



Craven Local Plan

Cross-boundary Strategic issues and Duty to Cooperate Statement

December 2017

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1. Introduction

- 1.1. The primary purpose of this statement, is to demonstrate how preparation of the local plan takes account of, and complies with the provisions of the Duty to Cooperate (the duty) and associated legal tests. The statement is issued alongside the publication version of the local plan and provides opportunities for neighbouring authorities, prescribed bodies, infrastructure providers and other interested parties to comment on the compliance of the plan and plan documents with the legal tests, should they wish to do so.
- 1.2. This statement identifies the local strategic issues that cross planning boundaries and how these have been addressed as part of preparation of the local plan, and as part of the duty. This statement also sets out the relationships between all relevant bodies concerned with local strategic issues, how the interactions have informed plan, policy preparation and supporting document preparation, and how interactions have been maintained and progressed through preparation of the Local Plan.
- 1.3. This statement is structured as follows:
 - Section 2 sets out the legislative requirement to the duty;
 - Section 3 establishes the Craven context;
 - Section 4 identifies duty partners;
 - Section 5 provides details of cross boundary engagement;
 - Section 6 considers the key cross boundary issues; and
 - Section 7 considers how engagement has informed shaping of the plan.
- 1.4. The report then sets out conclusions to demonstrate that the provisions of the duty have been met.

2. Legislative Requirement

Context

- 2.1. The need to engage with neighbouring authorities on issues that cross boundaries has been an important aspect of planning for some considerable time, and was previously considered and embodied in the preparation of a number of high level planning policy documents such as the former Regional Spatial Strategy for Yorkshire and the Humber and the former North Yorkshire County Structure Plan.
- 2.2. However, Section 109 of the Localism Act 2011 gave Government the powers to revoke the eight regional strategies in England, once a strategic environmental assessment for each had been completed. The Regional Spatial Strategy for the Yorkshire and the Humber was revoked in February 2013, whilst the North Yorkshire County Structure Plan is time expired, and this left a potential strategic planning deficit that needed to be filled.
- 2.3. In response, and to ensure that cross boundary issues would continue to be addressed, Section 110 of the Localism Act 2011 introduced the Duty to Cooperate (the duty), with the specific requirements set out in paragraphs 178 - 181 of the National Planning Policy Framework (NPPF).

The Duty

- 2.4. The duty requires local planning authorities, such as Craven District Council, to engage constructively, actively and on an on-going basis with neighbouring local planning authorities, county councils, prescribed and other bodies on strategic cross boundary matters in the preparation of local planning documents.
- 2.5. A strategic matter is defined as being the sustainable development or use of land that would have a significant impact on at least two local planning areas, or on a planning matter that falls within the remit of the county council. The NPPF provides further clarity at paragraph 178. The paragraph states that *“public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities set out in paragraph 156.”*

2.6. Paragraph 156 identifies the strategic priorities as:

- the homes and jobs needed in the area;
- the provision of retail, leisure and other commercial development;
- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- the provision of health, security, community and cultural infrastructure and other local facilities; and
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

Regulatory Framework

2.7. Part 2 of the Town and Country Planning (England) (Regulations) 2012 defines the prescribed bodies (in addition to surrounding planning authorities and other bodies) where the Council is required to engage as part of the Duty to Cooperate. These are defined as:

- the Environment Agency;
- the Historic Buildings and Monuments Commission for England (known as Historic England);
- Natural England;
- the Mayor of London;
- the Civil Aviation Authority;
- the Homes and Communities Agency;
- each Primary Care Trust established under section 18 of the National Health Service Act 2006 or continued in existence by virtue of that section;
- the Office of Rail Regulation;
- Transport for London;
- each Integrated Transport Authority;
- each highway authority within the meaning of section 1 of the Highways Act 1980 (including the Secretary of State, where the Secretary of State is the highways authority); and

- the Marine Management Organisation
- 2.8. In the case of Craven, the identified bodies with an interest in the plan area are as follows;
- Environment Agency;
 - Historic England;
 - Natural England;
 - Homes and Communities Agency;
 - Primary Care Trusts/Clinical Commissioning Groups –Airedale, Wharfedale and Craven and Morecambe Bay Clinical Commissioning Group
 - The Office of Rail Regulation (Office of Road and Rail)
 - North Yorkshire County Council as Integrated Transport Authority and Highways Authority;
 - Highways England
 - Civil Aviation Authority;
 - York and North Yorkshire Local Enterprise Partnership
 - West Yorkshire Combined Authority including Leeds City Region Local Enterprise Partnership (LEP) and Metro
- 2.9. Other bodies identified under the regulations but have no interest in Craven are as follows:
- The Mayor of London;
 - Transport for London and
 - The Marine Management Organisation.
- 2.10. The regulations also set out organisations that are prescribed, but where the duty does not apply. These include both Local Economic Partnerships (LEP) and Local Nature Partnerships. For Craven, relevant bodies include:
- The Leeds City Region LEP;
 - York and North Yorkshire LEP; and
 - York and North Yorkshire Local Nature Partnership

Practice

- 2.11. The NPPF (paragraph 181) states that:
“Local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross boundary impacts when their Local Plans are submitted for examination.”
- 2.12. It also indicates how local planning authorities can demonstrate evidence of having effectively cooperated to plan for issues with potential cross boundary impacts when plans are submitted for examination. These include the joint preparation of evidence base documents, strategies and policies; the establishment of joint committees; and the production of a memorandum of understanding to show how the signatories have agreed to cooperate with each other.
- 2.13. It should be stressed though, that the Duty to Cooperate is not a duty to agree. Local planning authorities should however, make every effort to secure the necessary cooperation on strategic cross boundary matters before they submit their Local Plans for examination.

3. Craven and the plan area; Context

- 3.1. Craven is situated at the western end of the county of North Yorkshire, England's largest County and is 370 square kilometres in area (see Figure 1 below). The total area of Craven District is 1,179 square kilometres. The remainder of the Craven District (808 square kilometres) is within the Yorkshire Dales National Park.
- 3.2. For the avoidance of doubt, the Yorkshire Dales National Park Authority is a separate planning authority that produces a park-wide local plan. That plan encompasses parts of Craven, Richmondshire, South Lakeland and Eden Districts. The boundary of the National Park in the Craven District generally follows the A65 to the north of Skipton and the A59 to the east. At several locations, the boundary of the National Park bisects several settlements e.g. Embsay, Clapham, creating a 'split' in planning control between the National Park Authority and Craven District Council. This raises some cross-boundary issues that are rare in occurrence and potentially unique. For the avoidance of doubt, when reference is made to Craven in this document, this means Craven District outside the Yorkshire Dales National Park.
- 3.3. Craven is flanked by the Yorkshire Dales National Park to the north and east, the County of Lancashire and the Lancashire districts of City of Lancaster, Ribble Valley and Pendle immediately to its west and south and Bradford Metropolitan District to the south-east¹.
- 3.4. The whole of Craven District is made up of 72 Parishes, and 19 Wards that are represented by 30 Councillors. Of these, 24 Parishes and 11 wards are entirely outside the Yorkshire Dales National Park, 15 Parishes and 8 wards are 'split' by the National Park boundary and 33 Parishes and 2 Wards are within.
- 3.5. At the time of writing, there are 3 designated Neighbourhood planning areas in the Parishes of Bradley, Cononley and Gargrave.

¹ There are cross boundary planning issues that exist in relation to Lancashire County, Lancaster, Pendle and Bradford, but this is not the case for Ribble Valley where cross boundary planning issues are more limited to the Forest of Bowland AONB, and these are dealt with through a dedicated working group the Forest of Bowland AONB funders group.

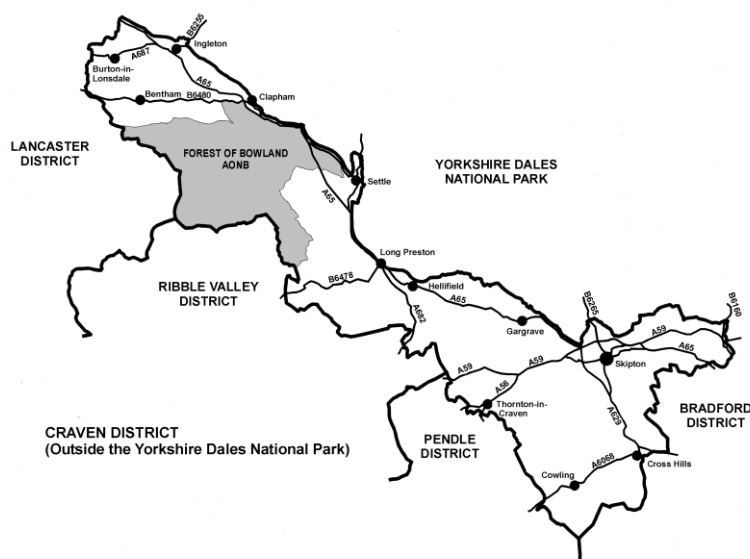


Figure 1 - Context map of the Craven Plan Area

- 3.6. Craven is part of a two-tier area of Local Authority Control, North Yorkshire County Council is responsible for delivering services such as education, transport, highways and social services, along with issues such as minerals and waste planning.
- 3.7. In terms of infrastructure providers, the location of the Craven plan area relative to the rump of the county of North Yorkshire, and geographical relationship with Lancashire means that in many cases there are multiple agencies to interact with, depending upon geographical location. The Infrastructure Delivery Plan provides more detail in this regard.

4. Duty Partners

- 4.1. In addition to the prescribed organisations defined in the Town and Country Planning Regulations and set out above, there are a number of duty partners operational/with an interest in Craven. These organisations, and the prescribed bodies are presented in the table below:

Duty Partner type	Body
Neighbouring Planning authority	<ul style="list-style-type: none">• Yorkshire Dales National Park Authority• Bradford Council• Pendle Council• Ribble Valley Council• Lancaster Council• Lancashire County Council• North Yorkshire County Council
Interest in Craven	<ul style="list-style-type: none">• Historic England• Natural England• Environment Agency• Yorkshire Water• United Utilities• National Grid• Northern Gas Networks• Northern Powergrid• Openreach• North Yorkshire Police• Yorkshire Ambulance Service• North Yorkshire Fire Service
Wider Strategic Partner	<ul style="list-style-type: none">• South Pennine Authorities Group• West Yorkshire Combined Authority including Leeds City Region Local Economic Partnership (LEP) and Metro• York and North Yorkshire Local Economic

	Partnership <ul style="list-style-type: none"> • York and North Yorkshire Local Nature Partnership • Homes and Communities Agency; • Primary Care Trusts/clinical commissioning groups – in the case of Craven these are identified as Airedale, Wharfedale and Craven, and Morecambe Bay Clinical Commissioning Group • The Office of Road and Rail • Highways England • Civil Aviation Authority; • Harrogate Borough Council • Forest of Bowland AONB Funders Group • South Pennine Authorities
No interest in Area	<ul style="list-style-type: none"> • Mayor of London • Transport for London • Marine Management Organisation

Table 1 - Key Duty Partners

- 4.2. All the identified bodies, except those defined as having no interest in the area or where initial discussions have confirmed there being no cross-boundary issues or other issues to discuss, are where the Council has sought on-going interaction and engagement.

5. Cross Boundary Cooperation and Issues - Details of Engagement

- 5.1. As part of the preparation of the local plan, there has been on-going engagement with a range of bodies on cross-boundary matters. This has evolved, and has informed the nature of cross boundary issues and the shaping of emerging strategy. This is detailed and summarised below.

Neighbouring Authorities

Yorkshire Dales National Park

- 5.2. The National Park Authority is a key partner in terms of the meeting the duty. There are established linkages between the authorities on a range of matters and there are clear functional relationships that exist including at the Member level. The Craven housing market is identified as being self-contained, but under the planning control of CDC and YDNPA as separate planning authorities. The treatment of employment land, and the roles of settlements under split planning control between CDC and the YDNPA has also been the subject of extensive ongoing engagement.

Member Level Engagement and Interactions

- 5.3. At the Member level, there is cross pollination of democratic representation with elected 5 Members of Craven District Council and/or North Yorkshire County Council also serving as appointees to the YDNPA. This includes the chairman of the YDNPA who, at the time of writing, is also an elected CDC member. As such, there are established connections and interactions and cooperation at Member level between the CDC and YDNPA.

Evidence Sharing

- 5.4. There has also been sharing of underpinning evidence with the YDNPA, in particular the Strategic Housing Market Assessment, 2016 and 2017 updates, which were commissioned by the Council and prepared by Arc4. The 2017 SHMA concludes as follows:
- The OAN for the whole of Craven District for the period 2012 to 2032 is for an annual average of 242 dwellings per annum; and
 - Of the 242 dwellings pa, the study identified a housing need of 206 dwellings pa in Craven outside the National Park and 36 dwellings pa within.

The Housing Markert Area (HMA), YDNPA local Plan and Craven Local Plan

- 5.5. A key consideration that is of relevance to the HMA is a potential reliance on windfall development, as set out in the adopted YDNPA local plan, as a mechanism for housing delivery. This carries with it a number of implications for housing delivery in the wider HMA.
- 5.6. Whilst acknowledging the particular circumstances pertaining to the National Park area of Craven and that great weight is applied to National Park purposes, conservation of landscape and scenic beauty of these areas in plans pursuant to paragraph 115 of the NPPF, the NPPF is clear in that local plans should meet objectively assessed housing needs in housing market areas in full². Of significance is the reliance on windfall as a substantive component of housing supply in the adopted YDNPA local plan. Notwithstanding the reasoning behind the approach taken by the YDNPA, that approach introduces an element of uncertainty as to deliverability of the planned housing supply for the wider District and HMA. There are also potential implications for meeting the identified OAHN as identified by the 2017 SHMA.
- 5.7. By its' nature, windfall development is unpredictable and can be erratic in location and occurrence. Consequently, there is no guarantee that the level of housing potentially to be delivered through windfall in the HMA will occur, or whether it is in the right place. Whilst an approach such as this has been taken in the National Park area and the adopted YDNPA local plan, it is this approach that could have implications for the Craven District HMA, for which an OAHN of 242 dwellings pa has been identified.
- 5.8. The YDNPA recognises that some of its housing demand may not be delivered in the National Park Area - their population is older overall and many new jobs, newly forming households and affordable stock are likely to be located outside it. This is also reflected in the approach taken to housing provision and the decision to set an annual average housing delivery rate of 230 dwellings pa, against an OAN of 206 dwellings pa for the District outside

² NPPF, Para 47.

the Yorkshire Dales National Park. Furthermore, the identification of land allocations to meet the housing requirement in the review of the YDNPA plan without adverse impact on the primary objectives of the National Park is likely to be a challenge for the YDNPA.

- 5.9. It is though, the way in which the CDC has engaged positively and constructively with the YDNPA on cross boundary issues such as these that is of most relevance here.

Ongoing Engagement 2017

- 5.10. In the light of new evidence presented in the 2016 and 2017 SHMA updates and acknowledging the outcome of the YDNPA plan examination, there has been further on-going engagement with the YDNPA primarily on matters relating to housing and employment OAN and possible apportionment between authorities. The outcome of these discussions is that there is broad agreement between the Council and YDNPA, and the authorities have entered into Memoranda of Understanding (MOU), the first in June 2017, the second in December 2017, to account for changes in the evidence base to agree matters relating to the treatment of the following issues:

- Objectively Assessed Housing Need (OAHN),
- Objectively Assessed Employment Need (OAEN),
- Apportionment between Craven District Council and Yorkshire Dales National Park Authority, and
- Strategy Alignment

- 5.11. Committee minutes CSP. 146, and POL 897 refer, setting out Member resolutions to enter into a MoU, demonstrating on-going engagement and cooperation on cross-boundary matters between key duty partners. A copy of the agreed December 2017 MoU is presented at Appendix 1.

Bradford

- 5.12. On-going engagement with Bradford Council confirms that the key issue that relates to cross boundary effects have been treatment of the OAN for respective housing market areas, and preparation of the site allocations

plan, for Bradford, which is underway following adoption of the Core Strategy.

- 5.13. In terms of cross-boundary effects, it is the nature and extent of site allocations in Steeton, Silsden and Eastburn that will have potential cross-boundary effects for Craven, not least education matters and South Craven School, which is the purview of North Yorkshire County Council. In addition, the effect of growth proposals in Bradford and highways effects in South Craven has also been identified as a cross boundary issue arising from emerging work as the Bradford plan moves forward. Nonetheless, a key factor arising from discussions under the duty is that housing needs in each area are to be met in full in each respective area.
- 5.14. Both Craven and Bradford Councils are part of the Leeds City Region LEP and West Yorkshire Combined Authority where mechanisms for ongoing engagement on plan proposals and the setting of strategy are established, and are utilised. A copy of the response of Bradford Council is presented at Appendix 2.

Pendle

- 5.15. On-going engagement with Pendle Council shows that the main cross boundary issues between Craven and Pendle centre up on cross boundary transport linkages and in particular the A56, the Skipton to Colne railway track bed, A6068 and A59. Improving east – west connectivity is identified as a principal issue.
- 5.16. Unlike the position with the YDNPA and Bradford, evidence shows that there are limited interactions with the respective housing markets. Pendle Council has however, expressed support for the emerging local plan.
- 5.17. As part of consultation on the pre-publication local plan, Pendle Council observed that the plan:
- recognises the potential for transport improvements between Craven and East Lancashire, both by road (para 2.13) and rail (para 2.13)
 - acknowledges that the proposal for the A56 Colne-Foulridge bypass and the support for this from the East Lancashire Highways & Transport Masterplan (2014), Pendle Core Strategy (2015) and Lancashire

Enterprise Partnership in view of the potential for the scheme to enhance the economic linkages between Lancashire and Yorkshire (para 2.13)

- notes that the route of the former Skipton-Colne railway line is protected in the Pendle Core Strategy (December 2015) (para 2.15)
- supports sustainable development that protects and enhances heritage and promotes tourism along the Leeds and Liverpool Canal (Policies ENV2, ENV11 and ENV12).

5.18. Appendix 3 sets out the response and shows that, cross boundary matters have been considered and taken into account in the formulation of proposals.

Lancaster

5.19. Engagement with Lancaster Council identifies that the main cross boundary issues between Craven and Lancaster centre upon housing market interactions, and the influence of the Lancaster on settlements such as Bentham, Ingleton and Burton in Lonsdale. Engagement has been on-going and has highlighted the synergies in approach between Craven and Lancaster, and in respective plans, and this is reflected in respective documents.

5.20. At the elected Member level, engagement between the authorities confirms that there has been ongoing engagement in a range of spheres, and this has confirmed that there are no outstanding issues between the authorities. Appendix 4 sets out ongoing engagement undertaken.

Ribble Valley Borough Council

5.21. Ongoing engagement with Ribble Valley Borough Council on emerging planning documents has shown that there are no other cross-boundary issues identified between Craven and Ribble Valley borough, other than those related to the Forest of Bowland AONB, which is addressed by the Forest of Bowland AONB Funders Group. This is a dedicated working party, of which both Craven and Ribble Valley Councils are part and the Council is nonetheless engaged in a review of the AONB management plan that is to be undertaken in early 2018.

North Yorkshire County Council (NYCC)

- 5.22. As Craven is within a two-tier local authority area, engagement has been ongoing and extensive with NYCC, including during preparation of the minerals and waste plan, Infrastructure Delivery Plan (IDP), and iterations of the Craven local plan, part of which forms a suite of documents.
- 5.23. Engagement has also been on-going in respect of highways, adult social care, extra care housing and education. This has included providing input to site selection, evidence sharing and joint commissioning of transport evidence. There has also been extensive engagement on providing inputs to the IDP, which is updated regularly. The outcome of the engagement has been to inform the shaping of policy development, site allocations and updating the IDP.
- 5.24. NYCC also has also provided data and input regarding the update to the Strategic Flood Risk Assessment (SFRA). This was commissioned by the Council, and the SFRA was received by the Council as evidence on 22 November 2016 under minute reference CSP 125.
- 5.25. Overall, engagement with NYCC has been ongoing and extensive. This has resulted in informing the shaping of planning policy, evidence procurement, and setting of strategy.

Lancashire County Council (LCC)

- 5.26. There has been ongoing engagement with LCC, and the following cross boundary issues have been identified:
- Improving east to west connectivity
 - Education provision in Lancashire and cross boundary effects of plan proposals on school places.
- 5.27. In particular, LCC raised consideration of the effects of growth proposals on the highways network in ~Lancashire, particularly around Bentham and the B6480.

Organisations with an interest in Craven

Historic England

- 5.28. It is acknowledged that a characteristic of built environments in Craven is of strong historic character and this is reflected in the extent of Conservation

Area designation. As a reflection of this quality and as an outcome of on-going engagement with Historic England, a primary outcome has been the joint commissioning of evidence in the form of Conservation Area Assessments to underpin the designations as evidence and to inform policy development, approach and development management. The jointly commissioned evidence has been finalised and accepted by the Council under committee minute reference CSP 115.

- 5.29. In addition to this, there has also been on-going engagement regarding policy development, individual sites and preferred sites for allocation. This has served to inform and guide the shaping of planning policy in the local plan.

Natural England

- 5.30. There has been on-going engagement with Natural England regarding evidence gathering, policy development and the assessment of sites. Key examples include completion of a landscape visual impact assessment of sites on the setting of the Yorkshire Dales National Park and Forest of Bowland AONB, accepted under minute reference CSP.152, There has also been on-going engagement regarding providing input to supporting assessments to accompany the plan including Sustainability Appraisal Appropriate Assessment and Habitat Regulations Assessment.
- 5.31. Natural England has also engaged to assist the shaping of the plan by providing input into and guiding policy development. This has been in the form of providing feedback on drafts of the plan and drafts of policies.

Environment Agency

- 5.32. The Environment Agency has engaged with the Council providing input into policy development throughout preparation of the local plan, which has informed policy and plan development. In addition, there has also been on-going engagement primarily regarding evidence commissioning, and an update to the Strategic Flood Risk Assessment (SFRA) in particular. The SFRA is a key element of evidence that will underpin and inform the shaping of planning strategy, land allocations and associated mitigation. The report was received and accepted by the Council under minute reference CSP. 125.

Yorkshire Water

- 5.33. There has been on-going engagement with Yorkshire Water as part of preparing the following evidence base documents:
- SFRA
 - Infrastructure Delivery plan.
- 5.34. An issue arising from on-going discussions has been the infrastructure limitations arising in the Aire Valley Trunk Sewer (AVTS). This constraint, in tandem with limitations imposed from flood risk have served to inform plan strategy, the result being that more limited growth has been directed towards to Glusburn and South Craven to account for these constraints to development. The on-going engagement has served to inform preparation of the Infrastructure Delivery Plan, which supports publication documents and is part of the publication package.

United Utilities

- 5.35. There has been on-going engagement with United Utilities as part of preparing the following evidence base documents:
- SFRA
 - Infrastructure Delivery plan.
- 5.36. There has been engagement with United Utilities arising from them being sewerage undertaker for the northern and western part of the plan area. In addition, on-going engagement has served to inform preparation of the Infrastructure Delivery Plan, which supports publication documents, and forms part of the suite of publication documents.

Wider Strategic and Other Partners

South Pennine Authorities

- 5.37. The South Pennine Authorities is a group of planning authorities that covers an extensive area straddling the borders of Greater Manchester, Derbyshire, Lancashire, and parts of North, West and South Yorkshire, including Craven. In this regard, there is a history of cross-border consultation and cooperation on renewable energy proposals in particular, and associated issues dating back to the early 1990s primarily through the former Standing Conference of South Pennine Authorities (SCOSPA). Now, the South

Pennine authorities below have worked together to establish a framework for cooperation and have established a Memorandum of Understanding (MOU) about strategic renewable energy planning and development issues.

- 5.38. In establishing a framework on renewable energy issues, the MOU sets out a framework for cooperation between partner South Pennine authorities on planning issues related to renewable energy and wind turbine development. the South Pennine Authorities that are signed up to the MOU are as follows:

- Barnsley MBC
- Burnley BC
- Bury MBC
- Calderdale MBC
- Craven DC
- High Peak BC
- Hyndburn BC
- Kirklees MBC
- Lancashire CC
- Pendle BC
- Rochdale MBC

- 5.39. Craven District Council resolved to sign the MOU, under minute reference CSP 116. Joint working on issues such as wind turbines, and where the effects of development proposals may go beyond administrative boundaries can be beneficial in terms of taking forward planning management practice and refining planning policy development. A copy of the MOU is presented at Appendix 5.

West Yorkshire Combined Authority (WYCA) including Leeds City Region LEP and Metro

- 5.40. There has been on-going engagement with West Yorkshire Combined Authority about the shaping of the emerging plan, and this has been achieved through participation in existing WYCA governance structures at officer and member level.
- 5.41. Primarily, engagement has been in the form of attending and presenting regarding the emerging plan at WYCA Heads of Planning and portfolio holders meetings, whilst also participating in working groups on issues that are greater than local, and specific duty to cooperate groups. Of particular relevance is the presentation and consideration of the draft plan proposals by Heads of Planning and Planning Portfolio Holders at officer and elected

member levels³. This shows that there has been ongoing engagement at member and officer levels.

- 5.42. The outcomes of the on-going engagement have served to refine plan proposals and to ensure that Duty to Cooperate matters have been addressed⁴.

York and North Yorkshire Local Economic Partnership (YNYLEP)

- 5.43. There has been on-going engagement with YNYLEP and comments have been sought and received on the plan proposals as they have come forward. Broadly, the YNYLEP is supportive of the emerging plan although on-going engagement will be sought particularly about demonstrating meeting the provisions of the duty.

York and North Yorkshire Local Nature Partnership (YNYLNP)

- 5.44. There has been ongoing engagement with YNYLNP and comments have been sought and received on the plan proposals. Broadly, the YNYLNP is supportive of the emerging plan and policy framework, and correspondence received confirms that the Council has worked constructively with partners. See appendix 6.

Harrogate Borough Council

- 5.45. Whilst not an adjoining planning authority, the wider district adjoins Harrogate Borough. There has been ongoing engagement with Harrogate primarily through WYCA and the Leeds City Region.

Forest of Bowland AONB Funders Group

- 5.46. The Council is a member of the Forest of Bowland AONB funders group, a cross administrative boundary group that is interested in the Forest of Bowland AONB, of which Craven is part. Other group members include Ribble Valley Council, Pendle Council, Lancaster Council and Natural England. Engagement has been on-going particularly regarding informing AONB planning policy development and the review of the AONB management plan and overall approaches to policy development.

³ Report to WYCA Heads of Planning meeting 14 July 2017 and Planning Portfolio Holders 21 July 2017

⁴ WYCA consultation response dated 16 August 2017

- 5.47. Interactions with the funder group has served to inform and influence policy development primarily through consultation interactions.

Civil Aviation Authority (CAA);

- 5.48. Engagement with the Civil Aviation Authority confirms that Craven and the plan is of no interest to the CAA. This is by virtue of relative remoteness to airports and a lack of aerodrome provision in Craven. A copy of the confirmation is presented at Appendix 7.

Homes and Communities Agency (HCA)

- 5.49. On-going engagement with the HCA shows broad support for the emerging local plan⁵. The engagement has reached several conclusions and raised several issues which can be summarised as follows:
- Broad support for the development strategy;
 - Support for directing a proportion of growth toward smaller settlement thus stimulating SME activity;
 - Dealing with the ramping up of housing delivery and delivery of the planned for growth;
 - Addressing the implications of an ageing population;
 - Affordable housing delivery; and
 - Issues over density targets
- 5.50. Consideration of how the interaction has shaped emerging planning policy is set out at section 7 of this statement. The HCA has confirmed that there are no further observations to make⁶

Primary Care Trusts – in the case of Craven these are identified as Airedale, Lancaster and Morecambe Bay Clinical Commissioning Group. Now Clinical Commissioning Groups (CCG). Yorkshire Ambulance Service

- 5.51. Engagement has been sought with CCGs since the inception of preparation of the local plan. The CCGs that relate to Craven are:
- Airedale, Wharfedale and Craven CCG; and
 - Morecambe Bay CCG.

⁵ Correspondence with HCA dated 23 September 2016.

⁶ Consultation response 27-07-2017

Morecambe Bay CCG

- 5.52. Specifically, Morecambe Bay CCG commented that the planned for population increases and challenges described in the demographic and age growth mirrors what the CCG envisaged in the wider population of the Morecambe Bay CCG area. In particular, the CCG confirmed that:

“The increased housing in Bentham and strategic plan for improving the current stock is welcomed and any impact on healthcare services that may be reported in the future please get in touch. At present we have not received any concern from our clinical colleagues from these plans.”

- 5.53. With regard to the shaping of the plan, the CCG confirmed that
- “It is positive to see a proactive use of open social space and connectivity to the social fabric of the Craven communities. In particular improving access and cycle ways, footpaths etc. can only add to the ongoing support for an active lifestyle in those communities and help reduce negative burden as the population ages. “*

- 5.54. Overall, ongoing engagement shows how cooperation has been sought and the responses received confirm that the plan has been prepared positively and in cooperation with the CCG.

Airedale, Wharfedale and Craven CCG

- 5.55. Ongoing engagement with Airedale, Wharfedale and Craven CCG has provided input to the shaping of plan proposals. There are established mechanisms for engagement. In particular, input is provided to the CCG ‘Accountable Care Programme Board’ where the Council is represented and provides ongoing engagement with the CCG. In addition, the CCG has provided more detailed input to the plan proposals through ongoing engagement. A response is presented at appendix 8.

The Office of Rail Regulation (ORR)

- 5.56. The Leeds-Lancaster and Settle-Carlisle railway lines pass through/originate in Craven. Ongoing engagement with the ORR confirms that the plan proposals do not affect the interests of that office and vice versa. See Appendix 9.

Highways England

- 5.57. Craven contains no trunk roads, and no motorways within its boundaries, and as such, there are limited direct effects on the Trunk Road network. However, it is recognised that growth proposals in the plan could influence the strategic highway network beyond Craven and on-going engagement with Highways England confirms that there is likely a limited effect upon the strategic highways/trunk road network arising from the plan and related growth proposals. Confirmations are provided as Appendix 10.

Infrastructure providers

- 5.58. Whilst not forming prescribed bodies or surrounding planning authorities, there has been on-going engagement sought under the provisions of the duty in the preparation of an infrastructure delivery plan that supports preparation of the Craven local plan. North Yorkshire County Council, Yorkshire Water and United Utilities are also key duty partners in this regard, and details of on-going engagement are presented in preceding sections of this statement. In addition to this, there has also been engagement with the following infrastructure providers who operate within and beyond Craven:

- National Grid
- Northern Gas Networks
- Northern Powergrid
- BT Openreach
- North Yorkshire Police
- Yorkshire Ambulance Service
- North Yorkshire Fire Service

- 5.59. The outcome of this engagement has served to inform preparation of the infrastructure delivery plan that accompanies the plan.

Marine Management Organisation (MMO)

- 5.60. Whilst it is acknowledged that the whilst MMO have no direct interest in Craven, the Council has engaged with the MMO to confirm this point, and to consider potential effects to the marine environment arising from Appropriate Assessment of plan proposals.

6. Key Cross Boundary Issues

- 6.1. As a result of the on-going engagement with partners under the duty (see section 5 above), several cross-boundary issues have been identified as key matters. These key issues, their significance, and organisations where on-going engagement has/is taking place are summarised in the table below:

Issue	Organisations engaged with	Significance (1-4, 1 = high, 4 = low)
Housing strategy and approach to housing delivery.	Yorkshire Dales National Park Authority	1
Alignment of approaches to settlement strategies including treatment of those split by Yorkshire Dales National Park Boundary.	Yorkshire Dales National Park Authority	1
Landscape relationship between Craven and Yorkshire Dales National Park, including consideration of National Park setting.	Yorkshire Dales National Park Authority	1
Affordable housing meeting needs in other areas.	Yorkshire Dales National Park Authority	
Flood risk, flood resilience and taking account of climate change	Environment Agency, NYCC	1
Housing strategy,	Bradford Council	2

Issue	Organisations engaged with	Significance (1-4, 1 = high, 4 = low)
market area, migration patterns and, commuting patterns.		
Housing market area, strategy, commuting patterns, relationship between the Lancaster market, Bentham, and Ingleton	Lancaster Council	2
Strategic transport linkages with West Yorkshire and Lancashire including A56 and A629 corridors	Pendle Council, Bradford Council, Highways England, Lancashire County Council.	2
Consideration of the Forest of Bowland AONB and associated planning policy approaches.	Pendle Council, Lancaster Council, Ribble Valley Council, Natural England. Forest of Bowland Funders Group.	2

Table 2 – Cross Boundary Issues Summary

The nature of the on-going engagement means that it has been focussed with relevant duty partners, whilst also accounting for other groups and bodies.

7. How Ongoing engagement with duty partners and prescribed bodies has informed shaping of the plan

- 7.1. The preceding sections of this document show that there has been extensive and on-going engagement with duty partners and prescribed bodies in the preparation of plan proposals and associated documents. The ongoing engagement is not limited to neighbouring planning authorities, and has served to inform the shaping of plan strategy, the commissioning of underpinning evidence, supporting documents and consideration of cross-boundary matters.
- 7.2. A summary of how on-going engagement has informed the shaping of the plan, policies and underpinning evidence is presented in the table overleaf, and for the avoidance of doubt, is not presented in any priority order.

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Issue	Bodies engaged with	Outcomes Summary
Consideration of the historic environment in the shaping of planning policy	Historic England	<p>In addition to Conservation Area assessments completed for Skipton, Settle and Giggleswick in 2008, joint commissioning evidence in the form of Conservation Area Assessments for Burton-in-Lonsdale; Carleton; Cononley; Cowling; Eastby; Embsay; Farnhill; Gargrave; Ingleton; Kildwick; Kildwick Grange; Lothersdale; Low Bradley; Settle-Carlisle Railway (the area falling within the planning jurisdiction of Craven District Council); Sutton-in-Craven and Thornton-in-Craven as background evidence to inform planning policy making.</p> <p>Joint commissioning of evidence in the form of assessments to consider the designation of Conservation Areas in High Bentham, Low Bentham and Glusburn.</p> <p>Assessment work received and considered by the Council under minute reference CSP115.</p> <p>Policy ENV2 considers heritage and the conservation of heritage assets, policy amended arising from ongoing</p>

Issue	Bodies engaged with	Outcomes Summary
		engagement with partners.
Cooperation and development of planning practice on renewable energy	South Pennine Authorities	Signing of Memorandum of Understanding on Renewable technologies authorised under Committee minute reference CSP116.
Housing Strategy and approach to meeting the OAHN as identified in the 2016 and 2017 SHMA.	Yorkshire Dales National Park Authority	Broad alignment of respective planning strategies particularly when considering planning approaches to settlements split by the National Park boundary. Respective local plans relate. A Memorandum of Understanding between the YDNPA and CDC, and authorised by committee minute POL 897 has been entered into and confirms the positions of respective planning authorities, on cross boundary matters, housing market, and approaches taken in respect of split settlements and strategy alignment.
Alignment of settlement strategies split by Yorkshire Dales National Park Boundary in respective spatial strategies	Yorkshire Dales National Park Authority	Broad alignment of respective planning strategies particularly when considering planning approaches to settlements split by the National Park boundary as shown in the YDNPA and Craven local plans. Position confirmed via entering into MOU with YDNPA which

Issue	Bodies engaged with	Outcomes Summary
		broadly aligns plan strategies regarding split settlements.
Landscape relationship between Craven and Yorkshire Dales National Park, consideration of setting.	Yorkshire Dales National Park Authority	Setting of National Park accounted for in the forming of plan strategy and site allocations. Objective PO3, para 2.26, 5.7 – 5.10, policies ENV1, ENV9, and site development principles on sites allocated in the local plan relate.
Flood risk, and allowing for climate change	Environment Agency, NYCC	Update to SFRA commissioned to consider climate change effects and to inform selection of areas identified for development. SFR.A accepted by the Council under committee minute CSP 125 into the evidence base. New policy SD2 considers this issue.
Housing strategy, market area, migration, commuting	Bradford Council	Discussions confirm that respective OANs are to be met within respective districts. The plan takes account of in commuting arising from Bradford and Leeds.
Housing market area, strategy, commuting patterns, relationship between Lancaster market, Bentham, Ingleton	Lancaster Council	The plan takes account of the influence of Lancaster in the plan proposals. Sections 2, 3, policy SP7, SP9 and SP11 (part), of the Local Plan refer.
Strategic transport linkages with West	Pendle Council, Bradford	Reference included in local plan at para 2.41, plan

Issue	Bodies engaged with	Outcomes Summary
Yorkshire and Lancashire including A56 and A629 corridors	Council, West Yorkshire Combined Authority	objective PO1.
Forest of Bowland AONB considerations.	Pendle Council, Lancaster Council, Ribble Valley Council, Natural England	Member of Forest of Bowland funders group and providing input to the AONB management plan review. AONB considerations are a thread in the plan. References in the vision, objective PO3, paras 5.3-5.10, policy ENV1 in particular,
Addressing the implications of an ageing population;	Homes and Communities Agency	The plan recognises the ageing population profile and this is described and acknowledged at paras 2.33-2.36. The issue is acknowledged as a key issue at para 2.41 bullet point 1. Policy SP3 refers to enhancing housing mix to offset an ageing population profile, whilst policy H1 and paras 6.1-6.4 consider the specific housing needs of older people.
Affordable housing delivery	Homes and Communities Agency	Affordable housing delivery is recognised and policy H2 deals with affordable housing delivery as part of development proposals.
Issues over density targets	Homes and Communities Agency	Additional research on the approach to density and mix has been undertaken and published in a background paper to support the plan. Policy SP3 has been revised

Issue	Bodies engaged with	Outcomes Summary
		to account for both housing mix and density. Individual housing density targets are determined for individual sites and the plan has been refined to determine the approach.
Consideration of cross boundary effects of Bentham proposals on highway network in Lancashire.	Lancashire County Council	The Infrastructure Delivery Plan (IDP) considers this issue. See appendix c of the plan.

Table 3 – Engagement Outcomes

- 7.3. The table above shows that the primary outcomes of the on-going engagement has served to inform and influence the shaping of the plan, related proposals, supporting documents and underpinning evidence with regard to cross boundary issues.

8. Conclusions

- 8.1. The government is committed to addressing strategic planning for issues through cooperation, that need to be addressed at a larger than local scale, in the context of 'localism'. The form of this co-operation is not prescribed, but at the discretion of the local planning authority. From this the Council has tailored the extent of engagement so that it is proportionate to the issue in hand.
- 8.2. To comply with the requirements of the Duty and meet the associated legal tests, the council and public bodies are required to engage constructively, actively and on an on-going basis in relation to planning for sustainable forms of development. In particular, local planning authorities, prescribed bodies and infrastructure providers should work together to consider and address development issues that cross administrative boundaries. One way to do this is to consider entering into agreements on joint approaches, and/or prepare joint evidence base documents and local plans. This statement shows that these approaches have been taken where appropriate and this has influenced preparation of the local plan, considering underpinning evidence and shaping planning policy.
- 8.3. To be found sound at examination, local plans must demonstrate that they have addressed any strategic issues in a proper and timely manner. This statement demonstrates that Craven District Council has embraced the spirit of partnership working on strategic cross-boundary issues from the outset; and that this co-operation has shaped and helped to increase the effectiveness of the final strategy to manage development and growth.
- 8.4. The extent to which co-operation should take place is not defined or prescribed, and it should be emphasised that it is a duty to co-operate, and not necessarily a duty to agree. However, to demonstrate effective co-operation, talks without any agreement is unlikely to be sufficient.
- 8.5. This statement demonstrates that Craven District Council has carried out a high level of co-operation and engagement with local authorities and other public bodies in the preparation of the local plan. Where appropriate this has included the joint preparation of evidence and entering into memoranda of understanding on a range of issues.

- 8.6. This statement provides a summary of the collaborative work Craven District Council has carried-out to address the cross-boundary issues that have been identified in the preparation of the local plan. The statement also shows how organisations have been involved in this work, the key issues that have been identified and how the plan has been shaped by the on-going engagement. this statement sets out applicable committee minutes and resolutions, which serves to support the meeting of the duty.

Appendices

Appendix 1 - Memorandum of Understanding between Craven District Council and Yorkshire Dales National Park Authority



Craven Local Plan.

Craven District Council. Yorkshire Dales National Park Authority.

Approach to:

- Objectively Assessed Housing Need (OAHN),
- Objectively Assessed Employment Need (OAEN),
- Apportionment between Craven District Council and
Yorkshire Dales National Park Authority, and
- Strategy Alignment

Memorandum of Understanding

1. Introduction

- 1.1 This Memorandum of Understanding (MOU) sets out the positions of Craven District Council (CDC) and the Yorkshire Dales National Park Authority (YDNPA) regarding:
- Treatment of the OAHN) and OAEN in Craven District;
 - Apportionment of the OAHN and OAEN between CDC and the YDNPA as planning authorities for the whole of Craven District; and
 - Alignment of the overall planning strategies particularly in terms of settlements that are bisected by or proximate to the National Park boundary.
- 1.2 This MOU identifies areas where there is agreement between CDC and the YDNPA and where there is not. In turn, this approach and agreement informs preparation of the Craven Local Plan, and provides evidence of on-going engagement between CDC and the YDNPA under the provisions of the Duty to Cooperate. The Yorkshire Dales Local Plan has been examined and adopted.

2. Background and Context

OAHN, OAEN, Housing, and Employment Land Evidence

- 2.1 The starting point for consideration is the evidence base. In this regard, CDC initially commissioned an update to the Strategic Housing Market Assessment (SHMA) for Craven in 2015, along with an Employment Land Review (ELR), which was undertaken separately. The SHMA was updated again in November 2016 due to the release of 2014 Sub National Population Projections (SNPP). Due to the geographies of housing markets, the SHMA considered the entire Craven District as a single housing market in its' own right.
- 2.2 The 2015 SHMA identified an OAHN for the whole of Craven District of 290 dwellings pa for the period 2012-2032. Of the 290 dwellings pa for the District, additional work undertaken by Edge Analytics determined that 256 dwellings pa be directed towards the district outside the Yorkshire Dales National Park, and 34 dwellings pa within. The apportionment of the OAHN was not agreed with the YDNPA, and the matter was examined by the Inspector into the YDNPA local plan. The Inspector concluded that disaggregation (apportionment) was not necessary for soundness.
- 2.3 The release of the 2014 Sub-National Population Projections gave rise to the need for a review of the OAHN arising from an update of the SHMA, which was undertaken in 2016. The 2016 SHMA update identified an OAHN of 214 dwellings pa for Craven District, of which 182 was directed to the District outside the YDNP and 32 pa within. The ELR which takes account of the revised OAHN identified that 26-29 Hectares of employment land is required for Craven District for the period to 2032. The findings of the 2016 SHMA and ELR were considered by the Council Spatial Planning Sub Committee (SPSC) and Policy Committee in November/December 2016 and the SPSC considered a Craven Local Plan: Housing Growth Option Paper in June 2017. The latter concluded that the housing requirement for the Craven Local Plan should be 214 dpa.

- 2.4 In response to representations received during consultation on a pre-publication draft plan the following evidence documents were updated/published:
- SHMA (Nov 2017) and Employment Land Review(Nov 2017) (alignment of housing and employment forecasts/market signals uplift/higher rates of younger age groups household formation); and
 - Publication of more recent data: (ONS mid year estimates; REM jobs growth forecast March 2017; OBR Economic Activity Rates).
- 2.5 The SHMA and ELR were updated subsequently. The outcome of the additional work is to:
- Increase the District's OAN to 242 dwellings per annum (from 214 dpa); and
 - Increase the Plan areas OAN to 204 dpa (from 182 dpa).
- 2.6 A Housing Growth Options Paper: Addendum November 2017 assesses these latest figures as new Housing Growth Options, along with a higher figure of 280 dpa.
- 2.7 This paper rejects all the above and concludes that 230 dpa should be the Craven Local Plan's housing requirement. This will more than meet the Plan Area OAN.

Strategy Alignment

- 2.8 As part of the preparation of the Craven and YDNP local plans, there has been broad alignment of respective local plan strategies particularly with regard to settlements bisected by the YDNP boundary or in proximity to it. This is reflected in table 1 of the adopted YDNP local plan and table 2 of the publication draft Craven local plan.
- 2.9 Both strategies recognise the roles and functions of bisected settlements as service centres and hubs that serve a wider hinterland beyond the boundaries of the Craven plan area.
- 2.10 The National Park Authority is supportive of housing, employment and infrastructure growth in the service settlements outside the National Park.

3. Understanding between Parties, cooperation and on-going engagement.

OAHN, OAEN and Apportionment

- 3.1 With regard to the housing OAHN arising from the 2016 SHMA and 2017 update, the following has been agreed between CDC and the YDNPA:
- That 230 dwellings pa is an appropriate housing requirement for the Craven Local Plan (outside the Yorkshire Dales National Park)
- 3.2 With regard to the employment OAEN arising from the ELR, the following has been agreed between CDC and the YDNPA:
- That 27-32 Hectares of employment land is the identified employment OAEN for Craven District; and
 - The substantive OAEN is to be accommodated in Craven District outside the Yorkshire Dales National Park. However allocated employment sites at Threshfield Quarry, Giggleswick Quarry and Linton Camp in the YDNP will provide additional flexibility of provision.

Strategy Alignment

- 3.3 With regard to strategy alignment, the following has been agreed between CDC and the YDNPA:
- That the settlement hierarchies set out at:
 - Policies SP3 and table 1 of the Yorkshire Dales Local Plan; and
 - Policy SP4 and Table 2 of the Publication draft Craven Local Plan;

Broadly align and complement each other, particularly in terms of approaches to the roles and functions of bisected settlements.

3.4 It is agreed that this forms an appropriate basis for plan making.

Signed on behalf of Yorkshire Dales
National Park Authority

P. R. Stockton

Date: 20th December 2017

Peter Stockton

Head of Sustainable Development



YORKSHIRE DALES
National Park Authority

Signed on behalf of Craven District
Council

David Smurthwaite

Date: 21/12/17

David Smurthwaite

Strategic Manager for Planning and
Regeneration



Appendix 2 – Response of Bradford Metropolitan District Council

Department of Place

City of Bradford Metropolitan District Council,
4th Floor ,
Britannia House,
Hall Ings,
Bradford
BD1 1HX

W www.bradford.gov.uk

Tel: (01274) 434050

Email: [andrew.marshall @bradford.gov.uk](mailto:andrew.marshall@bradford.gov.uk)

Date: 31st July 2017

Dear Matthew

RE: CONSULTATION ON THE PRE-PUBLICATION DRAFT CRAVEN LOCAL PLAN

Thank you for consulting City of Bradford MDC on the above document.

Following a review of the document and supporting documents and in light of the on-going work as part of the Duty to Cooperate through the Leeds City Region and on a one to one basis, we are content with the approach to strategic matters and cross boundary issues.

In particular it is noted that Craven is proposing to meet its Objectively Assessed Need (OAN) in full. In this respect, I can confirm that Bradford Council (as set out in the recently adopted Core Strategy) is planning to meet its own OAN within the District and therefore it is unnecessary for Craven Council to consider whether any of the development needs of Bradford District are able to be met within Craven District.

The Council will continue to engage with Craven on strategic and cross boundary issues as you progress the Plan to submission and also in light of Bradford's emerging site allocations work in order to align both Local plans and in our discharge of the Duty to Cooperate..

Yours faithfully

Andrew Marshall
(Planning & Transport Strategy Manager)



Appendix 3 – Response of Pendle Council

Matthew Collins
Planning Support Officer
Planning Policy Team
Craven District Council
1 Belle Vue Square
Skipton
BD23 1FJ

Date: Tuesday 5th September 2017
Our ref:
Your ref:
Ask for: John Halton
Direct line: (01282) 661330
Email: john.halton@pendle.gov.uk
Service Manager: Neil Watson

Dear Mr. Collins,

Consultation on the 3rd Pre-publication Draft Craven Local Plan (June 2017)

Thank you for your email of 19th July 2017 informing Pendle Council about the above public consultation, which concluded on Monday 31st July 2017.

Section 33A of the Planning & Compulsory Purchase Act 2004 (as amended by the Localism Act 2011) places a legal duty on local planning authorities *“to engage constructively, actively and on an ongoing basis”* with other local authorities in the preparation of their Local Plan. Furthermore the National Planning Policy Framework refers at paragraph 179 to the need for local planning authorities to *“work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in individual Local Plans.”*

I write to confirm that officers of Craven District Council have actively engaged with, and formally consulted, Pendle Council throughout the preparation of their Local Plan. In this respect, we feel that the requirements placed on Craven District Council by the Duty to Co-operate have been met.

Pendle Council is pleased to note that the 3rd Pre-Publication Craven Local Plan:

- recognises the potential for transport improvements between Craven and East Lancashire, both by road (para 2.13) and rail (para 2.13)
- acknowledges that the proposal for the A56 Colne-Foulridge bypass and the support for this from the East Lancashire Highways & Transport Masteplan (2014), Pendle Core Strategy (2015) and Lancashire Enterprise Partnership in view of the potential for the scheme to enhance the economic linkages between Lancashire and Yorkshire (para 2.13)
- notes that the route of the former Skipton-Colne railway line is protected in the Pendle Core Strategy (December 2015) (para 2.15)
- supports sustainable development that protects and enhances heritage and promotes tourism along the Leeds and Liverpool Canal (Policies ENV2, ENV11 and ENV12).

Continued over

Pendle Council is satisfied that the 3rd Pre-Publication Craven Local Plan contains no other proposals that are likely to raise any significant cross boundary issues for the Borough of Pendle.

I trust that this information is satisfactory for your requirements. Should you require a more detailed Statement of Common Ground addressing the scale and distribution of housing provision, employment, infrastructure and implications for the Borough of Pendle, please contact Neil Watson Planning, Building Control and Licensing Manager.

Yours sincerely,



John Halton

Principal Planning Officer
Planning Policy & Conservation



Appendix 4 – Details of interactions and engagement with Lancaster City Council

From: Porter, David <dporter@lancaster.gov.uk>
Sent: 28 July 2017 15:26
To: Matthew Collins
Subject: RE: Duty to co-operate
Attachments: Craven DTC meeting notes 070717.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Matthew,

Thank you for the plan making update when we met at Skipton on 7th July. I have reviewed the draft

notes which are a good record of the meeting, and added some comments on the Lancaster situation (as

attached). I trust you will finalise the document if you agree with my additions.

I have reviewed the latest draft consultation version of Craven's Local Plan. As you would expect, may

main concerns on behalf of the City Council are whether Craven has calculated and is planning to meet

its OAN, and on whether Craven and Lancaster's planning policy approach is broadly compatible in and

around the areas where we have a common border.

On the subject of the OAN I can see that this version of the Local Plan has made an adjustment to the

OAN, based on an assessment of new evidence. I can also see that Craven is planning to meet the OAN

of 214 dwellings pa between 2012 and 2032 (option C). In this sense I believe the Plan to be sound and

that there is no conflict in the approach taken by Lancaster, where we have a similar intention to meet

our OAN calculation of 675 dwellings pa, entirely within our district boundaries.

On the detailed policies I have reviewed the settlement hierarchy and distribution of development and
note the proportion and number of dwellings proposed in High and Low Bentham. There is some
interaction between these settlements and parts of Lancaster district, notably with settlements
along
and close to the Lune valley. I believe the level of development proposed in High and Low Bentham
is
appropriate and compatible with the modest levels of growth proposed in the neighbouring part of
Lancaster district.

I have also reviewed policies on matters including landscape, biodiversity, tourism and flood risk,
and
am content that these are consistent with national policy, compatible with Lancaster's policies and
appropriate for Craven. I am especially glad to see reference made to the conservation of the
landscape
within the Forest of Bowland AONB (in Policy ENV1(d)), because as you know I am keen to see a
greater
alignment of key policy approaches between the six district authorities responsible for planning
within
the AONB.

I trust that you will accept this email as a formal response by Lancaster City Council to Craven's
consultation.

Regards,

David Porter BA MA MRTPI | Senior Planning Officer

Regeneration and Planning Service | Lancaster City Council

Morecambe Town Hall | Marine Road East | Morecambe | LA4 5AF

E: dporter@lancaster.gov.uk | T: 01524 582335

From: Matthew Collins [<mailto:MCollins@cravendc.gov.uk>]

Sent: 13 July 2017 11:40

To: Porter, David <dporter@lancaster.gov.uk>

Subject: RE: Duty to co-operate

Dear David,

It was good to meet with you last week. Please find attached a draft meeting note for your attention. If

you may be able to add a few word on the position with Lancaster, that would be great – I'm not sure I

caught everything. Hopefully the note will then be finalised.

I look forward to hearing from you.

Kind regards

Matthew

Matthew Collins

Planning Support Officer

t: 01756700600

e: MCollins@cravendc.gov.uk

1 Belle Vue Square, Broughton Road, Skipton, BD23 1FJ

www.cravendc.gov.uk

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From: Porter, David [mailto:dporter@lancaster.gov.uk]

Sent: 06 July 2017 09:44

To: Matthew Collins

Subject: RE: Duty to co-operate

Matthew,

Thank you for the email and draft agenda. There is not as much to update you on from our side, so the

general agenda item for Lancaster is fine. I look forward to meeting up again tomorrow.

Regards,

David

David Porter BA MA MRTPI | Senior Planning Officer
Regeneration and Planning Service | Lancaster City Council
Morecambe Town Hall | Marine Road East | Morecambe | LA4 5AF
E: dporter@lancaster.gov.uk | T: 01524 582335

From: Matthew Collins [mailto:MCollins@cravendc.gov.uk]
Sent: 30 June 2017 12:07
To: Porter, David <dporter@lancaster.gov.uk>
Subject: RE: Duty to co-operate

Dear David,

Thank you for your email. I will double check the most appropriate Member contact, (although I see that you have written to Cllr Sutcliffe) and come back to you. In the meantime, I attach an agenda for our meeting next week. I hope this is in order.

Kind regards

Matthew

Matthew Collins
Planning Support Officer

t: 01756700600
e: MCollins@cravendc.gov.uk

1 Belle Vue Square, Broughton Road, Skipton, BD23 1FJ

www.cravendc.gov.uk

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From: Porter, David [<mailto:dporter@lancaster.gov.uk>]

Sent: 27 June 2017 09:46

To: Matthew Collins

Subject: Duty to co-operate

Matthew,

Following our duty to co-operate meeting in February, I am about to circulate a members' letter on the

subject (see attached draft). Our portfolio holder, Janice Hanson, is keen to ensure that there is duty to

co-operate engagement with fellow councillors, so that there is a proper political contact as well as through the executive. In practice, most of the liaison and discussion will continue to be through officers, and you will see that the letter links in to you for this reason.

The main purpose of this email is to notify you of the letter, and to ask whether we are addressing the

correct councillor, Mr Sutcliffe? We will be posting and emailing the letter, so could you please also confirm the email address we should use as well as the recipient. Thank you.

Regards,

David

David Porter BA MA MRTPI | Senior Planning Officer

Regeneration and Planning Service | Lancaster City Council

Morecambe Town Hall | Marine Road East | Morecambe | LA4 5AF

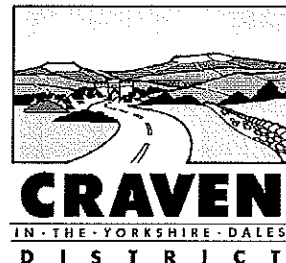
E: dporter@lancaster.gov.uk | T: 01524 582335

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DISCLAIMER:

1 Belle Vue Square
Broughton Road
SKIPTON
North Yorkshire
BD23 1FJ



Councillor Janice Harrison
Lancaster City Council
PO Box 4
Town Hall
Dalton Square
Lancaster
LA1 1QR

Telephone: 01756 706287
E-mail: cllr.jdawson@cravendc.gov.uk

Please address correspondence on this matter to:
Councillor John Dawson
Date: 22 August 2017

Dear Councillor Hanson,

Planning Policy Duty to Cooperate

Thank you for your letter dated 29 June 2017 and I apologise for the delay in replying. This was due to me not receiving the letter until recently.

At the outset, Craven District Council is supportive of co-operation between planning authorities on matters that cross administrative boundaries. There has been ongoing engagement and co-operation between Craven District Council and Lancaster City Council on this matter, the most recent meeting taking place on 7th July 2017, as part of consultation on a Craven District pre-publication draft local plan. A note of that meeting is attached.

The outcome of the ongoing engagement is that the dialogue has not given rise to any strategic planning challenges or disagreements. The ongoing dialogue between the authorities has been positive and constructive.

In particular, there are no issues between Craven District Council and Lancaster City Council that require further discussion or resolution, and the Council is keen to ensure that the Duty to Co-operate is fulfilled accordingly.

I hope that this sets out our understanding of the position between our Councils and I look forward to Officers continuing the dialogue as Craven District Council moves towards publication of the Craven Local Plan.

Yours sincerely

Councillor John Dawson

Chair Spatial Planning Sub Committee

Record of meeting with Lancaster City Council Duty to Cooperate.

Friday 7 July 2017

Craven District Council Offices, Skipton

In attendance: David Porter, Matthew Collins

Apologies: Sian Watson

- 1) Introductions;
- 2) Purpose of meeting;
- 3) CDC Local Plan consultation; initial feedback and matters arising including;
 - An outline was given as to the nature of the consultation and to the drivers behind it, in particular the change to the OAN and the implications for the local plan.
 - The draft plan strategy has not changed substantively in terms of the direction proportions of growth to specific settlements. The proportion of growth directed towards High Bentham has changed from 10.2% to 10.5%.
 - The key changes to the plan policies were identified as:
 - SP1: Meeting Housing Need
 - SP2: Economic Activity and Business Growth
 - SP3: Housing Mix & Density (Significant change to existing Policy SP3 to include density considerations, Deletion of Policy H4 Housing Density)
 - ENV10: Local Green Space (approved by the Sub-Committee in January 2017)
 - ENV11: The Leeds & Liverpool Canal (new policy)
 - ENV12: Footpaths, Bridleways & Cycle Routes (new policy)
 - ENV13: Green Wedges (new policy)
 - Policy H2: Affordable Housing
 - EC4A: Tourism-Led Development At Bolton Abbey (new policy)
 - Policy INF6: Education Provision (new policy)
 - Other changes to policies were also outlined on the back of changes in legislation or new evidence including:
 - Updated Strategic Housing Market Assessment (SHMA) 2016,
 - The Strategic Flood Risk Assessment 2017,
 - Conservation Area Appraisals 2016,
 - Employment Land Review 2017,
 - Craven Local Plan Viability Appraisal 2017
 - Highway Modelling Report for Skipton 2017.
 - Changes to policies are highlighted in red in the consultation documentation.

- Entering into a possible MoU was discussed but further consideration was needed as to practicalities.
- Lancaster Council were to respond to consultation in due course.

4) Lancaster planning update;

- Consultation was undertaken on the strategic policies and land allocations DPD and DM Policies DPD, ending March 2017. Officers are reviewing responses and evaluating new evidence with a view to publishing the final version of the DPDs in late 2017/early 2018
- An update as to planning in Lancaster was given including the collation of new evidence e.g. SFRA, SHELAA, Housing needs and viability
- Lancaster has agreed an OAN of 675pa, but currently has a small shortfall against that figure. It intends to meet the OAN within the district on sites close to and within the main urban areas, based in the findings revealed in the SHELAA (currently under way)
- The Arnsdale and Silverdale plan was discussed as was the issue of Major Developed sites in Hornby.

5) AOB

- None.

Appendix 5 – South Pennine Memorandum of Understanding on Renewable Technologies

South Pennine Memorandum of Understanding on Renewable Technologies

PURPOSE

This Memorandum of Understanding establishes a framework for co-operation between South Pennine local authorities with respect to strategic planning and development issues relating to renewable energy, in particular wind energy. It is framed within the context of the Section 110 of the Localism Act 2011 and the duty to cooperate in relation to the planning of sustainable development. It sets out the way in which the authorities have, and will continue to, consult one another and work together on matters which affect the South Pennine area.

In line with the National Planning Policy Framework, particularly paragraphs 97 and 98, Planning Authorities will seek to take a positive approach to renewable energy development both in development planning and management. This will include taking opportunities to maximise strategic cross-border benefits as well as ensuring that any potential negative impacts are minimised or avoided.

PARTIES TO THE MEMORANDUM

The Memorandum is agreed by the following Local Authorities:

Barnsley MBC

Burnley BC

Bury MBC

Calderdale MBC

High Peak BC

Hyndburn BC

Kirklees MBC

Lancashire CC

Pendle BC

Rochdale MBC

Rossendale BC

Craven District Council

OBJECTIVES

The Memorandum has the following broad objectives:

- To help secure a process and framework enabling a consistent strategic approach particularly to Wind Energy and also to other Renewable Energy issues as appropriate; including development management, strategic planning and monitoring between neighbouring local authorities
- To enable a sharing of information and views and, where appropriate, to facilitate joint working on strategic issues which affect more than one local authority area
- To facilitate joint research and procurement between neighbouring authorities
- To facilitate strategic co-operation and partnership on issues of shared interest with statutory consultees such as the Environment Agency, Natural England and English Heritage and other key consultees including planning, delivering, managing and mitigating renewable energy and its impacts

TOPIC ISSUES

The principal topics where co-operation are considered to be valuable are:

- Effective and timely consultation on planning applications, EIA Screening Opinions and Environmental Scoping Reports of cross-border significance in the South Pennines and related areas
- Development of mutually consistent databases on planning applications to enable “cumulative impact” issues to be addressed particularly on wind energy but also other technologies
- Consistent application of landscape character assessments such as the “Julie Martin Study” (or successor documents); the Peak District National Park Landscape Strategy and Action Plan and, as appropriate, other evidence base documents or cross-border landscape studies, when assessing planning proposals
- Joint procurement of evidence base documents and professional expertise where this would bring economies of scale and be mutually beneficial
- An approach to Planning Policy development and Development Management that takes into account as appropriate cross border effects on:
 - Landscape and visual impact
 - Cumulative impact
 - Historic landscape character
 - Ecology including flora, fauna and peat
 - Water supply, hydrogeology and flood risk
 - Recreational assets, bridleways and footpaths
 - Green infrastructure
 - Noise
 - Cultural and built heritage
 - Shadow Flicker
 - Socio-economic benefits
 - Access and grid connections
 - Telecommunications and radar
- Co-operation on planning issues relating to the implementation of renewable networks such as District Heating schemes; energy from waste or biomass particularly where these are

identified in studies such as the Greater Manchester, Yorkshire and Humber, Lancashire and East Midlands Renewable and Low Energy Studies and have clear cross-border affects

- Joint working as appropriate on policy development and implementation relating to low carbon development including Allowable Solutions and Zero Carbon development
- Consultation on Local Plan policies and SPD's on renewable energy beyond immediate neighbours where proposals are innovative or of wider interest
- Support as appropriate at Planning Inquiries
- Information sharing on current "good practice" at local and sub-regional level

MECHANISMS FOR CO-OPERATION

- Regular meetings will be held (at least 3 times per year) with special meetings if necessary, such as when triggered by an application of major cross-border significance or other specific issues of common interest
- Renewable energy databases will be regularly updated and circulated in particular to inform Local Authority Monitoring Reports
- Consultations on wind energy planning applications, Screening Opinions and Environmental Scoping opinions with neighbouring planning authorities will occur in the following circumstances :
 - Affected neighbouring authorities where the Zone of Visual Influence shows an impact on land outside the host authority area
 - Where there are significant impacts on Recreational Trails of sub-regional or greater significance
- Consultations on non-wind renewable energy applications and Environmental Scoping Opinions will be considered on a case by case basis
- Liaison on development of Planning Policy documents and SPD's
- Sharing of development management policies and validation requirements to facilitate a standardised approach to planning applications across the South Pennines

LIMITATIONS

The Local Authorities recognise that there will not always be full agreement with respect to all of the issues on which they have agreed to cooperate. For the avoidance of doubt, this Memorandum shall not fetter the discretion of any of the local authorities in the determination of any planning application, participation in evidence base studies or in the exercise of any of its statutory powers and duties.

Signed: 

Organisation: Craven District Council

Position: Strategic Manager for Planning and Regeneration

Date: 8/9/16

Annex One – Background Context

BACKGROUND

The South Pennine landscape straddles the borders of Greater Manchester, Derbyshire, Lancashire and North, West and South Yorkshire. Upland areas are particularly attractive for wind energy developments, ranging from very large wind farms to small individual turbines. While parts of the area such as the Peak District National Park, Forest of Bowland Area of Outstanding Natural Beauty and the South Pennine Special Protection Area/Special Area of Conservation are subject to national landscape or conservation designations substantial areas are not. Issues of cumulative visual impact from wind energy proposals are the major cross-border issue and were clearly identified in the “Landscape Capacity Study for Wind Energy Developments in the South Pennines” (2010) commissioned jointly from Julie Martin Associates by a number of authorities. There is a history of cross-border consultation on renewable energy dating back to the early 1990’s through the Standing Conference of South Pennine Authorities (SCOSPA).

While wind power is the dominant cross-border energy issue other forms of renewable energy that are being developed in the area include solar power, biomass and small scale hydro. These can have localised cross-border impacts. Opportunities for development were identified in the jointly commissioned “Renewable and Low Carbon Energy Study” (Maslen 2010). Other separate studies exist for the East Midlands (LUC, CSE and SQW 2011) Greater Manchester (Aecom 2009), Lancashire (SQW/Maslen 2011/12) and Yorkshire and Humber Low Carbon and Renewable Energy Capacity Study (Aecom 2011).

Appendix 6 - Local Nature Partnership Response

North Yorkshire and York Local Nature
Partnership
c/o Waste & Countryside Services
County Hall
Northallerton
North Yorkshire, DL7 8AH

Matthew Collins
Planning Support Officer
Craven District Council
1 Belle Vue Square,
Broughton Road,
Skipton, BD23 1FJ

Contact: Matt Millington
Direct dial: 01609 532127
E-mail: matthew.millington@northyorks.gov.uk
Web: www.northyorks.gov.uk

17 November 2017

Dear Matthew,

Re: North Yorkshire & York LNP comments on Craven Local Plan.

I am writing to you on behalf of the North Yorkshire and York Local Nature Partnership (LNP) and the Partnership Chair, David Sharrod. Thank you for providing the LNP with the opportunity to engage in your Local Plan process. While the LNP cannot endorse Local Plans, as we do not have this responsibility under our governance arrangements, the LNP feels it is important that Craven District Council is aware of the aims and aspirations of the LNP and that, where possible, these are reflected in your plan.

The vision of the LNP is to "To see the natural environment of North Yorkshire and York conserved, enhanced and connected across the whole LNP area for the benefit of wildlife, people and the economy." To do this the LNP is focussing its work on 4 themes: Habitats and Species; Economy; People & Communities; Climate Change. Each of these has objectives and targets detailing how these will be progressed. For more information please see the LNP strategy at www.nypartnerships.org.uk/lnp.

The LNP welcomes the inclusion within the plan the statement, "Craven's growth includes growth in biodiversity." We also welcome the inclusion of the role of the LNP in achieving this. We welcome the range of policies under the Environment, including Landscape, Heritage, Biodiversity, Green Infrastructure and Flood Risk, that outline how investment in the natural and historic environment can promote sustainable growth and better health and wellbeing in the district.

I have one minor point of clarity on 5.46 (page 113), which refers to the North and East Yorkshire Biological Records Centre. Its title is actually the North and East Yorkshire Ecological Data Centre.

Section 33A of the Planning & Compulsory Purchase Act 2004 (as amended by the Localism Act 2011) places a legal duty on local planning authorities *“to engage constructively, actively and on an ongoing basis”* with other local authorities in the preparation of the Local Plan. Furthermore the National Planning Policy Framework refers at paragraph 179 to the need for local planning authorities to *“work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in individual Local Plans.”*

I write to confirm that officers of Craven District Council have actively engaged with, and formally consulted, York and North Yorkshire Local Nature Partnership during preparation of the Craven Local Plan. In this respect, we feel that the requirements placed on Craven District Council by the Duty to Co-operate have been met.

If you require further information, please do not hesitate to contact the LNP via matthew.millington@northyorks.gov.uk.

Yours faithfully

Matt Millington
Local Nature Partnership Development Officer
North Yorkshire County Council

Appendix 7 – Civil Aviation Authority Response

From: CAA Aerodrome Standards Department

<CAAerodromeStandardsDepartment@caa.co.uk>

Sent: 03 November 2016 11:59

To: Matthew Collins

Subject: RE: Craven Local Plan - Duty to Cooperate

Dear Matthew

Thank you for your email of this morning. I would like to confirm that the CAA will not be affected by

the Local Plan and therefore has no comment to make. I hope this answers your enquiry.

Kind Regards

Emma Forrest

Business Support Officer

Approvals and Certification

Civil Aviation Authority

Tel: 01293 768374

Follow us on Twitter: @UK_CAA

Please consider the environment. Think before printing this email.

From: Matthew Collins [mailto:MCollins@cravendc.gov.uk]

Sent: 03 November 2016 11:40

To: CAA Aerodrome Standards Department

Subject: RE: Craven Local Plan - Duty to Cooperate

Dear Emma,

Thanks for your email and attachment, which I have seen previously.

My enquiry relates to Section 110 of the Localism Act (2011) and demonstrating compliance with the

Duty to Cooperate. We do not think that the interests of CAA will be affected by the plan - Craven is beyond safeguarding zones relating to Leeds Bradford International Airport or any other airport.

However to meet the provisions of the Duty to Cooperate, please could you confirm this to be the case

and that the Duty to Cooperate has been met?

I look forward to hearing from you.

Yours faithfully

Matthew Collins

Matthew Collins

Planning Support Officer

t: 01756 70

e: MCollins@cravendc.gov.uk

1 Belle Vue Square, Broughton Road, Skipton, BD23 1FJ

www.cravendc.gov.uk

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monitoring in accordance with relevant legislation.

From: CAA Aerodrome Standards Department
[mailto:CAAerodromeStandardsDepartment@caa.co.uk]

Sent: 02 November 2016 12:49

To: Matthew Collins

Subject: RE: Craven Local Plan - Duty to Cooperate

Dear Matthew

Thank you for your email enquiry of this morning. Please find attached some guidance on the Planning

Application process.

Kind Regards

Emma Forrest

Business Support Officer

Approvals and Certification

Civil Aviation Authority

Tel: 01293 768374

Follow us on Twitter: @UK_CAA

Please consider the environment. Think before printing this email.

From: Matthew Collins [mailto:MCollins@cravendc.gov.uk]

Sent: 02 November 2016 11:36

To: CAA Aerodrome Standards Department

Subject: FW: Craven Local Plan - Duty to Cooperate

Dear Sir/Madam,

Further to my email below, could you be in a position to provide confirmation please? This would assist

with demonstrating compliance with the Duty to Cooperate.

Many thanks and kind regards,

Matthew

Matthew Collins

Planning Support Officer

t: 01756 70

e: MCollins@cravendc.gov.uk

1 Belle Vue Square, Broughton Road, Skipton, BD23 1FJ

www.cravendc.gov.uk

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From: Matthew Collins

Sent: 19 September 2016 12:34

To: 'aerodromes@caa.co.uk'

Subject: Craven Local Plan - Duty to Cooperate

Dear Sir/Madam,

I am writing to you in connection with the above local plan, section 110 of the Localism Act (2011) and

the Duty to Cooperate. As you may be aware, we have recently consulted on a second draft plan, which

makes provision for 5,120 dwellings and 28 Hectares of employment land over the period 2012-2032.

Please see below for a link to the consultation documents:

<http://www.cravendc.gov.uk/newlocalplan>

With regard to aviation, the nearest airport is Leeds Bradford International Airport but is not within associated safeguarding zones. We understand that there are no aerodromes in Craven.

Overall, we do not think that the interests of CAA will be affected by the plan. However to meet the provisions of the Duty to Cooperate, please could you confirm this to be the case and that the Duty to

Cooperate has been met?

I look forward to hearing from you.

Yours faithfully

Matthew Collins

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Appendix 8 – Response of Airedale, Wharfedale and Craven CCG

DRAFT CRAVEN LOCAL PLAN FOR CONSULTATION

June 2017

Background

The council's third draft local plan is out for public consultation until 31 July 2017. This follows consultation on an initial draft in autumn 2014 and a second draft in spring 2016.

Purpose of the plan:

- to inform decisions on planning applications;
- sets out how land is to be used for things like housing, business, recreation and conservation;
- describes how the right development is to be achieved in the right location at the right time;
- describes how sustainable development can be achieved overall.

Area and timescale

The area covered is the Craven District outside the Yorkshire Dales National Park and the period is until 2032.

Monitoring

Progress on achieving the objectives in the plan will be reported in an annual report.

Relevant points for the CCG

New housing: The plan sets the ambition to create 214 new dwellings per annum, which equates to 4,280 dwellings between 2012 and 2032.	<i>Implication for CCG</i> - This will create additional demand for acute, community and GP services. The additional patients will need to be registered at the 5 GPs in the Craven area (4 of which sit in the AWC area).
Attracting staff to the area: The report notes issues with affordability of housing and the fact that existing housing stock is increasingly occupied by one or two person older/retired households. The plan addresses the need for more affordable housing and housing that appeals to younger households.	<i>Implication for CCG</i> - The health system would benefit from any actions to attract more potential staff to the area.
Aging population: The percentage of the population aged 65+ in Craven is expected to increase from 25% in 2014 to 34% by 2032 (a 9% increase), with the percentage aged 80+ expected to increase from 7% to over 12% (a 5% increase). The plan recognises the need for both traditional care homes and extra care accommodation.	<i>Implication for CCG</i> – A site has been identified in Gargrave for 50 extra care homes. This will create additional demand for acute, community and GP services.
Transport: The plan notes that there are opportunities for improved connectivity and economic links with Lancashire and West Yorkshire via road and rail networks. However, it is not within the scope of the plan to address transport links.	<i>Implication for CCG</i> – Access to health services continues to be an issue for residents in rural areas.
Internet access: The plan commits to making sure that	<i>Implication for CCG</i> – Improved access to

new developments have access to high quality broadband.	broadband has positive implications for health schemes, such as, telemedicine. However, this plan does not cover the improvement of access to broadband for existing dwellings.
Gypsy, Traveller, Showmen and Roma communities: It is not proposed in the local plan to make a specific allocation of land for a public site for these communities.	<i>Implication for CCG – None</i>
Healthy developments: The plan commits to new developments having easy access for pedestrians, cyclists and people with disabilities by improving existing routes, adding new ones and creating connections to enhance the local network.	<i>Implication for CCG – Encouraging people to walk and cycle will have positive benefits for the health of local residents.</i>

Summary

The plan is high level, but makes a number of commitments that are in keeping with the CCG's objectives, such as encouraging people to walk and cycle. The main issue for the CCG to take note of is the increase in the number of dwellings and the impact that this will have on health and social care services.

Appendix 9 – Response of Office of Road and Rail

From: CCT Contact
To: [Matthew Collins](#)
Subject: Craven Local Plan - Duty to Cooperate
Date: Tuesday, December 20, 2016 11:14:37 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

Dear Mr Collins,

Thank you for your correspondence regarding the Craven Local Plan.

It was forwarded to the Inspector responsible for the area, who has advised that, as the proposals do not involve level crossings, because there aren't any in the area, it is unlikely to affect railway safety. We, therefore, do not have any comments.

Apologies for the delayed response and Season's Greetings!

Yours Sincerely,



Customer Correspondence Team

020 7282 2000
ORR.gov.uk
One Kemble Street
London
WC2B 4AN
Follow us on twitter [@railandroad](#)

From: Matthew Collins [mailto:MCollins@cravendc.gov.uk]
Sent: 15 December 2016 11:31 AM
To: CCT Contact
Subject: FW: Craven Local Plan - Duty to Cooperate

Dear Sir/Madam,

Further to the email below, I am yet to receive a response. It would be helpful please if someone email me some contact information so that we can address this point?

Many thanks

Matthew Collins

Matthew Collins
Planning Support Officer

t: 01756 70

e: MCollins@cravendc.gov.uk



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From: Matthew Collins
Sent: 14 November 2016 13:08
To: 'contact.cct@orr.gsi.gov.uk'
Subject: FW: Craven Local Plan - Duty to Cooperate

Dear Sir/Madam,

Further to my telephone conversation with your office, please could the ORR contact me with regard to the email below?

I would be keen to establish contact with the ORR, the Craven Local Plan and next steps.

Many thanks and kind regards

Matthew Collins

From: Matthew Collins
Sent: 18 August 2016 10:46
To: 'dutytooperate@orr.gsi.gov.uk'
Subject: Craven Local Plan - Duty to Cooperate Confirmation

Dear Sir/Madam,

I am writing in connection with the emerging Craven Local Plan and the provisions of the duty to cooperate. The consultation documentation can be found here:

<http://www.cravendc.gov.uk/newlocalplan>

I would be grateful if you could have a look at this and come back to me with regard any observations. If possible please could you also confirm that the provisions of the Duty to Cooperate have been met?

We have had confirmation from Network Rail that they have no comments to make.

Kind regards

Matthew Collins

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Appendix 10 - Response and confirmation of Highways England



Our ref: <<<Insert ref (where applicable)>>>
Your ref: <<<Insert ref (where applicable)>>>

Matthew Collins
Planning Support Officer
1 Belle Vue Square
Broughton Road
Skipton
BD23 1FJ

Highways England
Operations
Lateral
8 City Walk
Leeds
LS11 9AT

Direct Line: 0300 470 2472

<http://www.highways.gov.uk>

For the attention of Matthew Collins

19 December 2017

Dear Sir

CRAVEN DISTRICT COUNCIL, PRE-PUBLICATION DRAFT CRAVEN LOCAL PLAN

Highways England welcomes the opportunity to provide comments on the Craven District Local Plan, Pre-Publication Draft dated June 2017, and has undertaken a review of this in accordance with its responsibilities and aims. This letter provides a summary of our response to your Email dated 29th November 2017 in relation to the Local Plan, Policy Approach and Maps including site allocations.

The Strategic Road Network [SRN] within the Craven District

Following the de-trunking of the A65, the Craven District lies somewhat remote from the SRN. However, travel to/from the district could potentially impact on nearby sections of the SRN. The M6 motorway provides a north-south link to the west of the district and the A1(M) provides a north-south link to the east of the district. The nearest SRN connections to the south of the district are the M65 which provides an east – west link from Burnley to the M6, and the M62 which provides an east – west link ultimately connecting Hull and Liverpool. The M62 also provides connections to the M606 in Bradford and the M621 in Leeds.

Pre-Publication Draft Craven Local Plan

Highways England welcomes the collaborative approach to the Local Plan. Given the location of the Craven District in relation to the SRN, it is unlikely that development activity within the area will have any direct impact on the SRN. However, traffic commuting in and out of the district is likely to make use of the SRN and as such any development that could increase the commuting levels on the SRN will be of interest to Highways England.

It is noted that Housing Growth Option C is the accepted option and provides 214 dwellings per annum from 2012 to 2032 (4,280 dwellings). It is understood that Draft Policy SP1: Meeting Housing Need sets out that this provision is a minimum provision equating to an annual average housing requirement of 214 net additional dwellings per annum. The traffic impact of these dwellings at the SRN will need to be understood by Highways England, however, once the traffic associated by these dwellings has been distributed across the various SRN routes surrounding Craven, Highways England considers that this is unlikely to have a significant impact at any particular SRN location. However, evidence will need to be provided to confirm this conclusion.

It is also noted that Draft Policy SP2: Economic Activity and Business Growth identifies a provision will be made for a minimum of 28 hectares of employment land over the plan period

for B1, B2 and B8 Uses. It is understood that 15.5 hectares of additional employment land for B1, B2 and B8 uses will be allocated in Skipton (Policy SP5), Settle (Policy SP6) and Ingleton (Policy SP9). Highways England will need to understand the traffic impact of the employment allocations at the nearby SRN, however, given the distance of the employment locations from the SRN, it is likely that once development traffic is distributed across various routes, the traffic impact at the SRN will not be significant. However, evidence will need to be provided to confirm this conclusion.

Draft Policy SP4: Spatial Strategy and Housing Growth identifies how new dwellings will be distributed across a settlement hierarchy. The only settlement identified with a notable number of dwellings is Skipton. However, given the distance between Skipton and the nearest SRN junctions, once any traffic from the developments is distributed across various routes, it is unlikely that the impact at the SRN will be significant. This conclusion should also be confirmed with evidence.

Draft Policies SP5 to SP11 detail the strategies for each area. Given the above, it is unlikely that developments identified within each of these policies will have significant individual impacts at the SRN. However, Highways England will need to understand the cumulative impact of all the allocations at the SRN.

In relation to Draft Policy SP12: Infrastructure, Strategy and Development Delivery, Highways England welcomes the principles set out by the Infrastructure Delivery Plan [IDP] and support the updating of the IDP on a regular basis.

Notwithstanding the above, any development that could potentially have a detrimental impact upon the SRN, particularly which would lead to increased commuting in the area, would require further assessment in accordance with the provisions of Circular 02/2013 'The Strategic Road Network and the Delivery of Sustainable Development.' Highways England would welcome the opportunity to be continually involved in the development of the Local Plan and the identification of the potential impact of the Plan sites on the SRN, in order to ensure that the impact of all the Plan sites is fully understood and if necessary mitigated.

I trust this response will be helpful, however should you require any further information, please do not hesitate to contact me. I look forward to receiving confirmation that our comments have been received.

Yours sincerely

Simon Jones
Asset Manager
Highways England
Email: Simon.Jones@highwaysengland.co.uk