic which will accompany new housing/employment development (i.e. junction at Cononley Lane End). • The Settle area has plenty of provision for new residential/ housing with no serious provision for employment which will result in an increased burden on the A65 as residents commute out of the area to work. The plan needs to identify land for business premises where they will be able to establish their roots and have room to grow, separate from residential properties. Mixed use sites for 'new employment' are not adequate. B1 is not the solution. • A large supply of skilled labour from outside Craven would be advantageous to businesses and employment prospects. However increasing this available pool of labour would be enhanced by better road and public transport links into the major employment centre of Skipton. • Given the existing connectivity between the northern sub area and the eastern part of South Lakeland District (employment and retail in Kendal and Kirkby Lonsdale) and schools (Kirkby Lonsdale), then policy support in the emerging Craven Local Plan (SP15) for enhanced transport connectivity with South Lakeland (Cumbria) is welcomed.
SP16 New Land and Premises for Business	<ul style="list-style-type: none"> • The Local Plan should include a reference to the emerging North Yorkshire County Council, City of York Council and North York Moors National Park Authority Minerals and Waste Joint Plan. It should also set out what policies that plan will determine that will then influence decision making in Craven, including the need to consider the impact of mineral sterilisation (NYCC Planning, Minerals and Waste). • The Local Plan should clearly set out what factors have been utilised in

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	<p>the site allocation selection methodology (for all allocations), to ensure that the significant legacy of past coal mining activity in Craven and the resulting potential for unstable land together with the issue of mineral sterilisation is properly considered in the site allocation process. (NYCC Planning, Minerals and Waste)</p> <ul style="list-style-type: none"> • With regards to the Skipton Rock Quarry site (identified for employment) it will be important to ensure that development would not prevent minerals extraction in the future, and would safeguard coating plant infrastructure. (NYCC Planning, Minerals and Waste) • Various objections to the allocation of 2ha of new employment land in the Settle south area (near A65) as this allocation is based on uncertain evidence. Such an allocation only benefit a small number of already successful businesses who would like to relocate near to the A65 but lack a business case for the necessary infrastructure investment. Concerns also expressed about the loss of the area as green space, the detrimental effect industrial development would have on the approach to Settle, the loss of grade 3 agricultural land, flooding issues, and effect on the vibrancy of the town centre should businesses move out to this site. • Need to attract industries and employers who provide jobs for the people who live in Skipton or the South sub-area, not those coming in from outside of Craven. • The Local Plan should include an Appendix which sets out detailed considerations which would need to be taken into account in the development of employment sites. • Query as to any further development potential at Riparian Way Business Park. • Query as to whether the redevelopment of Hayfield Mill, Glusburn reflects recent conversations with Cirteq? • Objection to further industrial development in Gargrave as the area is more suited to tourism. • The Plan should include an Appendix which sets out the detailed considerations which would need to be taken into account in the development of all the sites that are allocated for business development. An additional Paragraph should be added to the end of Policy SP16 along the following lines:- "Site allocated in this Local Plan be required to accord with the development principles set out in Appendix x"
<p>SP17 Strategic Employment Site</p>	<ul style="list-style-type: none"> • Opposing views of both support and objection expressed for the mixed use development at the Skipton South site, which will deliver B1, B2 and B8 uses, along with residential development. Need for this site to deliver new formal playing pitches (i.e. in north-eastern corner of site). Objections to supermarket on this site. • English Heritage commented that an assessment is required of impact of the proposed Skipton South site on the adjoining Skipton Conservation Area. • Likely traffic flows between the A629 and the Skipton South site should be analysed, and the link road should be restricted to its

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	<p>primary purpose of routing HGVs. Concern about HGVs exiting site onto Carleton Road (one way system suggested onto bypass for HGVs).</p> <ul style="list-style-type: none"> • Objection to further commercial and retail park ribbon development along the A629 between Snaygill roundabout and Skipton i.e. Guysons
<p>SP18 Rural Economy</p>	<ul style="list-style-type: none"> • Need to sustain/maintain rural farming via good husbandry and forestry practises in relation to bio-diversity and adaptation to climate change (i.e. organic farming, appropriate tree planting. Also need good communication links for rural businesses (broadband) • SP018 should also include reference to the need to protect natural and historic assets of Craven when redeveloping rural farm buildings. • Need to remove B1 live work condition on live-work units. However rather than having to go for full planning that takes a further three months, I think the Council should consider quicker solution via amendments. There will be a lot of barns where it is not needed to go for full planning as there are no design changes, just simply removal of conditions that make development impossible. This way Craven get there pound of flesh in fees, client gets planning that a bank will work with and buildings that need development are brought back to life again. • The draft plan refers to diversification of the rural economy and the enhancement of tourism opportunities and yet makes no mention of promoting these changes in Clapham-cum-Newby. Mention has already been made of the enormous recreational potential of Clapham's proximity to the Forest of Bowland. A network of cycle routes has been established in Gisburn Forest but there are very few footpaths or bridleways in other parts of the Forest. The need for such routes and uses should be taken into consideration in revising the draft plan. Equally, visitor and employment opportunities related to outdoor leisure need to be better promoted in the Forest, as they are in the Yorkshire Dales National Park. The Draft Plan needs to be revised to include the prospect of additional footpaths and bridleways in that part of the Forest of Bowland which falls within Craven. Potential sites for recreation-related facilities should be included, such as toilets, watering points, foul-weather shelters, picnic areas and parking areas. Such facilities would allow fuller use by the public and would encourage the generation of recreation-related employment in the area - walks guiding and leading, orienteering, geocaching, livery stables, hacking, field courses, hostels, tearooms etc.
<p>SP19 Tourism</p>	<ul style="list-style-type: none"> • Plan should not encourage tourism which is brash, extensive, pollutant, and maximises only gain. This type of policy approach will destroy the valuable assets of the area such as tranquil settings, wildlife, and small-scale activities and hospitality, which the region has to offer and is known for at present. • Sustainable tourism growth should be supported by visitor friendly fees (i.e. for car parking), accessible pedestrian routes and consistent regular transport services providing easy access for residents and visitors to the area. • Better transport links across the Pennines to Lancashire and the

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Response Summary for Section 6: Economy

	<p>northern part of Greater Manchester would encourage greater tourism.</p> <ul style="list-style-type: none"> • Plan should ensure new developments are sympathetic to cultural tourism, in particular that spaces are created which will enable larger numbers of people to gather for arts and cultural events. • Policy SP19 should make express reference to land at Hellifield being available for tourism uses. • Support for the development of Bentham as a visitor gateway for the Forest of Bowland AONB, in particular linked to the Way of the Roses. • Tourism in Settle is detracted by HGVs travelling through the town. Relocating business premises to an out of town location (such as proposed Settle Bypass site) would alleviate the HGV problem and benefit tourism in the town centre. • Plan should include examples of South Craven tourism opportunities such as the moors, local walks, canal and river fishing, historic buildings, village trails, and local pubs. • Skipton would benefit from an increase in safe, cycling friendly routes by adaption of available roads and lanes and better signing on highways both in and out of town. The development of a closed road circuit in Skipton would enhance the sporting aspect of cycling locally. The canal towpath should also be upgraded through the district. • Aireville Park and the master plan for the park need to be included in the local plan. • Additional bullet point should be added to SP19 as follows. “Ensuring that proposals for development – of the types described and supported in principle above - will succeed in preserving the character of the countryside and landscape, safeguarding the natural, built and historic environment, and in achieving sustainable development overall”. • A policy reference to be provided in policy SP19: Tourism indicating: “Delivering sensitive mixed use development at Bolton Abbey, including new tourism and leisure facilities on the allocated village-centre site, through a Masterplan process, which supports the village’s complimentary role as a tourism destination and service village.”
<p>SP20 Retail and Town Centres</p>	<ul style="list-style-type: none"> • Empty properties need to be considered for renovation/occupation before new builds. • Various suggestions for alteration to town centre map boundaries, i.e. boundary changes suggested to the Main Shopping Area map for Skipton to include various shops on the south side of Newmarket Street and ‘The Mill Shop’ in the car park. Also query as to whether town centre maps are needed for Glusburn/Cross Hills. • Need to attract, support and retain independent shops as opposed to national chain shops. • Plan needs to avoid any substantial out of town retail developments which could weaken the position of the High Street. Need to strengthen the emphasis on the protection of the core retail area. • Retail offer in town/village centres should match housing growth. • Support for SP20 in that it seeks development that will not harm the cultural functions of town centres, as these facilities are essential for

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	<p>the health and well-being of a sustainable community.</p> <ul style="list-style-type: none">• Reference to High Bentham markets is inaccurate. The monthly farmers market no longer occurs and the weekly market consists of two stalls and are therefore not important elements of the town's continued vitality.• Large scale housing development planned for Cross Hills should be backed up by adequate provision for retail and parking.• When planning for growth near Skipton Station and around the Skipton South site (west of bypass), need to consider adequate transport improvements
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Response Summary for Section 7: Infrastructure, Services and Facilities

Section 7: Infrastructure, Services and Facilities	
Policy	
SP21 Sustainable Buildings, Infrastructure and Planning Obligations	<ul style="list-style-type: none"> • Substantial concern that housing growth will not be matched by appropriate level of infrastructure investment (i.e. schools, road improvements to support industry and residents, health services, telecommunications, additional and adequate levels of car parking, adequate public transport including rail improvements). • Minimising the volume of HGV quarry traffic through Craven will positively contribute to meeting the Craven Plan objectives PO2 (Conserve and enhance the high quality local environment) and PO5 (Enhance the vitality of market towns and larger village centres). Plan needs to encourage the use of rail. Plan should encourage slower traffic movement throughout Craven (i.e. with 20mph zone in villages). • There is a need for a specific telecommunications policy within the emerging Local Plan. Telecommunications play a vital role in both the economic and social fabric of communities; as such a policy which refers specifically to telecommunications developments is required. • The Plan should not include a policy requiring higher levels of energy efficiency from dwellings. The cumulative impact of such policies combined with requirements for other contributions are likely to threaten the viability of development within the area. Reference to additional energy efficiency requirements above those specified in Building Regulations should be deleted. • United Utilities suggests the inclusion of a policy which seeks to ensure that new development is supported by essential infrastructure. Delivery of development should be coordinated with timing for the delivery of infrastructure improvements. • Infrastructure improvements via Planning Obligations is insufficient if not supported by an effective enforcement structure. • Buses and trains need to link Low Bentham to Lancaster, Kendal and Skipton more frequently so that they can be used to get to and from work. Also links to Grassington, Leeds/Bradford should be improved. Smaller buses should be used to make running costs lower. There should also be the ability to get on and off the bus where you need to rather than designated bus stops. Need a Craven Bus and Rail Strategy. • Support expressed for the references in the Draft Local Plan to the relevance of the railways through Craven in general and, specifically, the line from Skipton to Bentham which continues towards Lancaster, in providing facilities for commuting for work purposes into, within and out from Craven, for transporting students to schools and colleges, again into, within and out from Craven and forming a crucial part of the tourist infrastructure of Craven. The railways serves many of those towns and villages in which most of the housing development is envisaged in the Draft Local Plan, specifically Bentham, Settle and Skipton. • Need a slow release of land for development to meet future housing needs. It is essential that any Section 106 managed cash bonus received is to benefit the area's infrastructure and not just lost in the

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Response Summary for Section 7: Infrastructure, Services and Facilities

<p>SP22 Community Buildings and Social Spaces</p>	<p>CDC cutbacks ether.</p> <ul style="list-style-type: none"> • The term 'Community Facilities' should be used instead of 'Community Buildings and Social Spaces'. The function of community facilities is to provide services and access to venues for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community and your cultural facilities include theatres, cinema, community halls, music venues (often in pubs), museums, and libraries. This term is all encompassing and ensures all your valued services and facilities are covered and therefore protected. • Community facilities may be inherently unviable in developer terms, however they are valued community facilities run for the benefit and well-being of the local community and should therefore be protected • Sport England will challenge the soundness of the Local Plan if it is not justified by; an up to date playing pitch strategy (within 3 years) and an up to date built sports facilities strategy (within 5 years). • Aireville Park and the master plan for the park need to be included in the local plan. •
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Response Summary for Section 8: Local Plan Map

Section 8: Local Plan Map

- Clapham does not have a Settlement map in the proposed Local Plan. Clapham is not mentioned in any of the documents that have led to formation of the Plan and Clapham hasn't been involved in a public consultation. Why has Clapham been overlooked?
- Natural England note that many of the allocations presented lie within proximity of sites and areas designated for nature conservation importance and landscapes including internationally protected Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar, nationally protected sites of special scientific interest (SSSIs), the Yorkshire Dales National Park and the Forest of Bowland Area of Outstanding Natural Beauty (AONB). In addition to local designations. We advise that potential impacts from allocations on sites protected under the Conservation of Habitats and Species Regulations 2010 will need to be assessed in a Habitats Regulations Assessment. Furthermore impacts on, but not limited to, SSSIs, nationally protected landscapes and local designations will need to be assessed in the Sustainability Appraisal.
- The Coal Authority supports the intention expressed on page 73 that relevant designations/constraints are to be illustrated on the Local Plan Map. It is useful for plan users to understand the broad spatial extent of such designations/constraints. The Coal Authority would suggest that you may want to consider illustrating the "Development High Risk Area" which we define for coal mining legacy will be included on the Local Plan Map. This is the GIS layer that we provided to your Development Management team, in order that they can identify instances where submission of a Coal Mining Risk Assessment would be necessary to support a development proposal.
- The precise intent of the hatched area sites in the document is not immediately apparent i.e. is it hatched to show that the 'target' can be met without filling the whole site over 15 years or is it that part of the site is unsuitable? In this context the development density stated appears to refer to the whole site. These issues need clarification –they apply generically to the whole document. Could the areas considered for development within the individual sites be stated at this stage?
- An enlargement of Inset Map Section 8: Local Plan Map would be helpful. Individual streets cannot be identified, which defeats the object.
- The development of several of the sites identified in Section 8 could, potentially, result in harm to elements which contribute to the significance of Craven's designated heritage assets. It also seems quite likely that several would also harm other elements which contribute towards Craven's "high quality landscape and treasured environmental assets". Because of the sensitive nature of some of these locations, it is not sufficient to rely on the very general Policies of this Plan as the basis for ensuring that the development of these areas is delivered in a way which will safeguard the area's natural and historic environment. In order to assist those preparing detailed schemes for these allocations and to help ensure that the sites are developed in a sustainable manner, the Plan needs to set out the key considerations that need to be taken into consideration in the development of each of these areas. This could, for example, be included within an Appendix. However, if such an approach is used, the need for development proposals to have regard to the contents of the Appendix would have to be referred to as one of the Criteria of the relevant Local Plan Policy. Such an approach has been used in a number of other Local Plans and helps to provide certainty to both potential developers and local communities about precisely what will, and will not, be permitted on these sites. (English Heritage comment)
- Conservation Areas: A number of the areas being considered as potential allocations would result in the loss of currently-open areas either within or adjacent to one of the District's Conservation Areas. As you will be aware, the Council has a statutory duty under the

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Response Summary for Section 8: Plan Area Maps

provisions of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay “special attention” to “the desirability of preserving or enhancing the character or appearance” of its Conservation Areas. However, there appears to be no evidence of any assessment having been undertaken of the potential impact which the loss of these undeveloped areas and their subsequent development might have upon the character of the respective Conservation Area. In order to demonstrate that the allocation of these site is not incompatible with, either, the statutory duty placed upon the Council under the provisions of the 1990 Act or, indeed, the Plan’s own policies for the conservation of the historic environment, there needs to be an evaluation of what contribution these currently-undeveloped sites make to the significance of the Conservation Area, and what effect their eventual development might have upon that significance. We would also strongly recommend that Conservation Area Appraisals are produced for all the settlements where sites are being proposed as Allocations. This will:-

- Identify which buildings and spaces make a positive contribution to the character of the character or appearance of the Conservation Area and, therefore, should be retained in the development of a particular allocation.
- Assist the Council in determining the most appropriate form of development for each particular site.
- Help to provide the necessary evidence the Council will need to justify the allocation of these areas.

For those Conservation Areas where a significant number of sites are being proposed (such as Cowling, for example) there would also need to be an evaluation of the cumulative impact which the development of all the sites suggested would have upon its character and appearance. (English Heritage comment)

- Listed Buildings: There are a number of sites which, if developed, would result in the loss of currently undeveloped land in the vicinity of a Listed Building. As you will be aware, there is a requirement in the 1990 Act that “special regard” should be had to the desirability of preserving Listed Buildings or their setting or any features of special architectural or historic interest which they possess. However, there appears to be no evidence of any assessment having been undertaken of the potential impact which the loss of these sites and their subsequent development might have upon the significance of the respective Listed Building. In order to demonstrate that the allocation of these sites is not incompatible with, either, the statutory duty placed upon the Council under the provisions of the 1990 Act or the Plan’s own policies for the conservation of the historic environment, there needs to be an evaluation of what contribution these currently undeveloped sites make to the significance of the Listed Buildings, and what effect their eventual development might have upon that significance. (English Heritage comment)
- It would be helpful if people could better understand how Craven geographically relates to the major cities and towns nearby. Therefore on several maps I would suggest adding the location of Leeds Bradford, Harrogate, York, Preston, Liverpool, Manchester and various towns in East Lancashire. One good map showing Craven relative to all other major towns and cities within 50 miles would be a major improvement to this draft plan.

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Response Summary for General Responses to Local Plan

General Responses to Local Plan

- There is a fear amongst some residents that if they offer alternatives to the CDC preferred sites in their settlement that CDC will simply add these to its LP and increase the housing allocation to the settlement. Because this indicates the level of distrust amongst residents for CDC elected representatives and officers, steps need to be taken to allay this fear and do more to inform, reassure and encourage active participation in the formal consultation.
- We need to have a Local Plan in place as soon as possible to manage planning and defend against wildcat developers, but we must take care that no opportunity is presented whereby this process could be de-railed by challenge.
- Clearly identification of housing (numbers) and Employment Land (area) are strategic, with allocation of total area to subdivisions in Craven. However there doesn't seem to be any disclosure on exactly how EL area is calculated and allocated to settlements. Plan should not have identified EL sites in settlements with no mention of sustainability testing. There is also no clear correlation between housing numbers and imposed EL sites.
- Plan should not to be consulting on the non-strategic policy of housing sites when a neighbourhood plan is in development.
- The plan is supposed to be a summary of the evidence base for the selection of sites. It is a weak effort which cherry picks points in support of CDC preferences rather than allowing sites to be identified through the assessment itself. It is also based on (a) opinion gathered at community events, poorly advertised, the great significance of which was poorly explained, poorly understood by residents and poorly attended and (b) Stage 1 & 2 check lists which contain inaccurate information and aren't evenly compiled.
- Plan is not clear enough. A straight forward, plain language one pager should have been made available with the publication of the 22nd Sept draft LP outlining the process which CDC has adopted. This should be rectified for the formal consultation.
- This Parish Council (Embsay with Eastby) has sought to engage actively with the planning process and it has adopted a realistic position with regard to new development within the Parish. This Council recognises that there is a need for the settlements to accommodate some new development and that this will help to sustain the limited services and facilities that exist. We believe that this is demonstrated by the 'Local Land Development Position Statement', a copy of which is enclosed with these representations for ease of reference. It would be preferable if we had the resources available to us to provide comments on the plan in its entirety; the Parish is not an 'island'. We have, however, to be pragmatic and have confined our comments to how the plan will impact upon this Parish.
- The plan indicates an end date of 2030, yet the start date is more elusive. It is noted Policy SP11 indicates that the housing requirement is for the next 15 years. This suggests a plan period of 2015 to 2030, however, this is not formally stated. It is recommended that the plan period (both start and end date) be clearly identified within the opening chapters of the plan. Establishing the plan period is essential for the purposes of calculating the housing requirement, the housing trajectory, the five year land supply, and consideration of whether it is necessary to address any backlog in delivery. The NPPF (paragraph 157) indicates a preference for plans to have a 15 year time horizon. In this regard it would appear that the Craven Local Plan will meet this preference, providing it is adopted next year. If the Council anticipates any slippage in its timetable it is recommended that the plan period be extended to ensure that a 15 year horizon be retained.
- Craven District contains coal resources which are capable of extraction by surface mining operations. These resources cover an area amounting up to 25% of the overall Craven District area, including the part in the Yorkshire Dales National Park. The Coal Authority is keen to ensure that coal resources are not unnecessarily sterilised by new development.

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Response Summary for General Responses to Local Plan

Where this may be the case, The Coal Authority would be seeking prior extraction of the coal. Prior extraction of coal also has the benefit of removing any potential land instability problems in the process. In the part of Craven outside of the National Park, which forms this plan area, mining legacy is concentrated in the north-west around Ingleton and Bentham (North Sub-area) and in the south-east around Skipton and Glusburn & Cross Hills (South Sub-area). Although mining legacy occurs as a result of mineral workings, it is important that new development recognises the problems and how they can be positively addressed. However, it is important to note that land instability and mining legacy is not a complete constraint on new development; rather it can be argued that because mining legacy matters have been addressed the new development is safe, stable and sustainable. As The Coal Authority owns the coal and coal mine entries on behalf of the state, if a development is to intersect the ground then specific written permission of The Coal Authority may be required.

- Amazingly complex, full of jargon and generalisations e.g. spatial strategy, multifunctional countryside, windfall proposals etc. Most residents want an end to housing expansion and infilling and require the protection of green sites. Over development leads to a loss of character and visual amenity. According to Rightmove there are currently over 500 houses for sale within 5 miles of Skipton and over 1000 within 10 miles of Skipton, plus hundreds for rent. Do we really need more when jobs are scarce?
- The continual updating involved in Cravens iterative process of site selection and policy development by consultation leads to justification of Cravens preferred site or policy by amendment. Craven have written that they have 'cherry picked' employment for Gargrave and are now using the consultation to amend those sites and policy to fit responses. The NPPF describes correct process as using the evidence of sustainability through assessment to identify the most sustainable sites and policies. Craven DC's approach is qualitative not quantitative which gives no ranking of most sustainable to least sustainable and as a consequence does not identify the most sustainable site or policy. This poor practice has led to the selection of unsustainable sites (i.e. GA028 and GA029).
- If this Plan had been produced in a timely fashion Craven District Council (officers and Councillors) may not have been presiding over the current shambles whereby housing developments are blighting Craven, many built on green field sites while brown sites could have been alternatively developed. Developers have taken advantage of this abject failure and the Council have had to approve many developments that a properly and timely developed Local Plan could have prevented.
- There is a need in Skipton for a cultural building. In the TCPA guidance suggests that there should be 45 sq m of arts facilities space per 1,000 people. This should be reflected in this policy document
- Although there is to be a Community Infrastructure Levy 123 document written after the Local Plan, does any reference need to be made to the CIL's priorities in the Plan?
- The Council are progressing with an Open Space Assessment that will essentially assess the quantity and quality of all open space and identify future needs. However, this does not follow Sports England's methodology. It is understood that this requires the local Authority to obtain the Post Code of every playing member of a club and that this is something that has the backing of the various Governing Bodies. Unfortunately, this appears to only apply to selected sports. Sport England's methodology therefore appears to be not only extremely time consuming but selective. The Council's Open Space Assessment is considered be more equitable and also comprehensive.
- It is understood that the New Homes Bonus has another 2 or 3 years to run. It appears to be extremely selective and the distance criteria very restrictive. It is considered that the Community Infrastructure levy is a much more appropriate mechanism for assisting strategic

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Response Summary for General Responses to Local Plan

important needs such as Sandylands Sports Centre. Craven District Council has over the years granted significant capital expenditure to projects such as Aireville Swimming Pool at Skipton and the Sports Hall at Upper Wharfedale School at Threshfield. It also makes an annual payment to the Swimming Pool at Settle. Unfortunately, Sandylands Sports Centre, a self-help Registered Charity, and the main provider of community sport and recreational facilities in Craven with over 200,000 person visits per year, receives no such funding.

- This is a long term strategic plan and therefore should be looking at the possibility of more wide-ranging and especially longer terms issues. The Draft Plan basically assumes housing, employment and transport will be essentially “steady state” – i.e. focusing on low key, smaller developments. There are no big plans for either major developments or big infrastructure projects. This assumption is not actually realistic over a period of decades.
- One of the key underlying issues in this area is that the population of Craven, and in particular Skipton and the Dales, is noticeably getting older. Also, as houses in Skipton (and particularly in the Dales National Park) become completely unaffordable for youngsters, this will cause businesses in Craven various employment issues, especially that our future employees will be forced to commute further to get to work. In order to provide business with a labour force and therefore to promote continued economic growth, in the longer term it will be necessary to bring in labour from elsewhere, i.e. outside of Craven. Quite simply travelling will become a major issue for businesses if we cannot get good and well educated people to work for us and travel to work. Therefore these two demographic and housing trends will put increased pressure on improving transport links into Skipton.
- The plan is ignoring the several large cities and many large towns in Lancashire (and even towns in nearby East Lancashire). These towns and cities in Lancashire should be key local markets for businesses in Skipton and the rest of Craven. Manchester City region is very strongly growing at the moment, and looks likely to grow for many years to come. Therefore more consideration should be given to links with Lancashire and Manchester
- Transport is a key issue which needs to be addressed (in the long term) to help develop businesses who operate in Craven. Quite simply - businesses in Craven must have good and improving transport links to be viable. With an ever-increasing amount of business being undertaken on the internet, more than ever it is vitally important that we have excellent transport links (road, rail and air). This is especially important to be able to dispatch goods ordered over the internet to customers worldwide. As such the following ought to be considered or studied as part of the Craven long term plan;
 - Improvements to A56 Road, to improve link Skipton to M65 and Manchester/Liverpool.
 - Improvements to A65 Road – to improve link with Lake District (bypass a few villages)
 - A59 to Harrogate - Harrogate needs a bypass (to access A1M, York and Humberside)
 - Rail links to Manchester and Lancashire – these must be improved
 - would not support expansion of Leeds-Bradford airport. Our most important airport is Manchester and we want better links to Manchester
- Broadband Connectivity: This internet is now a vitally important asset to all business. Needs a mention in the plan.
- Quality of Life: need a combination of good job, good housing, good local facilities and good clean environment. None of the proposals for developments have anything in them that contribute to the quality of life – such as parks, cycle tracks, good urban spaces. Another key concern would be that future proposals do not mix in heavy industry with residential developments.
- There is no mention of who owns the land currently and what discussions have been held or if compulsory purchase is a consideration. This information needs to be included so that residents are clear on what the potential impacts will be.

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Response Summary for General Responses to Local Plan

- New planning guidance states explicitly for the first time that "once established, green belt boundaries should only be altered in exceptional circumstances. This overrides existing guidance which states that "inappropriate development" on the green belt "should not be approved except in special circumstances".
- Plan is too unrealistic. Account for costings and 'where the money comes from' statements. Ideally a budget showing options and expected costs would be useful. This would enable residents, business and other stakeholders to comprehend this nice, but unrealistic, plan.
- The timing of the draft plan needs to be up to 2020 to align with the NYCC Plan. If the plans were both synchronised in a timely fashion then costings for projects and resources could be accommodated. This would save Craven Council and NYCC money, which is the residents money after all.
- Would be useful to include paragraph numbers in order to assist those commenting on the plan.
- There is a need for strategy planning in respect of changes to refuse collections on 'public rights of way' and 'healthy & safety'. Collection of refuse bins from cobbled streets in Skipton may not continue and this is a concern for those that are unable to take their bins somewhere else for collection because of health issues and whether or not there is space anywhere else where the refuse bins can actually be placed altogether for collection as a whole. This needs strategic thinking, so that no 'public right of way' or 'health & safety' issues are breached. Also of the move is actioned, then residents need to see a reduction in the rates bills as a consequence.
- The County Council suggests that further work is undertaken to articulate and present the process, evidence and analysis of alternative options that has underpinned the strategic approach of the Draft Plan. Similarly, work is on-going to refresh, complete and present other elements of the evidence base. Through discussions we have identified ways in which the County Council can assist and contribute towards this on-going process and we look forward to doing so in due course (North Yorkshire County Council comment).
- It is important that Local Plans look to unlock the economic potential of their areas as well as addressing their full range of social and housing needs. It is also important that any infrastructure requirements are fully understood, and that they are deliverable. Furthermore, given the specific projected demographic trends facing Craven District, the County Council considers it important that the developing Plan seeks to ensure the long term sustainability and viability of rural settlements and services in the most effective way possible. (North Yorkshire County Council comment)
- There is a need for new development in Bolton Abbey in order to ensure its dual-role can be enhanced to the benefit of the local community, economy and those who visit it. The provision of new housing, visitor accommodation and commercial development (to include enhanced service provision) over the coming years will benefit the local economy, the community of Bolton Abbey and those communities of the surrounding areas, which use it as a service village. The emerging Craven District Council Local Plan is of fundamental importance to delivering the Chatsworth Settlement Trustees objectives for Bolton Abbey over coming years and decades. While the recognition of Bolton Abbey within the Pre-Publication draft is welcomed there is a clear need for future iterations of the plan to provide greater support and plan-led certainty for development in the village in order that its role can be enhanced. Greater policy support for development of a specific site within the village ensures compatibility with the approach that has been taken by the Yorkshire Dales National Park Authority, in relation to this cross-boundary village, by elevating Bolton Abbey in its settlement hierarchy to the level of Service Village. The amendment of Craven District Council's Local Plan in relation to Bolton Abbey would also sit comfortably within the scope

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Response Summary for General Responses to Local Plan

of national planning policy and guidance and the clear support it provides for new development which enhances the role of rural settlements.

- In progressing preferred sites the Local Highways Authority will need reassurance that the proposed growth can be accommodated on the Local Highway Network. Necessary infrastructure needs must also be identified. (North Yorkshire County Council Highways comment)
- In terms of the growing older population and problems with increased isolation and loneliness, provision and support needs to be easily accessible with offer of support made clearly visible at obvious places i.e. Doctors Surgeries, local media, leaflets in Rates Bills that go out each year etc.
- The Local Plan does not provide a wholly positive policy approach and, in a number of areas, is inconsistent with national policy. Key areas where there are concerns are summarised as follows: (1) Housing requirement: We are concerned the proposed housing requirement does not reflect the true, full objectively assessed needs for the district and has been arbitrarily constrained. It is not fully clear whether the council has assessed the potential to deliver a higher housing requirement or tested this against potential delivery constraints. (2) Duty to Cooperate: The process of determining the Council's objectively assessed housing needs should be undertaken with full regard to the duty to co-operate as set out in section 110 of the Localism Act. (3) Affordable Housing: The Council's proposed housing requirement is likely to significantly constrain the scope for addressing affordable housing needs in Craven. This supports the need to increase the council's overall housing requirement. (4) Spatial distribution of housing: Supportive of the Council's approach to direct development to larger, key settlements. However, the plan should provide sufficient flexibility to address situations where housing does not come forward as expected and to allow development across a broader range of settlements and sites, where sustainable. (5) Housing standards: The Council should reviews its policies concerning sustainability standards for new housing so that they concur with current Government thinking, including the standards emanating from the recent Housing Standards Review.
- The National Planning Policy Framework requires local planning authorities to work collaboratively across boundaries, yet there is little evidence in the draft plan of such collaboration with the Yorkshire Dales National Park Authority. It would be very helpful for the plan to commit to such collaboration.
- The plan is full of woolly policies that undermine the stated aims identified at the beginning; it says what but fails to say how exactly; it's like a fairy story; it downgrades the Craven area; it could apply to any urban area in England; it lacks a language of commitment and responsibility; is full of should, would and may be and therefore open to interpretation. Too much interpretation of local opinion was based upon post it notes written by planners at the local parish meetings. The data is neither quantitative nor qualitative.
- The plan must show a clear recognition of 'phasing'; must include full accountability of all windfall developments within targets; must factor in the hundreds of existing permissions granted in the Craven area already; must illustrate adequate recognition of the value of food, farming and Craven's outstanding grazing land; must provide clear recognition and protection for biodiversity, tranquillity, heritage assets and dark skies.
- There is no heritage map clearly identifying Conservation areas, mapping assets clearly for all to see. We have no green belt in Craven but we do have green wedge however this is now a vague wiggly line that is open to misinterpretation by the more predatory developers
- Need to address the caravan problem - those large parks in the area granted permission for holiday use and slowly morphing into back door housing estates - usually in areas where planning for houses would not normally be granted.

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- There is no SHLAA document to support the Plan. The nearest thing to a SHLAA document is the 'Craven Local Plan Draft 22/9/14 – Sites Preferred and Not Preferred for Consultation' which is not compliant with SHLAA guidance. A SHLAA document that meets the SHLAA Guidance needs to be produced. This needs to be open and transparent, which the existing document is not. The Council already have the evidence to create the document (data which used to be available on the Council's website). The SHLAA document needs to make the phasing clear. Sites with planning permission are suitable for development now, as they have already proved to be sustainable and suitable sites. Other sites should be suitably phased, which the Plan can then be built around. The Plan at this stage doesn't discuss phasing of housing sites.
- United Utilities wishes to highlight that we will seek to work closely with the Council during the Local Plan process to develop a coordinated approach to delivering sustainable growth in sustainable locations. New development should be focused in sustainable locations which are accessible to local services and infrastructure. United Utilities will continue to work with the Council to identify any infrastructure issues and appropriate resolutions throughout the development of the Local Plan.
- Hellifield Parish Council is on the whole supportive of the general content of the Local Plan.
- The calculation for local affordable housing in parishes should be based on more current information and not on data obtained in the last housing survey, undertaken in 2011.

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Response Summary for Comments made on the Consultation Process

Issue: Comments made on the consultation process for the draft Local Plan Sept 2014	
General comments	<ul style="list-style-type: none"> • Methods of consultation are obscure and opaque and suggest that you have no intention of listening. There needs to be full consultation with ALL locals in formulating the local village plan. • Specific terms need defining within the consultation e.g., what is mean by “Employment” when referring to specific sites. • CDC needs to be fair about the number of houses to be built e.g., 75 over 15 years is a lot more with all the other development which is currently going on. • Views from the consultation have been ignored. Parishes have put in small infill sites that relate to the small annual targets. The large sites identified do no relate to the small annual targets. Brownfield sites should be used first. • The Local Plan should be developed faster and in a more professional manner. Data provided by ONS on population are merely a snapshot and provide a basis for more informed decision making. Once they are produced they are out of date, but that is no excuse not to use them. The SHLAA was published in 2008. • Consultation with Cumbria County Council is suggested on the potential cross border education impacts of growth. • Craven District Council should only be consulting on the strategy for Gargrave in the Local Plan and the Gargrave Neighbourhood Plan Working Group should consult on sites as prescribed in paras 183, 184 &185 of the NPPF. By consulting on sites, CDC has caused confusion in Gargrave and damages the working group’s consultation on sites. To continue to consult on sites in Gargrave will lead to likely challenge. • Consultation should have been done on all sites in Gargrave rather than the “chosen” sites only. The outcome of the Neighbourhood Plan Working Group consultation event for sites GA028 & GA029 was in start contrast to Craven’s. • Consultation on the draft Gargrave Neighbourhood Plan, including asking for views on the draft Local Plan sites and asking for alternative sites to be put forward, has been written up in detail and shared informally with CDC. (has this been done?) • In reviewing the evidence base it is clear that there is a lack of evidence in relation to the employment land need and associated draft employment/mixed use allocations in Gargrave. There are concerns in relation to the site assessment process, in particular relating to the application of criteria relating to flood risk and the lack of reference to the latest Environment Agency Surface Water Mapping. • Gargrave Parish Council propose a meeting is arranged with CDC and their consultants Kirkwells where the emerging narrative, vision, objectives, themes and proposed site assessment criteria of the draft Neighbourhood Plan can be presented. A discussion can be had with the aim of agreeing the way forward for the progression of the two plans. A call for sites is planned together with undertaking of site assessments by the Neighbourhood Plan Working Group. Existing SHLAA sites will also be assessed against the same criteria. Consultation with the village is planned for early 2015 on a proposed

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	<p>alternative approach to the draft Local Plan allocations together with other Neighbourhood Plan proposals.</p> <ul style="list-style-type: none"> • Consultation has not been accessible, transparent, robust nor accurate. The use of jargon has meant that people are still unaware of what the Local Plan is and what it means/what impact it will have on communities. It is too much to expect the majority of individuals to access and understand the complexities of the Localism Act, the NPPF & the process of Sustainability Appraisal. Leaflets and posters are too wordy. A straight forward, plain language one pager should have been made available with the draft Local Plan outlining the process which CDC has adopted. The collection of feedback via the use of post-it notes and then the interpretation of them is laughable. If the Local Plan was advertised as “we want to build business units for employment purposes on these green fields and destroy this beauty spot” there would be a larger and angrier response. • Expecting older people to use online feedback forms is difficult, especially when Bradley has a poor internet connection. • Sutton Parish Council advertised the Local Plan throughout the village and advised people to comment in three ways, CDC’s online form, to the local plan email address and also by post to Local Plan Residents Feedback. Opportunities to express views fully must be provided. Not everyone is used to downloading or filling in forms online or they are not able to make a trip into Skipton to pick up a form. • In the interests of openness, it would be useful if you publish people’s views as you would with a planning application. • Objections made to planning applications on preferred sites should carry weight in the Local Plan process. • The selective exclusion of specific data included in the SHMA & Edge Analytic reports e.g., the affordable housing land requirement set out in the SHMA, the distribution of this requirement and that the housing requirement for Craven will need to address the ageing population by encouraging inward migration of people of working age, appears to have led to a draft plan that does not meet the recommendations set out in these two reports and has undermined the entire plan forming process. • The public consultation was done without adequate information for the public to make an informed decision and a negligible proportion of Craven’s population turned up to have its say. Up to this point the process has been flawed and the findings should therefore carry little weight. • There is a fear amongst residents that if they offer alternatives to the CDC preferred sites that CDC will simply add these to its LP and increase the housing allocation to the settlement. More needs to be done to allay this fear and do more to inform, reassure and encourage active participation in the formal consultation. • There is no clear correlation between housing numbers and imposed employment land sites. • There has been no mention of sustainability testing of the preferred housing and employment land sites.
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	<ul style="list-style-type: none"> • The Preferred and Not Preferred Sites Document is weak effort which cherry picks points in support of CDC preferences rather than to be identified through the assessment itself. It is based on poorly attended community events and Stage 1&2 check lists which contain inaccurate information. Stage 1&2 checklists should be placed on the CDC website to provide a fuller picture. Transparency for the public is more important than vague and imagined concerns over commercial confidentiality. • Parish Profiles should be used as part of the consultation and preparation of the Local Plan. The Parish Profile for Sutton states “Sutton village maintains its distinct rural identify with greenfields both in and around the village”. • There is distrust that CDC in holding this informal consultation, which it says is not inclusive of legal niceties, simply to ‘out’ criticisms so that it can prepare defensive arguments against them in order to retain its draft LP to the next stage with perhaps only cosmetic changes. • CDC must restrict its formal consultation on its Local Plan to strategic policy issues alone. It must reconsider the situation, especially where it has delegated planning authority to local communities and the scope of the formal consultation to come, at the very least in settlements where a Neighbourhood Plan (NP) is in development. • CDC has not done a sufficient job of explaining its approach to the Local Plan, particularly with regard to employment land selection and the actual scope of the informal consultation. It should also have placed its stage 2 check lists in the public domain so that at least some residents/organisations would have had the opportunity of a fuller picture of the process.
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