



Craven Local Plan

# Policy response papers

(response to comments received during consultation on the pre-publication draft local plan 2017)

Background Paper

January 2018

## Policy Response Papers for the Craven Local Plan Pre-Publication Draft Consultation 19/6/17 to 31/7/17

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The following tables provide a detailed summary of:

- Main issues raised in comments received
- The council's response on each issue
- Whether or not a change needs to be made to the draft plan
- Details of any changes made

### Navigation of the document

This document includes hyperlinks in the table of contents, below, and PDF bookmarks, which can be viewed in appropriate PDF software/apps. It is advisable to make use of these features, as they will help you to navigate the many sections and pages that follow. On a keyboard, pressing the 'Alt' key plus the left arrow key will take you to previously viewed pages and pressing the 'Alt' key plus the right arrow key will bring you back again. Pressing the 'Ctrl' key plus the 'F' key will allow you to search the document for specific text, such as a policy number or title, or a particular word or phrase.

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Duty to Co-operate

**June – July 2017 Draft Local Plan**  
**Response Paper – Section 1: Introduction**

<b>Section: Introduction</b>			
<b>Aim of the Section: To provide a general introduction to the Local Plan including the plan period and plan area, and the processes/requirements for its preparation.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan</b>
<p><b>Object:</b> The plan period is clearly set out at paragraph 1.8 of the consultation document. It is noted that the end date remains at 2032. Whilst it is recognised that further to the previous consultation on the draft plan in May 2016, the plan period was extended from 2030 to 2032, the delay in the preparation of the plan now means that it is unlikely that a 15-year time horizon, post adoption can be achieved. As a result, the plan period is not soundly based. The Council will be aware that the NPPF, paragraph 157, identifies a preference for a time horizon of at least 15 years. It is suggested that the Council consider further extending the plan period to accord with this preference.</p>	<p><b>Disagree</b> - Paragraph 157 of the NPPF does not state that local plans are required to have a minimum time period of 15 years post adoption. It states that local plans should “<i>be drawn up over an appropriate time scale, preferably a 15 year time horizon, take account of longer term requirements and be kept up to date</i>”. The Draft Local Plan has been developed for a 20 year period from 2012 to 2032, which is considered to be an appropriate time horizon of 20 years for the planning of longer term requirements and is based on up to date evidence. Changing the plan period at this stage would not confer any specific benefits and would introduce further delay into the plan preparation process.</p>	No	
<p><b>Object:</b> Paragraph 1.15 - Neighbourhood Plans In view of the small number of communities that have the resources and have</p>	<p>It is entirely at the discretion of parish councils whether they decide to produce a Neighbourhood Plan and what they wish to include in their Neighbourhood Plan, provided</p>	No	

<p>undertaken development of NP, the alternative option of Village Design Statements deserves a place in the Local Plan. We are disappointed that no change in the draft has been made in response to the request at consultation stage to allow Village Design Statements to have force in the Local Plan in those areas where the parish is not producing a Neighbourhood Plan. We ask for those places that have been unable to produce a Neighbourhood Plan due to their parish/town council refusing to support the process, to be allowed to have some way of influencing the quality of development in their village/town, such as via a Village Design statement. Question - In the absence of fully approved neighbourhood plans are initiatives and proposals from local communities valueless?</p>	<p>they broadly accord with the adopted development plan. Village Design Statements can be useful tools for communities, enabling them to engage positively with developers during pre-application community consultation on proposals. However, such informal documents cannot have the same legal force as Neighbourhood Plans if they have not been prepared in accordance with the statutory regulations.</p> <p>The Craven Local Plan provides support for community initiatives and proposals whether or not a Neighbourhood Plan has been prepared. For example, if a local community wants to promote an affordable housing scheme in their village, Policy H2 provides support in principle for the release of rural exception sites. Similarly, if a local community wishes to establish new or improve existing local community facilities, Policy INF2 provides support for such initiatives.</p>		
<p><b>Comment: (CPRENY)</b> Paragraph 1.12 is entitled 'engagement, collaboration and evidence' and details how and when stakeholders have had the opportunity to comment on the emerging Local Plan document. CDC made the decision to amalgamate similar responses together within their published Policy Response Papers, available on their website as part of this consultation exercise. These papers have been created by CDC to comment specifically</p>	<p>Comment noted, however the aim of the local plan consultation and engagement process is to identify the main issues that are relevant to the area and thereafter to develop through further engagement and consultation the most appropriate strategy and policies to address the identified issues and promote sustainable development. Local Authorities are not required to provide individual responses to each and every comment, some of which may relate to issues not relevant to planning or the</p>	No	



<p>on consultation representations made at the previous consultation stage (June 2016). CPRENY are disappointed that individual responses have not been dealt with independently by the Council, however, understand the reasoning as to why it is sometimes considered preferable by Officers for Local Authorities to group similar comments together and provide one Council response to all within that group. However, in the case of CPRENY, who submitted a large and detailed response to the previous consultation exercise, many of the valid points raised have simply not been addressed or responded to and do not sit within the scope of the matters raised by other respondents. Detailed responses to the CPRE response have been collated only within the Environment section. It is therefore, imperative that the responses are considered alongside each other as stated in <i>italics above</i>.</p>	<p>area. To do so would make the local plan process overly bureaucratic. The respondent in this case states that points they have made have not been addressed or responded to, but there is no detail on the points they consider have not been addressed.</p>		
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\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## June – July 2017 Draft Local Plan

## Response Paper – Section 2: Context

Section 2: Context			
Aim of the Section: To provide a context for Craven, its people and places and to identify the key issues and challenges for the area.			
Main issues from consultation *	Response	Change required to the local plan (Yes/No)	Changes made to the plan
<b>Comment :</b> Page 10 , paragraph 2.2 – The areas of Craven/North Yorkshire appear to be incorrect.	Comment noted and accepted. The error in paragraph 2.2 on the respective areas in square kilometres for Craven and North Yorkshire will be corrected in the Publication Plan.	Yes	Insert correct areas in square kilometres for North Yorkshire and Craven. Paragraph 2.2 first and second sentences to read “The Craven plan area is situated at the western end of the county of North Yorkshire, England’s largest County and is <b>8,654</b> square kilometres in area. The total area of Craven District is <b>1,777</b> square kilometres.”
<b>Comment:</b> Page 13 paragraph 2.10 – Re-opening of the Skipton to Colne rail link should be mentioned in this paragraph as a way of helping to address the issue raised from a survey of local businesses that 33% identified the availability of a local labour force as a barrier to their further expansion.  Page 15, paragraph 2.15. Suggest additional wording to be added to final sentence of para 2.15 as follows “...within Pendle District.	Comment noted. However the purpose of Section 2 of the Local Plan is to set out the context for the plan and to identify key issues for the plan arising from this context. The suggested additional wording forms a policy statement, which would not be appropriate in this section of the plan. Policy SP2: Economic Activity and Business Growth supports enhanced transport connectivity with surrounding areas including Lancashire and specifically protects the Skipton to Colne	No	

<i>Mindful of the benefit to Craven District, and in line with the “Duty to Cooperate” with Pendle, Craven supports the reinstatement of the Colne to Skipton railway line as a key strategic transport scheme in Craven and will protect the route of the former Colne-Skipton railway within Craven district. Development that could prejudice this scheme will not be permitted”</i>	railway line.		
<b>Support :</b> Pendle Council is pleased to note that the 3rd Pre-Publication Craven Local Plan: <ul style="list-style-type: none"> <li>• recognises the potential for transport improvements between Craven and East Lancashire, both by road (para 2.13) and rail (para 2.13)</li> <li>• acknowledges that the proposal for the A56 Colne-Foulridge bypass and the support for this from the East Lancashire Highways &amp; 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)</li> <li>• notes that the route of the former Skipton-Colne railway line is protected in the Pendle Core Strategy (December 2015) (para 2.15)</li> </ul>	Supporting comments noted	No	
<b>Comment:</b> (Historic England) Paragraph 2.40, third bullet-point. We would endorse the conclusion that one of the biggest issues	Comment noted and accepted.	Yes	Amend third bullet point on page 22 to read <ul style="list-style-type: none"> <li>• <b>Greenfield Development:</b></li> </ul>

that the plan has to address is how to reconcile meeting the assessed development needs of the area with the appropriate protection of its outstanding environment. However, this is a separate issue from the lack of brownfield land. These should be separated out into two separate bullet-points.			<p>The limited supply of brownfield land means that to meet objectively assessed development needs, greenfield sites will be required for development.</p> <p>Add additional bullet point as follows:-</p> <ul style="list-style-type: none"> <li>• <b>High Quality Environment:</b> Meeting objectively assessed development needs will need to be reconciled with the appropriate protection of the plan area's outstanding environment, including its natural and historic assets.</li> </ul>
<b>Support:</b> (Historic England) paragraphs 2.27 to 2.31 Support. This section provides a good summary of the rich heritage of the Plan area. These assets make an important contribution to the distinctive character of Craven's towns, villages and countryside, to the quality of life of its communities and to the economy of the area.	Support Noted	No	
<b>Comment:</b> Section 2 of the consultation document sets the context for the Craven District identifying key issues and challenges for the area. The Policy Response Paper sets out that the text at section 2.15 shall be amended to reflect agreed improvements to train services between Skipton and	Comment noted and accepted	Yes	<p>Insert the following after the first sentence in para 2.15 ending "...services."</p> <p><b>"Improvements to the train services between Skipton and Lancaster have recently been agreed and are included in the Council's</b></p>

Lancashire as set out in the Council's Infrastructure Development Plan, however, this has not been transposed across to the new document.			<b>Infrastructure Delivery Plan (IDP) together with the need to make improvements to existing railway stations along this route. "</b>
<b>Comment/Object:</b> (CPRENY) disappointed that the loss of agricultural land has not been identified as a key issue arising in the Craven Plan Area at section 2.40. Craven District contributes enormously to national food production and the agricultural workers and landowners in the area are responsible for maintaining the farmed countryside in the District (outside the National Park) which is also a haven for tourists. Should agricultural land (especially land classified as the best and most versatile) continue to be permitted to be changed into large scale developments out-with traditional settlement boundaries, this important economic asset to the District will be lost as will the identity and character of the District. Whilst, CPRENY welcome the need to reconcile the need to meet objectively assessed development needs with the appropriate protection of the area's outstanding environment including its natural and historic assets, it is vital that the Local Plan refers to this valuable asset and the need to protect agricultural land in general.	Disagree. The key issues at 2.40 clearly highlight that there is a limited supply of brownfield land, which means that to meet objectively assessed development needs, greenfield sites will be required for development. The Local Plan also recognises the value of the best and most versatile agricultural land and Policy ENV7: Land and Air Quality seeks to safeguard and improve land quality in the plan area by avoiding the best agricultural land(grade 3) wherever possible, unless the need for and benefit of development justifies the scale and nature of the loss. Policies which attempted to protect "agricultural land in general" would not accord with the NPPF. Additionally the residential site selection assessment process takes account of agricultural land quality.	No	

<p><b>Comment/Object:</b>(McCarthy &amp; Stone)The Draft Local Plan recognises the ageing demographic of Craven at paragraphs 2.33 and 2.34: It also highlights some of the implications of this:</p> <p>"including effects on the size and structure of the local labour force, the expected profile of future household formation, the balance and mix of Craven's communities, issues of loneliness and isolation, fuel poverty and effects on the provision of services". (Paragraph 2.35)</p> <p>And amongst the Key Issues for the Craven Plan that : "The provision of smaller properties will also enable older households to downsize and free up larger housing units". (Paragraph 2.40)</p> <p>However, it would appear that no attempt is made by the Local Plan to deal with this clearly key issue through policy or guidance.</p> <p>We consider that the best approach towards meeting the diverse housing needs of older people is by having clear and specific policies that encourage the delivery of specialist forms of accommodation. This is an expectation of the NPPG and possibly the subject of further legislation through the White Paper and in areas of similar demographics and housing needs, many Development Plan documents already do this. When selecting sites for elderly persons' accommodation careful consideration is</p>	<p>Comments noted and accepted. Whilst Policy SP3: Housing Mix and Density seeks to meet housing needs, including those of older households through an appropriate mix of dwellings by size, including the provision of smaller properties, it is not explicit within the policy that this may include specialist forms of accommodation to meet the diverse housing needs of older people. The point is also accepted that some of the proposed allocations for housing in the plan may not be ideally suited for such specialist housing, although sites HB011 at Bentham, GA009 at Gargrave and SG035 at Settle are specifically identified as being suitable for such forms of specialist housing for older people, including extra care housing.</p> <p>It is considered therefore that the local Plan would be improved by the inclusion of a specific policy to encourage the delivery of specialist forms of accommodation to address the housing needs of older people across all housing tenures.</p> <p><b>NB</b> In response to representations on the pre-publication draft local plan Policy H1: New Homes on Unallocated Sites, the provisions of Policy H1 are recommended to be included within Policy SP4: Spatial Strategy and Housing Growth in the Publication plan. The proposed new policy to encourage the delivery of specialist forms of accommodation to address</p>	Yes	<p>Replace Policy H1 (and supporting text) : New Homes on Unallocated Sites with <b>new supporting text and Policy H1: Specialist Housing for Older People.</b></p> <p><b>The diverse housing needs of older people in the area will be met by:-</b></p> <p><b>a) encouraging and supporting the provision of specialist housing for older people across all tenures in sustainable locations, provided proposals accord with Policy SP4;</b></p> <p><b>b) encouraging developers to build new homes to the 'Lifetime Homes' standard so that they can be readily adapted to meet the needs of those with disabilities and the elderly as well as assisting independent living at home;</b></p> <p><b>c) allocating specific sites in Settle, Bentham and Gargrave within Policies SP6, SP7 and SP10 respectively for delivering specialist forms of residential accommodation to meet the housing needs of older people.</b></p>
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<p>given to locational criteria including: Topography, Environment (including safety and security), Mobility, Services and Community Facilities. As such, suitable sites for specialist accommodation for the elderly are difficult to find and tend to be located within, or adjacent to town or local centres. It is therefore highly unlikely that the majority of development sites will be suitable for specialist accommodation for the elderly, particularly on urban extension sites where access to goods and services may be limited.</p> <p>Specialist accommodation for the elderly also usually provides an element of care and communal facilities at an additional cost to the developer. This requires a critical mass of residents in order to be feasible and small scale developments of specialist housing for the elderly could not be realistically asked to provide or maintain such facilities. It is therefore unlikely to expect the provision of specialist accommodation for the elderly to be met piecemeal in general needs housing developments.</p> <p>We would like to highlight the advice provided in the Housing in Later Life: Planning Ahead for Specialist Housing for Older People toolkit. This toolkit was developed by a consortium of private and public organisations with an interest in</p>	<p>the housing needs of older people across all housing tenures will therefore be titled Policy H1 : Specialist Housing for Older People</p>		
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<p>housing for the elderly and encourages a joined up approach to planning, housing and social care policy both in the collection of evidence and the development of specialist accommodation for the elderly. Whilst we appreciate that no one planning approach will be appropriate for all areas, an example policy is provided that, we hope, will provide a useful reference for the Council:</p> <p>"The Council will encourage the provision of specialist housing for older people across all tenures in sustainable locations. The Council aims to ensure that older people are able to secure and sustain independence in a home appropriate to their circumstances and to actively encourage developers to build new homes to the 'Lifetime Homes' standard so that they can be readily adapted to meet the needs of those with disabilities and the elderly as well as assisting independent living at home. The Council will, through the identification of sites, allowing for windfall developments, and for granting of planning consents in sustainable locations, provide for the development of retirement accommodation, residential care homes, close care, Extra Care and assisted care housing and Continuing Care Retirement Communities."</p> <p>We would commend such an approach in this instance, perhaps as a new Housing Policy.</p>			
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<b>Comment:</b> (Local Access Forum) The LAF would suggest that the final bullet point on Transport should not refer to connection further afield but should include words something like 'whilst also maximising every opportunity for sustainable transport (bus/cycle and foot) in all locations'.	Disagree. The key issue highlighted under the heading Transport arises from the sub regional/economic context of Craven and its transport links with the wider region and is a key strategic issue that is appropriate for the Local Plan to address. Policy ENV3: Good Design supports development that seeks to maximise opportunities for sustainable modes of travel and maximising opportunities for occupiers of dwellings to walk or cycle to most key services is included as a development principle for individual allocated sites within Policies SP5 to SP11.	No	
<b>Support:</b> (Natural England) Natural England welcomes the clarification provided by the updates to para 2.24 and Plan Objective P02.	Support Noted	No	
<b>Comment :</b> (YDNP) Para 2.2 – The National Park also now embraces a small part of the Lancaster City Council area.	Comment noted and accepted	Yes	Amend text in third sentence of para 2.2 to read "The Yorkshire Dales National Park Authority is a separate planning authority that produces a park-wide local plan, which encompasses parts of Craven, Richmondshire , South Lakeland and Eden Districts <b>and a small part of the Lancaster City Council area</b> "

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## June – July 2017 Draft Local Plan

## Response Paper – Section 3: Sustainable Development - Vision, Plan Objectives and Policy SD1 : The Presumption in Favour of Sustainable Development

Section 3: Sustainable Development (Vision, Plan Objectives and Policy SD1: The Presumption in Favour of Sustainable Development)			
Aim of the Section/Policy: To set out a Vision for Craven in 2032 and the key Objectives for the Plan to realise the vision through the promotion of sustainable growth.			
Main issues from consultation *	Response	Change required to the local plan (Yes/No)	Changes made to the plan
<b>Comment: (Vision)</b> The paragraph appears to suggest there are plentiful services in the village ( <i>Ingleton</i> ). This is not the case there is only one food shop in the village, the rest of the shops cater towards tourism not local residents.	Comment noted, however disagree with the suggestion by the commentator that Ingleton does not currently provide services for local residents. The Vision expresses the aspiration that through the promotion of sustainable growth, local service centres like Ingleton can be maintained and improved as sustainable communities.	No	
<b>Support:</b> Draft policy SD1, the presumption in favour of sustainable development, is welcomed and it is noted that the Council emphasise a proactive approach towards people and organisations wishing to carry out development. The highlighted change in the text to emphasise a solution finding approach is also welcomed.	Support noted	No	
<b>Comment: (Policy SD1)</b> The changes suggested and subsequently made to this policy were based on the principle of confirming that this does not apply solely to	Disagree. The suggested change to Policy SD1 is unnecessary. The purpose of Policy SD1 is to express the two key planning principles that are embraced and embedded in the strategy and	No	

<p>allocated sites. Since Craven will have a plan for the period to 2032, it can only be the interpretation of 'silent' that would allow a developer to target a larger site other than those allocated. This policy should be more specific to define the parameters under which deviation from the spatial strategy would be allowed.</p>	<p>policies of the local plan and in respect of decisions on planning applications, namely the presumption in favour of sustainable development as defined in the NPPF and the statutory requirement for decision taking in Section 38(6) of the Planning and Compulsory Purchase Act 2004, which states that the statutory Development Plan must be the starting point in the consideration of planning applications for the development or use of land. Development that accords with the provisions of the local plan will be approved unless material considerations indicate otherwise. Where the local plan is silent, or where relevant policies have become out of date, proposals for development will be approved, unless there are sound planning reasons why development should not be approved taking into account whether any adverse impacts of development would outweigh the benefits when assessed against the national planning policy framework (taken as a whole); or specific policies in the NPPF indicate that development should be restricted. The 'parameters' are therefore already set out in Policy SD1, in the event that the plan is considered to be silent in consideration of a development proposal.</p>		
<p><b>Support:</b> Draft Policy SD1: The Presumption In Favour of Sustainable Development. Gladman are fully supportive of the inclusion of the policy on Sustainable Development. The ethos of sustainable development is key to assessing planning proposals, it is the</p>	<p>Support noted</p>	<p>No</p>	

golden thread running through the NPPF.			
<p><b>Suupport: (Vision and Objectives) (NYCC)</b></p> <p>The vision and objectives of the Draft Craven Local Plan appear to be broadly in line with the aspiration of the County Council of achieving sustainable economic growth. The County Council welcomes the aspirations of Craven District Council to create an area with “greater equality amongst its communities in terms of housing choice, better paid local job opportunities, more opportunities for pursuing a healthy and active lifestyle and access to services upon which residents of all ages, depend...”</p> <p>Establishing the Plan up to 2032 provides a significant opportunity to foster the district’s potential and ambition for growth which could help to build economic resilience and help rebalance the demographic profile of the district. We would encourage the district to be confident in its Vision including its approach to economic growth, housing provision, including levels of affordable housing.</p>	Support noted	No	

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

**June – July 2017 Draft Local Plan**  
**Policy Response Paper – SP1: Meeting Housing Need**

<b>Policy: SP1</b>			
<b>Aim of the Policy: To set the housing requirement for the Local Plan from 2012 to 2032 and meet, as far as is consistent with the policies of the NPPF, the full objectively assessed needs for market and affordable housing.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan</b>
<b>Support.</b> Two parish council's support the proposed housing requirement of 4,280 dwellings between 2012 and 2032, which would represent an average of 214 dwellings per annum.	<b>Support noted.</b> However, the Council has needed to update the evidence base for its plan and this has resulted in an increase to the proposed housing requirement.  This issue has been addressed in the Council's Housing Growth Options Paper: Addendum, November 2017. See this Craven Local Plan Background Document as well as updated evidence on Demographic Forecasting, Strategic Housing Market Assessment and Employment Land Review.	Yes	The housing requirement for the plan has been amended to 230 dwellings per annum.
<b>Support.</b> Adjacent local planning authority (Lancaster City Council) considers the proposed housing requirement to be sound. There is no conflict in the approach taken by Craven compared	<b>Support noted.</b> However, the Council has needed to update the evidence base for its plan and this has resulted in an increase to the proposed housing requirement.	Yes	The housing requirement for the plan has been amended to 230

to that taken in Lancaster with regard to the meeting of its whole housing market area's housing need within Lancaster City's administrative area.	This issue has been addressed in the Council's Housing Growth Options Paper: Addendum, November 2017. See this Craven Local Plan Background Document as well as updated evidence on Demographic Forecasting, Strategic Housing Market Assessment and Employment Land Review.		dwellings per annum.
<b>Support.</b> Adjacent local planning authority (Yorkshire Dales National Park Authority) is fully supportive of the proposed approach in this policy.	<p><b>Support noted :</b> However, the Council has needed to update the evidence base for its plan and this has resulted in an increase to the proposed housing requirement.</p> <p>This issue has been addressed in the Council's Housing Growth Options Paper: Addendum, November 2017. See this Craven Local Plan Background Document as well as updated evidence on Demographic Forecasting, Strategic Housing Market Assessment and Employment Land Review.</p>	Yes	The housing requirement for the plan has been amended to 230 dwellings per annum.
<b>Objection:</b> There is no evidence in the draft plan to show that Craven has an agreement in place with neighbouring authorities to deliver unmet housing need.	<p>The Council has held extensive discussions with neighbouring planning authorities under the duty to cooperate. Details will be provided in a duty to cooperate statement that will accompany the publication draft plan.</p> <p>There are no specific agreements in place relating to the delivery of unmet housing need in neighbouring authority/housing market areas, as this has not been identified as a cross boundary administrative area issue.</p> <p>However, with regard to the Craven housing market area which includes the District within and outside the Yorkshire Dales National Park area, there is a Memorandum of Understanding (MoU) in place between the Council and the Yorkshire Dales National Park Authority (YDNPA) as local planning authorities. The MoU pertains to a range of issues including the treatment of objectively assessed housing need in the housing market area. This is the mechanism by which housing</p>	No	None

	<p>needs and matters in the Craven housing market area (which includes the national park area are addressed.</p> <p>The proposed change in the plan's housing requirement now requires a change to the MoU. Discussions with the YDNPA indicate that a MoU will be signed between the two authorities before Publication of the Local Plan</p> <p>Further to the publication of the Department of Communities and Local Government's (DCLG) September 2017 consultation on the provision of housing which deals with matters relating to the Duty to Cooperate, the Council are now in discussion with neighbouring authorities to prepare a Statement of Common Ground. This will further clarify the position regarding the provision of housing in the wider area around Craven District.</p>		
<p><b>Support and Objection.</b> Welcome the housing requirement being expressed as a minimum figure, but disagree that the figure should be reduced from 256 dpa (Draft Plan April 2016) to 214 dpa (Draft Plan June 2017) The proposed housing requirement is significantly lower than past plans and recent evidence. The Regional Spatial Strategy figure of 250 dpa (applied to Craven up to 2012) and the housing need of 290 dpa identified in the Council's 2015 SHMA for the District as a whole.</p>	<p><b>Disagree with the suggested increase in the housing requirement:</b></p> <p>This issue has been addressed in the Council's Housing Growth Options Paper: Addendum, November 2017. See this Craven Local Plan Background Document for response to this objection as well as updated evidence on Demographic Forecasting, Strategic Housing Market Assessment and Employment Land Review.</p>	Yes	The housing requirement for the plan has been amended to 230 dwellings per annum.
<p><b>Support.</b> Welcome the lower housing requirement figures compared to earlier consultations.</p>	<p><b>Support noted.</b> However an increase in the proposed housing requirement has been necessary to reflect the updated evidence on housing need. This issue has been addressed in the Council's Housing Growth Options Paper: Addendum, November 2017. See this Craven Local Plan Background Document for response to this issue, as well as updated evidence on Demographic Forecasting, Strategic Housing Market Assessment and Employment Land Review.</p>		The housing requirement for the plan has been amended to 230 dwellings per annum.

<b>Support and Objection.</b> Welcome the approach which seeks to meet the objectively assessed needs of the District, but don't consider that 214 dpa represents the full housing needs of the District.	<b>Noted:</b> This issue has been addressed in the Council's Housing Growth Options Paper: Addendum, November 2017. See this Craven Local Plan Background Document for response to this objection as well as updated evidence on Demographic Forecasting, Strategic Housing Market Assessment and Employment Land Review.		The housing requirement for the plan has been amended to 230 dwellings per annum.
<b>Comment.</b> Adjacent local planning authority (Yorkshire Dales National Park) suggests the key issues at paragraph 2.40 of the plan could be celebrated more, and added to with a list of opportunities to tackle these issues, given the District's inherent locational and environmental advantages.	<b>Comment noted:</b> It is not considered that there is a need to add to this paragraph of the plan. The whole plan and its policies already provide the Council's response to tackling these issues.	No	None
<b>Comment.</b> Adjacent local planning authority (Yorkshire Dales National Park Authority) suggest the plan should not overstate the risks to housing delivery in the Craven District part of the National Park. There is a gross planned housing supply in this area, currently standing at 164 dwellings, and representing 5 years' worth of housing against the notional OAN of 32 dwellings per annum. The National Park Authority is committed to reviewing its housing land supply culminating in a further release of housing land within 5 years.	<b>Comment noted:</b> In the light of the information now provided in the adopted Yorkshire Dales National Park Local Plan on this matter, it is accepted that the explanatory text for Policy SP1 in the Pre-Publication Draft Plan (2017) should be amended on this issue.  This issue has been addressed in the Council's Housing Growth Options Paper: Addendum, November 2017. See this Craven Local Plan Background Document for response to this issue, as well as updated evidence on Demographic Forecasting, Strategic Housing Market Assessment and Employment Land Review.	Yes	See revised explanatory text of Policy SP1.
<b>Objection.</b> It is unlikely that the Local Plan will be adopted until early 2019 at the earliest, such that it will cover only a 13-year (or less) timeframe. In this respect, the PPDLP is inconsistent with the NPPF and is therefore unsound. The plan period	<b>Disagree:</b> Paragraph 157 of the NPPF does not state that local plans are required to have a minimum time period of 15 years post adoption. It states that local plans should "be drawn up over an appropriate time scale, <i>preferably</i> a 15 year time horizon, take account of longer term requirements and be kept up to date". The	No	None



must be extended to 2034 at the earliest.	Draft Local Plan has been developed for a 20 year period from 2012 to 2032, which is considered to be an appropriate time horizon of 20 years for the planning of longer term requirements and is based on up to date evidence. Changing the plan period at this stage would not confer any specific benefits and would introduce further delay into the plan preparation process.		
<b>Objection: Housing Growth Options Paper.</b> This paper considers options for growth of option a (145dpa), option b (182dpa), option c (214dpa) and option d (350-400dpa). It is noted that the analysis of the Sustainability Appraisal suggests option c scores highest across most of the criteria. It is considered that there is no reason why an option closer to 280dpa would not score similarly well but also improve the economic potential of the area. A higher overall requirement would not only support economic growth but would also assist the Council in dealing with the increasing need for affordable housing, which increased by nearly 30% between the 2015 and 2016 SHMAs. The PPG is clear that “.....An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes.	<b>Agree in part:</b> These issues have been addressed in the Council's Housing Growth Options Paper: Addendum, November 2017. See this Craven Local Plan Background Document for response to this objection as well as updated evidence on Demographic Forecasting, a Strategic Housing Market Assessment and an Employment Land Review.	Yes	The housing requirement for the plan has been amended to 230 dwellings per annum.
<b>Objection: Housing Growth Options Paper.</b> Option B (182dpa) should be selected as the Local Plan's housing requirement. It is an achievable target (based on historic rates) and allow the Council better control to ensure the right housing is provided in the right place at the right time.	<b>Disagree:</b> This issue has been addressed in the Council's Housing Growth Options Paper: Addendum, November 2017. See this Craven Local Plan Background Document for response to this objection as well as updated evidence on Demographic Forecasting, Strategic Housing Market Assessment and Employment Land Review.	Yes	The housing requirement for the plan has been amended to 230 dwellings per annum.

<p>The development industry has historically under delivered within the Plan Area. Promoting Growth Option B also allows development needs to be met without the need encroach into higher flood risk land or risk adverse impacts on the District's heritage assets, so thus scores well in terms of the Sustainability Appraisal.</p> <p>As there has been a historical persistent under-delivery of housing throughout the Craven District area averaging a 135-140 completion rate, it is very likely [due to the nature of this representation a typographical error is presumed here and the word 'likely' taken to be 'unlikely'] that Craven will achieve the required 164 units (bearing in mind that the 1,569 extant permissions also have yet to be constructed) therefore, believe that a more realistic growth option should be promoted.</p>			
<p><b>Objection: Housing Growth Options Paper</b> Option A is not a logical, reasonable or robust growth option. It is supply-led; it has not been identified by a robust assessment of potential housing needs but instead simply projects forward the number of new homes completed in previous years. It does not therefore represent a legitimate growth option which has been identified in accordance with the methodology set out in the Planning Practice Guidance (PPG) or the NPPF. Moreover, Option A is well below the OAN for the District and would evidently fail to meet housing needs in full. It is therefore unsustainable and</p>	<p><b>Disagree:</b> This issue has been examined in the Council's Housing Growth Options Paper: Addendum, November 2017. See this Craven Local Plan Background Document for response to this objection as well as updated evidence on Demographic Forecasting, Strategic Housing Market Assessment and Employment Land Review.</p>	Yes	The housing requirement for the plan has been amended to 230 dwellings per annum.

wholly inconsistent with the requirements of the NPPF. It would effectively plan for decline, constrain economic growth, and exacerbate the housing crisis which is evident in the extremely low and worsening affordability in the District.			
<p><b>Objection: Housing Growth Options Paper:</b></p> <p>Options A, B and C are different from each other by 32 to 37 dwellings respectively; in contrast, the lower end of the range presented by Option D is 136 dwellings – almost 64% – higher than Option C. It is notable that CDC has not identified an intermediary option between C and D – for example between 250 to 300 dwellings; such an option would be aligned with the gap between Options A, B and C and would be consistent with:</p> <ul style="list-style-type: none"> <li>• the level of growth which has been achieved in previous years (e.g. 278 net dwelling completions in 2008/09); and</li> <li>• the level of growth proposed in the previous draft of the Local Plan<sup>2</sup> of 256 dpa.</li> </ul> <p>Rather, CDC has presented a single high growth option and noted that this would introduce “significant risks” to the environment. Mindful of the above, the housing requirement proposed in the PPDLP cannot be considered to be “...the most appropriate strategy...” when considered against the reasonable alternatives, given that the alternatives themselves are not reasonable. It is therefore unjustified in the meaning of paragraph 182 of the NPPF. It is important to</p>	<p><b>Agree in part:</b> These issues have been examined in the Council’s Housing Growth Options Paper: Addendum, November 2017. See this Craven Local Plan Background Document for response to this objection as well as updated evidence on Demographic Forecasting, Strategic Housing Market Assessment and Employment Land Review.</p>	Yes	The housing requirement for the plan has been amended to 230 dwellings per annum.

note that, in this respect, the assessment of the impact and appropriateness of the PPDLP undertaken by the associated Sustainability Appraisal (SA) is also considered to be deficient.			
<b>Objection: Housing Growth Options Paper.</b> Housing growth option D should be selected. This is the only option presented that would meet the full, objectively assessed need for market and affordable housing and comply with the NPPF on meeting such needs. The Council itself identifies in the plan at paragraph 2.40 'Affordable Housing Need' as a key issue.	<b>Disagree:</b> This issue has been addressed in the Council's Housing Growth Options Paper: Addendum, November 2017. See this Craven Local Plan Background Document for response to this objection as well as updated evidence on Demographic Forecasting, Strategic Housing Market Assessment and Employment Land Review.	Yes	The housing requirement for the plan has been amended to 230 dwellings per annum.
<b>Objection: Housing Growth Options Paper.</b> One reason given for the rejection of growth option D relates to significant risks to the environment and the unnecessary loss of significant areas of land of medium to high risk of flooding. Yet there are two SHLAA sites in Skipton (SK114 and SK119) where additional housing land can be provided on flood risk zone 1. These are just two examples of sites that could come forward with low flood risk and environmental harm. This indicates the Council has not assessed all reasonable alternatives in rejecting Growth Option D	<b>Agree in part:</b> This issue has been addressed in the Council's Housing Growth Options Paper: Addendum, November 2017. See this Craven Local Plan Background Document for response to this objection as well as updated evidence on Demographic Forecasting, Strategic Housing Market Assessment and Employment Land Review.  See Policy SP5 for Publication Draft Plan land allocations for Skipton.	Yes	The housing requirement for the plan has been amended to 230 dwellings per annum.
<b>Objection. Housing Growth Options Paper (HGOP).</b> This Paper, which supports Policy SP1, is convoluted and flawed, in particular in relation to the choice of Housing Growth Option D and the lack of an option which assesses growth between	<b>Disagree that the HGOP is flawed, but agree in part re assessment of additional growth option:</b> This issue has been addressed in the Council's Housing Growth Options Paper: Addendum, November 2017. See this Craven Local Plan Background Document for response to this objection as well as updated evidence on Demographic	Yes	The housing requirement for the plan has been amended to 230 dwellings per

Option C and D. Growth Option D is an extreme option not a reasonable one. The selection of Option C has the obvious appearance of an 'ex post facto' justification of an earlier decision made by the Council.	Forecasting, Strategic Housing Market Assessment and Employment Land Review.		annum.
<b>Comment: Housing Growth Options Paper.</b> Option D is broadly aligned with the scale of the affordable housing need in the District. As such, and unlike Option A, it is a legitimate growth option. However, it is notable that it is significantly higher than all the other options.	<b>Disagree:</b> This issue has been addressed in the Council's Housing Growth Options Paper: Addendum, November 2017. See this Craven Local Plan Background Document for response to this objection as well as updated evidence on Demographic Forecasting, Strategic Housing Market Assessment and Employment Land Review.	Yes	The housing requirement for the plan has been amended to 230 dwellings per annum.
<b>Objection: Housing Growth Options Paper.</b> It does not provide an objective assessment of the higher growth option. In consequence the case for a higher housing requirement than 214 dpa is not properly considered in the Local Plan (such as the previous 290 dpa OAN from the 2016 SHMA).	<b>Agree in part:</b> This issue has been addressed in the Council's Housing Growth Options Paper: Addendum, November 2017. See this Craven Local Plan Background Document for response to this objection as well as updated evidence on Demographic Forecasting, Strategic Housing Market Assessment and Employment Land Review.	Yes	The housing requirement for the plan has been amended to 230 dwellings per annum.
<b>Objection: Housing Growth Options Paper:</b> A higher requirement than Growth Option C (214 dpa) has been disregarded by CDC on the basis that: <ul style="list-style-type: none"> <li>• It may not be deliverable given the low rate of past dwelling completions in the District;</li> <li>• It would result in greater environmental harm; and</li> <li>• It would be "out of balance" with current economic growth forecasts for the District.</li> </ul> The first two of these issues is discussed below.	<b>Agree in part:</b> These issues have been addressed in the Council's Housing Growth Options Paper: Addendum, November 2017. See this Craven Local Plan Background Document for response to this objection as well as updated evidence on Demographic Forecasting, Strategic Housing Market Assessment and Employment Land Review.  The school's land at Lords Close is now proposed for a housing land allocation in the Publication Draft Plan under Policy SP11 of the plan.	Yes	The housing requirement for the plan has been amended to 230 dwellings per annum.  See also Policy SP11

<p>The economic growth forecast issue is dealt with under objections to the evidence base.</p> <p>Past dwelling completions</p> <p>It is acknowledged that housing completions in Craven over the preceding 10 years have been low, averaging approximately just 146 dpa between 2007/08 and 2015/16. However, as acknowledged by the PPDLP evidence base, this can be attributed to two key factors:</p> <ul style="list-style-type: none"> <li>• The economic downturn in the late 2000's. This was deepest and longest period of economic recession since the 1920's, which resulted in a significant decline in housing completions as finance – both for development and for mortgages – was extremely constrained.</li> <li>• The absence of an up-to-date local Development Plan which provides a deliverable supply of development land.</li> </ul> <p>As such, it is both erroneous and misleading to use past dwelling completions as a benchmark for the level of housing growth which should be provided for to secure a sustainable future for the District. They are not representative of what can be achieved in a positive economic context where a deliverable and viable supply of housing land is made available. Instead, they represent periods of recession and land supply constraints. The approach of CDC in this respect does not meet the clear requirement of the NPPF to plan positively and will not overcome obstacles</p>			
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<p>experienced in previous years to achieve a sustainable and aspirational vision for growth.</p> <p>It is inappropriate to suggest that growth options in excess of 214 dpa are unachievable, would “...saturate the market...” and undermine development viability.</p> <p>CDC provides no evidence to justify this claim. Conversely, there is clear evidence that:</p> <ul style="list-style-type: none"> <li>• A higher level of development can be achieved in the District, with 278 dwellings delivered in 2007/08; and</li> <li>• There is a recognised imbalance between supply and demand, with the District having an affordability ratio of 8.12 – almost 8% higher than that across England as a whole.</li> </ul> <p>It is evident that there is high demand in the District, as acknowledged by CDC in its assessment of market signals. In this context, the low rate of past completions does not justify a reduced housing requirement.</p> <p>Environmental considerations</p> <p>The PPDLP sets out that a requirement in excess of that proposed would risk environmental harm and/or unsustainable patterns of growth. However, it is evident that there is development land in the District that is not identified as a draft allocation but which is both suitable for development and sustainably located. For example, the School’s land</p>			
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<p>at Lord's Close in Giggleswick is not located in a flood zone or subject to any overriding environmental constraints. CDC's own evidence base<sup>13</sup> notes that the site "...performs satisfactorily..." in the Sustainability Analysis and is deemed to be sustainable for residential development. Indeed, it was previously identified by CDC as a preferred housing site and proposed allocation in the emerging Local Plan.</p> <p>The evidence base for the PPDLP therefore demonstrates that a higher housing requirement can be achieved whilst ensuring that the Local Plan itself is environmentally sustainable. Whilst environmental considerations might not support a requirement of 350-400 dpa, a requirement of 256 dpa – 19.6% higher than currently proposed – was set out in the previous version of the Local Plan and was judged by CDC at that time to be environmentally sustainable.</p> <p><b>Conclusion</b></p> <p>It is clear that the rationale applied by CDC in selecting the requirement – and in rejecting a requirement in excess of 214 dpa – is fatally flawed. As such, the housing requirement proposed by Policy SP1 of the PPDLP is not justified and is, therefore, unsound.</p> <p>It is considered that CDC should consider the merits of a higher housing requirement. It is apparent that there is a lack of alignment between the housing OAN and the</p>			
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<p>employment land OAN, with the concluded housing OAN running the risk of failing to support planned employment growth. This evidently poses a challenge to the soundness of the emerging Local Plan.</p> <p>Given the wide array of potential and environmentally sustainable development options identified by CDC, coupled with the scale of housing demand in the District, there is no reason why a higher level of growth should be considered unsustainable or unachievable. As CDC acknowledges, a higher rate of growth would result in the delivery of more affordable housing, which is an important consideration given that the approach set out in the PPDLP is incapable of meeting such needs. The area's affordable housing needs has increased by nearly 30% between the publication of the 2015 and 2016 Strategic Housing Market Area (SHMA).</p>			
<p><b>Objection: Housing Growth Options Paper.</b> The Sustainability Appraisal is flawed. There are no reasons why Option D should be scored negatively against the Sustainability Appraisal Objective SO3 (Promote equality and diversity, and foster community cohesion by reducing all forms of poverty) when potentially it is the only option that delivers the full assessed affordable housing need.</p>	<p><b>Disagree:</b> An updated Sustainability Appraisal forms part of the Council's Housing Growth Options Paper: Addendum, November 2017. See this Craven Local Plan Background Document for response to this objection as well as updated evidence on Demographic Forecasting, Strategic Housing Market Assessment and Employment Land Review.</p>	Yes	Plan supported by updated evidence base and revised housing requirement is 230 dpa.
<p><b>Comment: Housing requirement:</b> The current proposed OAN for Craven is 214. It is noted that this is for the whole of the</p>	<p><b>Noted:</b> See the Housing Growth Options Paper: Addendum November 2017 as well as updated evidence on Demographic Forecasting, Strategic Housing Market Assessment and Employment</p>	Yes	Plan supported by updated evidence base and revised

<p>Craven area, including those parts of Craven within the Yorkshire Dales National Park.</p> <p>Although the County Council welcomes the intention to provide more than the District's own OAN for housing, and recognises that a Memorandum of Understanding has been prepared between the District and the National Park, as both areas seek to provide more than their identified OAN, care is needed to ensure that this growth is attributed appropriately to enable housing provision within both planning areas so that social and housing needs can be met and key services are able to be supported by population growth. The Spatial Strategy can help balance how the OAN is met in order to maintain an appropriate balance with the YDNP.</p>	<p>Land Review. The OAN for the District as a whole has increased to 242 dwellings per annum (dpa) and the proposed housing requirement has increased to 230 dpa. This figure will still more than meet the plan areas OAN (206 dpa). The Spatial Strategy set out in Policy SP4 is considered an appropriate response to the issue of supporting key services in the plan area.</p>		<p>housing requirement is 230 dpa.</p>
<p><b>Comment: Affordable housing need and Jobs Growth.</b> It is acknowledged that the draft Craven Plan is proposing to meet more than the OAN as a minimum and will also be encouraging exception and windfall sites in addition to the OAN, although it is noted that the Draft Plan Options for SP1 indicate that the district's affordable housing need will not be met in full with an identified shortfall of 145dpa. The District does experience significant housing affordability issues with a house price-to-wage ratio of 9.1. As such it is important that the District Council does what it reasonably can to address housing needs and support economic growth in the area. This includes</p>	<p><b>Noted:</b> See the Housing Growth Options Paper: Addendum November 2017 as well as updated evidence on Demographic Forecasting, Strategic Housing Market Assessment (SHMA) and Employment Land Review (ELR). The updated SHMA concludes that the latest position on the need for affordable housing is 126 dpa. The OAN for the District as a whole has increased to 242 dwellings per annum (dpa) and the proposed housing requirement has increased to 230 dpa. The Council has sought to maximise the plan's ability to deliver affordable housing within the 'constraint' of providing for a sustainable pattern of growth. The Council estimates that about 74% of the need for affordable housing will be met within the housing market area (District as a whole, including the National Park).</p> <p>As the basis for deriving the plans housing requirement, the Council and the SHMA 2017 Update used the 'PG Long Term Trend' scenario.</p>	Yes	<p>Plan supported by updated evidence base and revised housing requirement is 230 dpa.</p>

ensuring that the District fully capitalises upon its competencies and connections in relation to sectoral strengths such as financial services and technology. Whilst accepting that delivery of the District's full affordable housing need is likely to be unrealistic, the County Council would welcome working together to monitor progress to help continue to ensure that a strong supply of deliverable housing sites throughout the plan period is achieved in the interests of enabling a realistic and deliverable proportion of affordable units on any one site. This will help to respond appropriately to changing demographic needs as well as in key sectors of the local economy.	The Council consider that the housing requirement of 230 dpa will support the number of jobs associated with this scenario.		
Comment The District Council needs to ensure that the housing numbers and the evidence base supporting them are robust and take adequate account of market signals and economic growth prospects. Whilst it is acknowledged that the Council is "...not seeking to promote a step change or uplift in the District's economic activity..." <sup>1</sup> , in order to reverse the decline in the resident work force the Council needs to be satisfied that the revised OAN does not constrain labour supply throughout the plan period. A continued strong supply and provision of housing would also help to address the constraints that an aging population is placing on economic growth, alongside rebalancing the high levels of inward	<p>See the Housing Growth Options Paper: Addendum November 2017 as well as updated evidence on Demographic Forecasting, Strategic Housing Market Assessment (SHMA) and Employment Land Review.</p> <p>As the basis for deriving the plans housing requirement, the Council and the SHMA 2017 Update used the 'PG Long Term Trend' scenario. The Council consider that the housing requirement of 230 dpa will support the number of jobs associated with this scenario.</p> <p>The net commuting ratio of the District is almost balanced and the numbers of people travelling to work from Craven to elsewhere is very similar to those travelling to work from elsewhere into Craven.</p>	Yes	Plan supported by updated evidence base and revised housing requirement is 230 dpa.

commuting that currently occurs (c9,000 daily). This could have the added benefit of reducing current and future rates of increase in congestion and vehicle emissions, and thereby contributing towards mitigating against the impacts of climate change.			
<b>Support:</b> Plan Review: In order to ensure that housing supply continues to reflect and be responsive to the performance and demands of the economy throughout the plan period, the County Council understands and welcomes that Craven District Council is committing to regular	<b>Support welcomed.</b>	No	None
<b>Objection: Evidence base (Demographic Forecasting).</b> The apportionment of 15% (32dpa) of the District's objectively assessed housing need to the Yorkshire Dales National Park (YDNP) is too high. The conclusion of Examination Inspector of the YDNP Local Plan concluded that the objectively assessed need for the whole of YDNP lay between 32 and 38dpa. The Council's assumption that 32dpa can be allocated to the National Park area within Craven District is clearly inconsistent with this finding in the YDNP.	<p><b>Disagree:</b> Edge Analytics developed a range of trend-based and dwelling-led forecasts for the YDNP (November 2015). These forecasts are presented in the YDNP Local Plan (Table 13, p10). Data underpinning these scenarios incorporated the 2012-based sub-national projection from ONS and the accompanying 2012-based household model from DCLG.</p> <p>Ignoring the 'Natural Change' scenario, these forecasts estimated a range of dwelling growth outcomes, from zero dwellings per annum (dpa) to 73 dpa for 2015–2030. YDNP's 'preferred' scenario, underpinning its objectively assessed need (OAN) was 32–38 dpa. Based on the evidence that was produced by Edge Analytics, the selected scenario represents a 'zero population growth' scenario.</p> <p>Edge Analytics subsequently developed a suite of trend and employment-led forecasts for Craven district (October 2016). Using local assumptions on fertility, mortality and migration, forecasts were also derived for the portion of Craven district that lies within the</p>	Yes	Plan supported by updated evidence base and revised housing requirement is 230 dpa.

	<p>YDNP. Data underpinning these scenarios incorporated the 2014-based sub-national projection from ONS and the accompanying 2014-based household model from DCLG.</p> <p>Craven district's 'preferred' scenario for its OAN was the PG Long-Term scenario, with an additional 20% uplift, resulting in 214 dpa for the district (2012–2032). This value was at the top-end of the range of scenarios produced. The estimated allocation to the YDNP 'portion' of Craven was 32 dpa.</p> <p>Inevitably there is a discrepancy between the YDNP and Craven outcomes, as each organisation has made a 'choice' for its OAN from a range of scenarios. YDNP selected a relatively low-growth (zero population growth) for its OAN scenario, whilst Craven selected a relatively high growth (plus uplift) for its OAN scenario. If Craven had chosen a lower growth outcome, then the dwelling growth allocated to the YDNP may have been more in line with the YDNP's choice.</p> <p>In addition to the effects of 'choice' of OAN scenario, there are also data differences to consider. The YDNP evidence was produced using 'earlier' demographic information (2012-based ONS and DCLG models), whilst the Craven evidence used more recent data (2014-based ONS and DCLG models). However, it is the respective choices of OAN scenario that results in the main discrepancy in the evidence.</p> <p>See also the Council's Housing Growth Options Paper: Addendum, November 2017, as well as updated evidence on Demographic Forecasting, Strategic Housing Market Assessment and Employment Land Review.</p>		
<p><b>Objection: Evidence base (Demographic Forecasting).</b></p> <p>The work in the SHMA refers to work by Edge</p>	<p><b>Disagree:</b> Under each of the scenarios, dwelling growth was estimated using assumptions from the 2014-based and 2008-based household projection models, resulting in a range of outcomes.</p>	Yes	Plan supported by updated evidence base and revised

Analytics that it says concludes that “sub-area analysis by Edge Analytics indicates that around 15% of dwelling requirements [are in the YDNP area]”. We have reviewed this Edge Analytics work and conclude that this assessment in the SHMA is partial. In fact, the “share” attributed in the Edge work for the YDNP area within Craven based on earlier demographic work ranges from 15% down to 8% for the pure demographic scenario (as little as 13 or 14 dpa). To apply the 15% to a new FOAN figure is not supported by the evidence produced.

Subsequently, a ‘mid-point’ between the two outcomes under each of the scenarios was calculated and expressed as a proportion of the total dwelling growth estimated for Craven (i.e. as a percentage of the dwelling growth for the aggregate of the four sub-direct areas). This is presented in the table below. As a range of demographic and jobs-led scenarios were developed, an average of the dwelling growth outcomes for each of the four sub-districts was calculated, resulting in 15% for YDNP within Craven. (see table below)

Scenario	Average Dwelling Growth 2012–2032 (2008-based & 2014-based)				Average Dwelling Growth % 2012–2032 (2008-based & 2014-based)			
	North Craven	Mid Craven	South Craven	YDNP Craven	North Craven	Mid Craven	South Craven	YDNP Craven
Jobs-led REM 2014	30	42	145	45	11%	16%	55%	17%
PG Long-Term	22	34	119	32	10%	17%	58%	15%
SNPP-2012	20	28	100	24	12%	16%	58%	14%
Jobs-led REM 2016	18	31	95	26	11%	18%	56%	15%
Jobs-led REM 2016 SENS1	18	31	93	25	11%	18%	56%	15%
PG Short-Term	1	16	118	23	1%	10%	75%	15%
SNPP-2014	16	29	83	22	10%	19%	56%	14%
Jobs-led REM 2016 SENS2	9	23	53	11	10%	24%	54%	12%
Average					9%	17%	58%	15%

The previous demographic analysis for Craven (published in January 2015) estimated household and dwelling growth under the 2011-based and 2008-based household projection models. The dwelling growth range (8% – 15%) was lower under the 2011-based household projection model but this model has subsequently been largely dismissed as inappropriate, replaced by the later 2012-based and 2014-based DCLG model alternatives.

See also the Council’s Housing Growth Options Paper: Addendum, November 2017, as well as updated evidence on Demographic

housing requirement is 230 dpa.

	Forecasting, Strategic Housing Market Assessment and Employment Land Review.		
<p><b>Objection: Evidence base. (Demographic Forecasting)</b></p> <p>Unable to find any firm evidential basis as to why the OAN for that part of Craven covered by the Craven Local Plan should be set at anything other than the OAN for the whole district. This means that in “choosing” Option C, Craven District Council is doing nothing more than meeting its own current assessed OAN for its Local Plan area.</p>	<p><b>Disagree:</b> In October 2016 Edge Analytics developed a number of demographic and jobs-led scenarios at district level, to consider a range of population and dwelling growth outcomes for Craven. In the configuration of the sub-district scenarios, the total (district level) population growth was disaggregated using output area assumptions on fertility, mortality and migration. This assigned each of the sub-district areas with a level of population growth over the plan period. Based on this sub-district population growth, headship rate and dwelling vacancy rate assumptions were then applied to derive the associated level of household and dwelling growth over the plan period.</p> <p>The October 2016 report suggests that under the level of population growth assigned to the Yorkshire Dales National Park within Craven, the associated annual level of dwelling growth required to support this growth is approximately 15% of the district’s total dwelling growth.</p> <p>See also the Council’s Housing Growth Options Paper: Addendum, November 2017, as well as updated evidence on Demographic Forecasting, Strategic Housing Market Assessment and Employment Land Review.</p>	Yes	Plan supported by updated evidence base and revised housing requirement is 230 dpa.
<p><b>Objection: Evidence base (SHMA and Demographic Forecasting).</b></p> <p>The District’s objectively assessed need for housing (OAN) should be higher than 214 dpa because an amendment to the 2014 headship rates is necessary. It is noted that the same consultants undertaking SHMA’s elsewhere have</p>	<p><b>Agree in part:</b> These issues have been addressed in the Council’s updated evidence on Demographic forecasting and Strategic Housing Market Assessment. See these and the Housing Growth Options Paper Addendum: November 2017.</p>	Yes	Plan supported by updated evidence base and revised housing requirement is 230 dpa.

<p>sought to improve headship rates. It is not suggesting that the 2008 headship rates should necessarily be applied but an improvement upon the 2012 and 2014 rates for younger age groups 25-44 would be appropriate and sound. Reason given: These nationally younger age groups have been affected by shortages in housing supply and increasing affordability. A consideration of Craven suggests that affordability is increasing and the supply has failed to keep pace with previous plan requirements. Furthermore the Government is actively seeking to increase headship rates, particularly amongst the younger age groups 25-44 through interventions such as Help to Buy and Starter Homes, the latter of which is aimed directly at the under 40 age groups. Given these Government stimuli, and the situation in Craven it would appear appropriate to ensure that headship rates for younger age groups are seen to improve over the period of the plan. This would inevitably have implications for the demographic starting point of the OAN.</p>			
<p><b>Objection: Evidence base (Demographic Forecasting) Economic Forecasts</b></p> <p>The 2016 Demographic Forecasting Update utilises two runs of the Yorkshire and Humber Regional Econometric Model (REM). The 2014 REM suggests an average rate of job creation of 147 jobs per annum. In comparison the 2016 REM suggests a significantly lower rate of jobs growth of just 39 per annum. It is notable that the demographic scenario PG Long-Term would provide 92 jobs per</p>	<p><b>Agree in part:</b> In the October 2016 report, Edge Analytics considered a range of employment growth forecasts, generated by the Regional Economic Intelligence Unit (REIU). At the time of the analysis, this included the latest Regional Econometric Model (REM) (September 2016), along with two earlier iterations (2016 and 2014). The REIU and SHMA are required to consider the appropriateness of the employment growth generated by the REM.</p>	Yes	Plan supported by updated evidence base and revised housing requirement is 230 dpa.



<p>annum (table 11, 2016 Demographic Forecasting Update). This sits approximately at the mid-point between the two projections and could therefore, at face value, appear an attractive option to balance employment and housing needs of the area.</p> <p>The volatility of economic projections is clearly illustrated in the two runs of the model and for these reasons it is not recommend either projection is looked at in isolation. Past performance is also a useful indicator. The past performance of Craven is one of successful jobs creation. The Council's 2017 Employment Land Review, paragraph 2.6, notes a 10.3% increase in jobs between 1997 and 2015 which is significantly greater than the Yorkshire and Humber average of 8.5% over the same period. Furthermore consideration of NOMIS data for Craven indicates that between 2012 and 2015 total jobs, including the self-employed, rose from 31,000 to 38,000. Whilst it is recognised these figures do not tell the whole story they do suggest that the 2016 REM is overly pessimistic.</p> <p>To convert the two REM projections into a dwelling requirement the 2016 Demographic Forecasting Update considers two core jobs-led scenarios and two sensitivities based upon the 2014 and 2016 runs of the REM. The core jobs-led scenarios utilise a number of assumptions. These are discussed below.</p>	<p>The issue of alignment between the housing and employment forecasts is discussed in the Council's Housing Growth Options Paper: Addendum, November 2017. See this Craven Local Plan Background Document for response to parts of this objection as well as updated evidence on Demographic Forecasting, Strategic Housing Market Assessment and Employment Land Review.</p>		
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<p><b>Commuting ratio</b></p> <p>The commuting ratio identifies the balance between workers within an area and the number of jobs. The 2011 census identified a relatively balanced situation in Craven with a ratio of 1.01. The core jobs-led scenario retains this ratio over the plan period. This is considered the correct approach.</p> <p><b>Unemployment</b></p> <p>The core jobs-led scenario also assume a reduction in unemployment to the pre-recession average of 2.8% by 2020. It is agreed that an improvement in unemployment rates may take place with the creation of additional jobs the unemployment rate is already significantly below the national and regional averages. The ability to sustain a rate of 2.8%, which is an average over just three years, over the whole plan period is considered highly aspiration and unlikely to be achievable.</p> <p><b>Economic Activity Rates</b></p> <p>The core jobs-led scenarios also consider economic activity rates and apply the Office for Budget Responsibility (OBR) rates derived from the 2017 Fiscal Sustainability Report to the 60 to 75+ age groups to the economic scenarios. Whilst it is preferred that this should be a sensitivity test rather than a core assumption it is considered reasonable in terms of Craven given the aging population structure and the changes to the State Pension Age.</p>	<p>Edge Analytics considers it reasonable to assume a small reduction in the unemployment rate for Craven. In the modelling approach, it is the change in unemployment rate over the forecast period (rather than the rate of unemployment itself) that has an impact on the relationship between the labour force and the level of employment that can be supported.</p> <p>The assumption of a reduction of 0.1 percentage points in Craven's unemployment rate over the forecast period is considered reasonable.</p> <p>Under the core jobs-led scenarios developed in the October 2016 report, the 2011 Census economic activity rates were applied by 5-year age group and sex. Adjustments were made to the older age groups (60–75+), in line with the labour market analysis from the Office for Budget Responsibility (OBR). At the time of the analysis, these were deemed appropriate statistics for providing a basis for assumptions on future levels of economic activity.</p> <p>An ageing population, increased life expectancies and changes to the State Pension Age (SPA) result in increased economic participation in the older age groups. In order to reflect these changing economic profiles, it is considered appropriate to make adjustments to the rates in the older age groups.</p>		
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<p><b>Outputs</b></p> <p>The jobs-led scenarios provide a range of dwelling requirements ranging from 150dpa to 281dpa, dependent upon the REM run and headship rates utilised. Based upon the statements above in relation to headship rates and the two REM projections it is considered that a figure closer to 281dpa (see table 12, 2016 Demographic Forecasting Update) would represent a positively prepared jobs-led scenario.</p> <p><b>Sensitivity Tests</b></p> <p>The first sensitivity test (SENS1) assumes that migration into the area is heavily weighted towards people of working age. Whilst the creation of additional jobs would be likely to attract younger migrants this would be contrary to the overwhelming evidence in relation to current migrants to the area who tend to be older. The realism of such an assumption is therefore questionable.</p> <p>The second sensitivity test (SENS2) retains the migration assumption from SENS1 but also maintains the economic activity rate of 63% to the whole 16-75+ population over the plan period. The impact of this sensitivity test is significant. This sensitivity test is unrealistic.</p> <p>Whilst economic activity rates may improve amongst younger age groups, given the creation of jobs within the district, this appears a very aspirational target due to the ageing nature of the</p>	<p>In an employment-led scenario, if there is an insufficient resident labour force to support the forecast annual change in employment (as defined by the REM) a higher level of in-migration will occur. The first sensitivity (SENS 1) scenario was developed to consider the potential impact of a higher proportion of the 'worker-age' population migrating to Craven to support the jobs growth. This scenario has been developed as a 'what-if' scenario, to evaluate the potential impact of a slightly different age structure on population and dwelling growth in Craven. Edge Analytics considers this to be a perfectly reasonable sensitivity scenario to evaluate the potential of attracting more 'working-age' population to fulfil the forecast level of employment. Overall this has a relatively small difference on dwelling growth in Craven, approximately 3–5 per year (2012–2032) under the 'Jobs-led REM 2016' and 'Jobs-led REM Sept 2016' scenarios respectively.</p> <p>The second sensitivity (SENS 2), examined the effect of maintaining a higher aggregate economic activity rate for the 16–75+ age groups (i.e. at the 2011 Census value of 63%) and a migration schedule more heavily weighted toward the labour force age groups. The higher aggregate economic activity rate results in a larger labour force being</p>		
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<p>population. The sensitivity test would require a significant proportion of the additional workers to come from this age group, therefore significantly increasing the proportion of the workforce required to be working into retirement than is currently projected by the OBR. The evidence that such a phenomenon is realistic, or even desirable, in Craven is lacking and is considered unjustified.</p> <p>On the basis of the above commentary it is not considered that either of the sensitivity tests are soundly based.</p>	<p>maintained throughout the forecast period. As a larger resident labour force is maintained in Craven, higher employment can be supported, reducing the need for higher in-migration. Sensitivity testing of economic activity rates is considered reasonable; particularly given that Craven has an ageing population. Whilst the OBR forecasts do provide some adjustments to account for this, it is noted by Experian that that these can be deemed relatively small and do not reflect recent changes to government's policy on State Pension Age (SPA). Economic forecasting models such as the REM and Experian tend to include higher rates of economic activity to account for this in context of economic growth.</p>		
<p><b>Objection: Evidence base (Strategic Housing Market Assessment) Economic Forecasts.</b></p> <p>The housing need identified in the SHMA is derived from a conservative view of the economic prospects of the District and runs the risk of the economy growing more than the latest conservative forecasts. There could be insufficient new dwellings which would restrict and prejudice the District's economic growth. Official data recorded since 2012 indicates a rate of growth in excess of the 2016 REM estimates (based on the Nomis report on Craven). Furthermore the District's previous housing need based on earlier higher economic estimates was 290 dpa). This suggests the 2016 REM estimates may be overly pessimistic.</p>	<p><b>Agree in part:</b> The SHMA 2016 OAN reflects long-term migration and supports economic growth in excess of the latest 2016 REM estimates. The OAN calculation has carefully reviewed available economic forecasts and whilst the current set of data are pessimistic there are notable economic uncertainties, not least the potential impact of Brexit.</p> <p>However, the Council has reviewed its position regarding OAN and the housing requirement. The issues in this objection have been examined in the Council's Housing Growth Options Paper: Addendum, November 2017. See this Craven Local Plan Background Document as well as updated evidence on Demographic Forecasting, Strategic Housing Market Assessment and Employment Land Review.</p>	Yes	Plan supported by updated evidence base and revised housing requirement is 230 dpa.
<p><b>Objection: Evidence base (Strategic Housing Market Assessment (SHMA)) Market signals</b></p>	<p><b>Noted:</b> The SHMA 2016 has been updated to take account of representations made during this consultation and new data.</p>	Yes	Plan supported by updated evidence base and revised

<p>The need for an uplift in the OAN based upon market signals is set out within the PPG. Attention is drawn to the fact that whilst some signals may not appear to warrant an uplift the PPG is clear that;</p> <p>'..A worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections..'</p> <p>The 2016 SHMA factors in a 20% adjustment to account for affordability signals in the OAN calculation (paragraph 6.23). This would accord with the level of uplift recommended by the Local Plan Expert Group in their 2016 recommendations to Government. In addition, the housing delivery should be added to these signals. Whilst a 20% uplift would appear reasonable this has been incorrectly applied. The 2016 SHMA applies the 20% increase based upon the baseline demographic position, 130dpa, resulting in an overall increase of 26dpa. However, given that the 2016 SHMA accepts that the PG Long-Term scenario represents the true demographic starting point the 20% uplift should be applied to this figure. This would require an uplift of 38dpa. The resultant OAN based upon the 2014 headship rates would therefore be 226dpa.</p>	<p>The SHMA 2017 has reconsidered the OAN in the light of the latest position in the housing market and demographics. See SHMA 2017 Update.</p>		<p>housing requirement is 230 dpa.</p>
<p><b>Objection and Comment: Evidence base (SHMA) Market Signals.</b></p> <p>Market signals are at the very core of what the Framework is trying to achieve in promoting</p>	<p><b>Agree in part:</b> Chapter 5 of the SHMA considers a range of housing market signals. This includes comparisons between Craven and other</p>	<p>Yes</p>	<p>Plan supported by updated evidence</p>

<p>sustainable development and boosting the supply of housing land.</p> <p>§19 and §20 of the PPG gives guidance on what market signals should be taken into account and how plan makers should respond to these market signals. The below extract identifies some particularly pertinent points:</p> <p>“The housing need number suggested by household projections (the starting point) should be adjusted to reflect the appropriate market signals, as well as other market indicators of the balance between demand for and supply of dwellings. Prices of rents rising faster than national/local average may well indicate particular market undersupply relative to demand.”</p> <p>The paragraph goes on to indicate that these factors would include, but should not be limited to land prices, house prices, rents, affordability, rates of development and overcrowding. However, given what the Framework says at §17, quoted above, it seems clear that particular consideration should be given to affordability.</p> <p>In order to consider how market signals should be taken forward §20 identifies some key concepts:</p> <p>“Appropriate comparisons of indicators should be made. This includes comparison with longer term trends (both in absolute levels and rates of change) in the: housing market area; similar demographic and economic areas; and nationally. A worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on</p>	<p>areas. However, the SHMA recommended an uplift to the OAN based on affordability ratios, with the House Price Ratio (median price to median earnings) of 7.7 and a Rental Affordability Ratio of 33.6%. PPG does not provide guidance regarding the scale of uplift associated with market signals, but the LPEG report provides helpful guidance. This has been used to establish a 20% uplift on the basis of market signals linked to affordability.</p> <p>See the Council’s Housing Growth Options Paper: Addendum, November 2017, as well as updated evidence on Demographic Forecasting, Strategic Housing Market Assessment and Employment Land Review.</p>		<p>base and revised housing requirement is 230 dpa.</p>
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<p>household projections.”</p> <p>It is therefore clear that where market signals are apparent (in any of the indicators assessed) there is an absolute and clear direction that an upward adjustment to housing numbers is required. It is also clear that both the level of change and the rates of change are considerations and that local planning authorities need to carefully benchmark themselves against other areas. This should not simply be a case of considering neighbouring authorities but should look at, as well as these, local authorities on a national basis, if the demographic and economic indicators are relevant. Considering comparisons purely against neighbouring authorities is not sufficiently robust and does not address the underlying issues which both the Framework and the PPG are trying to tackle with regard to housing.</p>			
<p><b>Objection and comment: Evidence base (SHMA) Market Signals</b></p> <p>When considering housing need and market signals, the period of time analysed is important when considering both relative and absolute change. It has become apparent in consideration of a number of plans, that many local planning authorities choose to look at periods of time which are not fully representative of the depth of the housing crisis which we are currently within. Local planning authorities must take a long term view when considering affordability and consider the relative and absolute change over a long term 15-20 year period, which coincides with the</p>	<p><b>Noted:</b> Market signals data was presented covering a 10 year period for Craven, with general comparator data based on a more recent 5 year period. Arc4 has responded to the HBF in particular by providing market signals data over a longer time period (10 years) for local authorities so trends can be observed over time.</p> <p>See the Council’s Housing Growth Options Paper: Addendum, November 2017, as well as updated evidence on Demographic Forecasting, a Strategic Housing Market Assessment and an Employment Land Review.</p>	Yes	Plan supported by updated evidence base and revised housing requirement is 230 dpa.

<p>normal time span of a Local Plan. Authorities should assess as a constituent part of their OAN, how they can improve affordability over the life time of a plan to a point where affordability is more in line with average earnings and affordable mortgage lending rates. They should assess a level of housing over the 15-20 year plan period which would enable this step change and consider its deliverability in the plan. Only through planning for significant housing growth can local authorities realistically tackle market signals in the way advocated by the PPG and tackle the affordability and housing crisis.</p> <p>The need to identify the full OAN before considering any issues with the ability of a Local Planning Authority to accommodate that level of development has been confirmed in the High Court. Most notably in Solihull Metropolitan Borough Council v (1) Gallagher Homes Limited (2) Lioncourt Homes Limited where it was considered that arriving at a housing requirement was a two stage process and that first the unconstrained OAN must be arrived at. In the judgement it was stated:</p> <p>“The NPPF indeed effected a radical change. It consisted in the two-step approach which paragraph 47 enjoined. The previous policy’s methodology was essentially the striking of a balance. By contrast paragraph 47 required the OAN [objectively assessed need] to be made first, and to be given effect in the Local Plan save only to the extent that that would be inconsistent with other NPPF policies. The two-step approach is by</p>			
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no means barren or technical. It means that housing need is clearly and cleanly ascertained. And as the judge said at paragraph 94, “[h]ere, numbers matter; because the larger the need, the more pressure will or might be applied to [impinge] on other inconsistent policies”.			
<b>Objection: Evidence base (SHMA and Demographic Forecasting). Economic growth and alignment with the Council’s Employment Land Review.</b> A more positive stance on economic growth should be reflected in the housing need/requirement. This would better align the housing need/requirement with the conclusions of the Council’s Employment land Review. It is considered that the Council should be more aspirational in respect to aligning its housing requirement to economic growth prospects and ambitions for the district.	<b>Agree in part:</b> The issue of alignment between the housing and employment forecasts is discussed in the Council’s Housing Growth Options Paper: Addendum, November 2017. See this Craven Local Plan Background Document for response to parts of this objection as well as updated evidence on Demographic Forecasting, Strategic Housing Market Assessment and Employment Land Review.	Yes	Plan supported by updated evidence base and revised housing requirement is 230 dpa.
<b>Objection: Evidence base (SHMA and Demographic Forecasting). Economic growth and alignment with the Council’s Employment Land Review.</b> The SHMA Update concludes that no adjustment to the OAN is required to support the job growth forecast by the most up-to-date forecast used at the time, the June 2016 Regional Econometric Model (REM). This version of the REM indicated that an average of 39 full time equivalent (FTE) jobs would be created annually on average in Craven over the plan period (2012 – 2032).	<b>Agree in part:</b> These issues have been examined in the Council’s Housing Growth Options Paper: Addendum, November 2017. See this Craven Local Plan Background Document for response to this objection as well as updated evidence on Demographic Forecasting, a Strategic Housing Market Assessment and an Employment Land Review.	Yes	Plan supported by updated evidence base and revised housing requirement is 230 dpa.

<p>In supporting this conclusion the SHMA Update references modelling which suggests that the population growth needed to support forecast job growth over the remainder of the plan period falls below that which would be expected to occur if long-term demographic trends continue. This is, however, inherently moderated by the extremely low level of employment growth forecast over the remainder of the plan period, with the accompanying demographic projections report confirming that the employment-led modelling supports only 15 additional jobs in total over the period from 2015 to 2032, or less than 1 job per year. This essentially represents a static position in terms of employment growth over the remainder of the plan period.</p> <p>However, CDC's latest Employment Land Review (March 2017) uses as its baseline forecast a more up-to-date run of the REM (October 2016). This iteration of the REM suggests a much stronger level of job growth with 2,400 additional jobs forecast over the plan period or 120 FTE jobs per annum. This level of growth is closer to the other job growth forecast referenced within the SHMA Update – the earlier 2014 REM – which forecast the creation of 147 FTE jobs per annum on average. This suggests that the June 2016 iteration of the model used within the SHMA Update in the derivation of the housing OAN is unduly pessimistic. The SHMA Update presents modelling which suggests that its preferred demographic</p>			
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<p>projection, which underpins the identified OAN, could support the creation of 92 jobs per annum over the full plan period. While this surpasses the growth forecast by the version of the REM used within the housing evidence, it evidently falls short of that used in the more up-to-date ELR.</p> <p>The ELR concludes that the realistic employment land OAN range is likely to be in the order of around 26-29 ha over the plan period. The lower end of this range is aligned with the demographic projection underpinning CDC's housing OAN with the upper end aligning with the 2014 REM job growth. It is noted that the baseline Experian forecast within the ELR is concluded as resulting in a need for 28ha of employment land and the PPDLP also recognises under Policy SP2 a minimum of 28 ha of employment land uses for B Class Uses to be provided. In this context it would appear that the housing and employment land policies are not aligned, therefore failing against the requirements of paragraph 158 of the NPPF.</p> <p>Outside of this lack of alignment, the PPDLP recognises that "...the ageing of the resident population has important implications for the future prospects for Craven as a place to live, work and play and raises important issues that the Local Plan Strategy will need to address..."</p> <p>However, CDC's evidence does not present a clear assessment place to live, work and play and raises important issues that the Local Plan Strategy will need to address...". However, CDC's evidence does</p>			
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<p>not present a clear assessment of the implied breakdown of the age profile of the population under the OAN. It is therefore not possible to establish the extent to which the forecast growth in the labour force, and the associated scale of job growth considered to be supported, is associated with a growth in the traditionally defined working age groups (16 – 64), or predominantly assumed to result from the increase in economic participation assumed within older age cohorts.</p> <p>CDC's ELR considers the likely sectors which will see employment growth at Table 7.1.</p> <p>It identifies strong growth sectors such as Accommodation, Food Services &amp; Recreation, Wholesale &amp; Retail and Public Services which have the potential to be supported by a strong growth in older components of the workforce. It also identifies, however, that there is forecast growth in sectors such as Construction and Finance &amp; Insurance for which the required skills are more likely to fall outside of this cohort.</p> <p>The 2014-based sub-national population projections (SNPP) – though found to require adjustment within the SHMA Update – notably show that a continuation of recent demographic trends would reduce the number of working age residents (aged 16 – 64) by some 12% over the plan period, contrasting with the 50% growth projected in those aged 65 and over. It is not clear whether the demographic adjustments applied in the SHMA Update result in a more balanced demographic profile, which would offer more flexibility in supporting employment growth</p>			
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<p>in the district.</p> <p>CDC itself acknowledges within its Housing Growth Options Paper that the CDC itself acknowledges within its Housing Growth Options Paper that the latest job forecasts risk underestimating future workforce requirements and recognises that a higher level of housing growth would offer some “...useful flexibility...” There is a danger that should the economy grow faster than the latest REM forecast there will not be sufficient housing in Craven to meet local economic growth needs. It is considered that the evidence within the ELR and in particular its more optimistic perspective on job growth than that advanced in the housing evidence further reinforces the identification of an option for housing growth which sits between Options C and D.</p>			
<p><b>Comment: Evidence base (SHMA)</b></p> <p>The Government intends to standardise the calculation of housing need as set out in the White Paper on housing. As yet, we are unaware of what the new methodology will involve but the Council will need to keep the evidence base of the Local Plan under constant review to ensure that it reflects the latest guidance as the White Paper is implemented.</p>	<p><b>Noted:</b> The Government has now published a Draft standard methodology to calculate housing need. This consultation is clear that provided Local Plans are submitted to the Secretary of State by 31 March 2018, they can continue to follow the existing guidance contained in the Planning Policy Guidance. The Council intend to consult on its Publication Draft Plan immediately after the Christmas holidays and then submit the plan to the Secretary of State before the end of March 2018.</p>	No	None

<b>Objection: Evidence base (SHMA)</b> The 2016 SHMA covers the period 2015-2030 so does not align with the plan period proposed.	This is not correct. The 2016 SHMA provides an OAN for the period 2012-2032 and is therefore aligned with the plan period. The previous SHMA published in 2015 referred to the 2015-30 period and this is where confusion may have arisen.	No	None

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## June – July 2017 Draft Local Plan

## Policy Response Paper – Policy SP2 : Economic Activity and Business Growth

<b>Policy: SP2</b>			
<b>Aim of the Policy: To promote the local economy to grow, diversify and generate new employment and productivity opportunities</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan</b>
<p><b>Comment :</b> Paragraph 2.15 (Context) and Draft Policy SP2: Economic Activity and Business Growth, sub paragraph c)</p> <p>Strongly support intention to protect track bed of Skipton-Colne Railway, but plan could go further to make eventual reopening of this railway a reality. It is essential that the option to re-lay the Skipton to Colne railway is preserved through protecting the track bed. The plan correctly identifies that transport links to the west from the region need to be further strengthened (for employment, business, leisure and other reasons). The railway represents the greenest and most “open to all residents” way of achieving this. The plan could go further by suggesting practical steps by which this might be achieved. For instance, the putting in hand of a feasibility study and creation of a committee/support group to take forward thinking on this idea. Such</p>	<p>Comment noted and it is accepted that the text within paragraph.2.15 of the Context section of the Local Plan and the supporting text to Policy SP2 does not reflect the recent progress made in respect of strategic transport planning by North Yorkshire County Council (Highway Authority) with their recent publication of “A Strategic Transport Prospectus for North Yorkshire “ In this document NYCC sets out how it would like to work with the Government, Transport for the North and the Northern City Regions to ensure that improved transport connections allow England’s largest County to both contribute to and share in the economic benefits of the Northern Powerhouse and to this end three strategic transport priorities have been identified :-</p> <ul style="list-style-type: none"> <li>-improving east-west connectivity(including trans-Pennine links)</li> <li>- improving access to High Speed and conventional rail and,</li> </ul>	Yes	<p>Insert the following text after the final sentence of paragraph 2.15 (re-numbered 2.16)(Context Section)</p> <p><b>“ North Yorkshire County Council in their recently published document “A Strategic Transport Prospectus for North Yorkshire “ sets out how it would like to work with the Government, Transport for the North and the Northern City Regions to ensure that improved transport connections allow England’s largest County to both contribute to and share in the economic benefits of the Northern Powerhouse and to this end three strategic transport have been identified :-</b></p> <p><b>--improving east-west connectivity(including trans-Pennine links)</b></p>

<p>steps can be low cost at this stage, but would give momentum to such a project in view of the extensive long term benefits. This could be linked to strategic thinking on reinstating regular passenger service on the Manchester-Clitheroe-Hellifield railway.</p> <p>It is suggested that the wording in sub paragraph c) of Policy SP2 could be modified to read “..... protection of the original double track route of the Skipton to Colne railway line for future <b><i>re-instatement as an extension of the Airedale Line</i></b> <b>[delete transport use]</b>, as identified on the policies map.</p>	<p>- improving long distance connectivity to the north and south.</p> <p>These strategic transport priorities are also reflected in the new Local Transport Plan (LTP4) 2016 to 2045. A number of key east-west routes are within Craven such as the A59, A56 and the A6068. NYCC with Lancashire Local Enterprise Partnerships and West Yorkshire Combined Authority have commissioned an East-West Connectivity Study which will focus on a ‘Central’ Trans Pennine Corridor, including key road routes such as the M65/A59/A56/A65 and rail routes such as the Calder Valley and the Skipton –Colne Lines. The study will aim to develop a strategic economic narrative to the case for potential intervention in road/rail based connectivity. CDC is a key stakeholder in this study.</p> <p>It is considered that the understanding of the significance of this issue for the local plan would be improved by the addition of explanatory text within the context section of the plan and the supporting text to Policy SP2, and it may also be useful to clarify that the former Skipton-Colne line is being considered within the Connectivity Study as a rail route and that this is reflected in sub paragraph c) of Policy SP2.</p>		<p>- improving access to High Speed and conventional rail and,</p> <p>- improving long distance connectivity to the north and south.</p> <p><b>These strategic transport priorities are also reflected in the new Local Transport Plan (LTP4) 2016 to 2045. A number of key east-west routes are within Craven such as the A59, A56 and the A6068. NYCC with Lancashire Local Enterprise Partnerships and West Yorkshire Combined Authority have commissioned an East-West Connectivity Study which will focus on a ‘Central’ Trans Pennine Corridor, including key road routes such as the M65/A59/A56/A65 and rail routes such as the Calder Valley and the Skipton –Colne Lines. The study will aim to develop a strategic economic narrative to the case for potential intervention in road/rail based connectivity. CDC is a key stakeholder in this study.”</b></p> <p>Insert additional supporting text to Policy SP2 in paragraph 4.34 (now re-numbered 4.31) as follows:-  <b>“.....Greater Manchester, including the potential re-instatement of the Skipton to Colne railway line to meet the strategic transport</b></p>
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			<p><b>priorities of the North Yorkshire Local Transport Plan ( LTP4) 2016 to 2045, and the potential re-opening of Crosshills Railway Station to contribute to the aims of the HS2 Growth Strategy of the West Yorkshire Combined Authority to improve the wider rail network serving the Leeds City Region.”</b></p> <p>Amend point c) of Policy SP2 as follows :- “...protection of the Skipton to Colne railway line for future <b>rail</b> transport use as identified on the policies map.”</p>
<p><b>Object:</b> Policy SP2 : Economic Activity and Business Growth</p> <p>Criterion c) of this Policy seeks to afford “...protection of the original double track route of the Skipton to Colne railway line for future transport use as identified on the policies map”. The policy seeks to prevent any development occurring along this route – effectively placing a development embargo for the duration of the Plan Period.</p> <p>The supporting justification to this Policy does not reference the former railway track bed at all – there is simply no justification offered for this part of the Policy and, importantly, no reference to any evidence base to indicate that there is a deliverable and programmed transport improvement</p>	<p>Disagree with the conclusion of the objector that the inclusion of the Skipton-Colne line within Policy SP2 is unsound.</p> <p>The Council in preparing its local plan has a duty to co-operate with neighbouring authorities and higher tier authorities (NYCC, LCC) on strategic cross boundary issues. There is clear recognition within the transport strategies of North Yorkshire and Lancashire County Council that east-west transport connectivity between the two counties is poor and complementary cross boundary strategies are in place to improve east-west connectivity to help improve economic performance. The former Skipton-Colne railway line presents an important opportunity for improving trans – Pennine links and is included within the East-</p>	No	

<p>involving the former track bed.</p> <p>Paragraph 41 of the NPPF states: “Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice.”</p> <p>The potential reinstatement of the Skipton to Colne track bed as a railway is not set out in any Transport Plan or Strategic Development Plan, and there is no robust ‘evidence available’ that indicates the delivery of this railway is ‘critical’ to widen transport choice.</p> <p>A central theme of the NPPF with regard to Plan Making is to ensure that proposed allocations of land are realistic, deliverable and viable. The NPPF at Paragraph 171 also indicates the importance of ensuring that any planned major infrastructure is deliverable during the plan period “It is equally important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion.”</p> <p>The proposed Policy to protect the track-bed from any development proposals therefore fails all the tests set out at NPPF paragraph 182 and is unsound.</p>	<p>West Connectivity Study commissioned by NYCC with Lancashire Local Enterprise Partnerships and West Yorkshire Combined Authority which will focus on a ‘Central’ Trans Pennine Corridor, including key road routes such as the M65/A59/A56/A65 and rail routes such as the Calder Valley and the Skipton – Colne Lines. The study will aim to develop a strategic economic narrative to the case for potential intervention in road/rail based connectivity. CDC is a key stakeholder in this study. Protection of the former Skipton-Colne railway line will therefore meet the requirements of para 179 of the NPPF which states that local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in Local Plans.</p>		
<p><b>Comment:</b> Policy SP2 c) Support for the re-opening of Crosshills Railway Station and protection of the area of land of the former railway station should be included at point c)</p>	<p>Comments noted and accepted.</p>	<p>Yes</p>	<p>Include support for re-opening of Crosshills Railway station and protection of land at the former railway station within Policy SP2 c)</p>

<p>of Policy SP2 to reflect the aims of the HS2 Growth Strategy developed by the West Yorkshire Combined Authority (WYCA) to realise in full the potential benefits of HS2 to accelerate the transformation and growth of the sub- regional economy. WYCA positions HS2 at the centre of a coherent strategy for improving the wider rail and transport network serving Leeds City Region. It will be integrated with enhanced inter-urban links across the north (Northern Rail), particularly a new fast east-west link between York, Leeds, Bradford and Manchester, and also between Leeds and Sheffield . A project inception report completed in February 2017 (managed by the WYCA and sponsored by NYCC and CDC) investigated the viability and business case for a new Station at Cross Hills. The report concluded that the scheme should be taken forward for further work and more detailed consideration.</p>			<p>as follows:-</p> <p><b>iv) support for the re-opening of the former Crosshills Railway Station by safeguarding land at the former railway station from other forms of development, as identified on the policies map.</b></p> <p>and insert supporting text at 4.34 (subsequent paragraphs to be renumbered) as follows:-</p> <p>paragraph 4.34 “...Greater Manchester , <b>including the potential re-instatement of the Skipton to Colne railway line to meet the strategic transport priorities of the North Yorkshire Local Transport Plan ( LTP4) 2016 to 2045, and the potential re-opening of Crosshills Railway Station to contribute to the aims of the HS2 Growth Strategy of the West Yorkshire Combined Authority to improve the wider rail network serving the Leeds City Region.</b>”</p> <p>Insert following text within paragraph 2.14 (Context)</p> <p><b>“The HS2 Growth Strategy of the West Yorkshire Combined Authority (WYCA) seeks to realise in full the potential benefits of HS2 to</b></p>
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			<p>accelerate the transformation and growth of the sub- regional economy. WYCA positions HS2 at the centre of a coherent strategy for improving the wider rail and transport network serving Leeds City Region. It will be integrated with enhanced inter-urban links across the north (Northern Rail), particularly a new fast east-west link between York, Leeds, Bradford and Manchester, and also between Leeds and Sheffield . A project inception report completed in February 2017 (managed by the WYCA and sponsored by NYCC and CDC) investigated the viability and business case for a new Station at Cross Hills. The report concluded that the scheme should be taken forward for further work and more detailed consideration.”</p>
<p><b>Object:</b> Economic growth. The limited employment development proposed means that the number of houses proposed for Settle will not be required. Settle can only be a key service centre if more employment is brought to the town and housing appropriate for those working in the town is provided. Building houses does not encourage employment. It is the converse which applies. Provide employment and the</p>	<p>Disagree. The proposed level of employment growth in Policy SP2: Economic Activity and Business Growth has been considered in conjunction with, and is aligned to, the planned growth for meeting housing needs in Policy SP1: Meeting Housing Need. Aligning the Local Plan’s housing and employment strategies will minimise the impacts of an aging population, promote the creation of balanced and inclusive communities , maximise the workforce</p>	No	

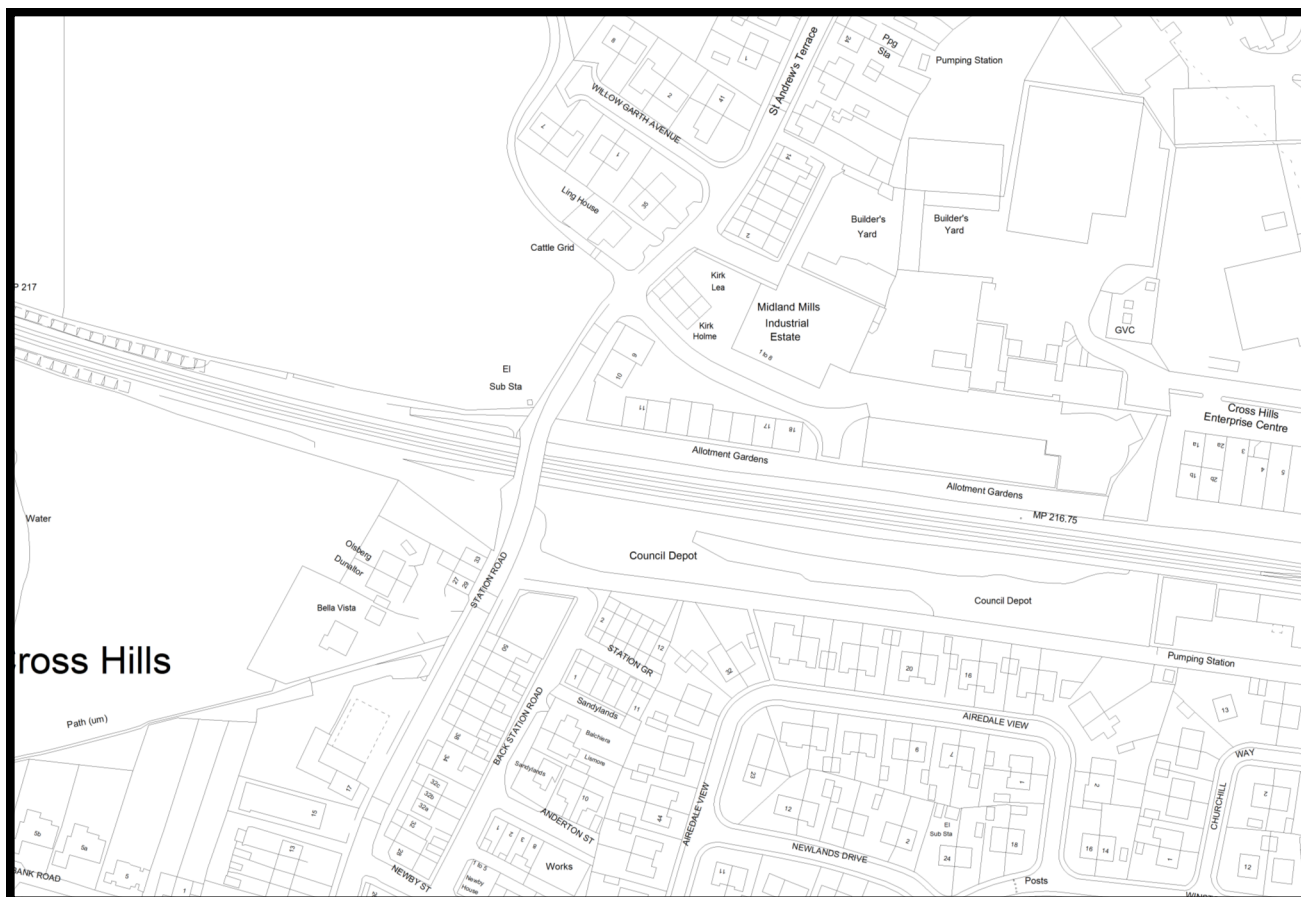
<p>demand for housing will arise. The plan does not underpin and enhance the role of Settle as a key service centre. Because the Plan does not emphasise employment, the proposed housing does not satisfy a local need. Consequently housing on sites SG021, SG066 and SG080 is likely to be occupied mainly by people retiring to the area; be used as holiday homes and therefore not be continually occupied, or by commuters to other towns. Commuting will be along the busy A65 adding to congestion and pollution. Although the Plan refers to supporting enhanced transport connectivity there are no plans in place for this and the existing arrangements for rail, bus and road travel will come under increased pressure. These are effects which are not supported by the plan. Therefore the provision of housing on sites SG021, SG066 and SG080 contradicts the Council's desire to reduce pollution, commuting and achieve housing close to employment.</p>	<p>potential to support existing local businesses and maximise affordable housing. Infrastructure to support the planned growth proposed in the Local Plan is set out in the Infrastructure Delivery Plan and will be secured through developer contributions as set out in Policy SP12: Infrastructure, Strategy and Development Delivery .</p>		
<p><b>Comment:</b> (CPRENY) we wish to seek clarity regarding point A ii of Policy SP2 with reference to the allocation of 15.5Ha of additional employment land for B1, B2 and B8 uses in Skipton, Settle and Ingleton – is this additional to the 28Ha – which is how it reads, or is it the intention of CDC to safeguard 15.5Ha of the overall 28Ha of land promoted through the Policy?</p>	<p>Comment noted, however, it is considered that there is no real ambiguity in Policy SP2, particularly in view of the clear explanation given in the supporting text at paragraphs 4.30 (including Table 3) and 4.31, which explains that after taking account of the current supply of employment land, there is a shortfall of between 12 to 15 hectares to meet the realistic range of employment land requirement of 26 to 29ha. To align with the Local Plan's strategy</p>	<p>Yes</p>	<p>Insert the word “<b>and</b>” between i) and ii) of point a) in Policy SP2.</p>

	for housing growth at 214 dwellings per year, evidence from the Employment Land Review indicates that 28ha of employment land is required. Policy SP2 therefore makes provision for a minimum of 28ha of employment land <u>through</u> safeguarding existing employment land and employment commitments and allocating 15.5ha of additional employment land. However, the addition of the word “and” between i) and ii) may help to address any perceived ambiguity by readers who may be reading the policy in isolation from the supporting text.		
<b>Comment:</b> (CPRENY) CPRENY welcomes the inclusion of ‘North Yorkshire’ into paragraph 4.34 of the supporting text to Policy SP2, however, this should also be transposed to Policy SP2 in the same way.	Comment noted and accepted	Yes	Insert “ <b>North Yorkshire</b> ” into the first sentence of point c) of Policy SP2
<b>Support:</b> Draft Policy SP2 sets out strategic aims for the allocation of employment land and for the support to enhance transport connectivity. This policy designates 15.5ha of additional employment land across Skipton, Settle and Ingletton which in turn supports the proposed allocation of the 6.02ha Sk049 employment site in Skipton under Policy SP5. This Policy is supported and considered sound.	Supporting comments noted	No	
<b>Support:</b> The Trustees strongly support draft Policy SP2 and the acknowledgement of the growing contribution that the Broughton	Supporting comments noted	No	

Estate is able to make to the economy of the area over the plan period.			
<p><b>Object:</b> Paragraphs 4.22 to 4.24 preceeding Policy SP2. We are not convinced by the claim that an additional, compensatory 12% needs to be added in order to achieve the target of 4280 properties by 2032. Losses of this order might well have occurred in the historic 10 year period that is cited but the assumption cannot legitimately be made that this will continue in the future, particularly when a large proportion of projected Local Plan development is on greenfield sites. In Rathmell, for example, we are unaware of any housing loss; indeed windfall gains in housing are, in our experience, more likely. We would imagine that this is common to many Craven parishes. If significant losses were to become apparent over the life of the Local Plan then we would hope that the Plan would be sufficiently flexible to accommodate these shortfalls in the areas concerned - a much better approach than adding a global and statistically suspect 12%.</p>	<p>Disagree. Losses to the existing housing stock will occur regardless of the type of sites allocated in the local plan. The 12% allowance is based on robust evidence over a 10 year period. At examination , the Council will be required to demonstrate that it can achieve delivery of a <b>net</b> number of additional dwellings to meet its housing requirements . Not accounting for potential future losses to the existing housing stock could result in the policies of the plan to meet housing need being found unsound.</p>	<p>No change required in response to objection, however it is proposed that the text relating to the allowance for future losses to the existing housing stock would be more appropriately located further on in Section 4, to provide context and explanation for Table 7, which provides a summary of the housing requirement and proposed supply by settlement.</p>	<p>Move paragraphs 4.22, 4.23 and 4.24 (and renumber) to accompany Table 7 on page 51 following Policy SP4 and preceding Policies SP5 to SP11.</p>

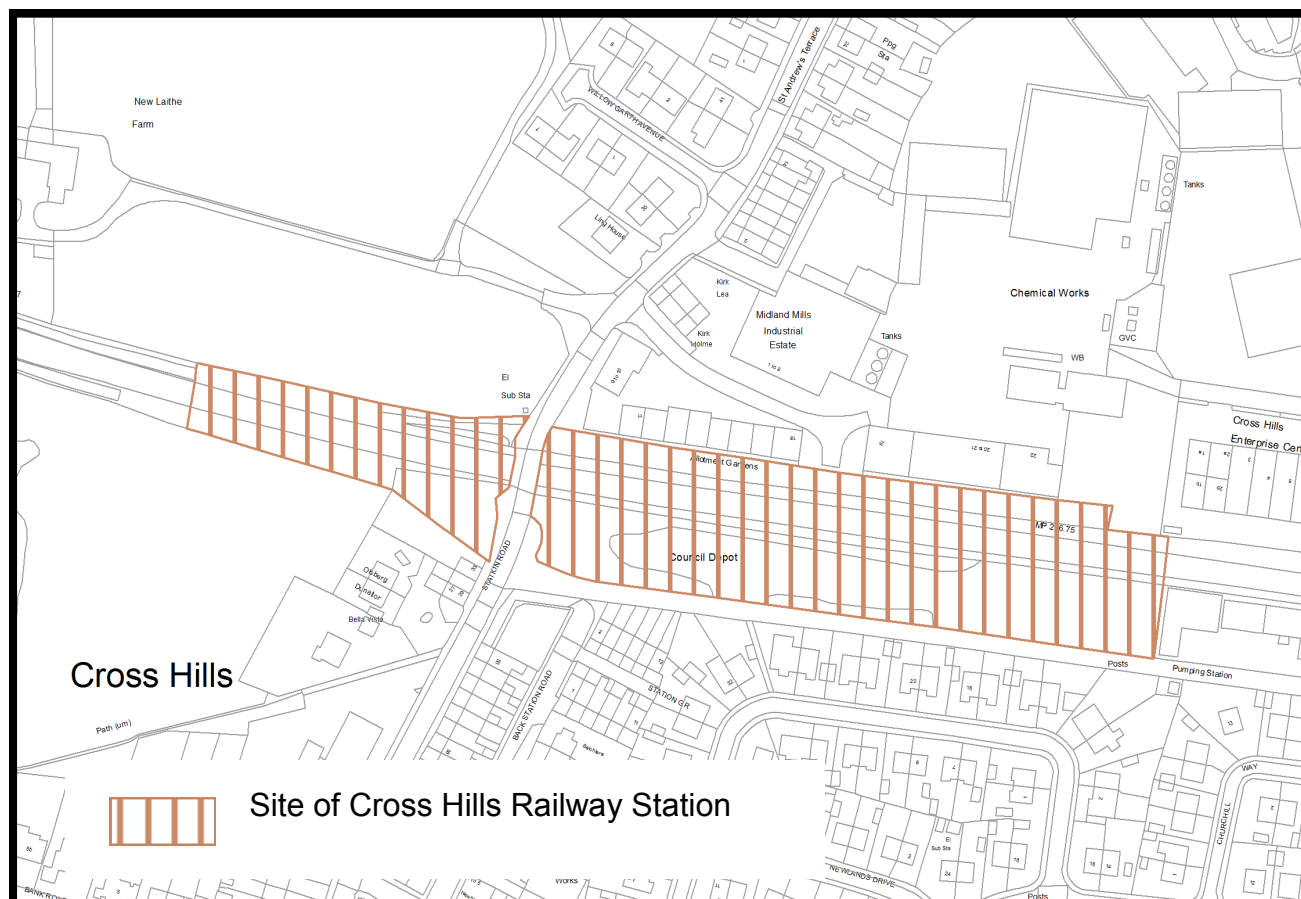
\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

**(Pre-Publication Local Plan 2017)**



**SP2: Land safeguarded for Cross Hills Railway Station**

**(Publication Local Plan 2018)**





## EC2: Thornton Station Yard, Ingleton (Pre-Publication Local Plan 2017)



## EC2: Thornton Station Yard, Ingleton (Publication Local Plan 2018)



## June – July 2017 Draft Local Plan

## Policy Response Paper – Policy SP3: Housing Density and Mix

<b>Policy SP3: Housing Mix and density</b>			
<b>Aim of the Policy: To help create better places, meet housing requirements and the needs of a range of residents, ensure that the right housing is delivered, and land is used in an efficient and effective manner.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan</b>
Object. The policy of building only 39.4% of homes as one and two bedroom completely contradicts earlier assessments of need which placed the need for this type of accommodation at 60%. Where is the evidence that 60.6% of housing need is for 3 bedroom and above? What multiple of a local salary does a first time buyer need in order to buy a 3 bedroom house (clue - it is over 10 times the salary)? Local demand is for small starter homes or for small specialist accommodation for the elderly. There is not a single policy statement in the whole document which will in any way help deliver the proportion of one bedroom homes that will be needed. An indication of need for 1-3 bedroom homes is pathetically weak. What we need a firm policy of no development of over 10 houses should contain more than 20% of 4+ bedroom houses.	Draft policy SP3 is based on the council's 2016 Strategic Housing Market Assessment (SHMA), which provides the best objective and most up-to-date evidence of housing need in the district.	No	
Support. We support the intention to allow variations from the indicative densities where it can be justified on planning grounds. This flexibility may be necessary in order to ensure that new development safeguards the distinctive character of a particular settlement or the setting of a heritage asset.	The support is noted and the policy will continue to contain appropriate flexibility.	No	
Object. 4.39 - 32 Dwellings per Hectare We do understand what a density of 32 dwellings/hectare looks	32dph is an indicative density for the whole plan area and has been	No	

<p>like. We have a half-complete development in Rathmell that comprises four dwellings on a 1255m2 plot (CDC planning website) and we calculate this to be 32 dwellings/hectare. In a larger settlement this density might be commonplace and acceptable but in this small rural village it is totally out of character and totally at odds with the Good Design sentiments expressed in the Local Plan 5.25. CDC planners have also endowed the village with another recent small development at a density of 41 dwellings per hectare.</p> <p>We wonder if the authors of the Local Plan have ever visited the village. If they have, they will have seen that the Rathmell is deeply rural, and that properties tend to be small but well-spaced with generous garden provision. They might also have gathered that the relative remoteness of the village requires many households to own two vehicles.</p> <p>We note that for both proposed development sites in Rathmell the number of dwellings is calculated on a density of 32 dwellings/hectare but we have difficulty understanding how this can be done whilst maintaining the rural character of the village, providing adequate gardens and parking space, and allowing for the thoughtful landscaping that will be needed if the rural integrity and environmental quality of the sites are to be maintained or enhanced.</p> <p>Question - Can you help our understanding?</p>	<p>used as a guide for estimating the amount of land required to meet the district's housing needs. It reflects the sizes of dwellings required and the need for garages, parking spaces, gardens, landscaping and open space. Policy SP3 includes flexibility to allow for appropriate variations from the indicative density, both upwards and downwards, to reflect the character of particular sites or locations. (NB. The comment above is also relevant.)</p>		
<p>Object. Para 4.41, line 3. In the case of affordable rented housing, the number of bedrooms needed by household size is determined by welfare reform changes, in particular the spare room subsidy. This dictates for example, that a family of two adults and two children of opposite sexes where one is under the age of ten should occupy a two bedroom house, or have housing benefit withheld. This clearly takes no account of the needs of households as they grow over the Plan period (nor of the fact that government policy might change). As the Strategic</p>	<p>Noted. The suggested amendment would be an improvement.</p>	<p>Yes</p>	<p>'Particularly the SHMA' has been changed to 'including the SHMA'.</p>

<p>Housing Authority, the council must look to the longer term and the future needs of its households to ensure the availability of suitable housing over the Plan period, indeed the NPPF says as much at para 159. SHMA data based on current welfare reform requirements is but one factor.</p> <p>Amend 'particularly the SHMA to 'including the SHMA'. See para 7.5 SHMA 2016 – the SHMA considers need based on current household size and the spare room subsidy, neither of which are likely to remain static over the Plan period, not the future requirements of growing families. The SHMA is but one of the factors that influence the size. National policy and waiting list data are others.</p>			
<p>Object. Draft Policy SP3, b). As written, it appears likely that all the 1 and 2 bed homes required on a site will be the affordables and all the larger ones will be the market homes. This is not supported for two reasons – a higher proportion of 3 bed affordable rented homes than is actually proposed is needed to meet the needs of households as they grow. As important – affordable homes should be indistinct from market homes in order to promote balanced and mixed communities in accordance with NPPF. It is very difficult to do that when all the market homes are big and all the affordable ones small. Introducing a higher proportion of 3 bed affordable rented homes will mean more homes look more alike and achieve better integration and sustainability.</p> <p>B) Introduce 'across all tenures' (also see para 6.16 objection below)</p>	<p>Noted. The presentation of SHMA recommendations in paragraphs 4.36 and 4.37 could be improved and a broader view of evidence would be more helpful. Whilst the policy is intended to guide the mix of dwelling sizes across all tenures, as suggested, this could be made clearer in both the policy and supporting text. Appropriate revisions should allay the concerns expressed.</p>	Yes	<p>The draft policy and supporting text have been amended to better reflect the nature of SHMA evidence and to clarify that housing mix applies across all tenures.</p>
<p>Object. It is considered that the housing mix policy is too prescriptive, down to a single decimal place, and therefore cannot be supported. As currently drafted it is not considered that the policy is workable and it does not offer landowners and developers flexibility across the District, unless justification is provided in each case. Such an approach does not allow for the</p>	<p>Whilst the draft policy is intended to be flexible and not too prescriptive, the comments are noted and indicate that further work is required. Appropriate revisions to the</p>	Yes	<p>The draft policy and supporting text have been amended to avoid undue prescription and to allow for appropriate flexibility.</p>

<p>differing demands across the various sub-area of the District. It is understood that the mix split as currently drafted has been taken directly from the 2016 SHMA. Whilst we acknowledge that this is the appropriate evidence to take account of, the SHMA provides an overview and provides no analysis of how the need or demand for differing house types will vary over the district. The Council should also note the challenges presented to the development industry by virtue of a prescribed housing mix policy within a Plan which also sets a challenging on site affordable housing requirement of 40% (see Policy H2 below). Whilst the objectives of the housing mix policy are noted, the emphasis placed on the delivery of predominately 2 &amp; 3 bed homes may prove challenging on sites constrained by existing viability issues, due to smaller plots commanding a lower market return. Flexibility in the application of the policy should be considered where viability issues are present, so as not to undermine the delivery of affordable homes.</p>	<p>policy and supporting text should allay the concerns expressed.</p>		
<p>SPL objects to Policy SP3 on the grounds the housing mix policy is derived from insufficient evidence, is too prescriptive and unnecessary in any event. In relation to the evidence base, the mix split as currently drafted has been taken directly from the 2016 SHMA. The SHMA however only provides an overview and provides no analysis of how the need or demand for differing house types will vary over the district. It also represents no more than a snap shot in time. In reality, the demand for different house types and sizes can vary quickly depending on complex interrelating factors including the availability of different sizes of second hand housing stock. As drafted the Policy prescribes a specific housing mix. This is unworkable because it does not offer landowners and developers flexibility to respond to different demands across the District, unless justification is provided in each case. Such an approach does not allow developers to respond to the differing market demands across the various sub-</p>	<p>Whilst the draft policy is intended to be flexible and not too prescriptive, the comments are noted and indicate that further work is required. Appropriate revisions to the policy and supporting text should allay most of the concerns expressed. However, the council is likely to continue with a policy to guide the mix of market housing, in order to properly plan for the district's objectively assessed need.</p>	<p>Yes</p>	<p>The draft policy and supporting text have been amended to improve the application of SHMA evidence, to avoid undue prescription and to allow for appropriate flexibility.</p>

<p>area of the District and also does not allow developers to respond to rapidly changing demands for market housing of different sizes. The Policy is not necessary in any event because of the prescriptive approach taken by the Council to the type of affordable housing units to be provided on site. In effect, the Council is seeking through Policy SP3 to socially engineer the mix of both affordable and market housing and prevent developers from responding to market demand and deliver housing products demanded by their customers. By retaining control on the affordable housing there is no need for the Council to also seek to prescribe the mix of market housing.</p>			
<p>The policy suggests an indicative density of 32dph should be sought and identifies a very prescriptive housing mix, down to less than 1%. Whilst it is noted that the policy includes an element of flexibility in the final paragraph, which is welcomed, the HBF is not supportive of such a prescriptive policy.</p> <p><b>Housing Mix</b></p> <p>The HBF understands the need for a mix of house types, sizes and tenures. It is, however, important that any policy is workable and ensures housing delivery will not be compromised or stalled due to overly prescriptive requirements or the need to provide significant amounts of additional evidence.</p> <p>The draft policy identifies a very prescriptive mix of house types, suggesting 39.4% one and two bedroom dwellings, 44% three bedroom dwellings and 16.6% four (or more) bedroom dwellings. Whilst the policy suggests this is indicative, thus providing a degree of flexibility it appears this will need to be justified in every case.</p> <p>The HBF understands that the identified mix has been directly lifted from the 2016 SHMA (Table 7.3). Whilst the need to take account of this evidence is understood it does not provide a definitive picture of market need and demand. Indeed the 2016 SHMA itself only suggests that the figures in table 7.3 provide a</p>	<p>Whilst the draft policy is intended to be flexible and not too prescriptive, the comments are noted and indicate that further work is required.</p> <p>Appropriate revisions to the policy and supporting text should allay the concerns expressed.</p> <p>A less narrow reading of the background paper “Approaching housing density and mix” would suggest that the introduction of an appropriate local plan policy (which was absent when the example schemes were approved) would help to guide future housing provision towards a closer match with objectively assessed housing needs.</p> <p>However, it is recognised that the draft policy needs to be revised.</p>	<p>Yes</p>	<p>The draft policy and supporting text have been amended to improve the application of SHMA evidence, to avoid undue prescription and to allow for appropriate flexibility in housing mix and density.</p>

<p>“...general view...”. There is no analysis of how the need or demand for differing house types will vary over the district. Figure 4.1 of the SHMA indicates significant variance in the make-up of the current stock across the various sub-areas of Craven. This will inevitably lead to differing needs and demands across the district.</p> <p>The mix, size and type must be considered within the context of the local area (NPPF paragraph 50) and should not be a plan wide requirement. The 2016 SHMA does not provide local area evidence, but rather is a district wide assessment. It therefore would not be appropriate to rigidly apply the SHMA requirements to every site. The supporting policy text should recognise this.</p> <p>It must also be recognised that the 2016 SHMA only provides a snap-shot and needs will vary geographically and temporally. The 2016 SHMA also takes no account for aspiration or the Council’s ambition for economic growth. The achievement of growth will be reliant upon attracting investors to locate to the Craven area. Part of this investment will be based upon the housing offer available and being planned. Furthermore the housing offer should include an element of aspiration to ensure working families are retained within the area and not lost to other areas as this would impact upon the economic prospects of Craven.</p> <p>The HBF therefore recommends a more flexible approach is taken regarding housing mix which whilst taking account of the SHMA findings is also cognisant that needs and demand will vary from area to area and site to site. It is recommended that the policy and/or supporting text refer to the following issues;</p> <p>Density</p> <p>Whilst it is recognised that the 32dph is indicative it is noted that 7 out of the 10 sites analysed within table 1 of the ‘Approaching housing mix and density’ background paper were below this</p>			
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density, some significantly so. These applications were all deemed acceptable by the Council and as such the HBF is unclear upon the justification for a density requirement of 32dph. The policy also appears to have little regard to local site characteristics or its setting and their impacts upon density.			
Object. It is considered that the housing mix policy is too prescriptive, down to a single decimal place, and therefore cannot be supported. As currently drafted it is not considered that the policy is workable and it does not offer landowners and developers flexibility across the District, unless justification is provided in each case. Such an approach does not allow for the differing demands across the various sub-area of the District. It is understood that the mix split as currently drafted has been taken directly from the 2016 SHMA. Whilst we acknowledge that this is the appropriate evidence to take account of, the SHMA provides an overview and provides no analysis of how the need or demand for differing house types will vary over the district.	Whilst the draft policy is intended to be flexible and not too prescriptive, the comments are noted and indicate that further work is required. Appropriate revisions to the policy and supporting text should allay the concerns expressed.	Yes	The draft policy and supporting text have been amended to improve the application of SHMA evidence, to avoid undue prescription and to allow for appropriate flexibility.
Draft Policy SP3 relates to housing mix and density and sets out two requirements that all housing proposals will be expected to adhere to. Whilst Gladman are pleased to note that, in line with our recommendations, the policy has reduced the indicated density that will be sought to 32dph from the 40dph that was detailed in the previous May 2016 draft Local Plan, we submit that the housing mix and density detailed is considered overly prescriptive. The draft policy details a very prescriptive mix of house types, stating that new housing development proposals will be expected to comprise 39.4% one and two bedroom dwellings, 44% three bedroom dwellings and 16.6% four (or more) bedroom dwellings. It is noted that an element of flexibility is detailed within the policy, however Gladman are not supportive of the draft policy overall. Gladman understand that this indicative housing mix is lifted	Whilst the draft policy is intended to be flexible and not too prescriptive, the comments are noted and indicate that further work is required. Appropriate revisions to the policy and supporting text should allay the concerns expressed.	Yes	The draft policy and supporting text have been amended to improve the application of SHMA evidence, to avoid undue prescription and to allow for appropriate flexibility.



from the 2016 SHMA, but consider that needs highlighted in the SHMA are a snapshot in time and do not necessarily represent the correct housing mix that is required at the time of an application. Considering housing mix on a site by site basis, with reference to the SHMA, will also allow viability issues to be considered on a similar basis as housing mix often has a considerable impact on a sites ability to be developed viably. In respect of the indicative housing density that is set out, we believe that a further element of flexibility should be built into the policy. Gladman support an approach which does not set a rigid density requirement, but rather seeks to encourage higher densities in certain locations, such as Skipton. This will enable sites to be designed to a density which is appropriate and responses to any site specific features or reflects the densities within the locality. Such a flexible approach is supported as it allows for housing density to be considered on a site by site and settlement by settlement basis.			
Policy SP3 has been completely revised to deal with specific targets for housing mix and density and CPRENY supports this approach, including the need for a lower density of dwellings per Ha. CPRENY would suggest the addition of 'in writing and to the satisfaction of by the Council' immediately to the end of the text 'on planning grounds' within the second paragraph regarding 'variations'. This is standard planning practise throughout the country and places a stronger emphasis on the developer to thoroughly justify any application to alter the density and mix of dwellings provided and gives the Council greater control over what is delivered on sites. CPRENY supports the deletion of Policy H4 and the insertion of SP3 in its place.	The support is noted. However, the suggested wording is unnecessary and likely to be too prescriptive and inflexible for inclusion in a revised policy.	No	
Object. We object to Policy SP3, which provides a very prescriptive approach to housing mix, with indicative percentages of houses sizes prescribed down to less than single percentage points. Whilst the policy allows for variations in this	Whilst the draft policy is intended to be flexible and not too prescriptive, the comments are noted and indicate that	Yes	The draft policy and supporting text have been amended to avoid undue prescription and to allow for appropriate

to be properly justified on planning grounds, and the policy itself states that proposals will be expected to meet the criteria, we recommend that this remains part of the reasoned justification of the policy, with the actual wording focused on ensuring that the mix is appropriate to the site in this context. It may, for example, be desirable for a proposal to be advanced in a particular area on a particular site for only one type of house size, and the policy would discourage this from the outset. Also, the implications of this policy needs to be considered in conjunction with section g) of Policy H2: Affordable Housing, which also seeks to define the mix of house sizes in developments. There is potential for these two policies to conflict with each other.	further work is required. Appropriate revisions to the policy and supporting text should allay the concerns expressed.		flexibility.
Object. This draft policy is considered to be overly prescriptive and is therefore unlikely to be effective of meet with national planning policy guidance. In the first instance an average indicative density of 32dph across the District is too high as it fails to take account of the wide variety of settlement types in the District and has the potential to lead to poor quality residential environments. The very precise 'indicative' housing mix figures, especially the high proportion of one and two bed units sought, if adopted, will significantly impact on site viability and therefore be counterproductive as it will lead to the non-delivery of sites and the delivery of lower percentages of affordable housing than sought under draft policy H2	Whilst the draft policy is intended to be flexible and not overly prescriptive, the comments are noted and indicate that further work is required. Appropriate revisions to the policy and supporting text should allay the concerns expressed. (NB. 32dph takes account of a wide variety of settlement types ranging from Clapham to Skipton and is informed by well-designed approved schemes – refer to the background document. The 2016 SHMA indicates a significant need for 1-2 bed homes.)	Yes	The draft policy and supporting text have been amended to avoid undue prescription and to allow for appropriate flexibility.
Object. It is considered that the housing mix policy is too prescriptive, down to a single decimal place, and therefore cannot be supported. As currently drafted it is not considered that the policy is workable and it does not offer landowners and	Whilst the draft policy is intended to be flexible and not too prescriptive, the comments are noted and indicate that	Yes	The draft policy and supporting text have been amended to improve the application of SHMA evidence, to avoid

<p>developers flexibility across the District, unless justification is provided in each case. Such an approach does not allow for the differing demands across the various sub-area of the District. It is understood that the mix split as currently drafted has been taken directly from the 2016 SHMA. Whilst we acknowledge that this is the appropriate evidence to take account of, the SHMA provides an overview and provides no analysis of how the need or demand for differing house types will vary over the district.</p>	<p>further work is required. Appropriate revisions to the policy and supporting text should allay the concerns expressed.</p>		<p>undue prescription and to allow for appropriate flexibility.</p>
<p>Object. Our client recognises that the need for a local plan policy on housing mix and density. We also acknowledge that its wording suggests that the targets for housing density and housing mix are indicative. However from experience, these targets are often applied rigidly by officers when it comes to the determination of planning applications.</p> <p>Our client considers that the imposition of a strict housing mix policy is unjustified and is not consistent with national planning policy. The latest housing mix figures set out within the SHMA represent the housing need at a district level. Whilst this is an important indicator, it is not appropriate to apply these figures rigidly to individual planning applications. The need for different types of housing will vary greatly between different areas and locations and will change significantly over the lifetime of the Local Plan. Therefore, it is important that a degree of flexibility is maintained so that the Local Plan can respond to changing circumstances. The NPPF is clear that planning applications should meet local housing demands (paragraph 50), which would not be the case if an onerous housing mix policy is applied. Furthermore, the housing mix policy does not seem to have been subject to any sort of viability testing and therefore its impact on deliverability is unknown especially when considered in conjunction with the proposed affordable housing target of 40% suggested in Draft Policy H2.</p>	<p>Whilst the draft policy is intended to be flexible rather than rigid, the comments are noted and indicate that further work is required. Appropriate revisions to the policy and supporting text should allay the concerns expressed.</p> <p>Draft policy SP3, the background paper “Approaching housing density and mix” and draft policy H2 were all taken into account in the council’s local plan viability assessment (June 2017), as were other relevant policies.</p>	<p>Yes</p>	<p>The draft policy and supporting text have been amended to improve the application of SHMA evidence, to avoid undue rigidity and to allow for appropriate flexibility.</p>

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

**June – July 2017 Draft Local Plan**  
**Policy Response Paper – Policy SP4: Spatial Strategy and Housing Growth**

<b>Policy: SP4 Spatial Strategy and Housing Growth</b>			
<b>Aim of the Policy: To achieve patterns of development supported by adequate and appropriate infrastructure which make the best use of available resources, promote sustainable travel movements, nurture high quality environments and community life, promote health, wellbeing and equality. (Plan objective 1)</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan</b>
<b>Policy principles and wording</b>			
<b>General support</b> for the settlement hierarchy	<b>Support noted</b>	No	None
<b>General objection</b> to the settlement hierarchy	<b>Noted.</b> However, no reasons have been provided to substantiate this objection.	No	None
<b>Comment :</b> The Yorkshire Dales National Park Authority notes that Policy SP4 makes allowance for some additional housing provision in small settlements within tier 5 of the hierarchy. Policy H1 makes provision for unallocated housing sites in settlements (including tier 5 settlements) through infilling and rounding off. These settlements might include a number split by the National Park boundary, such as Halton East, Eastby, Stirton, Bell Busk, Newby Cote etc. Although policy SP4 sets out an expectation of low growth in tier 5 of the hierarchy, and policy H1 seeks to exert some control over cumulative growth, it is not clear how the release of new building housing in these locations will be managed in practice.	<b>Noted</b> It is accepted that the combination of Policy SP4 and H1 to allow low levels of market housing growth on unallocated sites in the District's Tier 5 settlements needs to be carefully worded to avoid inappropriate growth levels and be clear on how the release of housing in these settlements will be managed.	Yes	This comment and a number of representations have led the Council to changes to the plan and to amalgamate Policies SP4 and H1. See Publication Draft Plan Policy SP4.

<p>These will be attractive locations for building new houses, unfettered by affordability requirements, but in sensitive locations often immediately adjoining the National Park. The Authority therefore has some concern to ensure the release of housing in these locations is suitably managed.</p> <p>On a wider point, the Authority is concerned that the approach to unallocated housing in policy H1 will undermine the potential for small scale rural affordable exceptions sites in settlements split by or close to the National Park boundary.</p>			
<p><b>Objection:</b> The wording of Policy SP4 should reflect that in Policy SP1 and refer to housing provision figures as a guideline and a minimum. The approach adopted by the Council in this policy should be more flexible. If the housing numbers referred to in this policy were adhered to rigidly this could stop otherwise sustainable development being brought forward in accordance with Policy H1.</p>	<p><b>Disagree:</b> It is not considered appropriate to refer to the figures for each settlement as a minimum. They are guideline figures to ensure that Policy SP1's minimum housing requirement is met. However, it is considered appropriate to amalgamate Policies SP4 and H1, and avoid any tension between the two policies.</p>	Yes	<p>This comment and a number of representations have led the Council to changes to the plan and to amalgamate Policies SP4 and H1. See Publication Draft Plan Policy SP4.</p>
<p><b>Comment:</b> Developers will continue to promote growth in settlements which do not meet their housing provision 'allocation' in the Local Plan.</p>	<p><b>Noted:</b> The Local Plan is seeking to promote a level of growth in settlements that is sustainable. If this planned level of growth is not coming forward through the plan's allocations then it may be appropriate to allow other planning applications.</p>	Yes	<p>A number of other representations have led the Council to changes to the plan and to amalgamate Policies SP4 and H1. See Publication Draft Plan Policy SP4.</p>
<p><b>Objection:</b> The annual levels of completions should also be deleted as this adds little to the policy and is unlikely to be realistic as it pays no regard to how sites are developed or brought forward. A housing trajectory should be utilised to</p>	<p><b>Agree:</b> Whilst local communities have found these figures helpful during the preparation of the plan, it is not necessary to continue to report on this figure.</p>	Yes	<p>This comment and a number of representations have led the Council to changes to the plan and to amalgamate Policies SP4</p>

identify the likely delivery of the housing requirement from known sources and the small sites allowance.	<p>However it is appropriate to include the total planned level of growth for each settlement in the revised Policy SP4.</p> <p>A housing trajectory is to be included in the Publication Draft Plan.</p>		<p>and H1. See Publication Draft Plan Policy SP4.</p> <p>See Housing Trajectory in the Publication Draft Plan.</p>
<p><b>Objection:</b> Policy restricts brownfield land development outside the settlement hierarchy despite potential benefits that might arise. Policy should be more flexible so as to allow brownfield development within tier 5 settlements and the open countryside. The last part of Policy SP4 (in relation to Tier 5) presents only limited flexibility and should be amended to make it clear that previously developed sites in Tier 5 settlements or the open countryside can make a very positive contribution to housing supply in the District and that small-scale housing schemes, and particularly those promoting home working and small scale linked business development, will be actively encouraged and supported as part of the housing strategy.</p> <p>Policy H1 should also be amended to reflect the same flexibility and in order to ensure the Policy properly reflects the core principle of the NPPF (paragraph 17) of “encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value.”</p>	<p><b>Disagree:</b> The policy does not restrict brownfield development within Tier 5 settlements and the open countryside and read with Policy ENV7 (b) the plan encourages the use of brownfield land in accordance with the NPPF paragraph 111.</p> <p>Furthermore, the revised Policy SP4 now refers specifically to the Council’s ‘in principle’ support for new homes on previously developed land within Tier 1, 2, 3, 4a and 4b settlements.</p>	Yes	<p>A number of other representations have led the Council to changes to the plan and to amalgamate Policies SP4 and H1. See Publication Draft Plan Policy SP4.</p>
<p><b>Objection:</b> The inclusion of a separate tier relating to homes within the open countryside should be considered in order to prevent inappropriate sporadic developments.</p>	<p><b>Agree:</b> The proposed revised Policy SP4 does separate out management of new homes in Tier 5 settlements and isolated homes in the countryside.</p>	Yes	<p>This comment and a number of representations have led the Council to changes to the plan and to amalgamate Policies SP4 and H1. See Publication Draft</p>

			Plan Policy SP4.
<b>Objection:</b> Careful attention should be given to the relationship between jobs and new housing – new housing being promoted where jobs will be provided. Lack of suitable major employers in the Craven region should be considered when new housing need is put forward. New developments often add to commuter demand, which in turn leads to increased pollution and traffic congestion. When considering housing need, local jobs for local people, should I feel take priority. The ability to walk or cycle to work cannot, I feel be underestimated.	<b>Agree in part:</b> The plan has given careful attention to the relationship between jobs and new housing both in terms of balancing the number of new homes with the likely future jobs created in the District as a whole and in terms of locating proportionately more housing to those settlements with the greatest potential to support employment growth.	Yes	This comment and a number of representations have led the Council to changes to the plan and to amalgamate Policies SP4 and H1. See Publication Draft Plan Policy SP4.
<b>Objection:</b> The hierarchy and growth should give more weight to maintaining the viability of schools in rural areas (tier 4 settlements)	<b>Disagree:</b> The plan has been prepared in conjunction with the Education Authority, North Yorkshire County Council Education and it is considered that sufficient weight has been given to school provision and viability in formulating this policy. The presence of local schools in the plan areas villages has been an important consideration in determining growth levels in rural areas.	No	None
<b>Objection:</b> All sustainable settlements should be allowed to play their part in meeting their own housing and employment needs as well as contributing to the wider district's requirements. A flexible approach to delivering the development needs of the district will ensure the plan's ultimate deliverability and success.	<b>Agree in part:</b> The level of growth should be broadly proportionate to the relative sustainability and role of each settlement and hence the need to identify a settlement hierarchy. However, both this policy and Policy EC1: Employment and Economic Development will allow under certain circumstances additional growth.	Yes	This comment and a number of representations have led the Council to changes to the plan and to amalgamate Policies SP4 and H1. See Publication Draft Plan Policy SP4.

<b>Support and Objection:</b> Consider it is appropriate that development is focussed upon the main settlements of Skipton, Settle and Low/High Bentham, as these represent the most sustainable locations for growth. However, the Council should recognise that directing further growth to Craven's Local Service Centres and Villages will result in a number of benefits for their on-going vibrancy.	<b>Agree in part:</b> It is considered that growth is appropriately focussed towards Skipton, Settle and Bentham with appropriate levels of lower growth distributed across many villages in the District. These lower levels of growth will assist in their on-going vibrancy.	Yes	A number of other representations have led the Council to changes to the plan and to amalgamate Policies SP4 and H1. See Publication Draft Plan Policy SP4.
<b>Support:</b> The spatial strategy appears to reflect access to services and strategic opportunities, as identified in the Strategic Economic Plan, the Northern Powerhouse, and the Strategic Transport Prospectus for North Yorkshire, and generally seems appropriate.	<b>Support noted</b>	No	None
<b>Growth of settlements: Skipton</b>			
<b>Support:</b> Support the classification of Skipton as a tier 1 Principal Town Service Centre and the focus of growth in the District. The consideration of the scale, nature and character of the settlements, including their level of services and facilities as well as their physical limitations, is clearly the logical basis for the classification and ranking of the settlements in terms of the distribution of the housing growth. Skipton is the largest town in the district with a population of 14,623 (2011 Census) and is the administrative and commercial centre. It is a location where services, facilities and employment opportunities are concentrated in the district including the main educational institutions and employers such as the Council and Skipton Building Society headquarters. The town also acts as a district hub for public transport with the train station providing regular services to Leeds, Bradford, Lancaster, Morecambe and Carlisle (and beyond).	<b>Support noted</b>	No	None



<b>Objection:</b> The housing provision for Skipton should be higher to ensure the market and affordable housing need is met.	<b>Disagree:</b> The plan is providing for more than the plan area's overall objectively assessed housing need and Skipton has been 'allocated' 50% of the plan's overall growth. This level of growth, along with higher and lower proportions either side of 50%, have been assessed in the Local Plan's Spatial Strategy Sustainability Appraisal (SA) in 2016. This SA concluded that a 50% proportion of the District's growth for Skipton was most appropriate for a sustainable pattern of growth across the plan area. In relation to affordable housing, the Council has had to accept that not all the need for affordable housing in the plan area is capable of being delivered in the plan period. (see Policy Response Paper for Policy SP1: Meeting Housing Need)	No	None
<b>Comment:</b> Care is needed, in a situation where Craven District and the National Park seek to provide more than their identified OAN, to ensure that this growth is attributed appropriately to enable housing provision within both planning areas so that social and housing needs can be met and key services are able to be supported by population growth. The spatial strategy can help balance how the OAN is met in order to maintain an appropriate balance with the National Park.	<b>Noted:</b> The effect of the spatial strategy of the Craven Local Plan on the balance of growth in Craven and the National Park is considered appropriate.	No	None
<b>Growth of settlements: Settle</b>			

<p><b>Comment:</b> Settle/Giggleswick – the Yorkshire Dales National Park Authority treats Settle and Giggleswick as contiguous settlements and they therefore appear alongside one another in the highest tier of the Yorkshire Dales Local Plan’s settlement hierarchy. The Draft Craven Local Plan treats them separately (tier 2 and 4b respectively). While it is not essential that the two respective settlement hierarchies match exactly, the way in which Giggleswick is treated may be relevant to concerns raised in relation to the extent of housing sites proposed in Settle.</p>	<p><b>Noted:</b> Plan preparation by Craven District Council has, since 2012, treated Settle and Giggleswick as two separate settlements of a different scale, function and character.</p> <p>The vast majority of the two settlements’ built up area, form and character are within the Craven Local Plan Area. The form and character of Giggleswick in the National Park compared to the character of the village in the Craven plan area, and in particular the conservation area of the village, is significantly different. These different contexts’ support a different approach to settlement hierarchy outside the National Park compared to within the Park.</p>	No	None
<p><b>Objection:</b> Settle Town Council thought that Settle and Giggleswick should be considered as one area. Giggleswick relies on Settle for its shops, employment, Health Service, transport and other resources and also provides the Settle area with its Swimming Pool and Secondary School site. It is therefore considered to be more appropriate to include the two together for allocation of housing and development. (See also the same objections under the consideration of representations on Giggleswick below). The town council considered that overall the projected number of houses is not deliverable.</p>	<p><b>Noted</b></p> <p>Plan preparation by the Council has, since 2012 treated Settle and Giggleswick as two separate settlements of a different scale, function and character.</p> <p>During community involvement on the plan preparation the local community of Giggleswick have highlighted the importance of retaining the separate identity and village character of the settlement. In April 2016 the Council approved the spatial strategy of the plan for consultation following a sustainability appraisal of 5 spatial growth options. One</p>	No	None

	<p>of the options, Option B Dispersed Growth, considered allocating growth equally to both Settle and Giggleswick. The sustainability appraisal identified that Option E: A Balanced Hierarchy of Growth was the most sustainable and this strategy pointed to differentiating growth between Settle and Giggleswick at 10.5% and 0.8% respectively.</p> <p>Whilst it is accepted that the residents of Giggleswick will benefit from the proximity of services in Settle, it remains the Council's view that the village's growth should be significantly lower than that of Settle in order to retain it's separate identity and village character. There is no reason given or evidence known to the Council to suggest that the number of homes proposed in Settle is not deliverable over the plan period up to 2032.</p>		
<p><b>Objection:</b> Housing in Settle is out of balance with employment provision. The limited employment development proposed means that the number of houses proposed for Settle will not be required. Settle can only be a key service centre if more employment is brought to the town and housing appropriate for those working in the town is provided. Building houses does not encourage employment. It is the converse which applies. Provide employment and the demand for housing will arise. The plan does not underpin and enhance the role of Settle as a key service centre.</p>	<p><b>Disagree:</b> 10 hectares for new homes and 6.7 hectares of land for employment is not considered out of balance. Housing is needed to generally align with new employment, but also provides for the existing residents need for affordable housing over the plan period as well as forecast demographic and household formation changes in the settlement. The above position indicates that commuting</p>	No	None

<p>Because the Plan does not emphasise employment, the proposed housing does not satisfy a local need. Consequently housing on sites SG021, SG066 and SG080 is likely to be occupied mainly by people retiring to the area; be used as holiday homes and therefore not be continually occupied, or by commuters to other towns. Commuting will be along the busy A65 adding to congestion and pollution. Although the Plan refers to supporting enhanced transport connectivity there are no plans in place for this and the existing arrangements for rail, bus and road travel will come under increased pressure. These are effects which are not supported by the plan. Therefore the provision of housing on sites SG021, SG066 and SG080 contradicts the Council's desire to reduce pollution, commuting and achieve housing close to employment.</p>	<p>should not increase significantly.</p> <p>Policy SP2: Economic Activity and Business Growth, of the Local Plan, supports enhanced transport connectivity with the wider Leeds City Region, Lancashire, Cumbria and Greater Manchester. Through the production of the Plan's Infrastructure Delivery Plan, the Council works with relevant agencies to ensure appropriate coordination of proposed transport enhancements in their own transport plans and programmes.</p>		
<p><b>Objection:</b> Disagree with the policy of building a large number of houses in Bentham and Settle. The demand for housing in Craven over the past few years has been for mid and south Craven. The policy of building most of the required housing in North Craven will put the policy at risk as demand is not as high as in mid and south Craven. Bentham in particular has little bus connections with the rest of Craven making it unsustainable for new housing. The road network to and from the A65 is limited. A better policy would be to spread the housing allocation around the whole of Craven. In particular allow limited new housing in the villages to keep them from dying. The schools are closing in Craven's villages due to low pupil numbers. Families need to be encouraged to move to the villages with the right type of housing.</p>	<p><b>Disagree:</b> This policy does not seek to build most of the required housing in north Craven. The majority of new housing is being promoted in mid and south Craven e.g. Skipton (50%), Glusburn/Crosshills (3.5%) and Gargrave (3.5%).</p> <p>In April 2016 the Council approved the spatial strategy of the plan for consultation following a sustainability appraisal of 5 spatial growth options. Following this consultation in 2016, the Council has maintained the same spatial strategy for growth. The sustainability appraisal identified that Option E: A Balanced Hierarchy of Growth was the most</p>	No	None

	sustainable and this strategy pointed to 10.5 % of the plan area's growth being accommodated in both Settle and Bentham. This level of growth reflects the function of these settlements as important service and employment centres in the northern half of the plan area. This policy still allows limited new housing in many villages across the plan area. This is considered to be an appropriate balance of growth in the interests of promoting a sustainable pattern of growth in accordance with the National Planning Policy Framework (NPPF).		
<b>Growth of settlements: Giggleswick</b>			
<b>Support:</b> Support the tier 4b settlement classification for Giggleswick. No need for more houses or employment. Giggleswick should no longer be a dumping ground for houses needed in Settle. No further developments should occur in Giggleswick, including those previously preferred allocations in the Local Plan.	<b>Support noted:</b> However, one housing land allocation has been put forward by the Council in Giggleswick. See Policy Response Paper for Policy SP11 for justification for this land allocation. Also the Pre-Publication Draft Plan Policy H1 set out the conditions for allowing new homes on unallocated sites. Further to other representations, the wording of Policy H1 has been amended and is now amalgamated with Policy SP4.	Yes	A number of other representations have led the Council to changes to the plan and to amalgamate Policies SP4 and H1. See Publication Draft Plan Policy SP4.
<b>Comment:</b> Settle/Giggleswick – the Yorkshire Dales National Park Authority treats Settle and Giggleswick as contiguous settlements and they therefore appear alongside one another in the highest tier of the Yorkshire	<b>Comment noted:</b> Plan preparation by Craven District Council has, since 2012, treated Settle and Giggleswick as two separate settlements of a different scale,	No	None

<p>Dales Local Plan's settlement hierarchy. The Draft Craven Local Plan treats them separately (tier 2 and 4b respectively). While it is not essential that the two respective settlement hierarchies match exactly, the way in which Giggleswick is treated may be relevant to concerns raised in relation to the extent of housing sites proposed in Settle.</p>	<p>function and character.</p> <p>The vast majority of the two settlements' built up area, form and character are within the Craven Local Plan Area. The form and character of Giggleswick in the National Park compared to the character of the village in the Craven plan area, and in particular the conservation area of the village is significantly different. Hence these different contexts support a different approach to settlement hierarchy outside the National Park compared to within the Park.</p>		
<p><b>Objection:</b> Settle and Giggleswick should be considered as one growth area. They should be treated as one Key Service Centre as are High and Low Bentham. The reasons given for arguing for this change to the settlement hierarchy and the combining of the two settlements are given as follows:</p> <ul style="list-style-type: none"> <li>• They share the same community and leisure facilities such as Settle College, Settle Community Pool and Settle Golf Club. (all located in Giggleswick). The proposed new surgery is in Giggleswick.</li> <li>• Some parts of Giggleswick are closer to Settle town centre than that of Giggleswick</li> <li>• All parts of Giggleswick, including those within the National Park, are within a mile of the centre of Settle and the Booths food supermarket.</li> <li>• It is not true to say that Giggleswick has only basic services.</li> <li>• The historic part of Giggleswick lies wholly outside the</li> </ul>	<p><b>Disagree:</b> Plan preparation by the Council has, since 2012 treated Settle and Giggleswick as two separate settlements of a different scale, function and character.</p> <p>During community involvement on the plan preparation the local community of Giggleswick has sought to retain the separate and village identity of the settlement. In April 2016 the Council approved the Spatial Strategy of the plan for consultation following a sustainability appraisal of 5 spatial growth options. One of the options, Option B Dispersed Growth, considered allocating growth equally to both Settle and Giggleswick. The Sustainability Appraisal identified that Option E: A Balance Hierarchy of Growth</p>	No	None

<p>National Park.</p> <ul style="list-style-type: none"> <li>• Settle and Giggleswick are not separate communities like Rathmell and Hellified.</li> <li>• Visitors to the area would assume that Giggleswick is part of Settle.</li> <li>• There is no gap in the housing between Settle and Giggleswick.</li> <li>• Settle, with few open spaces, been assigned large numbers of houses whereas Giggleswick is to have no buildings in the next few years. This is disproportionate and unfair.</li> <li>• there is a very short walk across the footbridge to Settle, bringing Giggleswick residents nearer to services than the outlying area of Settle such as that represented by area SG025.</li> <li>• Giggleswick is extremely well related to the shops, services and facilities within Settle – which is classed as a Tier 2 settlement. In fact, most areas within Giggleswick are within established walking distances of those shops and services making Giggleswick a sustainable location for new housing. The previous iteration of the Local Plan in 2016 reached the same conclusion and identified new housing allocations, as a sustainable location for new development.</li> <li>• Settle and Giggleswick are so closely - physically, socially and commercially – linked.</li> </ul> <p>The Council should reject the arguments put forward that they are separate communities and make Giggleswick part of the Settle tier 2 settlement. This would free up sufficient sites in Giggleswick for housing and employment which are deliverable. That which would mean that sites SG021, SG066 and SG080, which are not deliverable, can be removed from the plan.</p>	<p>was the most sustainable and this strategy pointed to differentiating growth between Settle and Giggleswick to 10.5 % and 0.8% respectively.</p> <p>Whilst it is accepted that the residents of Giggleswick will benefit from the proximity of services in Settle, and vice versa, it remains the Council's view that the village's growth should be significantly lower than that of Settle to retain its separate identity, village character and open spaces on the western side of the River Ribble. There are no reasons given or evidence known to the Council to suggest that the number of homes proposed in Settle is not deliverable over the plan period up to 2032. The sites in Settle referred to in this representation have adequate access and have raised no objections from the National Park Authority, Natural England or Historic England.</p>		
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<b>Objection:</b> For the above reasons, Giggleswick The following sites should be allocated for housing in Giggleswick: <ul style="list-style-type: none"> <li>Land east of Raines Rd, Giggleswick</li> <li>South side of Station Rd, Giggleswick</li> </ul>	<b>Disagree:</b> These sites are not required to meet the settlement's planned level of growth in accordance with the plan's spatial strategy and Site SG088, South of Station Rd, is constrained by high flood risk.		
<b>Objection:</b> The National Planning Policy Framework is clear that local planning authorities should 'boost significantly the supply of housing' and the housing figures set out in both the current and emerging Local Plan are acknowledged as being a minimum requirement. As such, there should be no cap on the level of development coming forward providing it is sustainable, appropriate to the scale of the settlement and meets the housing need of the area. In this regard, both sites listed below are considered to be sustainable locations within the village of Giggleswick and are sites that have been included as housing allocations within the Local Plan throughout its development: 14 dwellings to the west of Raines Road (SG085) and 20 dwellings to the east of Raines Road (SG086) it is considered that each site represents excellent options for delivering new, high quality housing in Giggleswick on sites that can be genuinely integrated into the village without causing harm to it or its surroundings. The sites are of a scale that can provide much needed affordable housing to the village and wider district as is required within the draft Local Plan	<b>Disagree:</b> The plan will boost significantly the supply of housing across the plan area by providing for more than the area's overall objectively assessed housing need. These sites are not required to meet the settlement's planned level of growth in accordance with the plan's spatial strategy.	No	None
<b>Growth of settlements: Low and High Bentham</b>			



<b>Support:</b> Proposed growth at High and Low Bentham is appropriate and compatible with growth proposed nearby in Lancaster City Council.	<b>Support noted</b>	No	None
<b>Objection:</b> The number of houses proposed in Bentham is too high. I disagree with the policy of building a large number of houses in Bentham and Settle. The demand for housing in Craven over the past few years has been for mid and south Craven. The policy of building most of the required housing in North Craven will put the policy at risk as demand is not as high as in mid and south Craven. Bentham in particular has little bus connections with the rest of Craven making it unsustainable for new housing. The road network to and from the A65 is limited. A better policy would be to spread the housing allocation around the whole of Craven. In particular allow limited new housing in the villages to keep them from dying. The schools are closing in Cravens villages due to low pupil numbers. Families need to be encouraged to move to the villages with the right type of housing.	<p><b>Disagree:</b> This policy does not seek to build most of the required housing in north Craven. The majority of new housing is being promoted in mid and south Craven e.g. Skipton (50%), Glusburn/Crosshills (3.5%) and Gargrave (3.5%).</p> <p>In April 2016 the Council approved the spatial strategy of the plan for consultation following a sustainability appraisal of 5 spatial growth options. The sustainability appraisal identified that Option E: A Balanced Hierarchy of Growth was the most sustainable and this strategy pointed to 10.5 % of the plan area's growth being accommodated in both Settle and Bentham. This level of growth reflects the function of these settlements as important service and employment centres in the northern half of the plan area. This policy still allows limited new housing in many villages across the plan area.</p> <p>This is considered to be an appropriate balance of growth in the interests of promoting a sustainable pattern of growth in accordance with the National Planning Policy Framework (NPPF).</p>	No	None

<b>Growth of settlements: Glusburn/Crosshills</b>			
<b>Support:</b> Support the proposed spatial strategy hierarchy of housing growth distribution, in particular the recognition in paragraph 4.50 around the physical constraints to growth in the Crosshills and Glusburn area.	<b>Support noted</b>	No	None
<b>Support and comment:</b> The spatial strategy appears to reflect access to services and strategic opportunities, as identified in the Strategic Economic Plan, the Northern Powerhouse, and the Strategic Transport Prospectus for North Yorkshire, and generally seems appropriate. However, there could be scope to elevate Cross Hills and Glusburn to Tier 2 to better reflect the local employment opportunities (See Employment Land Review (ELR) Fig 2.5) and services.	<b>Support noted:</b> The village of Glusburn with Crosshills is not considered to warrant elevation within the settlement hierarchy to Tier 2. Unlike the Tier 2 towns of Settle and Bentham, which provide a critical function as service centres for a large rural catchment area, the importance of the service centre function of Glusburn/Crosshills is diminished by its proximity to Skipton and the communities of Bradford District. It is accepted that it does provide a good level of existing opportunities as reflected in Figure 2.5 of the ELR. However, for the above reasons, its status as a Local Service Centre is considered more appropriate than a Tier 2 Key Service Centre.	No	None
<b>Objection:</b> Increased housing should be accommodated in Glusburn/Crosshills. The draft policy wording suggests that “proportionate growth to underpin their roles as Local Service Centres is directed to Glusburn/Crosshills, Gargrave and Ingletton as Tier 3 settlements”. All three settlements are proposed to accommodate 3.5% (approx. 8 net dwellings per annum) of housing growth. In the case of Glusburn/Crosshills this is a material	<b>Disagree:</b> The plan’s original guideline figure for the village’s growth as a proportion of the plan areas growth was 5.1% (Spatial Strategy Sustainability Appraisal 2016).  However, since then the plan’s evidence base has been updated and the flood risk	No	None

<p>reduction as compared to the 5.5% (or 14 net dwellings per annum) proposed for this area in the Preferred Sites for Housing Consultation Document (and 5.1% or 13 net dwellings per annum in the Second Draft Local Plan). It is considered that Policy SP4 should be amended to include a higher level of housing development in Glusburn/Crosshills, given the combination of its status as a Local Service Centre and that it is a substantial centre of population in Craven (as acknowledged in Draft Policy SP8). Glusburn/Crosshills has a good range of local amenities and additional housing development would help ensure the future vitality and viability of such services. Furthermore to the above, Glusburn/Crosshills is recognised as a Level 3 retail centre elsewhere in the Draft Local Plan, whereas the two other Local Service Centres - Ingleton and Gargrave - have a lower level retail centre (Level 4) and no recognised retail centre at all respectively. We consider this reflects the stronger potential for Glusburn/Crosshills to accommodate a higher level of development, and in turn deliver benefits to the vitality and viability of local amenities.</p> <p>Furthermore, allowing for increased housing at Glusburn/Crosshills would improve the prospects of delivering the number of homes required, both locally and district wide, to meet the needs of the area (including to achieve the minimum housing provision set out within Draft Policy SP1).</p>	<p>information provided in the Council's Strategic Flood Risk Assessment (SFRA) indicates that much of the land in and around Glusburn/Crosshills has high levels of flood risk. This constraint, and Natural England's comments that the plan should minimise impacts on the South Pennine Moor Special Protection Area (SPA) indicate that land suitability is a significant constraint to the centre's growth. The minimisation of impact on SPA's is an important part of the plan's strategy. It is important that the Craven Local Plan does all it can to minimise the impact on the South Pennine SPA as there are likely to be unavoidable high levels of growth immediately across the boundary within Bradford. The lowering of the centre's growth guideline figure reflects these constraints.</p> <p>Furthermore, the proposed planned growth of 3.5% is now in line with other Tier 3 settlements growth levels. The reduction in growth in Glusburn/Crosshills has been 'matched' with a higher growth at Gargrave and Ingleton. Such a redistribution of growth provides for retaining an appropriate overall level of the plan areas growth in Tier 3 settlements of around 10%.</p>		
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	It is considered that this proposed level of growth will deliver sufficient benefits in terms of the vitality and viability of local amenities. The distribution of growth proposed for the plan area's most sustainable settlements and the amount of land allocated for housing within them is considered sufficient to meet the plan's minimum housing requirement.		
<b>Growth of settlements: Ingleton</b>			
<b>Objection:</b> Ingleton has a good range of shops and services and employment places. The policy makes insufficient allowance for new housing sites given the capacity of the settlement to meet the needs of residents. Sustainable housing sites have been excluded unnecessarily. The housing allocation for Ingleton should be increased	<b>Disagree:</b> The spatial growth strategy resulting from the 2016 plan's sustainability appraisal indicated that 3.1% of the Plan area's growth should be planned for in Ingleton. This proportion has been raised slightly in the plan to 3.5% to reflect the local circumstances in Ingleton. However, this 3.5% growth is consistent with other Tier 3 settlements and it is considered that a higher 'allocation' of housing land would not conform with the plan's spatial strategy, as identified following the plan's Sustainability Appraisal in 2016.	No	None
<b>Comment:</b> The appropriate distribution of development opportunities across the plan area can help support the retention of services in sparsely populated rural areas, including those parts of Craven within the National Park, and meet local needs. North Yorkshire County Council would therefore question whether there may be scope to	<b>Agree in part:</b> It is accepted that population growth can help support the retention of services in rural areas. Indeed, the plan's proposed distribution of planned growth to Ingleton at 3.5% of the plan area is somewhat higher than the	No	None

consider opportunities in Ingleton in the wider geographical context and its potential for an enhanced role in providing and supporting tourism and local services within the northern part of the District.	plan's 2016 Sustainability Appraisal's guideline figure of 3.1% growth. This slight rise up to 3.5% will assist in bringing in additional spending within the local economy and is considered an appropriate level of growth to conform with the plan's Spatial Strategy.		
<b>Objection:</b> Land adjacent to A65 New Road, SE Ingleton should be allocated for residential development.	<b>Disagree:</b> This site has been refused planning permission twice in the past and is not considered appropriate to allocate in the Local Plan. It is not required for the settlement to reach its level of planned growth in accordance with the plan's spatial strategy and more sustainable sites are available to achieve this level of growth.	No	None
<b>Growth of settlements: Gargrave</b>			
<b>Support:</b> Support Gargrave's identification as a Local Service Centre	<b>Support noted</b>	No	None
<b>Objection:</b> The level of housing provision for Gargrave is too high for the following reasons: <ul style="list-style-type: none"> <li>This number of houses will ruin the village, increase traffic, noise and pollution – just because we have a co-op! Long term it will spoil the village for tourists and day trippers which the village needs to survive. The allocation should go back to what it was in the previous draft.</li> <li>The high growth levels for Gargrave wrong foots the</li> </ul>	<b>Disagree:</b> The spatial growth strategy resulting from the 2016 plan's sustainability appraisal indicated that 2.0% of the Plan area's growth should be planned for in Gargrave. The 2016 Draft Plan Policies consultation (April/May 2016) reflected this proportion of the plan areas growth in its Policy SP4.  However, in the light of the availability and	No	None

<p>village's emerging Neighbourhood Plan and represents non-cooperation by Craven District Council.</p> <ul style="list-style-type: none"> <li>• Gargrave Parish Council (GPC) has developed a Gargrave Neighbourhood Development Plan (NDP) over the last 2 to 3 years. Amendments to the Gargrave NDP have been made at the request of CDC a number of times over that period. Gargrave NDP is now submitted. Then suddenly, out of the blue, in this latest 3rd draft of the Craven local plan Gargrave has its housing numbers increased by nearly 100%.</li> <li>• Gargrave is the only settlement in the 3rd draft of the local plan to have its numbers increased.</li> <li>• It is unnecessary to increase Gargrave's housing allocation to accommodate the extra care housing as this can be provided through the submitted NDP on the old allocation for housing.</li> <li>• Housing allocation numbers are a minimum and the extra care could be included as additional numbers for this specific purpose. Gargrave's NDP supports the development of extra care in Gargrave.</li> <li>• This increase in housing numbers in the 3rd draft of the local plan appears as a deliberate step by CDC to delay the progress of Gargrave's NDP and is non cooperation</li> <li>• The consultation and will of Gargrave residents as shown in the Gargrave Neighbourhood Plan is being denied.</li> </ul> <p>There is no explanation as to the increase in numbers since the Draft Plan was published in 2014, nor an explanation of a reduction in housing numbers for Glusburn/Crosshills and Ingleton.</p>	<p>suitability of land in the area, and the dominant local service centre role of the village in this part of the plan area and District, the Council consider it appropriate to increase the proportional growth of Gargrave. The good level of services, including train services, and the need to maintain and enhance these services to reflect the village's tourist industry also adds to the justification for a higher than 2.0% growth for the village.</p> <p>Furthermore a higher level of growth for Gargrave is able to offset the reduction in growth in Glusburn/Crosshills for Tier 3 settlements. Such a redistribution of growth provides for retaining the appropriate level of the plan area's growth in Tier 3 settlements to around 10%.</p> <p>Craven District Council has provided a considerable amount of assistance to the Parish Council on the preparation of the Neighbourhood Plan. District Council officers have explained to the Parish Council that, in accordance with the paragraph 184 of the National Planning Policy Framework (NPPF), Neighbourhood Plan's must be in general conformity with the strategic policies of the Craven Local Plan and have sought to work with the Parish Council to ensure this is the case.</p>		
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	Gargrave's support for extra care housing in the village is welcomed. The provision of extra care housing is needed across the District and in Gargrave and it is important to understand that this type of housing forms part of the housing need and requirements of the District. The Planning Policy team are not aware of any evidence to date that the extra care facility promoted by NYCC can be accommodated on another site.		
<b>Growth of settlements: Burton in Lonsdale</b>			
<b>Objection:</b> Burton in Lonsdale should be given a higher % of growth for the following reasons: <ul style="list-style-type: none"> <li>The plan acknowledges that residents enjoy a vibrant community life with good access to local services and the village has been classified as a 'village with basic services'</li> <li>The proposal to reduce the proportion of housing growth within the village is not a strategic decision but has been taken as the Council believe there are no other suitable sites available for development within the village.</li> <li>Site BU013 (or BU012) is considered to be suitable for allocation purposes</li> <li>A 50% reduction in the growth of the village since the previous plan was consulted on will lead to a 50% loss of support for the village shop and pub and public transport, and potentially no affordable</li> </ul>	<b>Disagree:</b> The spatial growth strategy resulting from the 2016 plan's sustainability appraisal indicated that 1.2% of the Plan area's growth should be planned for in Burton in Lonsdale. The 2016 Draft Plan Policies consultation (April/May 2016) reflected this proportion of the plan areas growth in its Policy SP4. Site BU012, the former school site is proposed for allocation in the Local Plan. Site BU013 is unable to be accessed by an adoptable highway which reduces any scope for housing on this site below the threshold for allocated sites. Poor access and flood risk place significant constraints on the suitability of land for housing in this village. The closure of the local primary school also suggests a reduction in the	No	None

housing.	2016 planned growth levels is appropriate. Taking into account the above factors, a 0.4% growth of this village with basic services is considered appropriate.		
<b>Growth of settlements: Cononley:</b>			
<b>Objection:</b> Housing provision in Cononley is too high, not based on need, but the opportunity associated with the Mill development. The number per annum should be 3 dpa. If the Mill development failed to be delivered, 5 dpa would ruin the village.	<p><b>Disagree:</b> The spatial growth strategy resulting from the 2016 plan's sustainability appraisal indicated that 1.2% of the plan area's growth should be planned for in Cononley. The 2016 Draft Plan Policies consultation (April/May 2016) reflected this proportion of the plan areas growth in its Policy SP4.</p> <p>The Council consider that a rise in this level of growth figure up to 2.5% is appropriate and will assist in offsetting some reductions of growth levels elsewhere in Tier 4 settlements. The main reason for this uplift is to take advantage of the opportunity to promote the regeneration of Cononley Mill and adjacent land through a conversion to residential development with extensions and new build. In accordance with the NPPF's and this plan's policy to encourage the use of previously developed sites (Policy ENV7) and the plan's objective to make the best use of available resources, the benefits of reusing this building and brownfield site for residential development is considered an</p>	No	None



	<p>overriding factor in terms of the appropriate growth levels for Cononley. Furthermore the village has the benefit of a good range of services for a local service centre, including a very good train service on the Airedale line between Leeds and Skipton.</p>		
<p><b>Objection:</b> The Parish Council is disappointed to see that Cononley has seen a significant increase in its proportion of housing growth to 2.5%, which is more than double any of the other 4a villages with basic services, yet the local plan has nothing regarding improving the infrastructure to support such a significant population growth. In particular, as all of the housing sites allocated are expected to be built within the first 5 years of the plan, we are concerned about the impact this will have on the quality of life of both current and future villagers.</p>	<p><b>Disagree:</b> The spatial growth strategy resulting from the 2016 plan's sustainability appraisal indicated that 1.2% of the plan area's growth should be planned for in Cononley. The 2016 Draft Plan Policies consultation (April/May 2016) reflected this proportion of the plan areas growth in its Policy SP4.</p> <p>The Council consider that a rise in the Sustainability Appraisal proportional growth figure up to 2.5% is appropriate and will assist in offsetting some reductions of growth levels elsewhere in Tier 4 settlements. The main reason for this uplift is to take advantage of the opportunity to promote the regeneration of Cononley Mill and adjacent land through a conversion to residential development with extensions and new build. In accordance with the NPPF's and this plan's policy to encourage the use of previously developed sites (Policy ENV7) and the plan's objective to make the best use of available resources, the benefits of reusing</p>	No	None

	<p>this building and brownfield site for residential development is considered an overriding factor in terms of the appropriate growth levels for Cononley. Furthermore the village has the benefit of a good range of services for a local service centre, including a very good train service on the Airedale line between Leeds and Skipton.</p> <p>Planning policies exist now and are included within this emerging plan to secure appropriate planning obligations (financial contributions) for infrastructure provision necessary for residential proposals.</p>		
<b>Growth of settlements: Sutton in Craven</b>			
<p><b>Support:</b> Support the housing provision position for Sutton-in Craven, the removal of previous allocations and no need for further allocations in Sutton. Delighted that it has been recognised that, after extensive building within Sutton in Craven, there is no longer any housing required for at least the next 15 years and that all original potential sites have been removed from the plan.</p>	<p><b>Support noted.</b> However, it should be noted that Policy H1 of the Summer 2017 Draft Plan that the Parish Council has commented on, and which has now been amalgamated with a revised Policy SP4 does allow additional housing in settlements, subject to compliance with a number of criteria.</p>	No	None
<p><b>Objection:</b> We object to the reduction of the proportion of housing growth directed to Sutton in Craven, which has been reduced in previous draft Local Plan consultations from 2% to 1.6%, and now reduced further to 1.2%. There is no clear justification in the Policy Responses Paper for</p>	<p><b>Disagree:</b> The spatial growth strategy resulting from the 2016 plan's sustainability appraisal indicated that about 2.0% of the Plan area's growth should be planned for in Sutton. The 2016</p>	No	None

this further decrease in Sutton in Craven.	<p>Draft Plan Policies consultation (April/May 2016) reflected this proportion of the plan areas growth in its Policy SP4.</p> <p>Land suitability is a restraint on the level of planned growth for Sutton in Craven. Two of the limited number of sites with potential for housing have been refused by the Council and dismissed at appeal. The village's proximity to a Special Protection Area and the need to protect important green spaces also act as constraints to the village's growth.</p>		
<b>Growth of settlements: Rathmell</b>			
<p><b>Objection:</b> Rathmell primary school has now closed and the Council should re-assess this villages classification. The village has: An Anglican Church, a Methodist Chapel, a small, leased community centre, and a post box. The Tosside/Settle/Horton bus goes through the village three times a day.</p> <p>The village does not have: A school, a shop, a pub, a play area, pavements, street lighting, on-road parking, mains gas, or good internet services.</p>	<p><b>Agree:</b> The loss of the village primary school means that the level of services in Rathmell is now below that appropriate for a Tier 4 settlement.</p>	Yes	Rathmell is moved from a Tier 4 to a Tier 5 village and no longer requires land allocations to be put forward in the Local Plan.
<p><b>Comment:</b> The Parish Council note that this table specifies just 1 completion in Rathmell up to 31/3/17. Without researching the issue further, we suspect that the Beauty development in Rathmell was completed before this.</p>	<p><b>Noted:</b> The change of Rathmell village from Tier 4 to Tier 5 means that the calculation of completions and estimate of required housing in the village is no longer required.</p>	Yes	Rathmell is moved from a Tier 4 to a Tier 5 village and no longer requires land allocations to be put forward in the Local Plan

<p>Certainly there was an open day before this time and we imagine the first property had been sold by then. If this was indeed the case then the net completions would be 5 and the residual requirement 29. The dubious 12% tariff would now, to the nearest whole number, be 3, the gross residual figure would be 32, and the OPPs 13.</p> <p>Question - Does this make the Gross requirement 19 rather than 20?</p>	<p>There is no longer a specific planned growth level for the village. Any planning applications for residential development will be assessed against relevant criteria within the revised Policy SP4.</p>		
<b>Growth of settlements: Embsay</b>			
<p><b>Objection:</b> Embsay is erroneously classified within Tier 4b of the spatial strategy because it has a reasonable range of services and facilities including two public houses, a shop, thriving community centre, school, cricket and football clubs. It also differs significantly from other Tier 4b settlements due to its proximity to the Tier 1 settlement of Skipton, which is within walking/cycling distance with good public transport links. The settlement also has the infrastructure and capacity to accommodate a greater level of growth than 4 dwellings per year over the plan period. It is in very close proximity to the main service centre of Skipton.</p>	<p><b>Disagree:</b> The higher level of service centres of Glusburn/Crosshills, Ingleton and Gargrave in Tier 3 have a much wider range of shops, restaurants, services and employment. These settlements also have defined commercial centres. Embsay is primarily of a residential character with a significantly smaller range of services. There are other examples of Tier 4 settlements such as Bradley and Carlton in close proximity to Skipton. This proximity to Skipton is not an overriding reason to change the village's settlement hierarchy. The proximity of the National Park and the North Pennines Special Protection Area act as constraints to the village's growth.</p>	No	None
<b>Growth of settlements: Bolton Abbey/Long Preston</b>			
<p><b>Support:</b> Support the inclusion of Bolton Abbey within the settlement hierarchy contained within the Third</p>	<p><b>Support noted</b></p>		

Publication Draft Local Plan			
<p><b>Comment and Objection:</b> Chatsworth Settlement Trustees (CST) have outlined throughout its engagement process with CDC that its proposals for the village do include an element of housing.</p> <p>When Development Management Officers are assessing proposals at Bolton Abbey which are likely to include an element of housing, CST considers it is important that this policy cannot be read (and misunderstood) to present a barrier to housing development. It is therefore requested that an explanatory sentence is added at the end of paragraph 4.51 which states that:</p> <p>“Whilst no housing sites are allocated in Bolton Abbey or Long Preston, proposals for residential development that are brought forward on unallocated sites will be supported in these villages where they are in accordance with policy H1, other policies of the plan and national policy”.</p>	<p><b>Noted:</b> Further to a number of comments regarding the wording of Policy H1 and its linkage with Policy SP4, the two policies have been amalgamated and more clarity given to when unallocated sites will be supported. This policy re-wording is considered to cover the issue raised by Chatsworth Settlement Trustees and therefore no additional wording is required in the explanatory text.</p>	Yes	This comment and a number of representations have led the Council to changes to the plan and to amalgamate Policies SP4 and H1. See Publication Draft Plan Policy SP4.
<b>Growth of settlements: Broughton</b>			
<p><b>Support and Objection:</b> Broughton Hall Estate Trustees support the draft plan’s identification of the contribution the Estate makes to the economy of the area and acknowledgement that additional commercial and tourism development at the Estate is desirable. However the trustees remain very concerned that the plan will not facilitate the residential development at Broughton which is appropriate to Broughton. It is clearly appropriate and desirable that a proportionate level of housing is provided at Broughton in conjunction with new commercial and tourism development in order to promote sustainable</p>	<p><b>Disagree:</b> Broughton is not considered appropriate to classify as a Tier 4 settlement. It is not considered to have sufficient basic services. Therefore it is not appropriate to include allocations for planned growth in the settlement. Planning applications for residential development will be assessed against the relevant criteria of the revised wording in Policy SP4.</p>	Yes	This comment and a number of representations have led the Council to changes to the plan and to amalgamate Policies SP4 and H1. See Publication Draft Plan Policy SP4.

<p>patterns of development. To make the plan justified and take forward the most appropriate strategy for this part of the plan area, the following options should be considered and one of them selected for inclusion in the plan:</p> <ul style="list-style-type: none"> <li>• Proposal 1 - Include Broughton as a village within Tier 4 of the Local Plan's settlement hierarchy</li> <li>• Rationale - Broughton includes multiple services. In particular it includes a level of employment options , service provision and transport links which are unsurpassed in a village of its size in the plan area. On that basis there is a clear justification for including the village within a high tier in the settlement hierarchy.</li> <li>• Proposal 2 - Allocate the proposed site in Broughton village for a new village green and housing</li> <li>• Rationale – Additional information demonstrates that there is a site that is suitable and appropriate for allocation in the Local Plan. The development of the site will provide not only new housing to be retained and let out by the Estate but will also provide a new village green that will provide a substantial benefit to existing residents of Broughton Village.</li> <li>• Proposal 3 - Provision of a specific policy in the plan that provides a supportive context for (housing) development in the village</li> <li>• Rationale - On the basis that Broughton is unique in the plan-area in terms of the existence of a village and a substantial employment centre within a Parish close to Skipton, there is clear justification for a distinct policy within the Plan which relates to Broughton as a unique place and</li> </ul>			
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<p>would allow for a housing development (c.10 units ).</p> <ul style="list-style-type: none"> <li>• Paragraph 54 of the NPPF states that ‘In rural areas...local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs’ . Responding to the local circumstances of Broughton which are unique in the plan area there is a clear rationale for creating a policy (context) that would support a proportionate level of housing development in the village. The Trustees note that a specific policy is incorporated within the plan for mixed-use development at Bolton Abbey and considers a similar policy could be advanced for</li> <li>• Broughton. It is keen to engage with the Council on the terms of a policy.</li> <li>• Proposal 4 – In addition to, or if Proposals 1-3 are not observed, amend the wording of draft policy H1 to allow for a higher level of growth on unallocated sites in Tier 5 settlements when robustly justified, allowing a robust case to be put forward for a housing development in Broughton village of a scale envisaged in the attached site promotion document . We propose that the wording of draft policy H1 be amended to state that : “Within Tier 5 settlements and open countryside the scale of development to be</li> <li>• delivered on unallocated sites will be limited to less than 6 dwellings or 0.1ha (unless robust justification for an alternative limit is put forward) .” (proposed additions underlined)</li> <li>• Rationale - Draft policy H1 is supportive of</li> </ul>			
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<p>residential development in villages within Tier 5 of the settlement hierarchy such as Broughton stating that : Additional homes may be provided through the sustainable development of other unallocated sites put forward in planning applications . Proposals for residential development on such sites , including the infilling, rounding off , or extension of settlements will be acceptable...( subject to various criteria) . However, the policy references a scale of development up to five dwellings (or 0.1ha) . In the case of Broughton the delivery of only four houses (on the site now proposed for allocation) would not :</p> <ul style="list-style-type: none"> <li>• Provide a sufficient level of development around which to base the creation of a village green.</li> <li>• Be sufficient to positively address some of the negative demographic trends impacting upon Broughton Parish.</li> <li>• Provide a proper alignment between economic growth and residential growth within the same Parish to foster the delivery of sustainable development during the plan-period.</li> </ul>			
<b>Growth in Settlements: Elslack</b>			
<p><b>Objection:</b> Previously developed land at Station Yard, Elslack should be identified as an available, suitable and deliverable housing site.</p>	<p><b>Disagree:</b> Elslack is a tier 5 settlement and the plan does not allocate land for housing in these small villages. Any future proposals for new homes in Elslack will be supported if in accordance with the Publication Draft Plan Policy SP4</p>	No	None



\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## June – July 2017 Draft Local Plan

## Policy Response Paper – Policy Ref: SP12: Infrastructure, Strategy &amp; Development Delivery

<b>Policy: SP12: Infrastructure, Strategy &amp; Development Delivery</b>			
<b>Aim of the Policy: to provide a context for the provision of infrastructure arising from growth proposals and plan delivery</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan</b>
Draft Policy SP12 around infrastructure, strategy and development, and the associated Infrastructure Delivery Plan in Appendix C, whilst an improvement since the last draft, do we feel need further work. Further consideration of transport and effects on services is required.	Comments are noted. The policy and plan is accompanied by the Infrastructure Delivery Plan (IDP) which examines infrastructure requirements arising from growth proposals. It should be noted that the IDP is a living document that will change and be updated regularly over time. It is considered to provide sufficient adequate information on infrastructure at this time.	No	None.
Cross boundary effects arising from development require consideration	Strategic cross-boundary effects have been considered and taken into account as part of duty to cooperate discussions. This has been/will be reflected in the plan, duty to cooperate statement and supporting documentation.	No	None.
Infrastructure listed in Appendix C is little more than a wish-list. Inadequate highway modelling undertaken	The infrastructure requirements set out in the IDP have indicative costs associated with schemes and sources of funding. Where it can, the plan then puts mechanisms in place to secure contributions to funding for schemes. The IDP considers highways and transport	No	None.

	<p>infrastructure and junction modelling has been undertaken in Skipton, where most growth is directed. For the purposes of the plan and the need for a cumulative impact assessment, this is considered appropriate and proportionate. Transport Assessments (TA) will still be required for individual planning applications of the larger residential schemes across the plan area. A TA will ensure that a detailed assessment of the impact of each individual application will be made and where necessary mitigation measures will be funded by the developer.</p>		
<p>No apparent, rigorous assessment linking the proposed level of development, current and future transport infrastructure demand, capacity and impacts, to inform the appropriate phasing of development over time. The current approach is very simplistic. Existing situation and effect on infrastructure and services is not accounted for.</p>	<p>Disagree: See above response. As regards public transport and the rail network, the Council continues to work with Network Rail and the Leeds City Region to ensure co-ordination of planning. The IDP identifies requirements and sources of funding and delivery. The current position regarding infrastructure is already accounted for in the IDP.</p>	No	None.
<p>The above-mentioned points around infrastructure need we feel to be considered more thoroughly in the residential site selection process, for which a background paper has been published. The sifting methodology for site selection is completely devoid viability consideration of development. The plan should define specific measurables and targets.</p>	<p>The effects on infrastructure are considered as part of the site selection process. Viability is considered as part of viability work and associated study. Monitoring is/will be in place to assess the performance of the plan regarding infrastructure requirements arising from delivery of it. A monitoring system that considers plan performance will be in place as the plan moves towards publication.</p>	No	None.
<p>Concern over infrastructure effects arising from development and growth proposals.</p>	<p>Comment noted. The IDP considers this point and infrastructure effects and requirements</p>	No	None.

	arising from the growth proposals. The IDP is a 'living' document that will be updated regularly.		
Support for policy	Support is noted.	No	None.
<p>Draft Policy SP12: Infrastructure, Strategy and Development Delivery</p> <p>Draft Policy SP12 states that "Development proposals are expected to either provide, or enable the provision of, infrastructure which is directly related to, or made necessary by that development. Where infrastructure cannot be provided directly, the Council will seek developer contributions through planning obligations"</p> <p>Gladman contend that policies which seek such developer contributions, require extensive testing to ensure that their effects do not render proposals unviable and undeliverable and remind the Council of the guidance set out at Paragraph 173 of the Framework, which states that, "Plans should be deliverable. Therefore the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened."</p> <p>We further remind the Council of the circumstances in which developer contributions can be sought in accordance with the 2010 CIL Regulations. Developer contributions should only be required where they are necessary to address the unacceptable planning impacts of a</p>	<p>The Council has undertaken a Local Plan Viability Assessment: May 2017, and forms part of the evidence base. The assessment has taken into account all the proposed planning obligations proposed in the plan and concluded that 40% affordable housing, along with other obligation costs, is generally viable across Craven and on a cross section of site sizes. Individual site circumstances can be considered at the time of making a planning application. There are no plans to introduce CIL ahead of adoption of the plan.</p> <p>This assessment and the Council's policy approach is compliant with the NPPF and NPPG.</p>	No	None.

development. Contributions must be based on up-to-date, robust evidence of needs and cannot be used to make up the funding gap for desirable infrastructure, or to support the provision of unrelated items.			
Policy SP12 deals specifically with Infrastructure requirements and delivery. This section has been strengthened by the insertion of some explanatory text and the reference to the living document that is the Infrastructure Delivery Plan is welcomed. However, CPRENY is disappointed with the lack of detail within the IDP and feel this needs to be more robust to stand up to scrutiny and deliver fully sustainable development across the district. For example, in Skipton, only one of the proposed primary schools is identified. The opening of the fourth paragraph of Policy SP12 does not currently make sense, CPRENY believe the word 'that' immediately before infrastructure should be removed.	<p>The comments are noted. The IDP is a living document that will be updated regularly to provide additional detail as and when available. The full extent of the number of schools required in Skipton has been reviewed by North Yorkshire County Council and they have requested provision of 2 new schools in Skipton and require additional land at Bentham to accommodate an extension to the Bentham Primary School. These requirements will be reflected in the Publication Plan and the IDP.</p> <p>The deletion of the word 'that' from paragraph 4 will clarify wording and meaning of the policy.</p>	Yes	Delete "that" from line 1 paragraph 4 of policy SP12. Additional school sites requires to be shown on policies map
<p>SPECIFIC COMMENTS</p> <p>The following comments are submitted by United Utilities in response to the specific draft policies contained within the current Pre-Publication Local Plan.</p> <p>Policy SP12: Infrastructure, Strategy and Development Delivery</p> <p>United Utilities supports the inclusion of draft Policy SP12 which states (inter alia) and the Infrastructure Delivery Plan (IDP).</p> <p>However, we recommend the inclusion of</p>	<p>Support for the policy is noted.</p> <p>The principle raised in respect of timing of infrastructure delivery to the delivery of development over the plan period is already addressed in Policy SP12. The text suggested for inclusion in the supporting text for Policy SP12 relates to strategies for co-ordinating the delivery of development with timing for the delivery of infrastructure improvements related specifically to surface water management and</p>	No	

<p>the following text within the body of the policy SP12 to ensure that new development is supported by essential infrastructure: “Once more details are known on development sites, for example, the approach to surface water management and proposed connection points to the foul sewer network, it may be necessary to coordinate the delivery of development with timing for the delivery of infrastructure improvements.</p> <p>At the larger development sites, it may be necessary to ensure that the delivery of development is guided by strategies for infrastructure which ensure coordination between phases of development over lengthy periods of time and by numerous developers.</p> <p>Craven District Council will support the principle of investment in infrastructure to respond to development and environmental needs. Infrastructure is key to the delivery of sustainable development and economic growth, and meeting the development needs of the District.”</p> <p>In accordance with paragraphs 156 and 162 of the NPPF, the Local Plan should include strategic policies to (inter alia) deliver the provision of infrastructure, and LPAs should work with other authorities and providers to assess the quality and capacity of infrastructure within their areas.</p>	<p>foul sewer connections. It is considered that this issue would be most appropriately addressed within the Infrastructure Delivery Plan.</p>		
Policy SP12 –The timing of new development	Support for the policy and approach is noted.	No.	None.

will only be one factor that influences the delivery programme of infrastructure providers. The requirement for development to provide or enable the infrastructure needed to support it and achieve sustainable development is supported. The use of developer contributions is strongly supported given that there is clear evidence of an infrastructure funding gap.			
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\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## June – July 2017 Draft Local Plan

## Policy Response Paper – Policy Ref: ENV1

<b>Policy: ENV1</b>			
<b>Aim of the Policy: to ensure that the quality of Craven’s countryside and landscape is conserved for future generations to enjoy, and that opportunities to restore and enhance the landscape are taken whenever possible.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan</b>
<p>Historic England supports the policy subject to a suggested amendment (see below), which should help to ensure that development proposals not only safeguard the distinctive landscapes both within the LP area and beyond its boundaries. HE particularly welcomes the:</p> <ul style="list-style-type: none"> <li>• Support for proposals that secure the restoration of degraded landscapes in ways that also help achieve heritage objectives.</li> <li>• Support for proposals that secure the restoration, preservation and enhancement of historic features</li> <li>• A requirement that settlements grow in a way that respects their form and landscape setting.</li> </ul> <p>HE objects to criteria c). Any “restoration” or “enhancement” of a heritage asset has to ensure that the elements which contribute to its significance are not harmed (in line with advice in the NPPF). Therefore a criterion which gives, what amounts to,</p>	<p>Support is welcomed. Suggested amendment to criterion c) will be incorporated into revised policy ENV1</p>	<p>Yes</p>	<p>Suggested amendment to criterion c) will be incorporated into revised policy ENV1 for the Publication Draft LP, as follows: “Support proposals which secure the preservation and appropriate restoration or enhancement of natural ....”</p>



<p>support in principle for something which would not necessarily conserve the significance of a heritage asset would not accord with national policy guidance. Policy ENV1 Criterion c) should be amended to read:</p> <p>“Support proposals which secure the preservation and appropriate restoration or enhancement of natural ....”</p>			
<p>Natural England is pleased to see reference to protected species in relation to light pollution and dark skies in para 5.12 in line with NPPF para 125, which is clear that planning policies and decisions should limit the impact of light pollution from artificial light on nature conservation as well as local amenity and intrinsically dark landscapes. NE also welcomes the additional information provided on protecting dark skies in remote open area of the countryside in para 5.14. NE welcome the reference to the National Character Area Profiles and York and North Yorkshire Landscape Characterisation Project in criterion a) of the policy. Particularly welcomed is the final sentence of criterion a) which states that “Proposals should show how they respond to the particular character type they are located within”. However NE advise that the criterion should refer to the specific National Character Area Profiles in the supporting text for ease of reference. NE welcomes criterion e) which incorporates the restoration, preservation and</p>	<p>Support is welcomed. Suggested amendments to the supporting text will be incorporated.</p>	<p>Yes</p>	<p>Criterion a) of the draft policy will be amended to read (changes shown underlined):</p> <p><i>“Regard should also be had to the relevant Natural England Character Area Profiles <u>(listed at para 5.5).....”</u></i></p>

enhancement of PROW into the policy, however NE consider that it would be helpful to refer specifically to the Pennine Way and Pennine Bridleway National Trails in this context. NE welcome criterion f) regarding light pollution and the inclusion of existing and new public rights of way in criterion g).			
Policy ENV1 makes provision for development affecting the setting of the National Park. In so far as it goes the policy is welcomed, but feel that its emphasis could be broadened somewhat to embrace other special qualities of the National Park. Although the NPPF does refer to National Parks in terms of landscape and scenic beauty, the sum total of the National Park's special qualities extend beyond visual factors, including the historic/cultural environment, wildlife and less tangible qualities such as tranquillity. The YDNPA would therefore like to see the scope of this policy broadened by reference to "the special qualities of the National Park (which are summarised in the National Park Management Plan).	Support is welcomed. Part d) of the draft policy states: <i>"In determining proposals which affect the Forest of Bowland Area of Outstanding Natural Beauty (AONB) and its setting or the setting of the Yorkshire Dales National Park, the Council will give great weight to conservation of their landscape (including their intrinsically dark landscapes for the enjoyment and experience of dark skies) and scenic beauty. In addition, proposals will be considered on a needs basis, should be in scale with, and have respect for their surroundings and be in line with the AONB or National Park Management Plan objectives."</i> In order to incorporate the comment relating to the special qualities of the National [Park point d) will be amended.	Yes	Point d) of the draft policy will be amended to the following (change shown underlined): "In determining proposals which affect the Forest of Bowland Area of Outstanding Natural Beauty (AONB) and its setting or the setting of the Yorkshire Dales National Park, the Council will give great weight to conservation of their <u>special qualities, including their landscape, scenic beauty and intrinsically dark landscapes (for the enjoyment and experience of dark skies)</u> . In addition, proposals will be considered on a needs basis, should be in scale with, and have respect for their surroundings and be in line with the AONB or National Park Management Plan objectives."
Reference to dark skies and lighting within the policy is welcomed.	Support is noted and welcomed.	No	
Paras 109 & 113 of the NPPF sets out that the planning system should contribute to and enhance valued landscapes and should	Comment noted. Draft policy ENV1 is considered to meet the requirements of the NPPF relating to	No	

set criteria based policies against which proposals for any development should be judged.	conserving and enhancing the natural environment. Draft policy ENV1 is a criteria based policy which will be used to assess proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas, including international, national and locally designated sites.		
It is hoped that CDC would consider updating their Landscape Appraisal (2002)	The Craven District Outside the Yorkshire Dales National Park and Forest of Bowland AONB Landscape Appraisal (2002) is considered to be a piece of evidence that is robust and relevant in assessing existing landscape character types. This document is supplemented by a more up to date information contained in the AONB Management Plan (April 2014), the YDNP Management Plan (2013) and the North Yorkshire and York Landscape Characterisation Project (2011), which aims to provide a consistent sub-regional level landscape characterisation framework and evidence base for the Study Area. All these documents represent the evidence base for the draft Craven Local Plan and specifically for draft policy ENV1.	No	
Reference in the policy to developers having regard to Natural England's Character Area Profiles within the policy is welcomed.	Support is noted and welcomed.	No	
Welcomes the aspect of policy ENV1 e) which talks about restoration, preservation and enhancement of the PROW network and promotion of disabled access to the countryside. Also welcomes criterion g) which aims to preserve existing and create	Support is noted and welcomed.	No	

new connections between built up areas and the countryside.			
There should be no dilution of the protection of the environments when developments are considered. The environment should be enhanced where possible. Developers should not be allowed to duck their responsibilities to the environment.	Aim of policy ENV1 is to ensure that the quality of Craven's countryside and landscape is conserved for future generations to enjoy; and that opportunities to restore and enhance the landscape are taken wherever possible. It is considered, therefore that this policy will strengthen rather than dilute the protection of the environment.	No	
Draft Policy ENV1 (a) now includes reference to NCAs and the North Yorkshire and York Landscape Characterisation Project and this is welcomed. The correct title of this document is the 'North Yorkshire and York Landscape Characterisation Project'. There are strong links between Policy ENV1 and a number of other policies including ENV3 and 5. Paragraphs 5.14-5.16 have good advice on maintaining dark skies and ENV1 (f) now includes specific reference.	Support is noted and welcomed. Para a) of policy ENV1 will be amended to include the correct title of the 'North Yorkshire and York Landscape Characterisation Project (2011)'.	Yes	Para a) of policy ENV1 will be amended to include the correct title of the 'North Yorkshire and York Landscape Characterisation Project (2011) (or successor documents)'.
Policies contained in the environment chapter of the draft LP are riddled with woolly language, such as "could, should, must, except in exceptional circumstances" and should be rephrased to offer the protection that it deserves & to enable officers and members the ability to deliver the spatial strategy.	Comment noted. It is considered that draft policies included in the Environment chapter of the draft Local Plan, following suggested amendments by key statutory bodies will be sufficiently robust to maintain the quality, distinctiveness and vitality of the local environment. Exceptional circumstances are set out in some policies in order to provide clarity in terms of when an exception to the policy would be acceptable.	No	

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## June – July 2017 Draft Local Plan

## Policy Response Paper – Policy ENV2: Heritage

<b>Policy ENV2: Heritage</b>			
<b>Aim of the Policy: To help ensure that Craven's historic environment is conserved and, where appropriate, enhanced and its potential to contribute towards the economic regeneration, tourism and education of the area is fully exploited.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan</b>
Quite by accident I am amazed to find updated Conservation Appraisals online, having complained about our old one for Cowling quite a while ago. I have found a few mistakes and also have a some queries - so I have printed out most of it (now run out of ink) in order to write up my comments. Such a shame that local people weren't consulted before the new maps and appraisals went online! Also that our "bible" - Cowling a Moorland Parish 1980 does not appear to have been used as a source for research.	The 19 recent conservation area appraisals (including 3 appraisals of potential new conservation areas) are in draft form at the moment and will be subjected to public consultation after submission of the new local plan. Comments will be welcomed at that stage.	No	
Policy ENV2, Criterion (g). Object. Whilst we wholeheartedly support the concept that conservation and enhancement of the natural environment should be achieved simultaneously with that of the historic environment, we have concerns about this additional Criterion. The "enhancement" of a building is only appropriate if it conserves those elements which contribute to the significance of that asset. Indeed, there may be times when the "enhancement" of heritage assets to encourage biodiversity could actually result in harm to the significance of the building itself. Whilst we could support the justification to Policy ENV2 alerting potential developers of the need to consider biodiversity issues when	Noted – the suggested deletion and amendment will improve and clarify the policy.	Yes	Part g) of the draft policy has been deleted and paragraph 5.21 of the supporting text has been amended.

dealing with historic buildings, we do not consider that the in-principle support for works of “enhancement” of heritage assets to promote biodiversity within the Policy itself is compliant with either the duties under the relevant Acts or national policy guidance regarding the historic environment, (a)Policy ENV2, delete Criterion (g) (b)Amend Paragraph 5.21 to read:- “Conserving heritage assets in a manner which both sustains their significance whilst promoting biodiversity will be supported”			
Policy ENV2 and its justification. Support. The District has a rich legacy of historic buildings, archaeological sites and historic landscapes. These elements help to define the individual identity of its settlements, contribute to the quality of life of its communities, and assist in helping the area to achieve its wider economic objectives. It is essential, therefore, that the Local Plan sets out an appropriate framework for the protection and enhancement of this resource. Subject to the changes set out below, we support this Policy and its justification. This provides a good framework for the future management of the historic environment of the District and provides a clear indication of how a decision-maker should react to development proposals. We particularly welcome (and endorse) the identification within the Policy of those elements which are considered to be of especial importance to the distinctive character of the plan area. As such we consider that this Policy and its justification reflect the advice set out in Paragraph 126 of the NPPF.	The support is noted.	No	
PPLP Page 102. Subject: ENV2 Heritage. Support. The Parish Council supports the proposals for improved maintenance and creation of new footpaths to complement the emerging concept of a Parish Heritage trail which the Parish Council proposes to create for tourism and educational benefit.	The support is noted. (NB. Draft policy ENV12 may also be of interest.)	No	
We are supportive in general of the Heritage section of the plan. We agree with the importance of identifying and conserving Craven’s non-designated heritage assets. NCHT/NCBPT would be happy to play a role in helping identify such assets in the North Craven Area and are	The support is noted.	No	

equipped with the necessary skills and experience to do so.			
Support: Addition of biodiversity	Noted, but paragraph 5.21 requires amendment and part g) of the draft policy is to be deleted in response to comments received by others—see comment above. Nevertheless, biodiversity will continue to feature strongly in the supporting text.	Yes	Part g) of the draft policy has been deleted. However, biodiversity continues to feature strongly in paragraph 5.21 of the supporting text (as amended).
<p>P 106 ENV2 HERITAGE.</p> <p>Item (g) “Heritage buildings, barns and bridges can be very important nesting and roosting sites for endangered species such as swallows, bats and barn owls. Enhancement of such structures for biodiversity is important and will be supported by the authority.”</p> <p>We agree in principle, but feel that the wording does not make it clear if (g) means</p> <ul style="list-style-type: none"> <li>a. heritage structures already present on new development sites are to be left as they were and made more wildlife friendly</li> <li>b. off-site 106 contributions are to be invited for such enhancements</li> <li>c. planning permission will be given for visible additions such as batboxes on listed buildings and bridges Or other cases we have not thought of, or all of these. We ask for the application of (g) to be clarified. <p>Para 5.21</p> <p>We welcome this, but it does not seem strong enough to limit the biological impact on SINC and biodiversity sites when building takes place adjacent to them. Lighting, dumping, pets roaming and garden plant escapes are common adverse effects of habitation on nearby nature sites as is insertion of fences to prevent wild animals such as hedgehogs from roaming for food outside the SINC.</p> </li></ul>	Part g) of the draft policy is to be deleted and paragraph 5.21 is to be amended, as suggested above. However, biodiversity will continue to feature strongly in the supporting text. The point about potential impacts of development on SINC and other biodiversity sites is a general one and not specific to heritage. Appropriate biodiversity safeguards are included in, for example, draft policy ENV4, the local plan site allocations process and the determination of planning applications.	Yes	Part g) of the draft policy has been deleted. However, biodiversity continues to feature strongly in paragraph 5.21 of the supporting text (as amended).
We support the following new inclusions in the new draft: Additional requirements regarding archaeology	The support is noted.	No	



<p>Draft Policy ENV2: Heritage</p> <p>Gladman object to Policy ENV2. Although this policy does include elements from national policy it does not fully reflect the guidance set out in the Framework, paragraphs 126-141. The Framework requires a distinction to be made between designated and non-designated assets and different policy tests should then be applied to each.</p> <p>Paragraph 132 of the Framework makes it clear that great weight should be given to a heritage asset's conservation and that 'the more important the asset, the greater the weight should be'.</p> <p>Whilst Gladman recognise that ENV2(b) refers to designated heritage assets this does not set out the test to be applied as per the Framework. With reference to designated heritage assets, the Council should refer specifically to paragraphs 133 and 134 of the Framework which sets out that Councils should assess the significance of the designated heritage asset and where there is less than substantial harm, this should be weighed in the planning balance against the public benefits of the proposal. Where there is deemed to be substantial harm, then the proposal would need to achieve substantial public benefits to outweigh that harm.</p> <p>For non-designated heritage assets, the policy must reflect the guidance set out within paragraph 135 of the Framework. This states that the policy test that should be applied in these cases is that a balanced judgement should be reached having regard to the scale of any harm and the significance of the heritage asset.</p> <p>Gladman believe that this policy needs to be redrafted in order to ensure that it conforms with the guidance and requirements set through national policy. As currently draft this policy is unlikely to be found sound.</p>	<p>The comments are noted and some adjustment to the wording of parts b) and e) of draft policy ENV2 would be beneficial to bring them in closer alignment with the NPPF.</p>		<p>Part b) of the draft policy has been amended to include 'The more important the asset, the greater the weight that will be given to its conservation' and to say 'where it can be demonstrated that there are substantial public benefits' instead of 'in exceptional circumstances'.</p> <p>Part e) has been amended with the addition of 'having regard to the scale of the harm and the significance of the heritage asset'.</p>
<p>Policy ENV2 on Heritage is supported by CPRENY and the inclusion of reference to their contribution to biodiversity is welcomed within the Policy and the supporting text.</p> <p>CPRENY remain concerned, however, that no mention of the 'setting' to a heritage asset (designated or non-designated) has been identified</p>	<p>The support is noted, but paragraph 5.21 requires amendment and part g) of the draft policy is to be deleted – see comment above.</p>	<p>No</p>	

via the policy or textual justification. It is vital that harm to the setting of these assets are not eroded by inappropriate development and the Local Plan must protect them. Recent Case Law indicates that the setting of Listed Buildings, Conservation Areas and other heritage assets should be conserved. The Court of Appeal (Barnwell Manor Wind Energy Ltd v (1) East Northamptonshire DC & Others [2014] EW Civ 137) held that in enacting section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, Parliament intended that the desirability of preserving the settings of listed buildings should not simply be given careful consideration but “considerable importance and weight” when carrying out the balancing exercise. This gives rise to a strong statutory presumption against granting planning permission for development which would cause harm to the settings of listed buildings. Even where the harm would be “less than substantial” the balancing exercise cannot ignore the overarching statutory duty imposed by section 66(1). It is therefore imperative that CDC recognise this.	Paragraph 5.23 of the supporting text addresses the setting of a heritage asset and brings this clearly and appropriately within the scope of the policy.		
We welcome the consideration of protected species in the context of the conservation of heritage assets in para 5.21 and criterion g) of Policy ENV2.	Noted, but paragraph 5.21 requires amendment and part g) of the draft policy is to be deleted – see comment above. Nevertheless, biodiversity will continue to feature strongly in the supporting text.	Yes	Part g) of the draft policy has been deleted. However, biodiversity continues to feature strongly in paragraph 5.21 of the supporting text (as amended).
A lot of the heritage of this area lies undiscovered, and it is incumbent on CDC to ensure that developments do not destroy that heritage. See comments on the Settle Carlisle Heritage site at Hellifield.	These are ‘non-designated heritage assets’, which are addressed in the draft policy and supporting text.	No	
Pendle Council is pleased to note that the 3rd Pre-Publication Craven Local Plan: Supports sustainable development that protects and enhances heritage and promotes tourism along the Leeds and Liverpool Canal (Policies ENV2, ENV11 and ENV12).	The support is noted.	No	

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## June – July 2017 Draft Local Plan

## Policy Response Paper – Policy Ref: Good Design

<b>Policy: ENV3</b>			
<b>Aim of the Policy:</b> To promote good design in new development within Craven in relation to accessibility, layout, use of materials etc.			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan</b>
Support this Policy which should help to ensure that development proposals safeguard, and help to reinforce, the distinctive character of the settlements and landscapes of the plan area.	This comment supports draft Policy ENV3 on Good Design.	No	N/A
Craven's town centres still retain several traditional shop fronts which make a valuable contribution to the distinctive character of their local area. These should, wherever possible, be retained in any development proposals. Therefore an additional Criterion should be included: "Existing historic shop fronts which contribute to the character of the building or surrounding area should be retained and refurbished wherever practicable".	The extra criterion proposed has been included into the plan.	Yes	A criterion has been added into the policy which now encourages refurbishment of historic shop fronts wherever practicable.
Materials should be locally sourced whenever possible and reflect local style. This needs to be strengthened via a clear statement that the dominant local housing style is Yorkshire Stone and there needs to	It is considered that the wording provided in draft policy ENV3 is sufficiently robust to ensure that the most acceptable and complimentary materials will be used within new proposals .	No	N/A

be an explanation of why it is not appropriate to use that style in any new building development.			
Schemes should seek to incorporate storage for bicycles to encourage sustainable modes of travel. Suggest inserting 'secure' before storage.	The insertion of secure before storage is considered reasonable and has been included within the policy.	Yes	'Secure' has been included within the accessible section of draft policy ENV3 at criterion I).
Pleased to see the inclusion of BREEAM standards in the revised Plan at ENV3 3q). This is in line with the LEP strategy which states that in order to invest in places and unlock growth a sustainable approach will seek high environmental standards in developments plus flood risk reduction measures.	This comment supports draft Policy ENV3 on Good Design.	No	N/A
Draft Policy ENV3 sets out a list of objectives/principles and states that development proposals should be approved if they meet these. In this case these relate to designing a good quality place. In relation to these design policies Gladman refer to paragraphs 59 and 60 of the Framework. Specifically paragraph 59 which states: "Design policies should avoid unnecessary prescription or detail and should concentrate on the overall scale, density, massing, height, landscape, layout and access of new development in relation to neighbouring buildings and the local area more generally". Whilst Gladman recognise the importance of high quality design, planning policies should not be overly prescriptive and need flexibility in order for schemes to respond to site	Draft Policy ENV3 does set out a list of general objectives and principles that contribute to achieving good design, but it is considered that these principles are neither prescriptive nor inflexible and will allow individual proposals to be assessed taking into account a site's specific characteristics, context and location.	No	N/A

specifics and the character of the local area. There will not be a 'one size fits all' solution in relation to design and sites should be considered on a site by site basis with consideration given to various design principles/objectives.			
CPRENY is very supportive of this policy and hope that CDC will enforce these principles across all types of development within its jurisdiction. CPRENY particularly welcome the inclusion of points q and r as suggested in previous rounds of consultations in 2016.	This comment supports draft Policy ENV3 on Good Design.	No	N/A
Previously recommended the inclusion of text specifying that new developments should include water efficiency measures. We welcome the inclusion of criterion (r) and wish to emphasise the importance of incorporating water efficiency measures as part of the design process for all new development. There are a number of methods that developers can implement to ensure their proposals are water efficient, such as utilising rainwater harvesting and grey water harvesting for example. Improvements in water efficiency help to reduce pressure on water supplies whilst also reducing the need for treatment and pumping of both clean and wastewater. It is a part of the delivery of sustainable development.	This comment supports draft policy ENV3 on Good Design.	No	N/A
United Utilities recommends the following text is included as part of the Council's proposed development management	Include this information as one of the criterion of Draft Policy ENV3.	Yes	The proposed text has been included within Draft Policy ENV3.

<p>policies in relation to health, well-being and residential amenity:</p> <p>“The proposed development of sensitive uses (such as residential) adjacent to existing sources of pollution (e.g. noise, odour, traffic etc.) must demonstrate through the submission of appropriate impact assessments that there would be no detrimental impact on future residential amenity”. In the site selection process, we feel it is important to highlight that new development sites are more appropriately located away from existing operational sources of pollution such as noise and odour.</p>			
<p>Welcome sections h-k of this policy regarding accessibility or the disabled; new development making getting around easy for pedestrians, cyclists and the disabled by improving existing routes, adding new, and creating connections to enhance local networks; and even mentioning bike storage to encourage sustainable transport.</p>	<p>This comment supports draft policy ENV3 on Good Design.</p>	<p>No</p>	<p>N/A</p>
<p>Although no modifications have been made Natural England would like to suggest that policy ENV3 or the supporting text may be an appropriate place in the plan to highlight the importance of good design proposals affecting the special qualities or setting of the Yorkshire Dales National Park and Forest of Bowland AONB. We broadly welcome the existing policy as it stands but consider that specific reference to the importance of protected landscapes would be helpful.</p>	<p>Suggested change by Natural England would provide useful clarification of supporting text in paragraph 5.26.</p>	<p>Yes</p>	<p>Changes will be made to paragraph 5.26 to include the recommendations made by Natural England.</p>

CDC should ensure all developments be designed for minimising carbon emissions, have the highest standard of insulation and, wherever possible by generating power through solar or other means. This should include industrial and commercial developments.	Carbon emissions are already discussed within draft policy ENV3, however it is considered reasonable to include further information regarding solar power within all developments including industrial and commercial sites.	Yes	Information has been included within Draft Policy ENV3.
North Yorkshire Police propose that the following wording is included in the Plan: People's well-being and quality of life can be greatly affected by crime, the fear of crime and road safety. In the case of most planning applications, community safety issues will need to be addressed in terms of the layout and design of the development. Well-conceived and designed developments can help to prevent damages community cohesion and increases opportunities for criminal activity both of which can be perceived as 'threatening' by the people who use it. However, there may be rare occasions where evidence is clear that a proposed development is intrinsically likely to increase crime or disorder's effects upon the community. In such circumstances, where unacceptable community safety impacts cannot be 'designed out', planning permission should be refused. Generally, negotiation with applicants is encouraged to ensure their proposals maximise security for their users and for the community in general.	It is considered that the information provided by North Yorkshire Police regarding designing out crime is acceptable and should be included within the plan.	Yes	The wording proposed by North Yorkshire Police has been included within the justification section of draft policy ENV3.
CPRE note that there is a brief mention of	Information regarding dark skies and	No	Information regarding dark skies and

<p>both tranquillity and dark skies within bullet point a), CPRE believe that the tranquillity of the sparsely population area is a very important factor in the character of Craven District and as such should be detailed in another policy and within the supporting text. Ideally this should be featured within the section detailing the importance of countryside and landscape conservation and within Policy ENV1.</p>	<p>tranquillity has been included within policy ENV1.</p>		<p>tranquillity has been included within policy ENV1.</p>
<p>The inclusion of the criterion to seek improvements to, and the creation of, open public space is welcomed. In addition the requirement for accessible development and improving permeability for pedestrians and cyclists between spaces is welcomed. These can help contribute to the health and wellbeing and social cohesion of communities. The policy could consider supporting provisions to achieve good design outcomes and adaptable homes. These can make a significant contribution to achieving sustainable development and quality place-making that supports safe and healthy environments that assist in attracting and retaining the labour force needed to support economic growth. It also enables people to stay in their own homes and communities for longer, where they can access their social and support networks thereby improving their quality of life and reducing pressure on public services.</p>	<p>Support noted.</p> <p>A sentence supporting adaptable homes will be included within ENV3.</p>	<p>Yes</p>	<p>An additional criterion has been added into ENV3 which encourages good design and adaptable homes.</p>



\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

**June – July 2017 Draft Local Plan**  
**Policy Response Paper – ENV4: Biodiversity**

<b>ENV4: Biodiversity</b>			
<b>Aim of the Policy: Help to safeguard and improve biodiversity in Craven through new growth.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan</b>
The Woodland Trust welcomes the commitment to increase trees and woods. The Woodland Trust can help with this and more information on our primary tree-planting and woodland creation schemes (Statutory Body)	Support and additional information noted and welcomed.	No	
<p>The Woodland Trust welcomes the implicit recognition in this policy that ancient woodland is irreplaceable. However, we believe that this should be made explicit through the following wording:</p> <ol style="list-style-type: none"> <li>1. Loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, resulting from development proposals should be wholly exceptional.</li> <li>2. As ancient woodland and veteran trees are irreplaceable, discussions on compensation should not form</li> </ol>	<p>Comment (1) is noted and it is agreed that additional wording regarding the protection of ancient woodland and aged or veteran trees found outside ancient woodland should be added to draft policy ENV4 as an additional criterion (e).</p> <p>The policy is worded to ensure that development which includes the destruction of ancient woodlands and veteran trees would not be acceptable. As such it is not deemed necessary to add the wording suggested in part (2) of the Woodland Trust's response to draft policy ENV4.</p>	Yes	<p>Draft policy ENV4 should be amended to include an additional criterion (e) as follows:</p> <p>“The loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland would be wholly exceptional.”</p> <p>Draft policy ENV4 (d) should be amended as follows:</p> <p>“Would-be developers should be</p>

<p>part of the assessment of the benefits of the development proposal.</p> <p>3. Where ancient wood pastures are identified they should receive the same consideration as other forms of ancient woodland.</p> <p>(Statutory Body)</p>	<p>The comment (3) regarding the inclusion of the wording 'ancient wood pastures' is noted and it is agreed that these areas should receive the same consideration as other forms of ancient woodland.</p>		<p>aware that compensation through replacement of biodiversity assets may not be practical or realistic in every case (e.g. recreating ancient woodland or ancient wood pastures) and that any development scheme based on such impractical or unrealistic proposals will not be acceptable."</p>
<p>Good principles but spoilt in places by language.</p>	<p>Comment noted. It is considered that draft policy ENV4, following suggested amendments by key statutory bodies will be sufficiently robust to safeguard and improve the biodiversity of the plan area.</p>	<p>No</p>	
<p>With reference to bullet (ii) of ENV4: "Ensure that there is no adverse impact on any national or local designated sites and their settings, unless it has been demonstrated to the satisfaction of the local planning authority that the benefit of, and need for the development clearly outweighs the impact on the importance of the designation."</p> <p>Does inclusion of a site in the Plan, but which may have an impact on a designated site, suggest that this assessment of benefit and need has already been done and that the developer need not carry out this assessment? Or will the developer still need to carry out the assessment despite inclusion of the site in the Plan?</p>	<p>Sites allocated for housing in the local plan have undergone sustainability appraisal which included an appraisal of the level of biodiversity found on or near a site (information provided by the Ecological Data Centre). This information was used during sustainability appraisal to contribute to an overall assessment of whether or not a site was sustainable and could enter the pool of sites from which the preferred sites were selected. Consideration was given to sites that scored badly on habitat and species loss and overall comparisons were made on sustainable sites in each settlement to select the preferred housing sites.</p> <p>Development principles for greenfield sites allocated in the Local Plan will specify the need</p>	<p>Yes</p>	<p>Incorporate the need for an ecological assessment into the existing site development principle which refers to biodiversity and landscape mitigations (where applicable for sites listed in draft policies SP5 – SP11).</p>

	for an ecological assessment to be carried out during the planning applications process. This will also be a requirement for any future windfall sites on greenfield land. Developers will be required to carry out a site specific assessment on the biodiversity value of the site pre-development and how any proposed green infrastructure would result in a net gain in biodiversity value.		
Draft Policy ENV4 sets out the Council's proposed approach to achieving improvements in Biodiversity. Paragraph 113 of the National Planning Policy Framework refers to the need for criteria based policies in relation to proposals affecting protected wildlife or geodiversity sites or landscape areas, and that protection should be commensurate with their status and gives appropriate weight to their importance and contributions to wider networks. As currently drafted it is not thought that this policy aligns with the Framework given that the policy fails to make a distinction and recognise that there are two separate balancing exercises which need to be undertaken for national and local designated sites and their settings. Suggest that the policy is revisited to ensure that it is consistent with the approach set out within the Framework.	Comment noted. It is considered that draft policy ENV4, following suggested amendments by key statutory bodies is in line with the National Planning Policy Framework. Specifically, Natural England has confirmed their satisfaction with the wording of the policy.	No	
The section entitled Biodiversity has been expanded in line with CPRENY's recommendation in relation to Local Nature	Support noted and welcomed.	No	

Partnerships. CPRENY welcome this and the recognition of the Imperative Reasons of Overriding Public Interest (IROPI) Test that must be demonstrated should a development proposal be likely to adversely affect international designations. This has been transposed to Policy ENV4 as has the suggestion made by CPRENY to include reference to the impact on nationally and locally designated sites and their settings and is therefore supported.			
Need to include a list of preferred housing allocation sites at end of draft policy ENV4 where it is envisioned that the plan area's biodiversity can be improved as part of the development (as set out in the 2016 Policy Response paper).	Comment noted. Draft policy ENV4 will expect all sites in policies SP5 – SP11 to put forward proposals that meet the provisions of this policy. Where development principles for allocated sites specify the need for green infrastructure routes, these sites will be listed at the end of draft policy ENV4 in recognition of the net gains they will achieve in biodiversity. Most allocated sites are on greenfield agricultural land which is of limited biodiversity value. As such where green infrastructure is proposed on a site this would have the added value of increasing biodiversity in the area via additional planting, ponds, protection of water routes etc.	Yes	At the end of draft policy ENV4, include a list of sites allocated on greenfield land where green infrastructure routes are proposed, as detailed in the development principles in draft policies SP5-SP11, and on the Policies Map (in green hatch).
Points a) i) and ii) strengthen the policy. The Yorkshire Wildlife Trust supports the objective in point b), however in order for this to be meaningfully applied it is necessary that there is an accurate assessment of habitat loss and habitat created in mitigation.	Support for points a) i) and ii), and for the objective in point b) are noted and welcomed.  The policy will be amended to include a list of allocated sites where net gains in biodiversity are expected to be achieved through the provision of green infrastructure routes. Most	Yes	At the end of draft policy ENV4, include a list of sites allocated on greenfield land where green infrastructure routes are proposed, as detailed in the development principles in draft policies SP5-SP11, and on the Policies Map (in green

(Statutory Body)	allocated sites are on greenfield agricultural land which is of limited biodiversity value. As such where green infrastructure is proposed on sites this would have the added value of increasing biodiversity in the area via additional planting, ponds, protection of water routes etc., thus achieving a net gain. Development principles for greenfield sites allocated in the Local Plan will specify the need for an ecological assessment to be carried out during the planning applications process. This will also be a requirement for any future windfall sites on greenfield land. Developers will be required to carry out a site specific assessment on the biodiversity value of the site pre-development and how the proposed green infrastructure would result in a net gain in biodiversity value.		hatch).  Incorporate the need for an ecological assessment into the existing site development principle which refers to biodiversity and landscape mitigations (where applicable for sites listed in draft policies SP5 – SP11).
The most common complaint about urban areas is insufficient green space. Green space is important in providing for mental and physical health and for wildlife. The best towns have green corridors, wedges or “lungs” that penetrate through the town from the outer to the inner area, with paths through them. As the town grows, it leaves these green corridors in place and develops new ones, in radial patterns, so that nobody is ever too far from greenspace that they can walk or cycle through to get in or out of town. These corridors are often important for biodiversity as well.	The local plan’s overall strategic approach is to protect the open countryside and keep development contained in and around urban areas. The plan promotes green wedges to maintain separation between settlements and prevent severance of green networks. The plan is also proposing to protect open spaces set out in the Open Space Assessment 2016 via draft policy INF3, and to designate a number of special green spaces throughout the district as Local Green Space via draft policy ENV10. In addition, development principles on many of the larger greenfield site allocations specify the need for green infrastructure routes through the site to help achieve a net gain in biodiversity and to minimise impacts of nearby	No	

There is a huge difference between enhancing biodiversity as Yorkshire Wildlife asks for the Plan to say (pg 8), and what ENV4 does say, which is merely about avoiding loss of habitats and species by “incorporating beneficial biodiversity features.” We do not think that Yorkshire Wildlife’s comment has been taken enough notice of. Para 114 of the NPPF states that Plans should set out a strategic approach for the creation and enhancement of networks of biodiversity and green infrastructure. We support Yorkshire Wildlife’s request and do not think that a strategic approach that will create and enhance such a network is set out in the Plan.	SPAs , SACs and RAMSAR sites.		
Natural England is very pleased to see the inclusion of paragraph 5.42 and welcome the reference to climate change adaptation in this context. We also welcome the modification to para 5.44. We note para 5.45 which we consider to be a clear and helpful exposition of the IROPI test in the Habitats Directive and compliments criterion a) ii) of Policy ENV4 well. Natural England notes and welcomes the modifications to Policy ENV4. (Statutory Body)	Support noted and welcomed.	No	
CDC should ensure that all plans which adversely impact on biodiversity should be refused. The district encompasses much land used throughout the year by birds and other fauna in danger of extinction in England. This land may appear rough and of	Comment noted. It is considered that draft policy ENV4, following suggested amendments by key statutory bodies will be sufficiently robust to safeguard and improve the biodiversity of the plan area.	No	

little use, but is vital to this fauna. In addition, many sites have a rich flora, some spread from trains over the last 150 years or so, and these sites could be destroyed by commercial development.			
<p>NYCC Ecology suggested that the wording in policies within the Local Plan could be strengthened and clarified to ensure that development seeks to produce a net gain by designing in wildlife and by ensuring that any adverse impacts are avoided where possible or where it is not possible then appropriately mitigated for.</p> <p>NYCC Ecology clarified the original response from their team which stated that “Recommendations for adjustment or additions to text, including reference to relevant legislation and areas of geological interest should be provided in an appendix covering Biodiversity section of the draft local plan”:</p> <p>NYCC Ecology now confirms that geological interest in the district can be identified at a local level through non-statutory Local Geological Sites (LGS) and that these are the equivalent to SINCs. At present there is not a formal set of LGS for Craven District Council to designate within the local plan however the North Yorkshire Geodiversity Partnership is working on designation criteria and assessing a suite of candidate sites. As such</p>	<p>Section (a) of draft policy ENV4 states that “Wherever possible, development will make a positive contribution towards achieving a net gain in biodiversity, and in particular will...” “(vii) Enable wildlife to move more freely and easily throughout the local environment, including both the natural and built elements.” In addition section (b) states that benefits in biodiversity should be “equal to, or where possible exceed the biodiversity value of the site prior to development”. As such the LPA considers the policy sufficiently provides for net gains in biodiversity where these can feasibly be achieved (either on or off, but as close of possible to, the site). Section (c) also ensures that adverse impacts are avoided or compensated where possible, and development is resisted if significant loss in, or harm to, biodiversity on site cannot be avoided.</p> <p>Currently the supporting text for draft policy ENV4 states that habitats identified under the local designation of ‘Sites of Geodiversity Importance’ will be safeguarded. As noted by NYCC Ecology however, at present there is not a formal set of local geodiversity sites designated for Craven as this work is in its early stages. As such the LPA agrees that reference</p>	Yes	<p>Remove reference to ‘Sites of Geodiversity Importance’ from the list of locally designated sites to be safeguarded by draft policy ENV4.</p> <p>Make reference in the supporting text to the potential for Local Geological Sites to come forward during the plan period, to be included in a future review of the local plan. Supporting text to also include reference to the geodiversity element of many SSSI’s which are afforded protection by this policy.</p>



<p>proposed LGS may come forward during the plan period and reference to this could be made through the supporting text.</p> <p>Should you wish to provide further guidance on biodiversity and/or geodiversity interest to support the relevant policies within the Local Plan then this could be provided through an appendix, although this is at the discretion of Craven DC as to whether this is felt to be necessary.</p> <p>(Statutory Body</p>	<p>to Sites of Geodiversity importance should be excluded from the list of local habitats to be safeguarded and instead reference should be made in the supporting text to the potential for Local Geological Sites to come forward during the plan period, and to be included at a future review of the local plan. Mention should also be made of the geodiversity element of many SSSI's which are afforded protection by this policy.</p> <p>The LPA considers that an appendix providing further guidance on biodiversity and/or geodiversity interest would unnecessarily add to an already lengthy document, but the Council will consider providing links to any County Council guidance on biodiversity and/or geodiversity interests through its website.</p>		
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\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## June – July 2017 Draft Local Plan

## Policy Response Paper – ENV5: Green Infrastructure

<b>ENV5: Green Infrastructure</b>			
<b>Aim of the Policy: Help to create an improved and expanded green infrastructure network in Craven through new growth.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan</b>
Support for this Policy which should help to safeguard the Green Infrastructure of the District. Several elements of Craven's Green Infrastructure network are either designated heritage assets in their own right or contribute to the setting of its historic buildings and structures. The protection and effective management of this resource will not only help to safeguard many elements which contribute to the distinctive character of the area but also help to deliver the plan's Objectives for the historic environment. (Statutory Body)	Support noted and welcomed.	No	
Policy weakened by wording 'where ever possible'.	Comment noted. It is considered that draft policy ENV4, following suggested amendments by key statutory bodies will be sufficiently robust to safeguard and improve the biodiversity of the plan area.	No	
List of allocated sites where GI would be provided, as indicated in the 2016 draft of the local plan, has not been provided.	Comment noted. Draft policy ENV5 will expect all sites in policies SP5 – SP11 to put forward proposals that meet the provisions of this	Yes	At the end of draft policy ENV5, include a list of sites allocated on greenfield land where green

	policy. Where development principles on allocated sites specify the need for green infrastructure routes, these sites will be listed at the end of draft policy ENV5 in recognition of the improvements they will make to the green infrastructure network.		infrastructure routes are proposed, as detailed in the development principles in draft policies SP5-SP11, and on the Policies Map (in green hatch).
North Yorkshire Local Access Forum welcomes the importance of footpaths, cycle routes, national trails, etc in this policy	Support noted and welcomed.		
Paragraphs 5.47-5.49 & 5.56-5.61- While acknowledging that you cannot provide all the details in the local plan, the Ribble and tributaries and the Lune and its tributaries seem not to have been considered for their contribution to green space in the district. They are both, probably, more important for biodiversity and green space than the Aire Valley.	<p>The Aire Valley is specifically mentioned in paragraph 5.58 due to its prominence in the 'Fresh Aire' project. This paragraph outlines a number of key projects which promote GI in the plan area and beyond.</p> <p>Paragraph 5.57 acknowledges that there are a 'number of corridors within the plan area, including corridors of regional, sub-regional and district importance...' and although it doesn't specifically list all of these corridors it is referring to, among other green routes, the number of important rivers and tributaries across the district which play an important role in extending the GI network.</p>	No	
Where are paragraphs 5.50-5.55?	Comment noted and numbering anomaly acknowledged. This will be corrected in the publication draft of the local plan.	Yes	Number sequencing to be corrected in the publication draft of the local plan.

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

**June – July 2017 Draft Local Plan**  
**Policy Response Paper – ENV6: Flood Risk**

<b>ENV6: Flood Risk</b>			
<b>Aim of the Policy: Help to avoid and alleviate flood risk in Craven through a flood risk based sequential approach to new growth.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan</b>
Flood risk assessments inadequate as only concerned with whether there is flood risk on the site where development takes place. Need to address the issues of whether a site will increase run-off via creating hard standing areas, and the protection needed for sites lower down the valley against increased run-off.	<p>Comment noted, however it should be noted that flood risk assessments do consider run-off and increased risk of flooding downstream, and take this into account when assessing the risk a development may pose to the site and surrounding area.</p> <p>In addition, draft policy ENV6: Flood Risk specifically states in criterion (b) that development will incorporate sustainable drainage systems (SuDS) in the first instance, in order to help reduce the risk of surface water run-off which could affect sites further downstream. Criterion (d) also stresses the importance of avoiding development in areas which have to greatest potential to increase flood resilience in order to reduce flood risk downstream.</p>	No	
CDC should ensure that developments do not increase the risk of flooding elsewhere. This includes communities that are not in the	Flood risk assessments consider run-off and increased risk of flooding downstream, and take this into account when assessing the risk a	No	

<p>district, such as downstream from the catchment areas of rivers within the district boundary.</p>	<p>development may pose to the site and surrounding area.</p> <p>The LPA has specifically consulted with neighbouring authorities with regards to potentially cross boundary flood risk issues. No concerns have been raised with regards to increased flood risk in neighbouring authority's areas as a result of the proposed development in the Council's local plan.</p>		
<p>Local plan should recognise the increasing incidence of flooding on the road between Embsay and Skipton, which is exacerbated by the increase rates of surface water runoff from individual building projects. Part of the solution could include replacement of old tunnel through railway embankment with wider diameter piping. Recognition should be given to flooding problems at Low Lane and Brackenley Lane.</p>	<p>Draft policy ENV6: Flood Risk specifically states in criterion (b) that development will incorporate sustainable drainage systems (SuDS) in the first instance, in order to help reduce the risk of surface water run-off which could affect sites further downstream. This policy would be applicable to all planning permissions, from individual house extensions to large housing sites.</p> <p>In addition criterion (d) stresses the importance of avoiding development in areas which have to greatest potential to increase flood resilience in order to reduce flood risk downstream.</p> <p>The local plan is not currently proposing to allocate any additional land for development in Embsay. With regards to current and future windfall sites Building Regulations specify permeable surfaces to reduce runoff and (as</p>	<p>No</p>	

	also specified in this policy) appropriate drainage arrangements to ensure that surface water drainage utilises SuDS rather than the combined sewer.		
Within this section it states to refer to standards set out by the Environment Agency, see Appendix B. Appendix B is showing as Education Provision document both on the documents list and within the contents page of the draft plan. (Statutory Body)	It is acknowledged that the reference to Appendix B in draft policy ENV6 is an error. The Publication draft of the Local Plan will rename the appendix for draft policy ENV6 to 'Appendix D'.  'Appendix D: Draft Policy ENV6 – Environment Agency Technical Note' will be included at the end of the plan.	Yes	Amend draft policy ENV6 to refer to 'Appendix D' rather than 'Appendix B'.  Include 'Appendix D: Draft Policy ENV6 – Environment Agency Technical Note' at the end of the plan.
Although mentioning improvement of natural mechanisms to reduce flood risk, the policy falls short of identifying schemes to achieve this by promoting for example tree planting to reduce and slow run off.	Bullet b) of draft policy ENV6 specifies the incorporation of SuDS into development schemes where feasible; or other appropriate means of flood prevention and water management where SuDS is not possible. This latter statement is in reference to all other natural and man-made flood prevention schemes which may be practical/feasible on site.	No	
United Utilities supports Policy ENV6 which deals specifically with flood risk. However, whilst we acknowledge the current draft policy references surface water management, we recommend it is revised to include the following additional text after criterion (b) within the body of the policy: "Surface water should be discharged in the following order of priority: 1. An adequate soakaway or some other form of infiltration system.	The wording provided by United Utilities was included in Appendix B to draft policy ENV6 in the April 2016 pre-publication draft of the local plan. However due to an administrative error this appendix was not included in the June 2017 pre-publication draft of the local plan.  As such 'Appendix D: Draft Policy ENV6 – Environment Agency Technical Note' will be included at the end of the publication draft of the plan which includes reference to United	Yes	Amend draft policy ENV6 to refer to 'Appendix D' rather than 'Appendix B'.  Include 'Appendix D: Draft Policy ENV6 – Environment Agency Technical Note' at the end of the plan.

<ol style="list-style-type: none"> <li>2. An attenuated discharge to watercourse.</li> <li>3. An attenuated discharge to public surface water sewer.</li> <li>4. An attenuated discharge to public combined sewer.</li> </ol> <p>Applicants wishing to discharge to public sewer will need to submit clear evidence demonstrating why alternative options are not available. Approved development proposals will be expected to be supplemented by appropriate maintenance and management regimes for surface water drainage schemes. On large sites it may be necessary to ensure the drainage proposals are part of a wider, holistic strategy which coordinates the approach to drainage between phases, between developers, and over a number of years of construction. On greenfield sites, applicants will be expected to demonstrate that the current natural discharge solution from a site is at least mimicked. On previously developed land, applicants should target a reduction of surface water discharge. Landscaping proposals should consider what contribution the landscaping of a site can make to reducing surface water discharge. This can include hard and soft landscaping such as permeable surfaces.”</p> <p>We would like to emphasise the need to encourage new development to explore all methods for mitigating surface water run-</p>	<p>Utilities’ requirement for surface water discharge.</p>		
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off. Wherever possible, developers should look at ways to incorporate an element of betterment within their proposals as a means to reduce further the risk of flooding within the area. This approach is wholly in accordance with paragraph 103 of the NPPF. (Statutory Body)			
As the section of the local plan concerned with flood risk recognises the requirement for SuDS and makes reference to NYCC design guidance we have nothing further to add. (Statutory Body)	Support noted and welcomed.	No	

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.



## June – July 2017 Draft Local Plan

## Policy Response Paper – ENV7: Land and Air Quality

<b>ENV7: Land and Air Quality</b>			
<b>Aim of the Policy: Help to safeguard and improve land and air quality in Craven through new growth.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan</b>
Support for Local Plan acknowledgement that Grade 3 land, which is the highest grade of land in Craven District, would not be used for development unless such development can be justified.	Support noted.	No	
Paragraph 5.66 implies that only Grade 3 land can be grazed or harvested. However, Grade 4 land is also utilised year round for grazing and the production of silage and hay and this should be recognised in plan. Grade 4 land constitutes much of the land in Craven and also need protection.	Whilst it is acknowledged that Grade 4 land is utilised for grazing and the production of silage and hay in the plan area, it is not classed via the Agricultural Land Classification system as needing special protection from development. Grade 4 land is classified on the Agricultural Land Classification maps as 'poor'. To protect all Grade 4 land in the plan area from development would result in the local plan being unable to deliver its objectively assessed need for housing, as identified in the Council's Strategic Housing Market Assessment, resulting in the plan being found unsound at Examination.  It is deemed that paragraph 5.66 adequately	No	
In response to the revised text to Policy ENV7, land and air quality, CPRENY recognises that much of the agricultural land within Craven is not considered to be the Best and Most Versatile land in terms of crop production, however, Craven's livestock farming is reliant on much of the lower quality (grade 4 and 5) land within the District. CPRENY would refer you to their			

previous response on this matter and urge the Council to reconsider this important fact. The Auction Mart turned over £39,445, 819.23 in 2014, which is a significant income for a rural authority. Should this land not be safeguarded from development, the rural economy will undoubtedly suffer. This was recognised by CDC Local Plan 1999 in Policy ENV11 and should be referred to within the new Local Plan as a matter of some priority for this rural area.	addresses the important role Craven's livestock farming and local food production has in the District. As such grade 3 land is safeguarded from development wherever possible unless the need for development outweighs the scale of the loss of agricultural land quality.		
Lower quality land has agricultural value too. It is wrong to assume that Grade 4 land has little value to agriculture. Much is grazed the majority of the year and allows the higher grade land to be harvested for grass crop and forage (maize, etc. production).			
Evidence provided at drop in session of the value to Craven's economy, employment, tourism and food security of the categorised BMV land comprising most of Craven outside the National Park. This section (para 5.66) must be rewritten to reflect the value of farming which influences so much of this area.			
Development of brownfield sites should be 'prioritised' (DCLG) rather than 'encouraged' as stated in local plan.	Paragraph 111 of the NPPF states that <i>"Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value"</i> .  Draft Policy ENV7 is therefore in line with	No	

	national planning policy requirements.		
ENV7b) – Query regarding the change of ‘preferred’ to ‘encouraged’ regarding Brownfield development. Whilst the term is still in the NPPG, the Department for Communities and Local Government is recorded as saying that ‘We have been clear that local councils must prioritise development on Brownfield land. This later instruction should be highlighted in this section.	<p>The comment is unclear with regards to where DCLG has stated that local councils must prioritise development on brownfield land.</p> <p>The NPPG and NPPF in paragraph 111 is clear however that <i>“Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value”</i>.</p> <p>Draft Policy ENV7 is therefore in line with national planning policy requirements.</p>		
<p>With reference to criterion b) of ENV7 on brownfield sites</p> <p>The draft changes “preferred” to “encouraged”. This seems to be due to a response from HBF re. para 111 of the NPPF. We do not see that para 111 precludes the council plan from prioritising use of brownfield land. We object to the rewording which appears to completely remove any priority or target for brownfield land use from the Plan, and allows greenfield sites to be used ad lib when brownfield sites are available. That is not sustainability as it leaves brownfield sites without re-use, whilst allowing development of new sites. Sustainability is supposed to be the key factor of NPPF.</p> <p>NPPF 111 says “Planning policies should</p>	<p>Paragraph 111 of the NPPF states that <i>“Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value”</i>.</p> <p>Draft Policy ENV7 is therefore in line with national planning policy requirements.</p> <p>Throughout the plan making process the planning policy team has taken account of all available brownfield land in the Council’s SHLAA (Strategic Housing Land Availability Assessment). Sustainability Appraisal scores brownfield sites more favourably than greenfield, the outcome of which is that all available, suitable and deliverable brownfield sites within the plan’s spatial strategy</p>	No	

<p>encourage the effective use of land by re-using land that has been previously developed (brownfield land).” A policy to prefer brownfield does more to “encourage effective use of land by re-using land...” than not having a policy to prefer brownfield. That is exactly what a preference does, it encourages. We see no need to change the wording and object to the change. NPPF 111 does not say that councils can only encourage re-use, not prefer it.</p> <p>NPPF 111 also says. “Local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land.” If ‘prefer’ is to be replaced by the much weaker ‘encourage’, then a target becomes more vital, but there is not one in the Plan. We are not sure if the case for a target was considered when the wording change was proposed, and why it was ruled out.</p>	<p>settlements have been preferred for allocation. It has been necessary however to also allocate greenfield sites, as there are not enough brownfield sites in the Council’s SHLAA to meet the district’s growth requirements as set out in draft local plan policies SP1 and SP4.</p>		
<p>In terms of air quality, the queuing of cars to enter and leave tourist sites and the potential tourism development commitments outlined elsewhere, will adversely affect the quality of air locally.</p>	<p>Comments noted. Bullets d), e) and f) work to ensure air quality is safeguarded against the cumulative effects of development and a resulting increase in traffic. Mitigation measures will be introduced where necessary to reduce the impact on air quality.</p>	No	
<p>The HBF supports the change to this policy which accords with our previous comments.</p>	<p>Support noted and welcomed.</p>	No	
<p>Gladman are encouraged to note that in line with our previous representations, draft Policy ENV7(b) has been re-worded to reflect</p>	<p>Support noted and welcomed.</p>	No	

the approach taken by Paragraph 111 of the Framework. We now consider the policy to be in conformity with the Framework.			
Support for reference in the supporting text for ENV7 to the significant coal mining legacy present in Craven area. (Statutory Body)	Support noted and welcomed.	No	
Although disappointed that it is not explicit in the title of the policy the Coal Authority is pleased to see that consideration of unstable land is included within the main body of the policy text. (Statutory Body)	Support noted and welcomed.	No	
Natural England notes and welcomes the modifications to para 5.66 and Policy ENV7 with regards to protecting the best and most versatile agricultural land. (Statutory Body)	Support noted and welcomed.	No	

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

**June – July 2017 Draft Local Plan**

**Policy Response Paper – ENV8: Water Resources, Water Quality and Groundwater**

<b>ENV8: Water Resources, Water Quality and Groundwater</b>			
<b>Aim of the Policy: Help to safeguard and improve water resources in Craven through new growth.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan</b>
No comments received.			

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## June – July 2017 Draft Local Plan

## Policy Response Paper – Policy Ref: ENV9 Renewable and Low Carbon Energy

<b>Policy: ENV9 Renewable and Low Carbon Energy</b>			
<b>Aim of the Policy: To achieve renewable and low carbon energy development to help to reduce carbon emissions and support sustainable development</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan</b>
Historic England supports criteria b) & c) of the policy. The introductory section of the plan notes the outstanding local environment and the vision sets out an intention that the high quality landscapes and treasured environmental assets of the area be protected.	Support is noted and welcomed	No	
Natural England welcomes the reference made to impacts on bats and birds from wind turbine development in para 5.81.	Support is noted and welcomed	No	
Policy is too weak. It should include a requirement for development over a certain size to sensitively generate more renewable energy that the residents will use e.g., via heat exchange schemes.	CDC does not have any evidence to justify this approach. The NPPF is clear (para 158) that Local Plans are based on adequate, up to date and relevant evidence, therefore the Craven draft Local Plan cannot propose a policy requirement that is not based on up to date and relevant evidence.	No	
It is unfortunate that CDC cannot identify specific areas for renewable and low carbon projects.	It is considered that draft policy ENV9 is a positive policy, which sets out a proportionate approach by encouraging schemes to come forward. Therefore if specific projects come forward during the LP period this policy would be used to assess projects/proposals.	No	

Introductory sentence to the second part of this policy relating to commercial scale and turbines/farms is unnecessary as it is fully explained in the supporting text. By repeating in policy, this could be exposed as negative and not therefore confirming to the soundness test of being 'positively prepared'	It is considered that the introductory sentence within this part of policy ENV9 is required in order to clearly set out the policy requirements of this specific policy. The supporting text explains that the Council has not identified suitable areas for commercial scale wind turbines or farms for the purpose of providing power into the National Grid within Craven. This is then set out in the actual policy to provide context to the policy approach.	No	
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\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.



## June – July 2017 Draft Local Plan

## Policy Response Paper – Policy Ref: ENV10: Local Green Space

<b>Policy: ENV10: Local Green Space</b>			
<b>Aim of the Policy: To protect sites designated as LGS, from incompatible development that would adversely impact on their open character and particular local significance placed on such green areas which make them valued by their local community.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan</b>
CA-LGS2			
NYCC Highways has no objections to this proposal for LGS designation.	Noted	No	
CA-LGS6			
<p>This site should not be designated as LGS for the following reasons:</p> <ol style="list-style-type: none"> <li>1. It has always been the owner's intention to develop this site, which is in a central sustainable location and is a better option than allowing new development on the edge of the settlement.</li> <li>2. As the site has limited public views (is enclosed by development) the contribution the land makes to the character of the village is minimal.</li> <li>3. Owner also owns stone barn on northern side of the site, which could be converted to a residential use. It is envisaged that this site</li> </ol>	<p>The Council's LGS Assessment concluded that this site does meet Test 3 in terms of its historic significance and beauty.</p> <p>It is recognised that the assessment of beauty is a subjective one. The LGS assessment concluded that the site is valued for its beauty as it provides an area of openness in the centre of the settlement.</p> <p>The site is considered to have historic significance as evidenced in the Conservation Area Appraisal (2016), which states that the site provides some contribution towards the character and appearance of the area.</p>	Not at present	

<p>would be used in connection with the converted barn (garden &amp; parking).</p> <p>4. Allocation as LGS will severely devalue the site as an asset.</p>	<p>The comment refers to a stone barn. This barn is outside the area proposed as LGS designation.</p> <p>The LGS Assessment of this site can be found is set out in the <a href="#">LGS Assessment document</a>.</p> <p>There is a current planning application (2019/18190/FUL) at the barn and croft at Brook View, Carleton for the conversion of the existing stone barn to two dwellings, the erection of new dwelling on site of existing hen huts, and change of use of lean-to agricultural building to domestic outbuilding on the western part of the site. At 6<sup>th</sup> November 2017 no decision has been made on this application, therefore the current draft Publication Local Plan will include the proposed LGS designation on this site that was included in the Pre-Publication Local Plan (June 2017). Any decision made on this application before the deadline for Publication will be reflected in the Publication draft Local Plan. If this application is approved the extent of the proposed LGS designation included in the June Pre Publication Local Plan (central &amp; eastern section) not subject to any approval will be included in the Publication draft Local Plan.</p>		
CA-LGS10			
<p>NYCC Highways has no objections to this proposal for LGS designation.</p>	<p>Noted</p>	<p>No</p>	

CA-LGS11			
NYCC Highways has no objections to this proposal for LGS designation.	Noted	No	
EM – LGS2, EM-LGS3 & EM-LGS6			
Support for LGS designation of these sites as they contribute to the character of the area and reflect its historic roots and development.	Support noted	No	
<p>Para 77 of the NPPF make its clear the LGS designation “will not be appropriate for most green areas or open space”, therefore NPPF provides for an exceptional approach to the use of LGS designation. The evidence that has been prepared to inform the selection of potential LGS sites in the draft LP is UNSOUND for the following reasons:</p> <ul style="list-style-type: none"> <li>• There is a significant volume of sites illustrated on the draft Proposals Map as potential LGS designations following only partial assessment against 3 very basic criteria.</li> <li>• There are no parameters provided within those criteria to undertake an objective assessment of the role and function of the LGS and it is considered that these criteria are ambiguous and completely subjective and fail to define what the essential characteristics of the LGS should be</li> <li>• Test 3 relies solely on whether the proposed LGS has been shown by the community to be demonstrably</li> </ul>	<p>CDC has prepared a LGS methodology, based on national guidance (NPPF &amp; NPPG), which has been subject to targeted public consultation between 13-27th July 2015. Following consideration of comments received during this period of consultation, this methodology was then used to assess proposed LGS designations. The methodology, together with the assessment of proposed LGS sites was presented to Craven Spatial Planning Sub Committee on the 30th January 2017 and agreed. Members also agreed that this work be accepted into the Craven Local Plan evidence base and the 33 sites recommended for LGS designation be subjected to public consultation as part of the pre-publication draft Local Plan Between 19th June – 31st July 2017. The LGS methodology is focused on paragraph 77 of the NPPF, which sets out the specific situation when the LGS designation should be used. Paragraph 77 sets out the following 3 key criteria:</p> <ol style="list-style-type: none"> <li>1. Where the site is in reasonably close proximity to the community it serves;</li> <li>2. Where the green area is demonstrably</li> </ol>	<p>No specific change to the draft Local Plan, however the information submitted with each LGS applications will be published on the CDC Planning Policy webpages. This information forms background documentation to the LGS assessment.</p>	<p>The information submitted as part of a LGS application will be published alongside the revised Local Green Space Assessment with Annexes on the Craven District Council website at Publication of the Craven Local Plan.</p>

<p>special and yet the evidence to support this test is not included within the evidence base. This means that the LP has selected a significant volume of potential LGS sites that have been put forward by individuals or community groups without publishing for consultation the detailed evidence base to quantify the exceptional value of those LGS sites, and without consulting landowners of those sites.</p> <ul style="list-style-type: none"> <li>• This approach has provided a NIMBY's tool to stifle development potential of sites located within settlements that might otherwise provide opportunities for sustainable growth.</li> <li>• LP should accurately define what a LGS should be, clearly set the exceptional circumstances on which LGS will be identified and publish for consultation the detailed evidence which justifies the identification of each proposed designation.</li> <li>• Landowner is not supportive of LGS designation of these sites, they are not publically accessible, provide no formal recreation, informal amenity open space function, no special ecological habitat. Therefore these sites are not demonstrably special.</li> <li>• CDC has not provided any evidence</li> </ul>	<p>special to the local community, for example because of its beauty, historic significance, recreational value, tranquillity or richness of its wildlife; and</p> <p>3. Where the green area is local in character and not an extensive tract of land.</p> <p>Assessment against these criteria have been informed by relevant existing evidence e.g., information from the North Yorkshire Ecological Data Centre relating to wildlife and existing Conservation Area Appraisals. Some criteria such as beauty and tranquillity are more subjective. In terms of beauty information provided as part of a LGS application has been considered. If a site does not meet the other criteria included in test 3a, beauty has been assessed via a site visit. In terms of tranquillity the council requires clear justification why an area is of particular value in relation to this criterion. The CPRE tranquillity maps have been used to support the assessment of sites.</p> <p>Evidence of local support submitted with a LGS application has been considered. Where support has been submitted this is indicated within the assessment tables for test 3. Existing evidence has then been used to make an assessment of this local support. The information submitted as part of a LGS application will be published alongside the revised Local Green Space Assessment with</p>		
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<p>to quantify the “exceptional circumstances” that warrant designations of these sites as LGS. The lack of evidence makes proposed policy ENV10 unsound.</p>	<p>Annexes on the Craven District Council website at Publication of the Craven Local Plan.</p> <p>Comments of support for this policy have been received during the public consultation period from residents, local groups and from statutory consultees including Historic England and Natural England. Comments of objection have also been received for the designation of specific LGS, from landowners and other interested parties.</p> <p>It is therefore considered that CDCs approach to assessing and proposing LGS designations is sound and robust as it is based on the requirements of both the NPPF &amp; NPPG.</p>		
EM-LGS11			
<p>This proposed designation is noted which would prevent the coalescence of Embsay &amp; Eastby.</p> <p>Submission for smaller revised site boundary put forward to consideration by Craven Spatial Planning Sub Committee on 30<sup>th</sup> Jan 2017. Following assessment of this revised LGS site it is proposed as a LGS designation in the Pre Publication Craven Local Plan (June 2017).</p> <p>Note larger site ref is EM-LGS8. Revised site boundary ref is EN-LGS11.</p> <p>Support for this proposed LGS designation. Query the tapering of the boundary of this site opposite St Mary’s Church. If justification for the designation in this</p>	<p>Support and comment noted.</p> <p>Site boundary was that received for revised LGS application for a smaller site</p>	No	

location includes the setting of the church (which would seem entirely appropriate) then the extent of the area could be increased to afford the necessary protection.			
Objection from the landowner to any part of this site included as LGS. It is purely agricultural land with no public access.	The NPPF and NPPG are clear that to be designated as LGS a piece of land does not need to have existing public access. Landowners (where known) have been informed of proposals to designate land as LGS. The LGS assessment of this site concludes that the site meets criteria relating to historic significance, richness of wildlife, beauty and recreational value.	No	
HB-LGS3			
Delighted that this site is proposed for LGS. In terms of details of long term maintenance, CDC owns most of the site and Network Rail owns a triangle at the western boundary for maintenance of the bridge abutments. Friends of Bentham Station care for the station environs next to the site and the Leeds Lancaster Morecambe Community Rail Partnership has its headquarters in the station building.	Support and maintenance information is noted.	No	
As at Minute POL.135/08-09, the Council agreed to use its land located to the east of Station Road in High Bentham site to deliver a scheme to provide: -Long-term public car parking for light vehicles, so that the existing car park in the centre of town could be reserved for short stay use -An option to create another access route to	The information submitted during this round of public consultation relating to the scheme developed for this site, including the provision of amenities to attract visitors has been considered in terms of the proposed LGS within this area of Bentham.  The LGS application was put forward by a Bentham resident. The agreement of the	No	The area of LGS designation will remain the same as that proposed in the Pre Publication Craven Draft Local Plan (June 2017), given the fact that since 2009 planning permission has not been achieved on the site and the scheme has not been implemented.

<p>the Auction Mart for traffic approaching from the east in order to reduce the pressure on the Main Street</p> <p>-Quality office and business space – B1 and A2 planning uses</p> <p>A copy of the above Minute is attached for information. A scheme was subsequently developed – a copy of the scheme with the design, access and justification statement is also attached.</p> <p>The scheme was developed in consultation with a Steering Group, comprising representatives from the Town Council and local business community. The plans were also subject to a public consultation event; details in the attached statement.</p> <p>The need for the scheme is still relevant. In the intervening period we have been addressing the barriers to its delivery:</p> <p>A. Highways – a schedule of improvements along Station Road to ensure that access on and off the site is in accordance with highway requirements. The schedule of improvements has been included in the Infrastructure Delivery Plan for the Local Plan re. page 20, table 5.</p> <p>B. Finance – the scheme is part of the Council’s pipeline of projects for investment via regional and national regeneration programmes.</p> <p>The scheme will provide car parking needed to enable the Railway Station to develop – at present, it currently has 6 parking spaces,</p>	<p>Council’ Policy Committee was made in 2009. Since then no planning permission has been secured on the site and therefore no progress made on implementing the proposed scheme.</p> <p>Draft Local Plan policy ENV10 criterion e) states the following developments that may be acceptable on land designated as LGS:</p> <p><i>“Other form of development, including engineering operations, local transport infrastructure and the re use of buildings providing they preserve the open character of the Local Green Space and the local significance placed on such green areas which make them valued by their local community.”</i></p> <p>Draft local plan policy ENV10 therefore allows the consideration of these types of development therefore any future proposals on this site would be considered and assessed against policy ENV10.</p> <p>Plans for this site may be more advanced in the future and it may be appropriate to look at the siting and location of this specific LGS designation during a review of the Local Plan.</p>		
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<p>which will be insufficient if the plans for the Bentham Line are to be realised. Long-term, it allows for the provision of a new access road via Pye Busk – taking all heavy vehicles away for the town centre, which is recognised as being unsuitable.</p> <p>The scheme:</p> <ul style="list-style-type: none"> <li>-Maintains and enhances Bentham's tradition of being a working town centred on agricultural and manufacturing activity</li> <li>-Supports Bentham in attracting visitors through the provision of amenities</li> <li>-Provides a solution to help address some of the traffic problems experienced by the town</li> <li>-Provides a suitable site for new businesses wishing to establish in Bentham</li> </ul>			
<p>High Bentham needs more land designated for employment, if it is to remain sustainable. CDC could allocate some of this site for employment as it is close to the industrial estate, is adjacent to railway station and has access onto Station Road. There is sufficient land to allow for an area of green space and for some employment land.</p>	<p>See response above.</p> <p>The Publication draft local plan identifies land within High and Low Bentham as existing employment areas, however there are no employment land allocations identified. This is in line with the Employment Land Review 2017 which recommends that in view of the importance of the following sites to the Bentham economy</p> <ul style="list-style-type: none"> <li>• Angus Fire, Bentham Industrial Estate, Bentham Auction Mart, Atkinson Vos Site &amp; land to north east of Bentham Industrial Estate in High Bentham, and;</li> <li>• the existing small employment units at Mill Lane, Low Bentham</li> </ul> <p>they should be retained and protected as existing employment uses.</p>	<p>No</p>	<p>See above</p>



	The Employment Land Review does not recommend any employment allocations in High or Low Bentham.		
HE-LGS1			
<p>*Support the recommendation to designate this site as LGS given the wildlife (great crested newts, deer), recreation &amp; historical/archaeological value together with the beauty of the site. The unspoilt site is a significant area of land, separating Hellifield and Long Preston. It contributes positively to the character and appearance of the local area to the amenity of both residents and visitors.</p> <p>The site creates a buffer zone with regards to noise from the A65 for residents of village and particularly Midland Terrace.</p> <p>It is considered that the site meets all the tests for assessing LGS, including the fact that it has well defined boundaries and position in the local landscape.</p> <p>In terms of details of long term maintenance, assume that the spatial planning team will be aware of the information supplied by consultees and the public in response to the recent planning application on this site, which strongly reinforces the evidence base regarding wildlife on the site, historical assets, importance of the site to Hellifield and overwhelming support by Hellifield residents and public from surrounding areas to retain the sites importance, which LGS will enhance. Save Our Craven Countryside are</p>	Support and maintenance information is noted.	No	

<p>prepared to consult with interested parties to ascertain the best way forward for the site, should be designation be successful. The site was once recommended as a SINC yet no further action was taken in this recommendation.</p>			
<p>Objection to the proposed designation of this site as LGS. Previous objections submitted in Nov 2014 &amp; May 2016. Considered that the existing policy for tourism (saved 1999 LP policy EMP11) should be retained give the significant amount of public money that has been spent on constructing the access road. Planning permissions 42/2002/2763 &amp; 42/2005/5082 have therefore been implemented. There is a current planning application on this site (42/2016/17496), for the development of a leisure centre, which is currently being considered.</p> <p>In terms of tourism there is an increasing demand for tourism facilities in Craven and the YDNP and in particular serviced accommodation to facilitate short breaks. The increasing demand for tourism in the area will restrict any further tourism related development on the land and prevent these needs from being met. The Council's reliance on Bolton Abbey area providing tourism development is not realistic and if these proposed allocations cannot be developed, further land will be required. It is considered that this LGS designation</p>	<p>The Council's LGS Assessment concluded that this site does meet Test 3 in terms of its historic significance, wildlife value, recreation, tranquillity and beauty.</p> <p>There is extensive evidence to show that the site is rich in wildlife. Information from the North &amp; East Yorkshire Ecological Data Centre shows that the site is significant in terms of its wildlife value, given the high numbers of legally protected, S41/UK BAP, and Craven LBAP species found within a 500m buffer of the site. This threshold was discussed and agreed between CDC and the North &amp; East Yorkshire Ecological Data Centre as being an acceptable species threshold for Craven.</p> <p>In addition detailed information has been submitted by a local group setting out that The Hellifield Flashes are recognised as one of the premier sites in Craven for diversity and quantity of Bird Life. The existing range of birds and other species that have been recorded on the site, include 153 individual species of birds (20 birds on the UK Priority Species Records), common toad, brown hare, hedgehog, badgers, foxes, red &amp; roe deer and great crested newts.</p>	No	

<p>does not comply with the criteria of para 77 of the NPPF and that the proposed designation of such a large area in addition to 4 other designations does not relate to the small village of Hellifield.</p> <p>Consider that this site is an extensive tract of land (information from 2014 Examination on the Blackwell Neighbourhood Plan concluded that 2 sites (19 &amp; 32 ha) were considered by inspector as extensive tracts of land). The whole site has extant planning permission which is incompatible with the proposed designation and therefore fails test 2.</p> <p>In terms of archaeological value, Policy EC4 inset map indicates that part of the site has some archaeological value but it is not clear the extent of the value and it is assumed to cover the whole site. The designation of an archaeological area of value on the site is unsound and the Council have failed to comply with para 158 of NPPF and para 014 of PPG2. The Archaeological &amp; Cultural Heritage Desk Based Assessment was undertaken as part of the pending planning application and concludes that any archaeological potential is focused to the eastern area of the site, however there is no evidence to indicate that these remains would be of high importance, therefore their presence is unlikely to preclude development.</p>	<p>This information also sets out that water courses from the site run into the nearby SSSI of Pan Beck Fen then onwards to the River Ribble. Reference has been made, by this group, to this area being the last place in Craven to have a wild Wolf Pack.</p> <p>The site's historic significance relates to the Grade II Historic Passenger Building of The Hellifield Railway Station, which provides a scenic backdrop.</p> <p>There are existing PROWs on the site, which provide recreational value.</p> <p>The LGS Assessment of this site can be found is set out in the <a href="#">LGS Assessment document</a>.</p> <p>The area of the site that is subject to the extant planning permission is excluded from the proposed LGS designation.</p>		
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Objection received relating to the current planning application on this site.	The current planning application is being considered & dealt with within the council's formal Development Management process for considering planning applications. This comment has been sent to the DM team. The draft Local Plan proposes, through draft policy ENV10, the designation of a large part of this site as LGS.	No	
The LGS designation should be extended to include the parcel of land between the proposed LGS designation and A65. This would preserve the immediate environment of Hellifield and the transition zone between the A65 and the YDNP. There should be a strategy which allows the restoration of the vista of the Dales with good conservation.	This area of land formed part of the original application for LGS submitted to CDC. Following further assessment of this area shown white in the June 2017 Pre-Publication Craven draft Local Plan, it is considered that this area forms part of the Hellifield Flashes site which is not subject to planning consent and therefore should be proposed for LGS designation.	Yes	The Hellifield policies map will be amended to show this area of land as proposed LGS.
This site lies within an area identified under Policy S01 of the Minerals and Waste Joint Plan for safeguarding of the mineral resource and is adjacent to the rail sidings site identified under Policy S04 of the Minerals and Waste Joint Plan for safeguarding the transport infrastructure. However, it is not considered that any significant transport safeguarding or minerals safeguarding issues are likely to arise given the nature and extent of the minerals present and the nature of the proposed allocation.	Noted	No	
HE-LGS5			
A significant time and effort has been put	In assessing sites for LGS designation	No	

<p>into preparing a concept statement for this site showing housing development in the central part of the site (just over 50% of the site), which would seek to augment the quality of the approach to Hellifield and would not be of a “mass produced” nature. This site has been designated as LGS on the basis that it is rich in wildlife. As the site has been used for grazing by cattle for many years, it is not apparent what wildlife the site rich in. What wildlife is identified in the Ecological Information Data? Please explain the grounds for inclusion of this site as LGS? Request that this site is reconsidered.</p>	<p>information from the North East Yorkshire Ecological Data Centre was obtained to identify ecological benefits within a 500m buffer of a site. The information recorded each statutory site (AONB, Local &amp; National Nature Reserves, SSIs, National Parks, Ramsar Sites, SACs &amp; SPAs), non-statutory sites, priority habitats (e.g., ancient woodlands) and legally protected species, including S41 (UK BAP) or Craven LBAP species that intersects with the 500m buffer. The information from the Ecological Data Centre for this site indicates that this site is rich in wildlife as 7 or more species exist either on or within 500m of the site. This threshold was discussed and agreed between CDC and the North &amp; East Yorkshire Ecological Data Centre as being an acceptable species threshold for Craven. These species are common swift, common spotted &amp; fragrant orchid, bluebell, common Twayblade, magpie, bats including the Soprano Pipistrelle bat.</p>		
IN-LGS2			
<p>In 2015 the Ingleton Village Team, through local consultation developed the ‘Ingleton Village Action Plan.’ Designed to provide a comprehensive Plan for the regeneration of Ingleton a key priority theme is to encourage ‘The creation of new products and experiences that will attract new visitors’. Within this theme opportunities to ‘Optimise the Potential of Riverside Park’ was identified that would set out the different uses (facilities, features, activities and</p>	<p>As these two areas of land (swimming pool and play area) are designated in the draft Local Plan as INF3 sites they would be protected under the provisions of this draft policy. CDC have taken the approach that where sites are protected under draft policy INF3, there is a need for the council to consider whether any additional local benefit would be gained by an additional designation as a Local Green Space. The Council’s approach when assessing Craven’s main parks, including Aireville Park,</p>	Yes	<p>The proposed LGS designation boundary will be amended to include all aspects of Ingleton Park, including specifically the swimming pool and playground.</p>

<p>landscape) and positioning within the Park. The Master Plan was commissioned by the District Council and produced by landscape architects Newground who presented a final Plan in Spring 2017.</p> <p>Adjacent to the proposed Riverside Park Local Greenspace Designation; IN-LGS2, are two areas of land with a draft 'Open Space, Sport and Recreation Facilities' (INF3) designation. These areas of land are occupied by Ingleton Swimming Pool and the play area forming part of Riverside Park.</p> <p>In the recommendation of the Riverside Park Master plan it is suggested that the existing play area should be extended and partially relocated. Equally it is noted the outdoor swimming pool is a key feature of the landscape and setting of Riverside Park and it is proposed to incorporate new opportunities including a splash zone. Both activities fall within the exceptions for incompatible development in Local Green Space.</p> <p>As both the proposed relocation of the play area and facilities provided at the swimming pool have an impact on the setting of the draft Local Greenspace Designation it is recommended that the draft designation; IN-LGS2 should be extended to incorporate these areas and overlaid with the proposed</p>	<p>Skipton and Sutton Park has been to recognise the significant role these main parks have in the north, mid and south sub areas of the district by providing a multifunctional outdoor space for those communities; therefore it is considered that these sites are demonstrably special to the wider community and designation and LGS designation would be justified in addition to the protection of these park sites under draft policy INF3.</p> <p>Draft policy ENV10 does allow for the construction of new buildings or structures on LGS in specific exceptional circumstances, which are listed in the policy e.g., appropriate facilities for outdoor sport, and outdoor recreation provided the openness of the LGS is preserved and there is no conflict with the purpose of designating the site as LGS.</p> <p>Further details of the methodology used by CDC for assessing and designating LGS can be found in the <a href="#">LGS Assessment document</a>.</p>		
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<p>INF3 policy designation. Should the play area be repositioned this approach would then still afford the land Local Greenspace protection to the remaining land.</p> <p>For information the Riverside Park Master plan can be downloaded from the CDC Intranet Location  \\CRAVENFILE01\Services\Intranet Documentation\2. DIRECTOR OF SERVICES\Planning and Regeneration\Economic Development - EMPTY\Riverside Park Masterplan</p>			
KL-LGS2			
NYCC Highways has no objections to this proposal for LGS designation.	Noted	No	
<p>LGS protection KL-LGS2 needs extending north to cover the full field between Main Road and the two branches of Skipton Rd. This is vital for the visual appearance and setting of the village, important historic buildings within the village, as seen from the main road and the value it adds to the wider historical context of the Conservation Area. This site provides the setting for the Grade I listed river bridge and church. The field is tranquil, attractive and beautiful. LGS designation of this site may prevent future development and help to deter it to ensure Kildwick remains a village with a clear separation. The existing tree screen is not secure. Removal of it would expose any development and have a negative impact on</p>	<p>The Council's LGS Assessment concluded that this site does meet Test 3 in terms of its historic significance.</p> <p>The Kildwick Conservation Area Appraisal identifies the southern portion of this site as making a strong contribution to the character and appearance of the conservation area. The northern portion of the site provides no/negligible contribution.</p> <p>The LGS Assessment of this site can be found is set out in the <a href="#">LGS Assessment document</a>.</p>	No	

the existing village.			
SG-LGS4			
Settle Town Council maintain The Green as common land which is registered as VG 80 under the Commons Registration Act. It is cut twice a week between April – Oct. STC support this site being designated as LGS.	Comments and support noted.	No	
SG-LGS15			
Support for this site to be designated as LGS (although site is not in STC ownership)	Support noted.	No	
SG-LGS22			
Landowner has submitted representations on two occasions (Nov 2015 & May 2016), which set out that the land does not have attributes of LGS and object strongly to the LGS of Glebe Field. Agree that the site meets test 1 (is in close proximity to local community) and test 2 (is not an extensive tract of land). Considered that Glebe Field does not meet any criterion of Test 4 as there is nothing “demonstrably special” about the land which justifies such a designation. In terms of beauty the site makes only a marginal contribution to the townscape and character of the village; it does not have any distinguishing site specific attributes which afford it a level of beauty which is greater than other pieces of green spaces in the local area; an Arboricultural Report undertaken in May 2015 identified that non of the trees on site are Category A specimens and that the site includes a mixture of Category B&C specimens. In	<p>The Council’s LGS Assessment concluded that this site does meet Test 3 in terms of its historic significance, wildlife value and beauty.</p> <p>The 2008 Giggleswick Conservation Area Appraisal states that;  “Harrisons Playing Fields and the paths that follow Tems Beck are integral to the more open character of this part of the Conservation Area and that the form and massing of any new built development should be strictly controlled to reflect the compact groupings of older buildings around Church St and to enhance the setting of Hearse House and the Glebe Field.”</p> <p>As evident from its name ‘Glebe’, the site has historic significance through its past linkages with the church, churchyard and Herse House, all linked at the centre of the village from centuries ago.</p> <p>There is an existing PROW on the site, which</p>	No	



<p>terms of historic significance the site does not contain any designated or undesignated heritage assets or other landmarks which are of historical value, therefore it is considered that the site is not an important feature within the Conservation Area. In terms of recreational value the site is privately owned and not formally used for any recreational activities. A PROW runs across the site, therefore the landowner does enable the public to access the land for the purpose of using the PROW, however the public are not permitted to use the site itself for either formal or informal recreation. Any use of the site for such purposes represents its misuse by the local community. In terms of tranquillity, apart from access to the PROW across the site, it does not offer a place for reflection, other than in instances of misuse by a small number of local residents. It is considered that the site is not rich in wildlife evidenced by a Phase 1 Habitat Survey undertaken in May 2015, which identified the site contains amenity grassland, bare ground, hard standing &amp; scattered broad leaved trees and concluded that these habitats are of low ecological value. The site is not subject to any nature conservation ecological designations. It is considered that the site does not meet the tests set out in CDCs methodology.</p>	<p>provides recreational value.</p> <p>In assessing sites for LGS designation information from the North East Yorkshire Ecological Data Centre was obtained to identify ecological benefits within a 500m buffer of a site. The information recorded each statutory site (AONB, Local &amp; National Nature Reserves, SSSIs, National Parks, Ramsar Sites, SACs &amp; SPAs), non-statutory sites, priority habitats (e.g., ancient woodlands) and legally protected species, including S41 (UK BAP) or Craven LBAP species that intersects with the 500m buffer. The information from the Ecological Data Centre for this site indicates that this site is rich in wildlife as 7 or more species exist either on or within 500m of the site. This threshold was discussed and agreed between CDC and the North &amp; East Yorkshire Ecological Data Centre as being an acceptable species threshold for Craven.</p> <p>There has been considerable community support for designation of this site as LGS in the form of submitted LGS applications and comments submitted during public consultation on the Pre-Publication Draft Craven Local Plan (June 2017). This community support identifies that the site is valued in terms of its beauty.</p> <p>The LGS Assessment of this site can be found is set out in the <a href="#">LGS Assessment document</a>.</p>		
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Support for LGS designation of Glebe Field. Any development would be detrimental to the character of the village and pose a danger to vehicular and pedestrian traffic passing along Church St, in particular to children attending the nearby primary school. Designation of this field will help to maintain the individual character of Giggleswick, which is integrally linked to the community's history (Glebe Field showing links to the Grade I listed church and cultural activities of the village).	Comments and support noted.	No	
SK-LGS46 & SK-LGS50			
The proposed designation of all these sites as LGS is excessive. The objectives of LGS could be achieved by allocating a smaller area for LGS which would enable the rest of the land to be developed for much needed housing.	<p>The Council's LGS Assessment concluded that the area of the site covered by the existing protected road approach designated under saved Local Plan policy BE2 (1999) is proposed as LGS designation.</p> <p>Site SK-LGS46 does meet Test 3 in terms of its wildlife value as 7 or more species exist either on or within 500m of the site. Site SK-LGS50 does meet Test 3 in terms its historic significance, wildlife and recreational value. The 2008 Skipton Conservation Area Appraisal specifically identifies this site as one that enhances the environment and character of the conservation area.</p> <p>It is considered that the site is valued for its recreational value (PROW runs through the site).</p> <p>In assessing sites for LGS designation</p>	Yes to site SK-LGS50	<p>The area of land including SK-LGS50 and surrounding land (to include The Battery, Skipton Woods &amp; land to the east of the woods) has been assessed as LGS (site SK-LGS64). This assessment has concluded that this area is significant in terms of historic value as it contains the remnants of the Old Park/Hunting Grounds dating back to the 1300s, which ran from the Grade I listed Skipton Castle to Rylstone in the north and Bolton Abbey in the east. The Skipton Conservation Area Appraisal 2008 states that:</p> <p><i>"The town's setting is an important part of its character, as the rising ground on three sides and part of the south creates unique</i></p>

	<p>information from the North East Yorkshire Ecological Data Centre was obtained to identify ecological benefits within a 500m buffer of a site. The information recorded each statutory site (AONB, Local &amp; National Nature Reserves, SSSIs, National Parks, Ramsar Sites, SACs &amp; SPAs), non-statutory sites, priority habitats (e.g., ancient woodlands) and legally protected species, including S41 (UK BAP) or Craven LBAP species that intersects with the 500m buffer. The information from the Ecological Data Centre for this site indicates that this site is rich in wildlife as 7 or more species exist either on or within 500m of the site. This threshold was discussed and agreed between CDC and the North &amp; East Yorkshire Ecological Data Centre as being an acceptable species threshold for Craven.</p>		<p><i>views into and out of the town. Skipton Woods rise behind the castle and tree cover in the north and west sides of the town is strongly associated with it; Open fields and moorland with trees and heather cover are visible from the town centre. Individual building groups which link with the close proximity of natural features include:</i></p> <ul style="list-style-type: none"> <li><i>· Skipton Castle's setting on the highest point of the town is notable from the south, with gatehouse close to a principal access road and raised walk way. On the north side the steep quarried cliff face, with conspicuous geological folding visible, rises behind the Earl of Thanet's 'Springs Canal' and Eller Beck with associated water courses and provides a memorable setting."</i></li> </ul> <p>This appraisal identifies Grassington Road and The Bailey as natural approaches to Skipton, lined by trees and stone walls. In addition the appraisal identifies the view from Park Hill a significant view into the town and identifies this proposed LGS as an existing open and green space that enhances the environment and character of the conservation area (Map 6).</p>
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			<p>The site is also significant in terms of its wildlife value, given the high numbers of legally protected, S41/UK BAP, and Craven LBAP species found within a 500m buffer of the site. The wildlife value of this site is endorsed by the existence of a SINC at Skipton Woods. It is considered that site SK-LGS64 has clearly defined edges and that the site reasonably relates to the community it serves, therefore it is considered that it is not an extensive tract of land. The site provides a natural connection between Skipton town centre and the surrounding countryside, including the Yorkshire Dales National Park and designation of the site as LGS would ensure the protection of this existing significant natural gateway from the town to the open countryside.</p> <p>The site reference for this area of land is SK-LGS64 is proposed as LGS. This site will be included in the Council's LGS Assessment document and shown on the policies map for Skipton for the Publication Local Plan.</p>
SK-LGS47			
Plans for an extended Local Green Space along Gargrave Road were reduced despite the land fulfilling the LGS criteria. Strips	Following comments received from Historic England during public consultation on the Pre-Publication Draft Craven Local Plan in June &	Yes	Following consideration of the recommendations of Historic England the existing draft LGS

along the east and west edges are narrow and insufficient to adequately provide for biodiversity. A reappraisal of the extent of the LGS in view of the extent of development in the area would provide a better balance between built and natural environment.	<p>July 2017 sites SK-LGS47 &amp; SK-LGS54 have been reassessed for LGS designation. The Craven Conservation Areas; Skipton Draft Allocation Site Assessments, August 2016 produced by Alan Baxter considered that the area to the north of Gargrave Road and the area abutting the northern extension of the Conservation Area around Aireville Grange both make a strong contribution to the character of the Conservation Area. Given the heritage significance on this site the LGS designation in this area has been reassessed and extended to address the recommendations of Historic England.</p> <p>This site meets LGS criteria relating to richness of wildlife, tranquillity and historic significance.</p>		designation (SK-LGS47) has been reassessed to incorporate a significant amount of SK-LGS54. This revised LGS designation will be shown on the Publication Draft Policies Maps.
SK-LGS51			
Site should not be designated as it does not meet the criteria for LGS designation as set out in the NPPF. Site has been designated as LGS as it is considered to be demonstrably special to the local community as it is rich in wildlife. An Extended Phase 1 Habitat Survey & Ecological Assessment has been submitted with the consultation response which demonstrates this is not the case. They identify that the site does not benefit from any ecological designation and that the habitat on the site is limited to semi improved grassland, tall ruderal and scattered scrub, which are commonly occurring in the local area and one of limited ecological value. These survey/assessment	<p>Information obtained by CDC from the Ecological Data Centre (EDC) relating to the number of legally protected species and species identified in both the UK BAP and Craven BAP found within a 500m buffer of a site has been used to assess all potential LGS sites. The information provided for this site shows that more than 7 of these species exist within a 500m buffer of this site.</p> <p>In assessing this site for LGS it is considered that designation of part of this wider site would maintain this existing important road approach into Skipton, whilst protecting what is demonstrably special about this site. It is considered that the south, western and north</p>	Yes	The southern, western and north eastern sections of site SK-LGS51 is proposed as LGS.

also identifies that development of the site could include measures to provide ecological enhancement through the installation of bat and bird boxes and planting of nectar rich plants.	<p>eastern part of this protected road approach to the north east of Skipton is suitable for designation as LGS, given its richness of wildlife.</p> <p>The LGS Assessment of this site can be found is set out in the <a href="#">LGS Assessment document</a>.</p>		
<b>SK-LGS54</b>			
<p>It is disappointing that site SK-LGS54 is not proposed as a LGS designation. Considered that this site complies with criteria 77 of the NPPF as it has value as a home to wildlife, has a pleasing open character comprising grazing land and 2 copses of deciduous trees, is tranquil and has recreational value. It has local significance and is partly visible off Gargrave Rd. Whilst there is no public access, the site is owned by CDC. Part of a larger preferred housing site, it has no planning permission and is not allocated in the 1999 Local Plan for housing. It is not an extensive tract of land.</p> <p>This site should be given the same LGS designation as SK-LGS47. Test 3 assessment by Planning Officers is a subjective one rather than “evidence based” therefore the LGS Assessment is considered to be flawed.</p>	<p>Following comments received from Historic England during public consultation on the Pre-Publication Draft Craven Local Plan in June &amp; July 2017 sites SK-LGS47 &amp; SK-LGS54 have been reassessed for LGS designation. The Craven Conservation Areas; Skipton Draft Allocation Site Assessments, August 2016 produced by Alan Baxter considered that the area to the north of Gargrave Road and the area abutting the northern extension of the Conservation Area around Aireville Grange both make a strong contribution to the character of the Conservation Area. Given the heritage significance on this site the LGS designation in this area has been reassessed and extended to address the recommendations of Historic England.</p> <p>This site meets LGS criteria relating to richness of wildlife, tranquillity and historic significance.</p>	Yes	<p>Following consideration of the recommendations of Historic England the existing draft LGS designation (SK-LGS47) has been reassessed to incorporate a significant amount of SK-LGS54. This revised LGS designation will be shown on the Publication Draft Policies Maps.</p>
<b>SK-LGS62</b>			
<p>Objection that a more specific protection has not been given to Park Hill as essential and historic green space.</p>	<p>Noted. An area of land (site SK-LGS64) which would incorporate site SK-LGS62 (and other proposed LGS sites) has been assessed for its suitability as LGS.</p>	Yes	<p>Site SK-LGS64 is proposed as LGS. This site will be included in the Council’s LGS Assessment document and shown on the policies map for</p>

	<p>This assessment has concluded that this area is significant in terms of historic value as it contains the remnants of the Old Park/Hunting Grounds dating back to the 1300s, which ran from the Grade I listed Skipton Castle to Rylstone in the north and Bolton Abbey in the east. The Skipton Conservation Area Appraisal 2008 states that:</p> <p>“The town’s setting is an important part of its character, as the rising ground on three sides and part of the south creates unique views into and out of the town. Skipton Woods rise behind the castle and tree cover in the north and west sides of the town is strongly associated with it; Open fields and moorland with trees and heather cover are visible from the town centre.</p> <p>Individual building groups which link with the close proximity of natural features include:</p> <ul style="list-style-type: none"> <li>• Skipton Castle’s setting on the highest point of the town is notable from the south, with gatehouse close to a principal access road and raised walk way. On the north side the steep quarried cliff face, with conspicuous geological folding visible, rises behind the Earl of Thanet’s ‘Springs Canal’ and Eller Beck with associated water courses and provides a memorable setting.” This appraisal identifies Grassington Road and The Bailey as natural approaches to Skipton, lined by trees and stone walls. In addition the appraisal identifies the view from Park Hill a significant view into the town and identifies this proposed LGS as an existing open</li> </ul>		Skipton for the Publication Local Plan.
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	<p>and green space that enhances the environment and character of the conservation area (Map 6).</p> <p>The site is also significant in terms of its wildlife value, given the high numbers of legally protected, S41/UK BAP, and Craven LBAP species found within a 500m buffer of the site. The wildlife value of this site is endorsed by the existence of a SINC at Skipton Woods. It is considered that site SK-LGS64 has clearly defined edges and that the site reasonably relates to the community it serves, therefore it is considered that it is not an extensive tract of land. The site provides a natural connection between Skipton town centre and the surrounding countryside, including the Yorkshire Dales National Park and designation of the site as LGS would ensure the protection of this existing significant natural gateway from the town to the open countryside.</p>		
<b>General Comments</b>			
Chatsworth Estate have submitted comments on LGS sites, however these comments relate to the map showing all sites assessed as LGS designations in Embsay, rather than the map showing the proposed LGS designations. The Estate has objected to some sites that are not proposed as LGS designations, which are noted. The Estate supports the designation of site LGS-EM11.	Noted	No	
Comments have been submitted relating to	The draft Gargrave Neighbourhood Plan has	Yes	Draft policy ENV10 and supporting



the LGS designations within Gargrave. The comments either object to the sites identified in the draft Gargrave Neighbourhood Plan not being included in the Craven Local Plan or support for the Gargrave Neighbourhood Plan proposed LGS designations.	assessed and identified proposed LGS designations, therefore the proposed LGS designations are identified within the draft NP rather than the Craven Local Plan. CDC has worked with and advised Gargrave NP Working Group on the approach to assessing potential LGS designations. Once the Gargrave NP is made/adopted it will form part of the statutory development plan for the area.		text will be amended to explain that Neighbourhood Plans currently being prepared in Gargrave, Bradley & Cononley are assessing and designating LGS sites.
<p>Additional LGS applications have been submitted to the Council for the following sites:</p> <ul style="list-style-type: none"> <li>• Glusburn Park</li> <li>• Land to north of Skipton, bounded to the north by Skipton Bypass, to the east by Embsay Road &amp; The Bailey; and to the west by Grassington Road, Skipton (see comment below)</li> </ul>	<p>Both these sites were put through the LGS Assessment and as a result are both proposed for LGS designation in the Publication draft Local Plan. The results of this assessment are summarised below:</p> <ul style="list-style-type: none"> <li>• GLUS-LGS1: Glusburn Park – Site meets criteria relating to recreation value and beauty (as evidenced by LGS application). Whilst this site is protected under INF3, it has a significant role as one of the main parks in the south sub area of the district, offering a multifunctional community space; therefore it is considered that this site is demonstrably special to the wider community and LGS designation would be justified.</li> <li>• SK-LGS64: Land to north of Skipton, bounded to the north by Skipton Bypass, to the east by Embsay Road &amp; The Bailey; and to the west by Grassington Road, Skipton - site meets criteria relating to historic significance, richness of wildlife, recreation, beauty</li> </ul>	Yes	Following assessment sites GLUS-LGS1 and SK-LGS64 are proposed as LGS designations. These sites will be included in the Council's LGS Assessment document and shown on the policies map for Skipton for the Publication Local Plan.

	and tranquility. Note this site includes sites SK-LGS50 & SK-LGS53 which were proposed as LGS designations in the pre-publication draft local plan (June 2017)		
<p>Proposal suggested to keep a "Green Natural Gateway from the Centre of Skipton to the countryside beyond" to encompass the Castle, Skipton Woods (formerly known as the Old Park), Chapel Hill with Battery and the Old Show Field + adjoining fields. It is naturally bordered by the Grassington Road, Bailey - Embsay Road and the A59 by-pass. The area is shown on submitted plans and images.</p> <p>This proposal is justified as follows:</p> <ul style="list-style-type: none"> <li>•These unique spaces are of historical importance and beauty. This area is the remnants of the Old Park/ Hunting Grounds dating back to the 1300's, which ran from the Castle to Rylstone in the North and Bolton Abbey in the East.</li> <li>•This area is an important asset for the town, its locals, visitors and wildlife with its unique blend of Skipton town and country.</li> <li>•It would ensure footpaths from the centre of Skipton would remain an inspiring country- side walk rather than a bustling urban walk.</li> </ul>	<p>Noted.</p> <p>An area of land (site SK-LGS64) which would incorporate site SK-LGS62 (and other proposed LGS sites) has been assessed for its suitability as LGS.</p> <p>This assessment has concluded that this area is significant in terms of historic value as it contains the remnants of the Old Park/Hunting Grounds dating back to the 1300s, which ran from the Grade I listed Skipton Castle to Rylstone in the north and Bolton Abbey in the east. The Skipton Conservation Area Appraisal 2008 states that:</p> <p>"The town's setting is an important part of its character, as the rising ground on three sides and part of the south creates unique views into and out of the town. Skipton Woods rise behind the castle and tree cover in the north and west sides of the town is strongly associated with it; Open fields and moorland with trees and heather cover are visible from the town centre. Individual building groups which link with the close proximity of natural features include:</p> <ul style="list-style-type: none"> <li>• Skipton Castle's setting on the highest point of the town is notable from the south, with gatehouse close to a principal access road and</li> </ul>	Yes	<p>Site SK-LGS64 is proposed as LGS. This site will be included in the Council's LGS Assessment document and shown on the policies map for Skipton for the Publication Local Plan.</p>

<ul style="list-style-type: none"> <li>•It would protect and safe guard a green wooded corridor connecting the heart of the town through to the woods and countryside beyond.</li> <li>•It would protect the impressive green wooded backdrop to the town of Skipton and preserve the unique views from inside the ancient castle and inside the ancient woods, which are both visited by many thousands of people a year - from locals to visitors from all over the world.</li> <li>•It would relieve the recreational pressure put on the existing woods if development occurred in this area. It could also potentially allow for the expansion of the existing woods.</li> <li>•It would ensure a natural connection between the Town Centre and Dales/ National Parks.</li> <li>•It would safeguard an important green space for the well-being of Skipton's inhabitants for future happiness and good health for generations to come. Especially as many green spaces surrounding Skipton are being lost to development.</li> <li>•If not protected now, we would erode or at</li> </ul>	<p>raised walk way. On the north side the steep quarried cliff face, with conspicuous geological folding visible, rises behind the Earl of Thanet's 'Springs Canal' and Eller Beck with associated water courses and provides a memorable setting." This appraisal identifies Grassington Road and The Bailey as natural approaches to Skipton, lined by trees and stone walls. In addition the appraisal identifies the view from Park Hill a significant view into the town and identifies this proposed LGS as an existing open and green space that enhances the environment and character of the conservation area (Map 6).</p> <p>The site is also significant in terms of its wildlife value, given the high numbers of legally protected, S41/UK BAP, and Craven LBAP species found within a 500m buffer of the site. The wildlife value of this site is endorsed by the existence of a SINCC at Skipton Woods. It is considered that site SK-LGS64 has clearly defined edges and that the site reasonably relates to the community it serves, therefore it is considered that it is not an extensive tract of land. The site provides a natural connection between Skipton town centre and the surrounding countryside, including the Yorkshire Dales National Park and designation of the site as LGS would ensure the protection of this existing significant natural gateway from the town to the open countryside.</p>		
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worst loose these historic and inspiring spaces forever, changing this beautiful landscape drastically along with Skipton's core identity and the reason why so many people love Skipton.			
Historic England support draft policy ENV10 and welcome the inclusion of a policy to protect LGS and endorse the proposed criteria for identifying such areas. Many of the areas which are identified on the Policies Maps contribute to the special architectural or historic interest of the District's Conservation Areas, the landscape setting of its settlements or the setting of its heritage assets. The safeguarding of these areas, therefore, will also assist in ensuring that the distinctive character of Craven's settlements are retained and that the Plan's objectives for the historic environment are realised.	Support is noted and welcomed.	No	
Welcome new clauses e.g., b) that make clearer the policy when conflict arises between green space use and built sports facilities. This answers some objections made during the first consultation.	Support is noted and welcomed.	No	
Natural England broadly welcome paras 5.90 to 5.94 and Policy ENV10.	Support is noted and welcomed.	No	

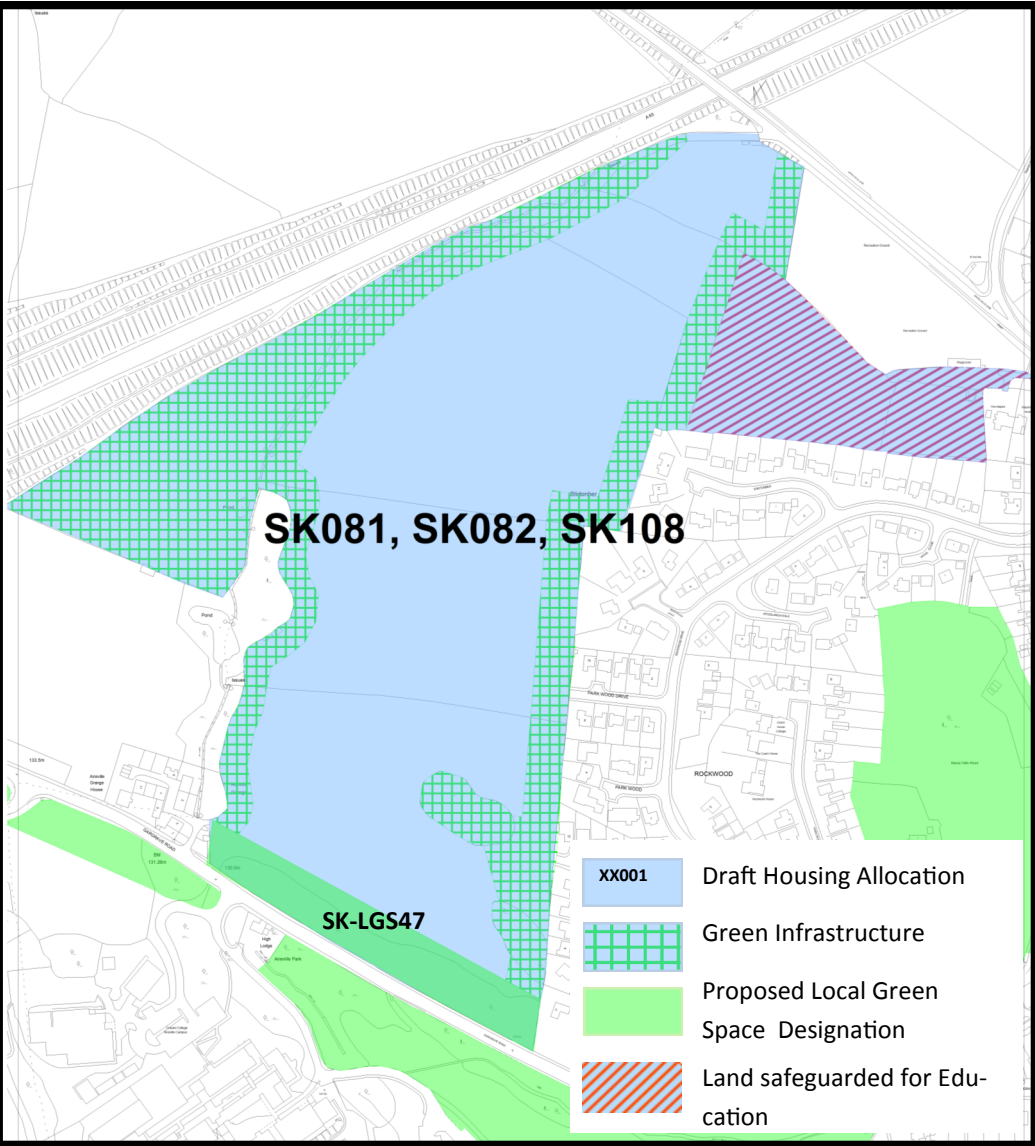
Support for draft policy ENV10, however it is considered that there are too few LGS designations. Some spaces e.g, Mill Bridge, The Wilderness & Bowling Green, Newmarket St, Skipton are protected under another designation (INF3) and not LGS. It is not clear why some are protected as LGS & others under INF3. Which gives greater protection?	Support is noted and welcomed.	No	
Draft policy ENV10 seeks to designate 34 parcels of land as LGS. It is considered that the criteria for designating LGS generally accord with the guidance set out in paragraphs 76 & 77 of the NPPF. Greater clarity as whether these spaces will automatically have public access, in whole, or in part, would make the aim of this policy clearer.	Support is noted and welcomed.	No	
Disappointing to see that the list of LGS does not include Cononley Playing Fields.	Cononley Playing Fields are designated as an INF3: Sport, Open Space and Recreation Facilities site.	No	
Support draft LGS designations for Skipton that are in the Plan, and other policies that promote greenspace, but are concerned that they do not go far enough in providing a strategy to create and enhance a network of biodiversity and green infrastructure in and around Skipton as para 114 requires.	Support is noted and welcomed. Draft policies ENV4: Biodiversity, ENV5: Green Infrastructure & ENV10: Local Green Space aim to provide a green network and achieve a net gain in biodiversity. Many draft site allocations incorporate proposed areas of green infrastructure, which will provide areas of open space and green infrastructure within the site,	No	

	as well as linking up with existing green infrastructure corridors close the proposed site allocations. This approach has the aim of creating and enhancing the network of biodiversity, recreation and green infrastructure around settlements, including Skipton.		
As school playing fields already have protection through legislation, and there is a need for operational flexibility, we would prefer for them not to be identified as designated local green space.	School playing fields have been included in the Council's Playing Pitch Strategy (2016), which forms part of the Local Plan evidence base. As such these sites are protected under draft local plan policy INF3: Sport, Open Space and Recreation Facilities, which aims to safeguard and improve these facilities, including school playing fields and pitches. School playing fields are therefore not proposed to be designated as Local Green Space.	No	
NYCC Minerals & Waste Team have provided the following comment relating to sites HB-LGS3, CA – LGS2, CA – LGS6, CA – LGS8, CA – LGS9, EM – LGS2, EM – LGS3, EM – LGS6, EM- LGS11, HE-LGS5, N-LGS2, KL-LGS2, KL-LGS4, KL-LGS5, KL-LGS6, SG-LGS4, SG-LGS15, SG-LGS22, SK-LGS1, SK-LGS2, SK-LGS11, SK-LGS28, SK-LGS33, SK-LGS46, SK-LGS47, SK-LGS48, SK-LGS49, SK-LGS50, SK-LGS51, SK-LGS53, SK-LGS55, SK-LGS60, SK-LGS5: Although these sites lie within an area identified under Policy S01 of the Minerals and Waste Joint Plan for safeguarding of the mineral resource it is not considered that any significant minerals safeguarding issues are likely to arise given the nature and	Noted	No	

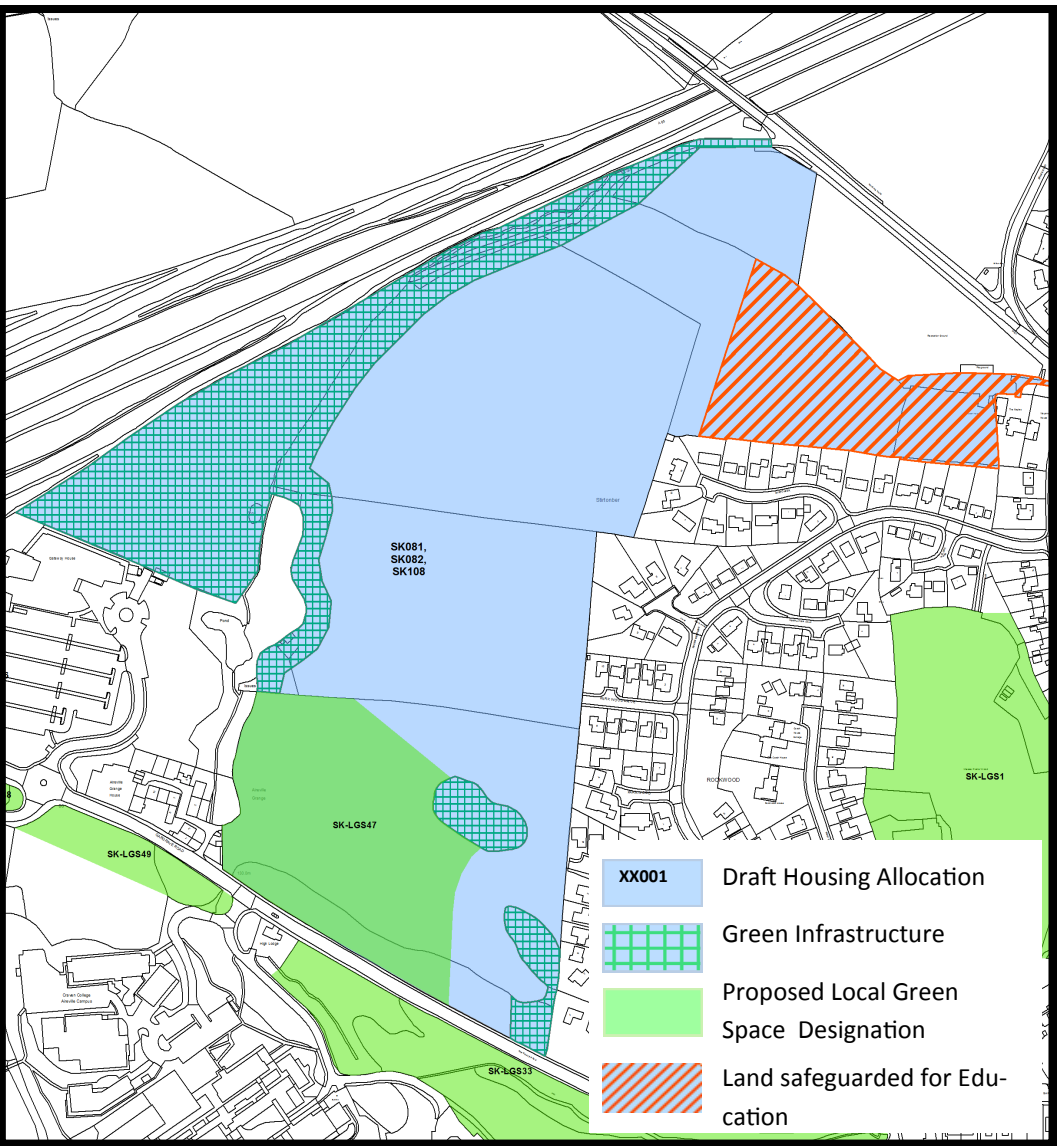
extent of the minerals present and the nature of the proposed allocation.			
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\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

Publication version  
**ENV10: LGS47— Existing protected road approach, north side of Gargrave Road, between roundabout Aireville Grange and Park View, Skipton**  
 (Pre-Publication Local Plan 2017)



**ENV10: LGS47— Existing protected road approach, north side of Gargrave Road, between roundabout Aireville Grange and Park View, Skipton**  
 (Publication Local Plan 2018)

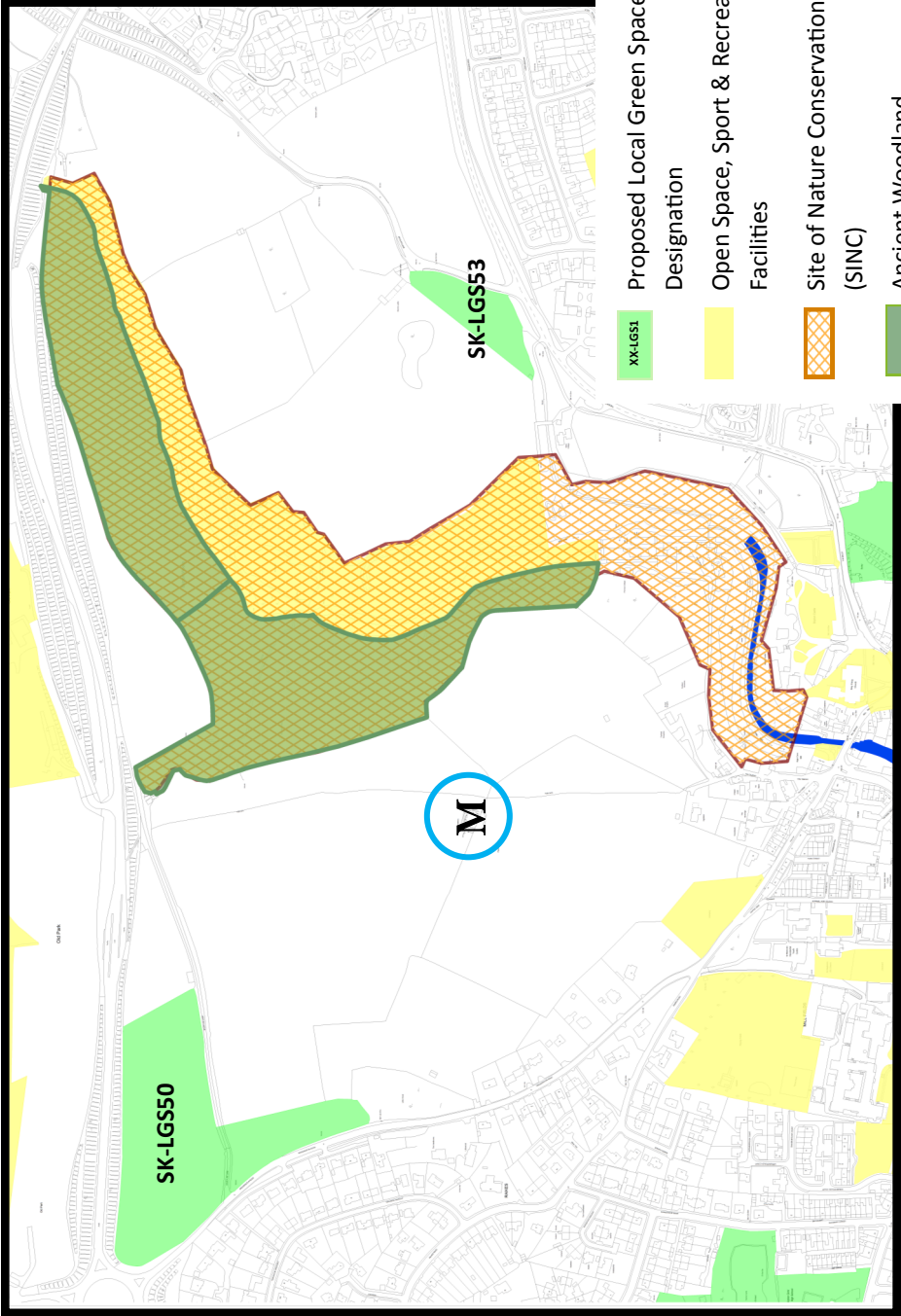




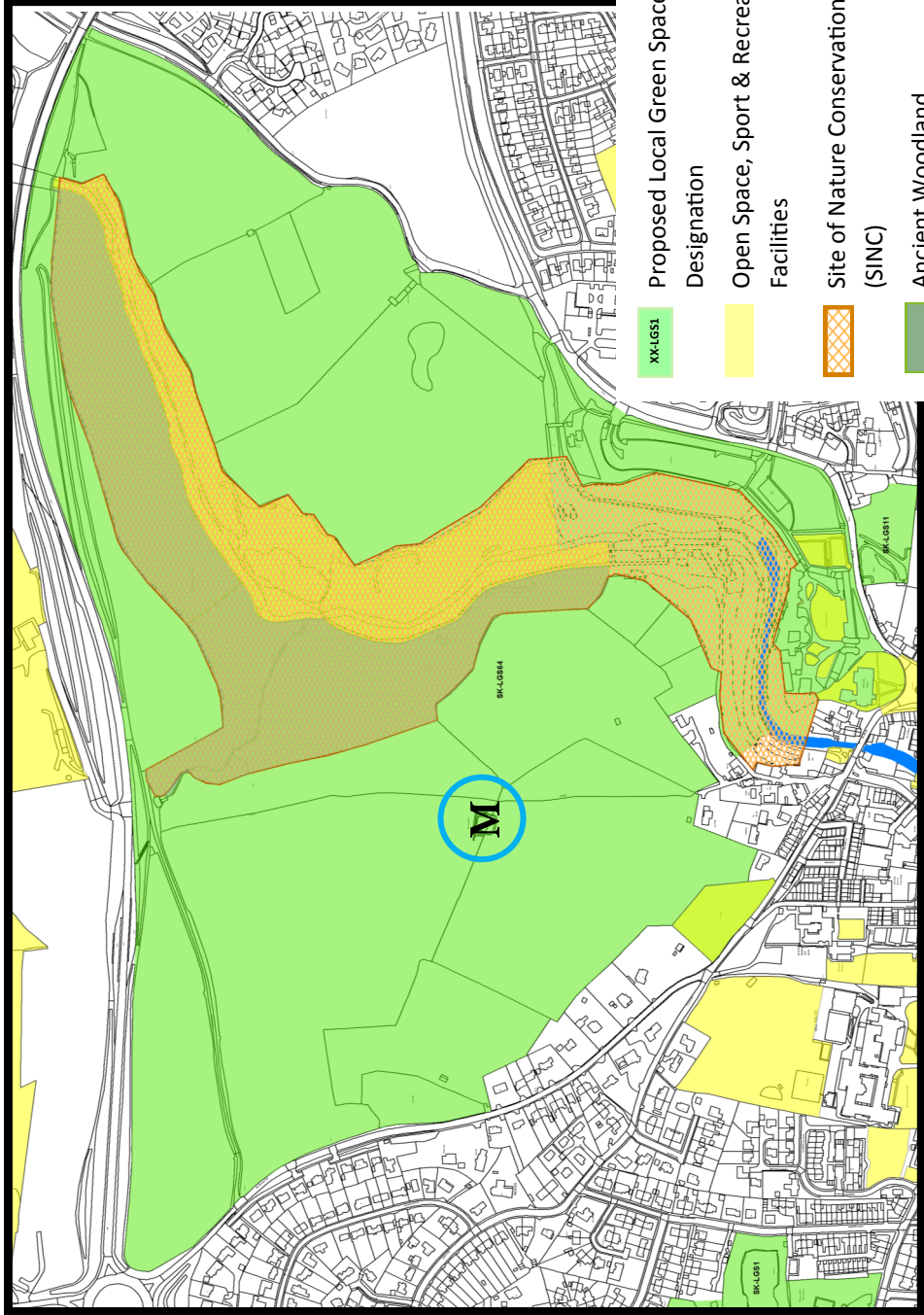
ENV10: SK-LGS50—Existing protected road approach, south east of Grassington Road, Skipton &

SK-LGS53—Existing protected road approach, west side of Embsay Road, Skipton (Pre-Publication Local Plan 2017)

Publication version

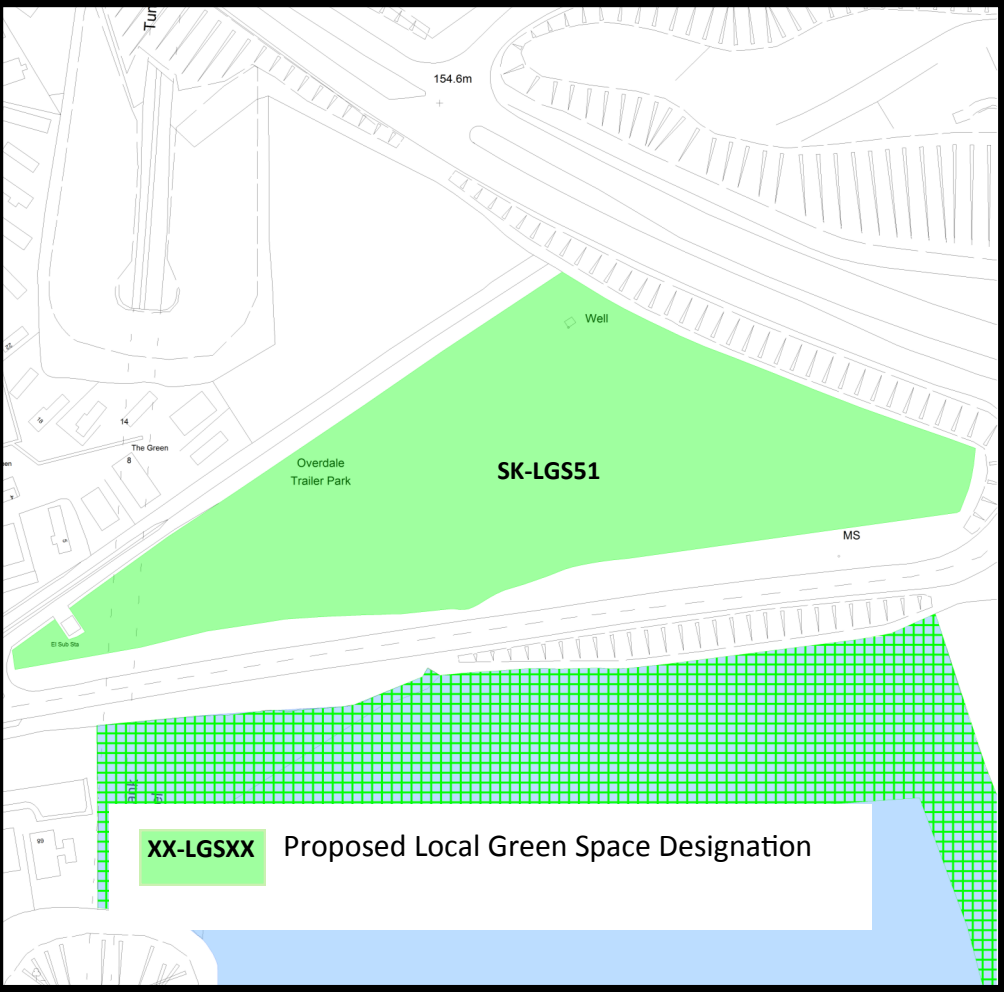


ENV10: SK-LGS64—Skipton North (Publication Local Plan 2018)



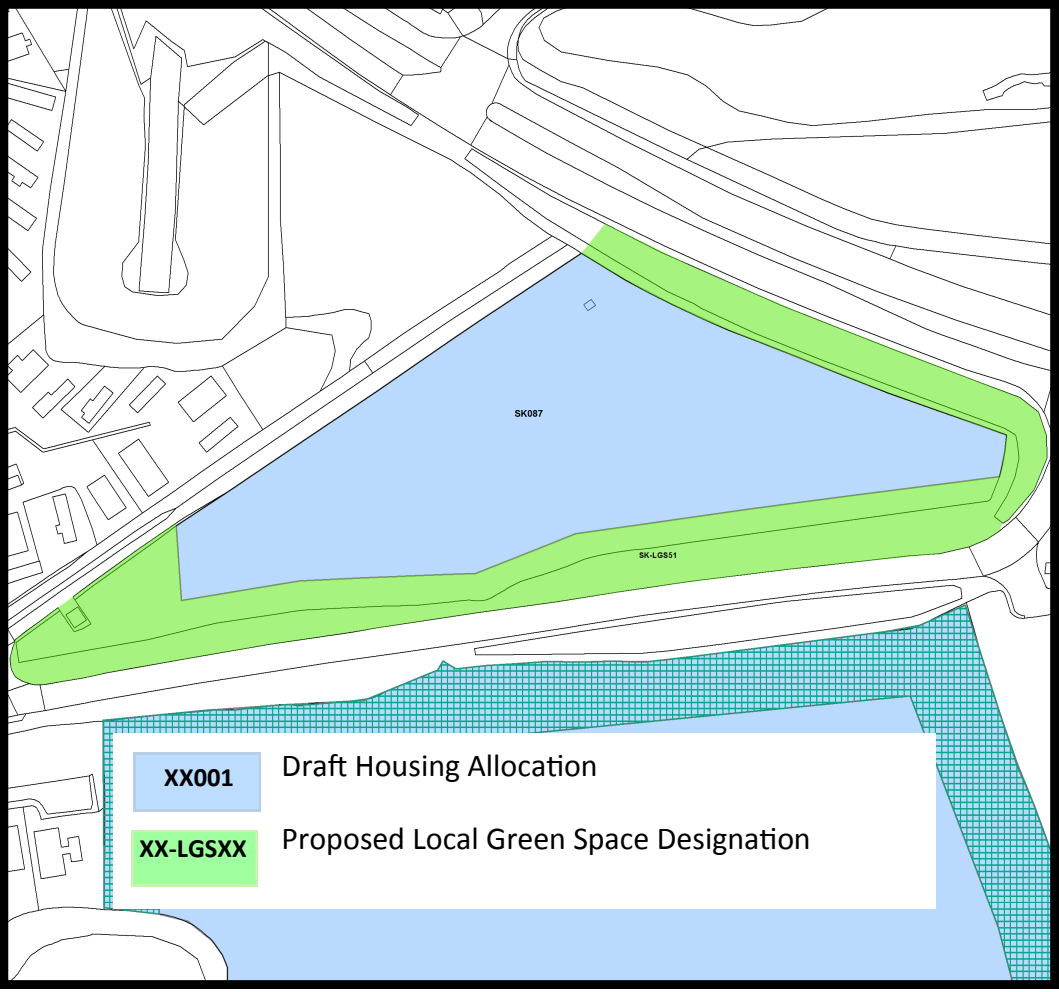
ENV10: SK-LGS51—Existing protected road approach between Harrogate Road and Overdale Grange, Skipton

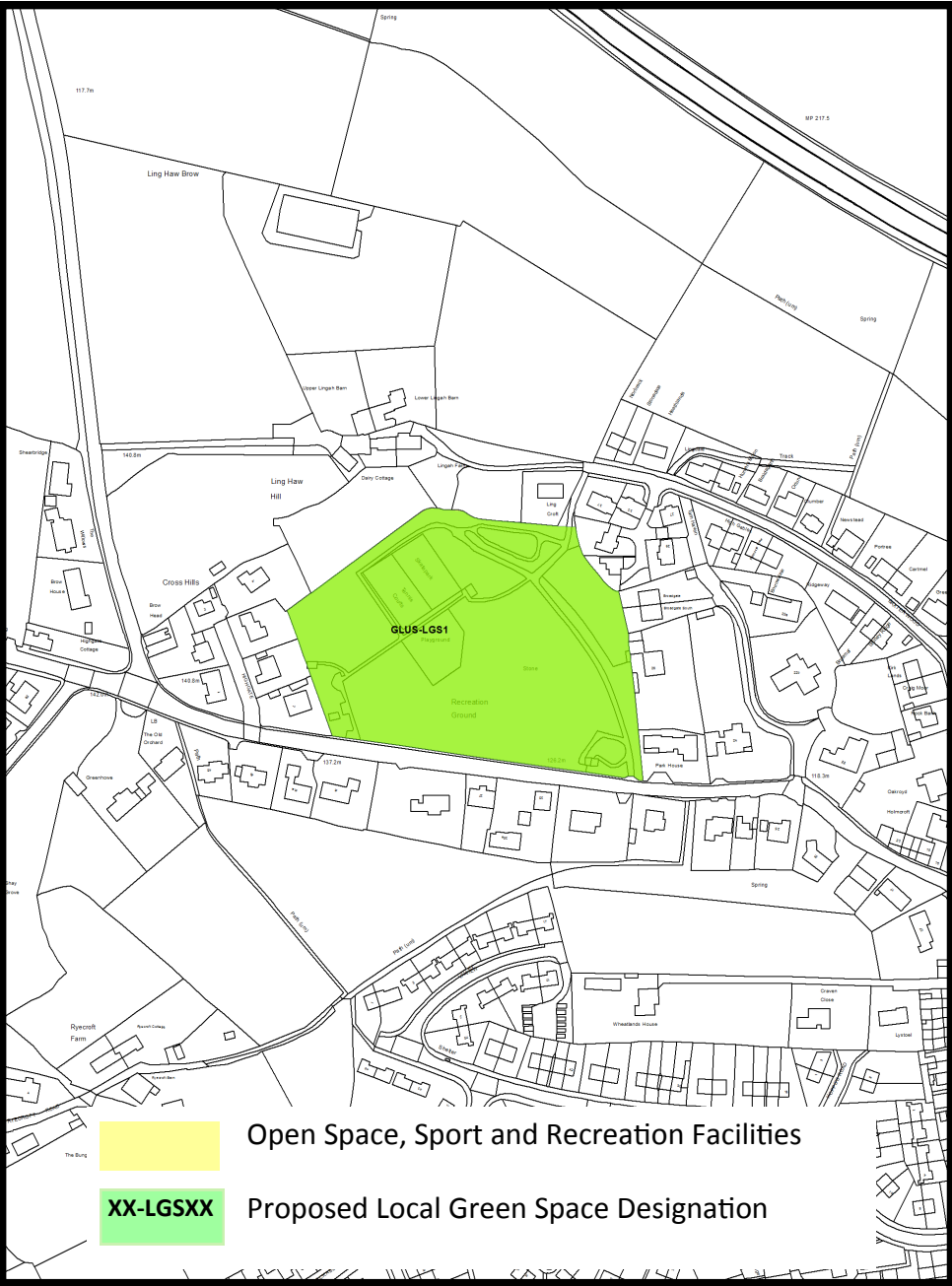
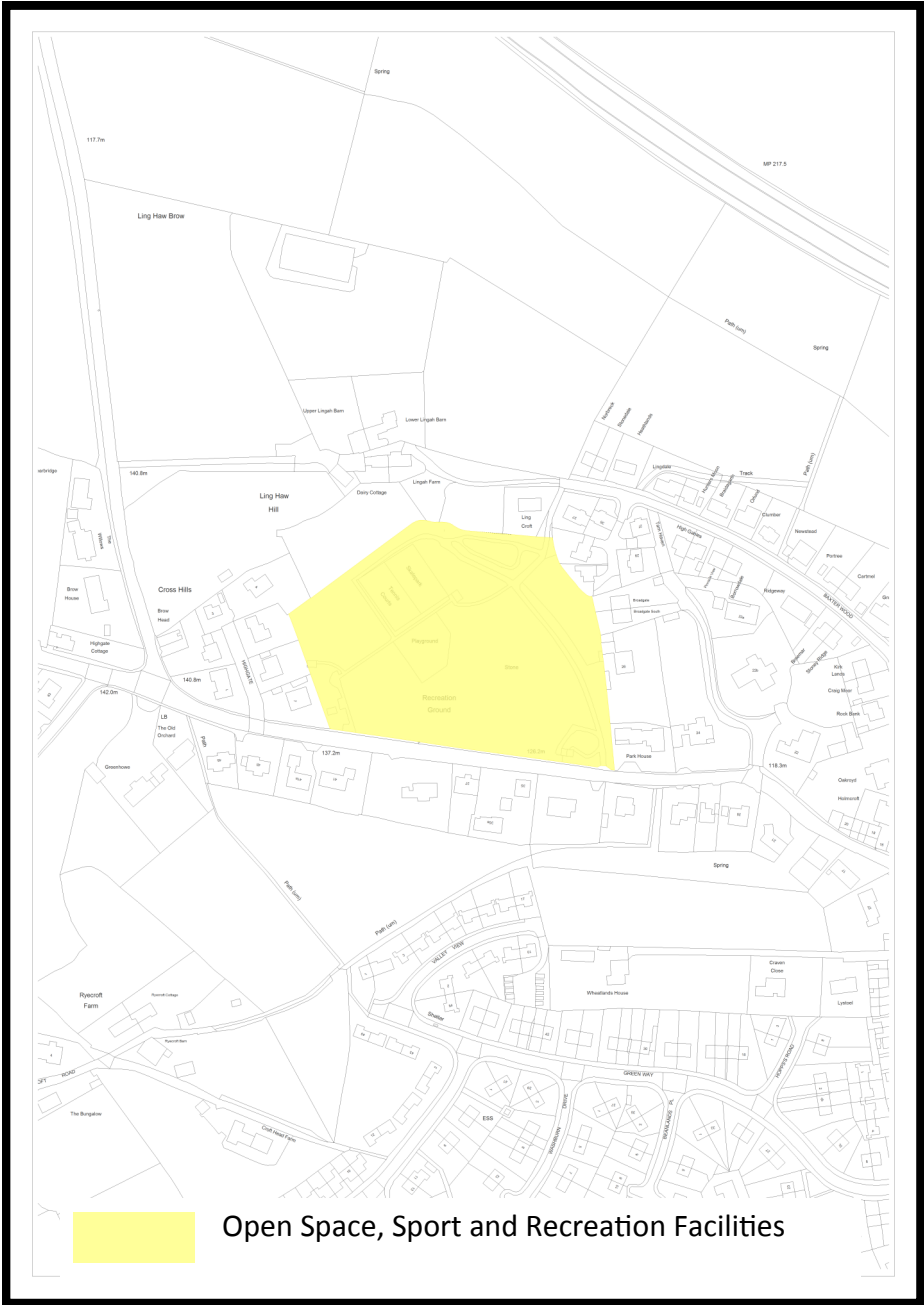
(Pre-Publication Local Plan 2017)



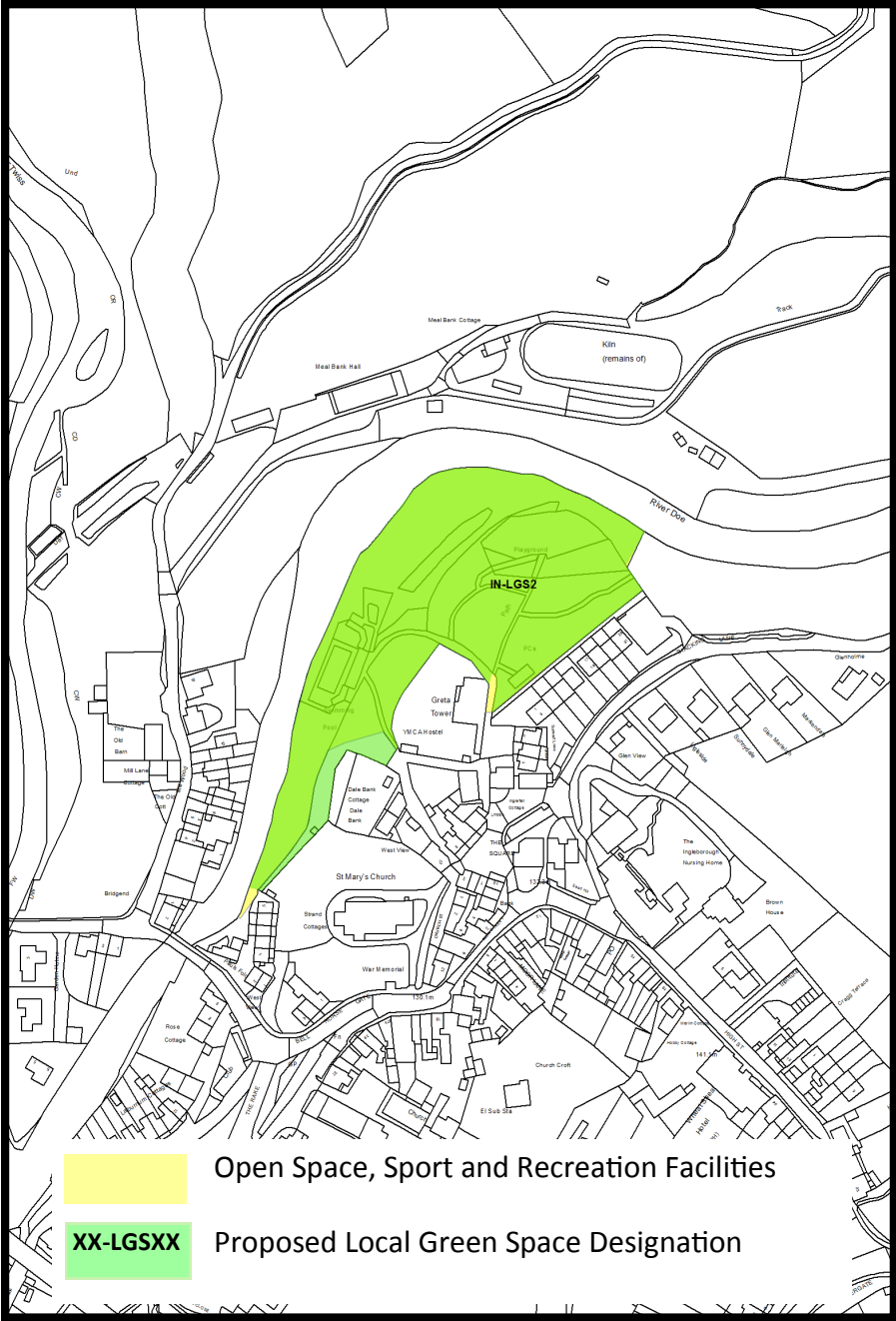
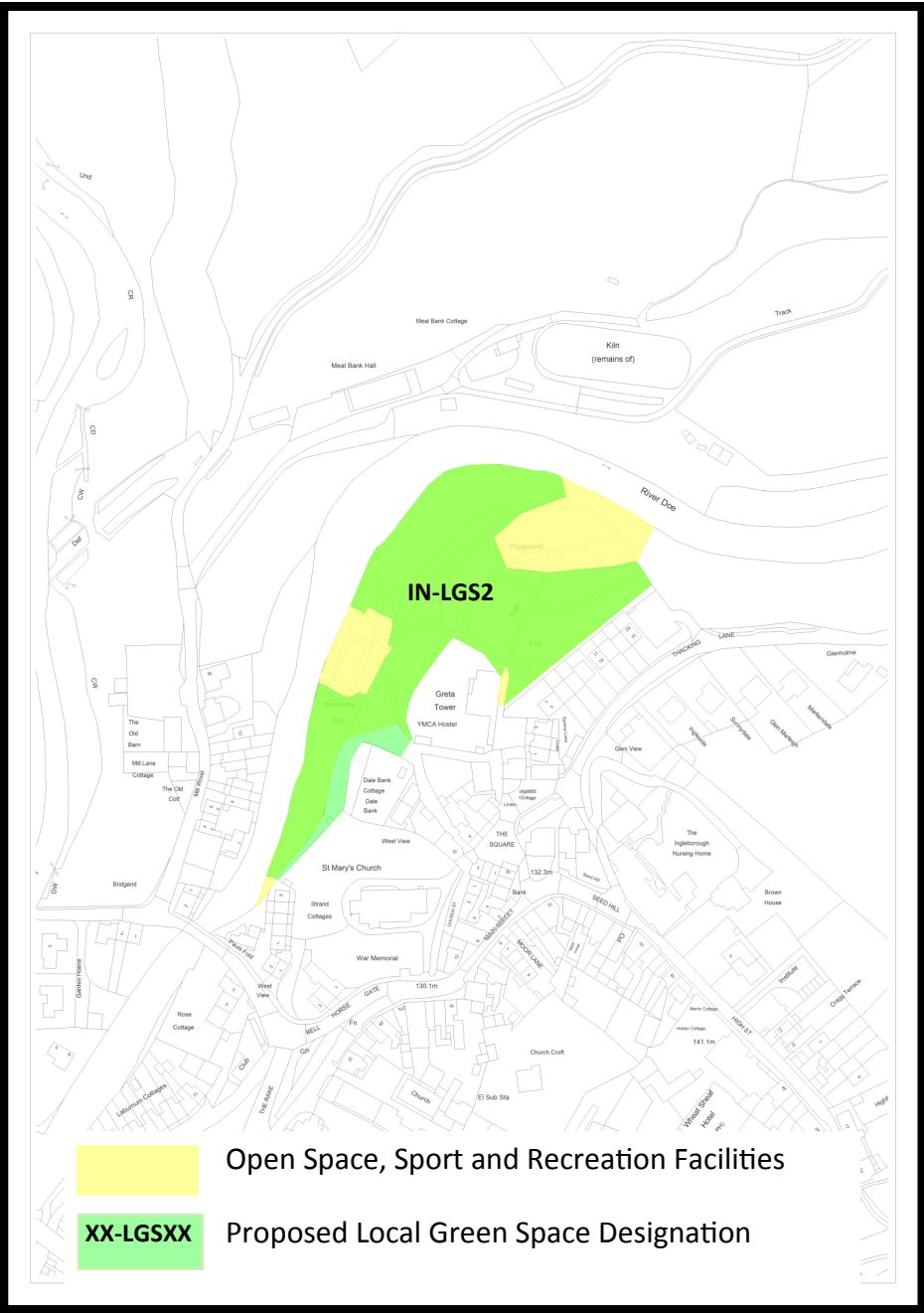
SP5: Skipton, Tier 1: Land to the north of A6131 and south of A65, SK087

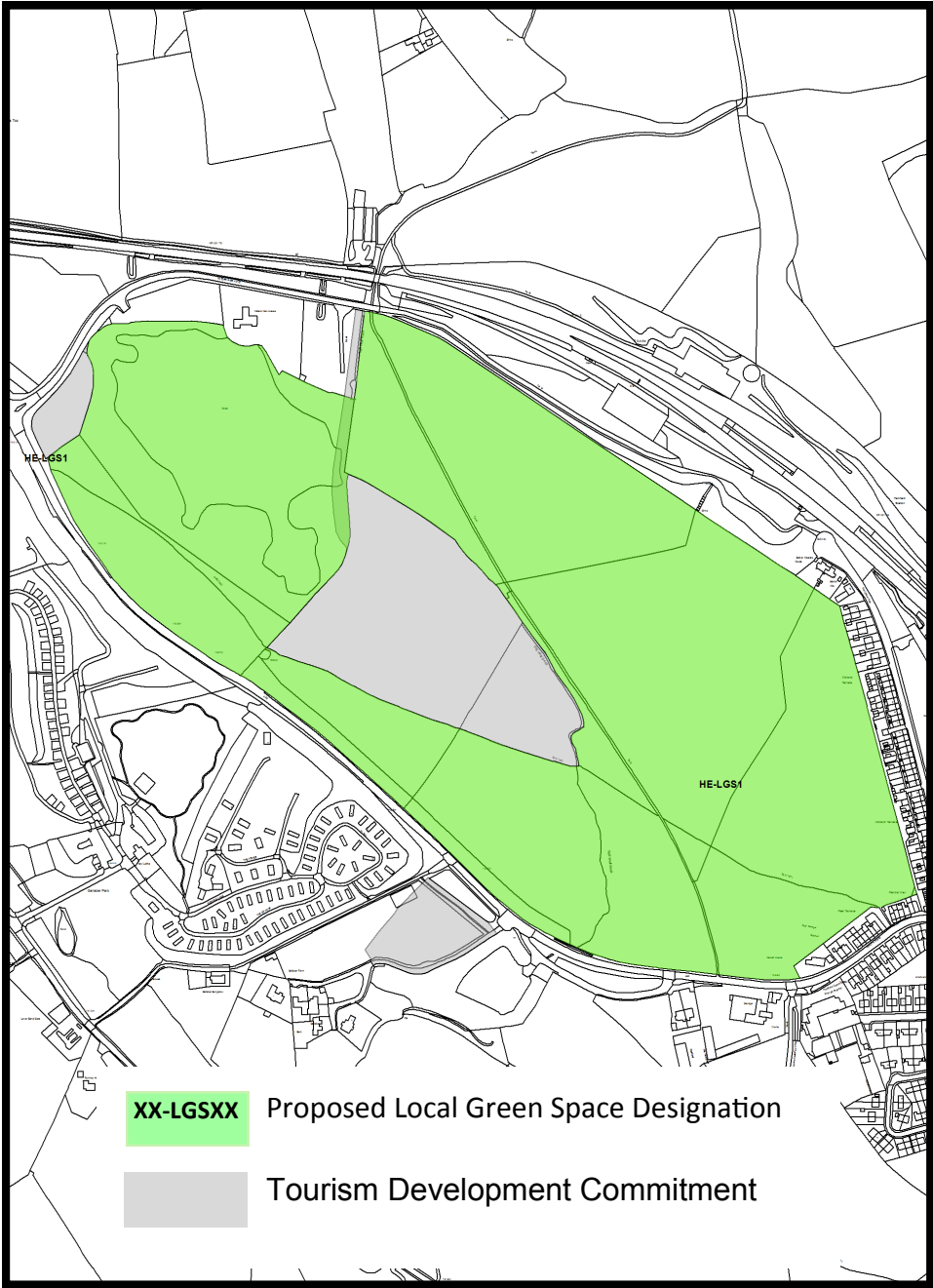
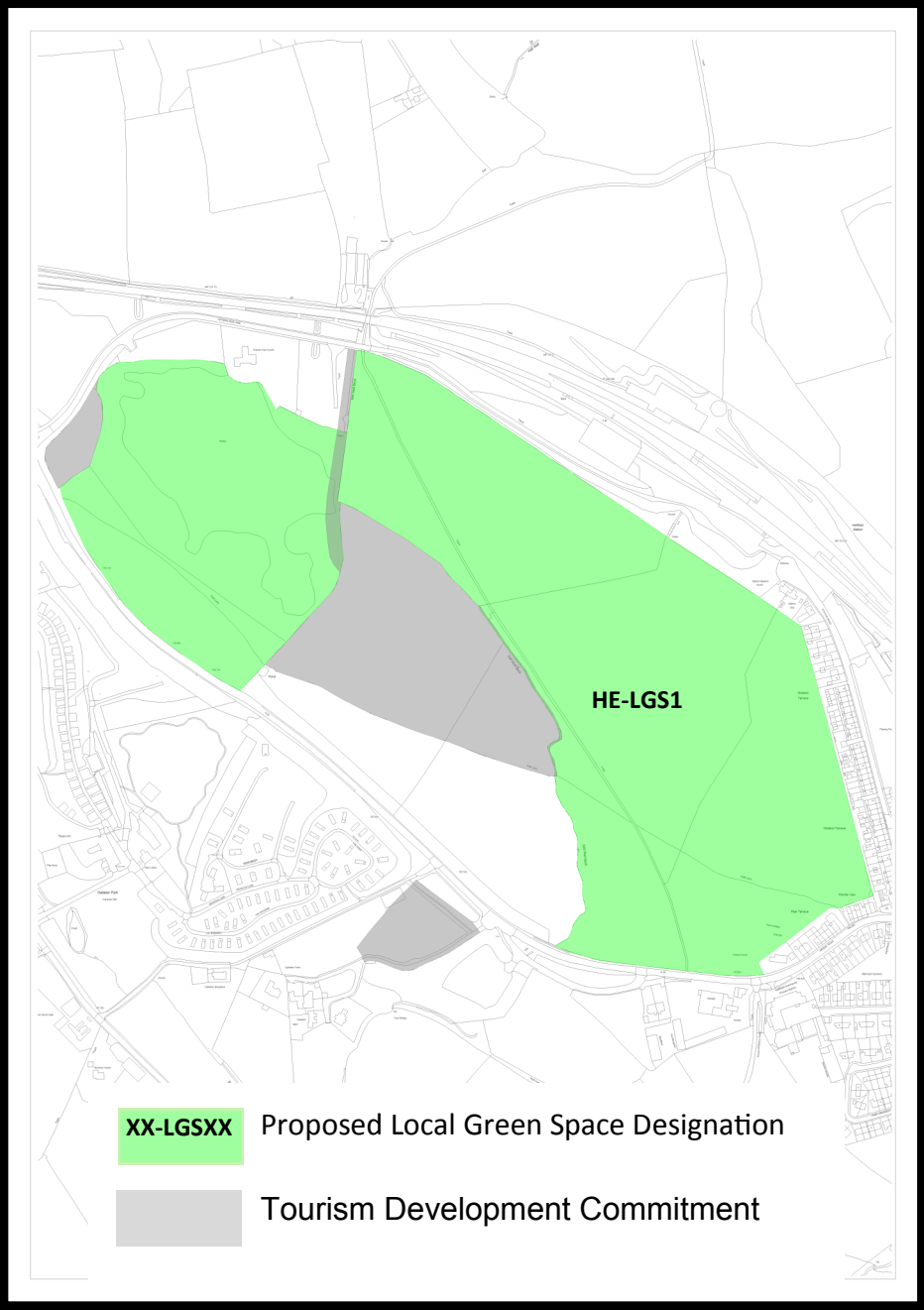
(Publication Local Plan 2018)











## June – July 2017 Draft Local Plan

## Policy Response Paper – ENV11: The Leeds and Liverpool Canal

<b>Policy: ENV11: The Leeds and Liverpool Canal</b>			
<b>Aim of the Policy: Protect and enhance the Canal and its setting as one of defining built and natural features in the District.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan</b>
The inclusion of the policy is welcomed and its objectives are generally supported. A number of amendments to the policy wording and supporting text have been suggested by Statutory and other consultees.	Support and comments noted	No	
Historic England object to the policy wording. Several sections of the canal run through Conservation Areas and many of its bridges, locks, warehouses and other structures are Listed Buildings. It is essential, therefore, that any developments in its vicinity relate sensitively to its heritage assets. Therefore request that Criterion (a) of policy ENV11 is amended to read: “Be of a high quality that safeguards its historic character and integrates the canal...”	Agree that amending the wording of the policy as suggested would strengthen the policy	Yes	Amend the wording of criterion a of the policy to read: “Be of a high quality design that safeguards its historic character and integrates the canal into the development proposals in a way that treats the waterway as an area of usable space;”
Historic England - Suggest amending the wording to ensure that developments within the vicinity of the canal relate sensitively to	Agree that amending the wording of the policy as suggested would strengthen the policy and add clarity.	Yes	Amend the wording of policy ENV11 to read: “Development adjacent to, adjoining

the waterway. Object to the use of the terms “adjacent to or adjoining” as it suggests that the policy only applies to development immediately next to the Canal. Amend the wording of the introductory paragraph of policy ENV11 to state explicitly that the policy relates to any development likely to have an impact upon the Canal. Suggest the following wording : “Development adjacent to or which its likely to impact upon the character of the Leeds- Liverpool Canal ...”			or which is likely to impact upon the character of the Leeds- Liverpool Canal ...”
Skipton Civic Society - The supporting text implies the canal is only used for leisure. The canal is also a vital artery of Skipton for non-recreational walking, used daily by residents and commuters to access school and college, the train station, bus station and shops. This use was recognised in the grant given for the canal towpath to be surfaced from Gallows Bridge to Bradley.	Noted	Yes	Amend the supporting text to highlight the use of the Canal as a route for recreational and non-recreational walking and cycling.
North Yorkshire Local Access Forum - The recognition of the huge public amenity value of the canal and its adjacent towpath are welcome. The Plan acknowledges that the canal and towpath are not public rights of way, but is confident that public access will continue, although access is permissive, and is in the hands of the Canals and Rivers Trust (section 5.165).	Noted	No	
Mixed use of towpaths by walkers, cyclists	Noted	No	

and wheelchair-users needs careful management, as does the selection of surfacing that accommodates all users, and which blends in with the character of the Canal. These matters may lie beyond the remit of the Authority, but close liaison between the Rights of Way Department and the Canals and River Trust will be important. The possibility of opening the towpath to horses, although contentious, could usefully be explored.			
Yorkshire Wildlife Trust supports the policy. The policy would be improved with inclusion of a phrase to protect the value of the canal for wildlife: “Developments near to the canal should support the wildlife that uses the canal with appropriate plantings, provision of features such as bat and bird boxes, and connectivity of habitat”	Agree that amending the wording of the policy as suggested would strengthen the policy and support the Plan Objective PO2, which aims to conserve and enhance Craven’s biodiversity.	Yes	Include an additional requirement within Policy ENV11 as follows:  “Development... will be expected to: ... Support the wildlife that uses the canal with appropriate plantings, provision of features such as bat and bird boxes, and connectivity of habitat”
Natural England welcomes the introduction of Policy ENV11. They advise including a reference to water quality with regards to the Leeds-Liverpool canal potentially including a cross reference to policy ENV8.	Agree that reference to water quality would be beneficial. Mention of Policy ENV8 within the supporting text of ENV11 would highlight that the policy is also applicable to developments affecting the Canal.	Yes	Policy ENV8 will be referenced within the supporting text of Policy ENV11. The requirement to maintain water quality will be added to the policy text of ENV11.
Pendle Borough Council is pleased to note that Local Plan supports sustainable development that protects and enhances heritage and promotes tourism along the	Support and comments noted		



Leeds and Liverpool Canal.			
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\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## June – July 2017 Draft Local Plan

## Policy Response Paper – Policy ENV12: Footpaths, Bridleways and Cycle Routes

<b>Policy ENV12: Footpaths, Bridleways and Cycle Routes</b>			
<b>Aim of the Policy: To help protect and enhance footpaths, bridleways and cycle routes and to ensure that Craven's growth includes growth in their extent, quality and accessibility.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan</b>
Support. Concern. The Parish Council supports this policy to particularly reduce the number of cyclists on the roads which are increasing, to a point where many secondary routes are becoming unsuitable for mixed cycle and vehicle traffic with a significant increase in safety risks. There are a number of 'designated' cycle routes through the Craven villages. It is the Parish Council's view that a Policy of signing 'PRIME CYCLE ROUTE' s made available to the parishes concerned, would help to alleviate the risk of accidents.	Noted, although the stated aims of the draft policy do not include reducing the number of cyclists on the road. Achieving improvements through better signage could be added to paragraph 5.108 of the supporting text.	Yes	Paragraph 5.108 of the supporting text has been amended to say "This could include better infrastructure, disabled access and signage..."
Support. We welcome the additional attention to rights of way and new DRAFT POLICY ENV12.	The support is noted.	No	
We support the following new inclusions in the new draft: New ENV12 to improve safeguarding of rights of way and the areas around them.	The support is noted.	No	
The Plan rightly recognises the importance of Craven's network of footpaths and bridleways, but is thin when it comes to detail. 1. The network is to be 'enhanced', but it is unclear what conditions need to be fulfilled if new rights of way are to be created. Walkers are, by and large, well- served by the existing footpath network – provided that the paths are well-maintained and signed, but the network of bridleways that cyclists and horseriders need is patchy. The creation of new bridleways should explicitly be considered.	1. Noted – new bridleways should be considered explicitly. 2. Noted, but it is not clear how this could be achieved through the local plan. 3. Noted – support for the creation of such circuits would be a good addition to the draft policy.	Yes	Part d) of the draft policy has been amended to include explicit reference to new bridleways.  Paragraph 5.106 of the supporting text has been amended and a new part

<p>2. The Rights of Way Department and the Highways Department have a long backlog of Definitive Map Modification Orders that need to be determined. Some consideration should be given to the prospects of clearing this backlog, and thus bringing the Definitive Map up to date.</p> <p>3. The plan contains (section 5.106) an aspiration to make ‘the countryside more accessible for disabled people.’ If this is to be more than an aspiration, some consideration should be given to a commitment to establish, in each area within Craven, short, well-surfaced, stile-free circuits suitable for wheelchair-users and people with limited mobility. (Yorkshire Water have done this, very effectively, in the Washburn Valley.)</p> <p>4. The plan considers only footpaths and bridleways. It says nothing about three other rights of way classifications that constitute an important part of Craven’s recreational assets – ie restricted byways (RBs), byways open to all traffic (BOATs), and unsealed, unclassified county roads (UUCRs). RBs are scarcely different from bridleways, differing only in permitting horse-drawn carriages. BOATs, which are defined as having the general character of footpaths or bridleways, are more contentious, for they are open to motor vehicles and thus often present challenging management problems. The public rights on UUCRs are unclear, beyond the unquestioned rights of pedestrians to use them. But in practice, cyclists and equestrians use them, along with recreational 4x4 and motorbike users. The management of ‘green lanes’ – as BOATs and UUCRs are colloquially known -presents challenges: the often conflicting demands of motorised and non-motorised are difficult to reconcile. Obviously, the Craven Plan cannot go into fine detail, but some consideration ought to be given to the three classes of rights of way that at present are not considered at all, but which are likely to present Craven with some of its most challenging rights of way management problems.</p> <p>5. Section 5.107 deals with footpaths that run through proposed new building developments. The Plan says that these rights of way must</p>	<p>4. Noted – North Yorkshire County Council’s PROW Team has recommended adding references to “byways” consistently throughout the draft policy and supporting text and it is intended to follow that recommendation.</p> <p>5. This is addressed in the subsequent paragraph, 5.108, and then followed up in the leading paragraph and parts d) and e) of the draft policy itself.</p> <p>6. Noted, but it is considered that the wording of the draft policy gives the appropriate and positive support required, including in part d), but also in the leading paragraph and second part c) [now part i)].</p>		<p>j) has been added to the draft policy to support the creation of accessible circuits.</p> <p>The draft policy and supporting text have been amended so that they refer to byways throughout.</p>
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<p>be respected by developers and not hemmed in or made difficult to use. The Plan does not seize the opportunity to say that brand new footpaths and cycle routes will automatically be included in new developments.</p> <p>6. Section 5.109 says that 'loops' will be created to join up existing rights of way, so as to provide attractive traffic-free routes between communities, and circuits around communities. This is welcome, but it stops short of declaring that new rights of way will automatically be created in order to complete a 'loop' or a route between communities - although the policy env12, section d, reassuringly declares, as a general policy, that new rights of way will be created.</p>			
Support. We note and welcome the introduction of the section on footpaths, bridleways and cycle routes and policy ENV12 in line with para 75 of the NPPF and the NPPGs on public rights of way and National Trails. We particularly welcome the reference to the importance of the Pennine Way and Pennine Bridleway National Trails.	The support is noted.	No	
In particular, the move to confine footpaths and bridleways in narrow corridors should be refused permission and enforcement taken.	The draft policy and supporting text contain appropriate safeguards.	No	
Pendle Council is pleased to note that the 3rd Pre-Publication Craven Local Plan: Supports sustainable development that protects and enhances heritage and promotes tourism along the Leeds and Liverpool Canal (Policies ENV2, ENV11 and ENV12).	The support is noted.	No	
The Draft Plan covers the need and desire for the protection and enhancement of PROW very well. However we would suggest that for consistency and completeness all PROWs are mentioned i.e. footpaths, bridleways and byways are mentioned throughout (as indicated in the attachment), rather than only footpaths, or footpaths and bridleways. [Suggested amendments provided]	The supportive comment is noted and the recommended amendments will be made.	Yes	The draft policy and supporting text have been amended so that they refer to footpaths, bridleways and byways throughout.

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## June – July 2017 Draft Local Plan

## Policy Response Paper – Policy ENV13: Green Wedges

<b>Policy ENV13: Green Wedges</b>			
<b>Aim of the Policy: To maintain the individual character and identity of settlements in close proximity and to help maintain or enhance recreational opportunities, by resisting development that would compromise the spatial gaps between settlements and lead to the coalescence of separate built up areas.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan</b>
<p>Support. Sutton-in-Craven's differences to Crosshills and Glusburn have been acknowledged with its own separate values. It is vital for Sutton-in-Craven that a visual separation is maintained between Crosshills/Glusburn and Sutton at the intersection of Holme Lane, Holme Beck in order to maintain Sutton's rural identity and the overall character and appearance of the area.</p> <p>That the Green Wedge maintains effective separation between Sutton-in Craven and the district and county boundary to the east, and the built-up area of Eastburn, beyond within the Bradford Met.</p> <p>The above is representative of the Sutton-in-Craven Parish Profile where it emphasises the need to maintain its distinct rural identity with Greenfield's both in and around the village.</p>	The support is noted.	No	
<p>Support. Delighted that both sides of the village have been recommended as Green Wedge designation, so the two most contentious sites on the original SHLAA, SC043 (Thompsons) which provides the green wedge between Sutton and Glusburn, and SC040 (Sutton Lane) which separates both the villages of Sutton and Eastburn, and also the counties of North and West Yorkshire.</p>	The support and typing error are noted.	Yes	The typing error in part 2 of the draft policy has been corrected.

I noted a spelling mistake in the draft consultation document on P143 under - "Distict" instead of "District"			
Support. Highly delighted to note that SCO40 and SCO43 which represent both sides of Sutton village have been recommended as Green Wedge designations and in particular SCO40 (Sutton Lane) which not only separates the villages of Sutton and Eastburn but also the counties of North and West Yorkshire. This is Vital. Thank you so much for listening and acting in our best interests.	The support is noted.	No	
Not sure that this area is still identified as a green wedge? There seems to be some confusion about this. On the southerly side, basically only one or 2 fields will separate the two settlements of High and Low Bentham going forward, since the School was allowed to be built, Cample Hatcheries built on and the inclusion of two development sites in this plan.	The gap between High and Low Bentham is diminished to some extent by existing development on the south side of the B6480. However, on that side of the road, there is a block of 4 fields, which makes a strong contribution to maintaining the gap. Those fields have been identified, on the draft policies map, as proposed green wedge.	No	
Policy ENV13, Criterion 2. Support. The draft Kildwick and Farnhill Conservation Area Appraisals identify the majority of the area between Kidwick/Farnhill and Cross Hills as making a strong contribution to the character and appearance of those Conservation Areas. Therefore, we welcome the intention to safeguard this area from development.	The support is noted.	No	
Support. We fully support the establishment of green wedges to prevent coalescence between villages and larger settlements.	The support is noted.	No	
Objection. We question why the green wedges have been limited to the stated settlements. A more general statement would be preferable as, in its present form, this policy leaves other villages vulnerable. For example, Stirton with Thorlby lies in very close proximity to Skipton. There is housing development	The proposed green wedge designation has been used judiciously in areas of greatest risk. Draft policy ENV1, part g), already includes a more general	No	

currently underway close to the Parish boundary and more land close to the boundary is earmarked for housing development and a school in the Plan. Why has this village not been designated as one requiring a green wedge to prevent physical coalescence?	statement of the type requested and part d) gives great weight to conserving the setting of the YDNP, which would be relevant to Stirton. There is also a degree of separation provided by Skipton bypass.		
Support. The Parish Council commends this policy to ensure that the intrinsic character of Craven and its discrete communities are kept physically separate and in particular, to maintain such a clear green division between Embsay with Eastby and the urban conurbation of Skipton.	Noted. Whilst no green wedge is proposed between Embsay and Skipton, draft policy ENV1, part g), includes a more general statement and part d) gives great weight to conserving the setting of the YDNP, which would be relevant to Embsay. There is also a degree of separation provided by Skipton bypass.	No	
Green Wedge between high and Low Bentham. This green wedge is on one side of the road only and will not give adequate separation of the two communities unless the opposite side of the road is also designated for green wedge.	Land on both sides of the B6480 is to be designated as green wedge under draft policy ENV13 – refer to the draft policies map.	No	
We totally support the inclusion of the Green Wedge Policy – Draft Policy ENV13. In particular, in relation to land between Glusburn, Crosshills, Sutton-in-Craven, Farnhill & Kildwick.	The support is noted.	No	
Support. Glad to see that green spaces and green wedges included on maps, to be preserved for future generations. Happy that each village to retain its own identity, with clear boundaries between each. Developers should be encouraged to build, as appropriate, within designated areas, with brownfield sites reused.	The support is noted.	No	
We strongly object to the inclusion on this land as a “green wedge”. This land has been promoted as a land bid for residential	The land in question is already designated as green wedge in the current local plan (adopted 1999)	No	

<p>development. It is considered that the inclusion of the Eastern part of the site. This parcel of land sits between residential properties. This land itself does not form a gap between the High and Low Bentham and is located between existing residential development. The land further to the east does however form an important gap – and we accept that retention of this as a green wedge might be necessary.</p> <p>We request that the area shown hatched red is removed from the green wedge proposal as it is currently surrounded by development and does not form a key gap between Low and High Bentham (such as the land to the East). (see full comments showing location of land hatched in red)</p>	<p>and the draft local plan proposes to continue that designation. The land comprises one of four fields that continue to make a strong contribution to the gap between High and Low Bentham and its development for residential purposes would erode that gap significantly. Promotion of the land as a land bid for residential development suggests there is a need to continue with the current designation.</p>		
<p>Natural England broadly welcomes para's 5.111 to 5.115 and ENV13 concerning green wedges but we would like specific reference to the role green wedges can play in protecting landscape character. We consider this to be particularly relevant with regards to High and Low Bentham with concerning protecting impacts on the setting and special qualities of the Bowland Fells AONB.</p>	<p>Noted. Whilst the green wedge is not a landscape designation, the policy's supporting text could refer to the landscape benefits of maintaining gaps between settlements and the relevance of this to Bentham and the AONB.</p>	Yes	<p>The supporting text for policy ENV13 has been revised and now says that maintaining gaps between settlements is likely to be consistent with protecting landscape character, particularly with respect to Bentham and the AONB.</p>
<p>Although the listed green wedges are important, other areas of land should be added to this list. In particular, the fairly short distances between villages such as Hellifield and Long Preston or Austwick and Clapham amongst others.</p>	<p>The proposed green wedge designation has been used judiciously in areas of greatest risk. With respect to the four villages mentioned, draft policy ENV1 would apply: part d) gives great weight to conserving the AONB and setting of the YDNP; and part g) includes a general statement about maintaining gaps between settlements.</p>	No	



<p>We are also disappointed that the land between Crosshills and Cononley has not been identified as a crucial green wedge, given that if development was to happen at either end of Crosshills or Cononley there is a danger that without this protected green wedge Cononley could over the years become part of the suburban amalgamation of what is currently Crosshills, Sutton, Glusburn and Eastburn, and thereby in danger of losing its unique character, in direct contravention of the green wedge policy.</p>	<p>The proposed green wedge designation has been used judiciously in areas of greatest risk and it is proposed to continue the designation at Cross Hills. A more general statement about maintaining gaps between settlements is included in part g) of draft policy ENV1 and this would apply to Cononley.</p>	<p>No</p>	
<p>Object. I am writing on behalf of the owners of the land identified in the SLHAA as SC071, copy attached. The draft allocation as shown on Map 2 which has placed this site within a green wedge and the applied policy is ENV13. This policy will not be undermined by the allocation of this site for housing because: Using the land for housing cannot in any sense be said to lead to the coalescence with any other settlement, the nearest of which is Cononley to the north. Nor will its development degrade any recreational facilities. On the contrary, its development will offer the opportunity to get a PROW blocked at Glusburn Park re-opened. These are the two prime objectives of the policy, neither of which would be prejudiced by allocation the land for housing.</p> <p>It is noticeable that this part of the draft green wedge is not referenced in terms, in the justification that seeks to underpin this policy. PARAGRAPH 4.45</p> <p>4.45 Glusburn/Crosshills, Ingleton and Gargrave whilst acting as local service centres do not have as substantial or wide a role in the plan area as Settle or Bentham, or as in the case of Glusburn/Crosshills, are not subject to the levels of constraint that limits their development potential. As such Glusburn/Crosshills, Ingleton and Gargrave perform a tertiary role in the settlement hierarchy as Tier 3 Local Service Centres.</p>	<p>The land in question is already designated as green wedge in the current local plan (adopted 1999) and the draft local plan proposes to continue that designation. The land comprises one of several parcels across a wider area, which continues to make a strong contribution to maintaining gaps between the south Craven settlements and between Craven and the Bradford conurbation. The land's development for residential purposes may erode and undermine the green wedge and its promotion as a housing allocation suggests there is a need to continue with the current designation.</p>	<p>No</p>	

<p>There is little detail as to what the levels of constraints are that limit the development of Glusburn/Crosshills. The 3.5% of the total housing requirement allocated to these settlements does not reflect the range of shops, local offices, cafes, restaurants and other services that are available nor the social infrastructure. Further, insufficient weight is given to the frequency of buses that connect these settlements to Skipton, Keighley and Colne.</p> <p>Paragraph 2.6 of annex C support this analysis :          "Glusburn/Crosshills, is located in the south of the plan area close to the boundary with Bradford Metropolitan District, and offers employment opportunities and a good range of services for a village of its size".</p> <p>Given that the Plan Period runs to 2032, there is no recognition of the potential that will occur should the re-opening of Cross Hills station materialise.</p> <p>Only two sites are allocated for housing in these settlements and both are predicated to be developed in the short term 1-5 years. The implication is that for the remaining period of the Plan i.e. 15 years, these two settlements are closed to any further housing developments.</p> <p>Please take these representations into account, and amend the Draft Plan accordingly.</p>			
<p>The continued use of Green Wedges is generally supported. Care is needed in defining Green Wedges to ensure that they do not unduly restrict flexibility to respond to growth needs, particularly in the Cross Hills (south of the railway adjacent to Cononley Rd), Glusburn and Sutton-in-Craven areas.</p>	<p>The support is noted. It should also be noted that the areas mentioned are already designated as green wedge in the current local plan and flexibility to respond to growth needs is mainly affected by flood risk, infrastructure and protected habitats.</p>	<p>No</p>	

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## June – July 2017 Draft Local Plan

## Policy Response Paper – Policy H1: New Homes on Unallocated Sites.

<b>Policy: H1: New Homes on Unallocated Sites</b>			
<b>Aim of the Policy: To manage the release of new homes on sites not allocated for development in the Local Plan.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan</b>
<b>Objection:</b> The wording in the latter part of this policy seems to imply that housing on unallocated sites will not be restricted to small development, in contrast to the impression given by infilling, rounding off. The exact conditions under which developers can expect approval for development on unallocated sites should be detailed to prevent exploitation of the presumption for sustainable development.	<b>Agree in part:</b> The policy wording could be clearer regarding what development is acceptable and the conditions when such development can be approved.	Yes	This policy has been revised and amalgamated with Policy SP4. See Policy SP4 in the Publication Draft Plan.
<b>Comment:</b> It is believed that small sites in villages (and elsewhere) should be considered suitable for housing development as they become available – the present plan is based it seems entirely on what landowners are prepared to consider for sale today. It is hoped the text of the plan provides this possibility and that particularly brownfield sites can be developed to the	<b>Comment noted:</b> This policy, as amended and amalgamated with Policy SP4, does provide for what the respondent is seeking to achieve. It sets out the conditions which should be met to allow sites to come forward as they become available. The plan can however only allocate specific parcels of land where it they are deliverable/developable. The revised Policy	Yes	This policy has been revised and amalgamated with Policy SP4. See Policy SP4 in the Publication Draft Plan.

common benefit.	SP4 and Policy ENV7 both encourage the use of brownfield land in accordance with the NPPF.		
<p><b>Support and objection:</b> Support draft Policy H1 and are encouraged that the policy provides for sustainable development on unallocated sites.</p> <p>The policy sets out four criteria that proposals for residential development on unallocated sites must adhere to. Criterion a. states that proposals must accord with policies SD1 and SP4. Concerns regarding the incompatibility of policies SP1 and SP4 regarding the use of 'minimum' housing targets. We therefore consider, that in order for draft Policy H1 to work effectively, this conflict needs to be addressed.</p>	<p><b>Support and objection noted:</b> It is not considered that Policies SP1 and SP4 are in conflict. Policy SP1 provides for a minimum housing requirement for the District as a whole. Policies SP4 and SP5 to SP 11 provide guideline housing growth figures for settlements and land allocations to meet the District's minimum housing requirement. However changes have been made to both Policy H1 and SP4 and the two policies have been amalgamated.</p>	Yes	This policy has been revised and amalgamated with Policy SP4. See Policy SP4 in the Publication Draft Plan.
<p><b>Objection:</b> CPRENY's concerns regarding Policy H1 and the potential for a proliferation of small sites (1Ha or less than 5 dwellings) to come forward in the open countryside which the Council cannot control remains pertinent as set out in the previous consultation response of May 2016. The following additional points were raised by CPRE in May 2016:- This proliferation of new homes could significantly impact on the countryside and the character of smaller villages and hamlets throughout the District in a way which would not otherwise be planned. Perhaps it may be wise to have a no development in the</p>	<p><b>Agree in part</b></p> <p>It is accepted that Policy SP4 and H1 should separate out control over new homes in isolated locations in the countryside from those in Tier 5 settlements. Furthermore in order to protect the character of the countryside and villages, which are of course important issues when releasing housing land on the edge of all settlements, appropriate criteria are now included in the revised policy.</p> <p>This policy has been revised and amalgamated with Policy SP4.</p>	Yes	This policy has been revised and amalgamated with Policy SP4. See Policy SP4 in the Publication Draft Plan.

open countryside policy unless for a specific reason denoting to agricultural/rural practises/re-use of an existing building. This may be an additional tier in the settlement hierarchy.			
<b>Objection:</b> Further retirement housing development would be most unlikely to make any significant "cumulative impact" but the criteria as drafted may be used as an attempt to put a ceiling on further development once all planned/allocated development has been provided for. This runs contrary to national policy and guidance and may prevent much needed specialised housing for older people from coming forward	<b>Disagree;</b> This policy does not attempt to put a ceiling on additional housing once all the planned/allocated housing has been provided for. What it does seek to achieve is to ensure that additional homes approved are compliant with the plan's spatial strategy. However, changes have been made to the policy to make clearer when such new developments should be approved.	Yes	This policy has been revised and amalgamated with Policy SP4. See Policy SP4 in the Publication Draft Plan.
<b>Comment:</b> This is an important policy as it provides the policy framework for consideration of housing proposals on unallocated sites. As the CDCLP does not provide an allocation in Bolton Abbey a decision maker may have some regard to this policy, in addition to policy EC4a which supports tourism led mixed-use development at Bolton Abbey, in determining a proposal including residential development. Chatsworth Settlement Trustees (CST) has identified throughout its assessment of its operation and in engagement with CDC the need for new housing at Bolton Abbey. For example the	<b>Comment noted</b> It is agreed that this is an important policy to include in the Local Plan. Indeed it is of strategic importance, and as such and because of its close relationship with Policy SP4 it has now been amalgamated with this policy.  This revised policy has sought to clarify the criteria regarding managing the release of new homes in smaller settlements and the open countryside.	Yes	This policy has been revised and amalgamated with Policy SP4. See Policy SP4 in the Publication Draft Plan.

Bolton Abbey Staff Needs Assessment by Frey Consulting has identified that the Bolton Abbey Estate lacks a sufficient supply of staff accommodation. The need for a policy framework that provides a clearly supportive framework for housing development at Bolton Abbey is important.			
<b>Support and objection:</b> Support in principle policy H1 but consider that the policy and its justification could be misinterpreted in the case of a Tier 4b settlement and requests its amendment: It is important to note that SP4 does not in either the policy wording or justification include reference to less than 5 dwellings or 0.1ha (or any numerical reference to an acceptable scale of development) on unallocated sites in Tier 5 (or other) settlements. The policy justification is therefore unclear and potentially misleading. It infers that on all unallocated sites a scale limit of less than six dwellings will be applied This scale is in itself misleading as the policy refers to less than 5 dwellings.  However, based upon the actual reading of policy H1 it is clear that this scale limit is only intended to apply within Tier 5 settlements. Based on the reading of the policy, in the case of a Tier 4b settlement such as Bolton Abbey there would be no numerical scale	<b>Support noted:</b> <b>Agree in part to objection.</b> This policy has been revised and amalgamated with Policy SP4. See Policy SP4 and its explanatory text.  This revised policy has sought to clarify the criteria regarding managing the release of new homes in smaller settlements and the open countryside.	Yes	This policy has been revised and amalgamated with Policy SP4. See Policy SP4 in the Publication Draft Plan.

<p>limit on the number of houses or size of sites. This lack of any numerical letter is appropriate given the services within Tier 4 settlements.</p> <p>For clarity and in terms of the effective implementation of draft policy H1 we would suggest that the following amendments are made:</p> <ol style="list-style-type: none"> <li>1. The words “including sites for less than six dwellings” is taken out of the policy justification.</li> <li>2. The words “to be delivered on unallocated small (less than 5 dwellings or 0.1ha) sites” are removed from their current position in the policy and a new sentence added at the end of the policy stating:</li> </ol> <p>“Within Tier 5 settlements and open countryside the scale of development to be delivered on unallocated sites will be limited to less than 6 dwellings or 0.1ha (unless robust justification for an alternative limit is put forward).”</p> <p>These changes are needed to ensure the policy is justified and effective and consistent with national policy, which does apply fixed limits to development in rural areas. It will also ensure that the policies of the plan may be properly understood and applied by a decision maker on a planning</p>			
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application.			
<b>Comment:</b> The Yorkshire Dales National Park Authority is concerned that the approach to unallocated housing in policy H1 will undermine the potential for small scale rural affordable exceptions sites in settlements split by or close to the National Park boundary.	<b>Comment noted:</b> Affordable housing provision to meet local needs in settlements split by and close to the National Park boundary will still be delivered on housing sites through non rural exception sites included in Policy H2 of this Local Plan.	Yes	This policy has been revised and amalgamated with Policy SP4. See Policy SP4 in the Publication Draft Plan.

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.



## June – July 2017 Draft Local Plan

## Policy Response Paper – Policy H2: Affordable Housing

<b>Policy H2: Affordable Housing</b>			
<b>Aim of the Policy: To address the shortfall in affordable homes in Craven, which largely results from a mismatch between local incomes and housing costs, by increasing the supply of new affordable homes from developer contributions and rural exception sites.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan</b>
Affordable housing requirement to be tightened? – could it be applied to developments of fewer than 11 houses? In a small village, a development of 6-9 houses may be significant, yet a developer is not required to include smaller homes which may be the type of homes required in the settlement.	Affordable housing requirements, with respect to small sites and settlements, are governed by national policy and guidance, and must remain within those parameters. See also draft policy SP3, which addresses housing mix and the need for smaller homes.	No	
Objection. There is a contradiction in terms in this paragraph. How can negotiations be conducted on an 'open book' basis if 'sensitive financial information' is then kept confidential?	The draft policy and supporting text need improvement around this issue and should reflect relevant legislation governing access to information.	Yes	The draft policy and supporting text have been amended and now state that negotiations will be on a 'transparent and open book basis'. A footnote has been added to explain the implications of Environmental Information Regulations and the possibility of information disclosure.

Whole policy. Objection. The whole of the policy does not appear to deliver enough safeguards to ensure developers stick to the affordable housing commitment they make when making the initial planning application.	Without more detail on specific points of objection, this comment is hard to respond to. The draft policy is considered to contain appropriate safeguards to ensure affordable housing delivery.	No	
Policy H2(a) (1) Affordable Housing. If the council secures an equivalent financial contribution as an alternative to new dwellings where are the guarantees that it this will be used to make up the shortfall?	Such 'guarantees' are embodied in a planning obligation or 'section 106 agreement', which is a legal agreement attached to a grant of planning permission.	No	
Policy H2 (i); Policy H2(j) Affordable Housing. Support. We fully support the proposal that affordable units are to be maintained in perpetuity for households in affordable housing need or that the affordable housing subsidy is recycled.	The support is noted.	No	
<p>•We object to the proposed affordable housing requirement. Contrary to the Council's assessment of Local Plan Viability the provision of 40% affordable housing with transfer rates at £1000 per sqm alongside education and open space contributions results in schemes for market and affordable housing being unviable.</p> <p>Keyhaven Homes have a consented scheme in Skipton which is not viable for development as a result of the affordable housing requirement and transfer values which are lower than build costs.</p> <p>•The viability assessment of the affordable housing requirement understates actual open market land values that should inform viability and therefore the evidence does not support the policy target for Craven.</p> <p>Section 6: Housing</p> <p>Draft Policy H2: Affordable Housing</p> <p>Keyhaven Homes do not support the proposed levels of affordable housing set out in Draft Policy H2. The policy seeks a provision of 40% of new dwellings as affordable housing on-site as part of developments of 11 dwellings or 1000 sqm or</p>	Objection noted. The viability of 40% affordable housing, in combination with open space, sport and recreation, education and highway infrastructure contributions and transfer rates of £1000 per square metre, have been reassessed in an addendum to the Craven Local Plan Viability Assessment (LPVA 2017). Whilst 40% affordable housing is still considered a viable proposition in Craven in many circumstances, a lower affordable housing proportion of 30% has been chosen to better conform with the NPPF and PPG. A good margin now exists between the estimated land value at which landowners should be willing to sell their sites and the residual land value that is estimated to remain after planning obligations and other costs have been taken into account on all site typologies assessed in the LPVA, apart from rural exception sites.	Yes	The draft policy and supporting text have been amended to reflect the recommendations of the Craven Local Plan Viability Assessment: Addendum, November 2017.

<p>more. Keyhaven Homes experience of sites in the Craven area is that 40% is not viable and is preventing sites from being brought forward for development.</p> <p>At paragraph 6.13 the Council acknowledge that the target should be realistic and set at a level that allows land to come forward and takes into account the need to contribute to other infrastructure improvements. Keyhaven Homes experience is that 40% provision does not support sites coming forward at the present time.</p> <p>Keyhaven Homes have a breadth of experience in delivering sites around Yorkshire, but cannot currently deliver their consented scheme in Skipton as a result of the affordable housing requirement. Build costs are higher in the Skipton area are 3-5% higher than other parts of Yorkshire, particularly as a result of delays resulting from colder weather as a result of Skipton's location. In addition, the transfer value has been set at £1000 per sqm (£93 per sq ft) yet build costs are £120 sq ft and therefore the developer would have to build the affordable housing at a loss which therefore affects scheme viability. In other areas in Yorkshire where there are high levels of affordable housing, such as Harrogate (40%) these schemes can still be delivered because the transfer rates are set at a realistic level of £115 per sq ft.</p> <p>The Local Plan Viability Assessment suggests the transfer rates need to be set at a rate that allow Registered Providers to provide homes at affordable prices, yet this statement ignores the impact on the developer and scheme viability. Homes cannot be provided at affordable prices if the transfer rates render the delivery of the scheme as a whole unviable and as a result no market or affordable homes are delivered.</p> <p>Paragraph 6.16 of the Draft Local Plan advises that the value of affordable housing will be determined by the Council's latest transfer prices, yet there is no transfer price set out in</p>	<p>The LPVA has been based on the latest evidence gathered by consultants on land values and additional evidence supports this addendum. It is not correct to say that the LPVA used only 3 sites to analyse land values. This has now been fully clarified in the addendum to the viability assessment which includes a spread sheet containing some 60 data points of land value information.</p> <p>Developers have had the opportunity to inform the LPVA on three occasions during the preparation of the plan, following stakeholder engagement in March 2017, Pre-Publication Draft Plan Consultation Summer 2017 and October/November 2017.</p> <p>There is no evidence that consented schemes are currently undeliverable. Rather, since March 2017 when the Council's approach to negotiating affordable housing was quashed in the High Court, it is likely that developers have been waiting the outcome of a test case in Craven on the requirements for affordable housing based on the NPPF and an emerging local plan policy.</p> <p>There will often be cross subsidy required for the developer to pay costs in the transfer of affordable homes to the registered provider, but this has been assessed in the LPVA and profits for the developer remain at an acceptable level for the overall development of the site.</p>		
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<p>the Draft Local Plan despite a figure of £1000 per sqm being stated in the Local Plan Viability Assessment and used in the viability calculations. This is a critical part of the policy in determining the level of affordable housing that is deliverable in Craven. It is essential that this forms part of the policy and is duly consulted upon. Based on Keyhaven Homes experience a transfer value of £1000 per sqm is insufficient to cover build costs and therefore with any affordable housing being provided at a loss, this directly impacts on viability. The viability assessment undertaken to support the affordable housing does not reflect the actual experience of developers in Skipton who have consented schemes that are currently undeliverable as a result of the affordable housing requirement and current transfer prices. 5.34 The affordable housing requirement therefore needs to be set at a level which will enable consented schemes to come forward and in particular have a transfer price which supports the delivery of the affordable element of the scheme. At the current level of required provision</p> <p>and transfers values schemes are not deliverable which results in both market and affordable housing needs not being met in the sustainable settlement of Skipton because the level of affordable housing required and associated transfer values result in the whole scheme becoming inviable.</p> <p>At paragraph 6.14 it is advised that the Council's Local Plan Viability Assessment has been used to inform the affordable housing targets and site thresholds. There are flaws in the approach taken in the Viability Assessment, principally in relation to the Land Market Review set out in Appendix 2 of the Viability Assessment Report. To determine land values a small sample of three comparable sites have been compiled. This is a small sample and two of the sites had their prices determined by District Valuers, further to the terms of option</p>	<p>Transfer prices of £1000 per sqm were included within the LPVA and the LPVA was the subject of consultation during June/July 2017. The current transfer price of £1,000 per sqm is now also included as a footnote to the explanatory text of the Publication Draft Plan Policy H2.</p> <p>Transfer values are not intended to cover build costs, but to enable Registered Providers (RP's – usually housing associations) to deliver affordable homes at rents and sales prices that are within the reach of local people on local incomes. Developer subsidy (in the form of discounted transfer prices) and RP borrowing (based on affordable rents capped by Local Housing Allowance rates) combine to fund affordable homes.</p> <p>Furthermore, alongside the Publication Draft, the Council has published information from Registered Providers regarding their position and general support for a standard transfer price of £1000 per sqm for the emerging plan policy on affordable homes.</p> <p>The use of transfer values to establish a commuted sum payment is clear and simple; the commuted sum represents the NPPF required "broadly equivalent value". Paragraph 50 of the NPPF states that for local planning authorities: "where they have identified that affordable housing is needed,</p>		
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<p>agreements. They do not represent market transactions. The open market site had a considerably higher land value of about £1,500,000 per hectare compared to the sites that were subject to option agreements. On this basis, the evidence used to support the viability of 40% affordable housing is not considered to be robust.</p> <p>There is also a lack of openness and explanation as to why the land values given in the viability assessments agreed on detailed planning applications with the Council and used as comparable evidence by Aspinall Verdi were so much lower than the market transaction and option agreement evidence. The land values applied to determine a 40% affordable housing are considerably lower than the market evidence they have sourced. The lack of evidence would also support the need to look at land transactions in neighbouring authorities. Whilst the policy does include provision for the target to be negotiated having regard to the circumstances of individual sites and scheme viability with developers expected to conduct negotiations on an open book basis, for the policy to be sound, the level of provision should be realistic at the outset without the onus being put on the developer to prove every time an application is submitted that the target is not viable.</p> <p>In conclusion, the affordable housing target is unrealistic and the land values and transfer prices upon which viability has been assessed should be reviewed as Keyhaven Homes' market experience proves that at the proposed levels schemes in Skipton will not be deliverable.</p> <p>Conclusions</p> <p>Keyhaven Homes objects to Draft Policy H2 which seeks to secure 40% affordable housing on developments of 11 dwellings or more or 1,000 sqm or more. Keyhaven Homes question the viability of the 40% provision based on their</p>	<p>set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified.”</p> <p>The developer’s contribution of onsite affordable housing is delivered at a cost to the developer of the market value less the transfer value. Hence setting out the commuted sum calculation in the same way ensures that the commuted sum is of broadly equivalent value to that of onsite affordable housing.</p> <p>The Council will publish additional practical guidance on the provision of affordable housing in the form of a supplementary planning document (SPD). This will include guidance on (amongst other things) the limited circumstances in which off-site provision or financial contributions will be considered in lieu of on-site provision.</p>		
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experience in delivering housing sites and the economics of doing so in Craven District. It is maintained the 40% target and associated transfer values are preventing sites from coming forward and whilst the policy makes provision for viability assessments being undertaken having regard to individual sites, this puts the onus and cost of doing so onto the developer when for the Policy to be justified and effective there should be evidence to demonstrate the level of provision proposed is viable at the outset. The evidence in the Local Plan Viability Assessment understates land values and is not a robust basis for determining viability.			
6.16. Amendment. The difference is between affordable housing transfer values and the open market value of a two bed 70 sm house on the same site (i.e. there are many instances where proposed dwellings are larger or smaller than those required).	Noted. The supporting text will be amended to reflect the method of calculation correctly.	Yes	The supporting text has been amended and now refers to affordable housing transfer values and open market values for 70sqm two-bedroom houses on the same site.
Note 44. Suggestion. Starter Homes policy seems unlikely to be confirmed now. Can we change 'once' in line 2 to 'if'?	Noted. Including the footnote in evolving pre-publication versions of the local plan was helpful, but now it is no longer needed and should be removed for publication.	Yes	Draft footnote 44 has been removed.
Question. Policy H2 seems very long, with a lot of detail. In the past, this has gone into the justification or guidance, so that it can be more easily revised when circumstances change. Could some of the text not go into SPD?	Comment noted. It is accepted that concise policies are preferred and there are matters of detail in the policy, such as how fractions of an affordable dwelling will be dealt with, that would be addressed more appropriately in the SPD scheduled in the Council's Local Development Scheme.	Yes	The draft policy and supporting text have been amended to reflect the recommendations of the Craven Local Plan Viability Assessment: Addendum, November 2017 and matters that would be addressed

			more appropriately within SPD have been removed.
Amendment. i) It is not the planning condition that secures the affordable housing. Could you please check with Legal for appropriate wording?	Comment noted. The Policy will be revised to reflect that affordable housing will be secured via a planning obligation	Yes	Part i) of the policy is now part e) and refers to the provision of affordable housing being 'secured via a planning obligation'.
Point of clarification/amendment. G)The mix required is around 60% two bed and 20% each of one bed and two bed, as justified above, not as stated in the SHMA. Affordable housing contributions should not comprise both affordable and social rented, but either affordable or social rented. Both have the same client group and address the same need.	Both points are noted and will be addressed. The SHMA is not the only source of evidence regarding affordable housing need and this should be reflected in the policy (see similar amendment to draft policy SP3).	Yes	Part g) of the policy is now part c) and refers to 'the most up-to-date evidence of affordable housing needs, including the Council's SHMA' and 'either social or affordable rent tenures'.
f. Also see p190 g). Amendment. F) We cannot promise to maintain confidentiality. Please add 'wherever possible'.	The draft policy and supporting text need improvement around this issue and should reflect relevant legislation governing access to information.	Yes	The draft policy and supporting text have been amended and now state that negotiations will be on a 'transparent and open book basis'. A footnote has been added to explain the implications of Environmental Information Regulations and the possibility of information disclosure.
6.16. Point of Clarification. It reads a little like VBC is calculated on any buildings that have been demolished. We	Noted. The supporting text can be improved in both respects.	Yes	The policy's supporting text now refers to

have had a couple of these cases. Could it be clarified please – if the building is gone, it can't be vacant. Also, the last line is confusing. The application of VBC determines what proportion of affordable housing there will be.			buildings 'to be demolished' and the explanation of how VBC is applied has been taken direct from the national Planning Practice Guidance.
Para 6.15. See the first objection above. To meet identified need, but given the caveat of the bedroom tax and needs of households as they grow over the plan period, the mix proposed is 'around 60% 2 bed and around 20% each 3 bed and 1 bed'. Again, affordable flats will only be acceptable where market flats are also proposed – can a line be added to that effect, or is SPD the place for it? This is particularly important in the case of two bed flats as these will have to be occupied by households with children, due to welfare reform requirements.	Noted, as above. The SHMA is not the only source of evidence regarding affordable housing need and this should be reflected in the policy (see similar amendment to draft policy SP3). Other points can be addressed more appropriately in the SPD scheduled in the council's Local Development Scheme.	Yes	The policy's supporting text now refers to 'the most up-to-date evidence of a need, including the SHMA'. A cross-reference to Policy SP3 has also been added, as this policy provides a guide to the overall mix of dwelling sizes needed across all tenures.
Para 6.14, last sentence. Amendment. We cannot guarantee that we can keep viability in formation confidential. It will not be placed on the public file , however because the Council is a public authority and subject to the Freedom of Information Act and Environmental Information Regulations, it is unable to guarantee the information will be withheld should a formal request for a copy of the information be made. In certain circumstances, the information provided may have to be disclosed.	The draft policy and supporting text need improvement around this issue and should reflect relevant legislation governing access to information.		The draft policy and supporting text have been amended and now state that negotiations will be on a 'transparent and open book basis'. A footnote has been added to explain the implications of Environmental Information Regulations and the possibility of information disclosure.
Section 6, para 6.8/6.9. Observation. The views of the	Comment noted, however these points can be	No	



Strategic Housing Authority are set out above. Can we introduce some caveat to the percentages here? Also, starter homes as a requirement on mixed tenure sites appear to be sliding down the national agenda (it is accepted that exception starter homes exist) – again, can a caveat be introduced here?	addressed more appropriately in the SPD scheduled in the council's Local Development Scheme.		
c. Point of clarification. Suggestion. C) Please clarify – it is a little confusing. Sites of 11 dwellings and above have an on-site affordable requirement of 40%. The Council will require a commuted sum from developments of 6 – 10 dwellings in designated rural areas and from all developments beneath these thresholds which exceed 1000m2 gross floorspace. NB The Council's Valuation Surveyor notes that the Aspinall Verdi EVA proposes a price per square metre contribution (commuted sum) where on-site AH is not required (6-10 unit sites), or generically not viable (flatted schemes) but this flat rate would certainly be easier than endless viability appraisals to find out exactly what the scheme can deliver Seems like a good idea.	Comment noted. The policy and supporting text need improvement around this issue. Several points can be addressed more appropriately in the SPD on Affordable Housing scheduled in the Council's Local Development Scheme. This would enable the policy to be clearer and more focussed.	Yes	The draft policy and supporting text have been amended to reflect the recommendations of the Craven Local Plan Viability Assessment: Addendum, November 2017 and matters that would be addressed more appropriately within SPD have been removed.
Object. It is noted that through draft Policy H2 the Council seek an affordable housing provision of 40% on new development sites of 11 or more dwellings. It is noted that in designated rural areas in lieu of 40% on-site contribution, on developments of 6-10 dwellings a financial contribution will be sought. Johnson Mowat express concerns over the level of affordable housing provision sought within the District and whilst it is noted that the local authority will consider circumstances of individual sites the viability of 40% affordable housing provision is of concern. We are aware of a number of planning applications currently pending considering with the Council which have been significantly delayed by ongoing viability negotiations. Johnson Mowat has had regard for the evidence base	Objection noted. The viability of 40% affordable housing, in combination with open space, sport and recreation, education and highway infrastructure contributions and transfer rates of £1000 per square metre, have been reassessed in an addendum to the Craven Local Plan Viability Assessment (LPVA) Whilst 40% affordable housing is still considered a viable proposition in Craven in many circumstances, a lower affordable housing proportion of 30% has been chosen to better conform with the NPPF and PPG. A good margin now exists between the estimated land value at which landowners should be willing to sell their sites and the residual land value that	Yes	The draft policy and supporting text have been amended to reflect the recommendations of the Craven Local Plan Viability Assessment: Addendum, November 2017.

<p>documents underpinning this policy of the Local Plan, namely the Local Plan Viability Assessment (2017) produced by Aspinall Verdi on behalf of the Council. We raise concerns regarding some of the assumptions made by Aspinall Verdi set out in Appendix 2, including assumptions on Land Value. We raise concerns that the assumptions are formed upon limited information and that further supplementary information should be provided including details from a greater spectrum of sites outside of Skipton within the wider Craven area. For example in attempting to determine Land Values a sample of only three sites have been used. Not only is this a small sample, it is not considered to be representative of market transactions given that two sites have their sales prices determined by the DV. We are aware that the representations made by Skipton Properties provide a detailed analysis of the concerns raised in relation to Land Value assumptions made and Johnson Mowat agree with the points set out.</p> <p>It is noted that the commentary provided at paragraph 6.16 of the Local Plan states that “the value of affordable housing will be determined by the Council’s latest published transfer prices”. Unfortunately the transfer prices are not provided in the Local Plan nor the evidence base and as such justification is not provided.</p> <p>Unknown transfer values has a significant impact on the viability and delivery of affordable dwellings.</p> <p>Johnson Mowat consider that further consideration of the evidence base to draft Policy H2 is required in order to justify the policy requirement of 40% affordable housing provision or else the level of provision itself should be revised downward.</p>	<p>is estimated to remain after planning obligations and other costs have been taken into account on all site typologies assessed in the LPVA, apart from rural exception sites.</p> <p>The LPVA has been based on the latest evidence gathered by consultants on land values and additional evidence supports this addendum. It is not correct to say that the LPVA used only 3 sites to analyse land values. This has now been fully clarified in the addendum to the viability assessment which includes a spread sheet containing some 60 data points of land value information. Developers have had the opportunity to inform the LPVA on three occasions during the preparation of the plan, following stakeholder engagement in March 2017, Pre-Publication Draft Plan Consultation Summer 2017 and October/November 2017.</p> <p>There is no evidence that consented schemes are currently undeliverable. Rather, since March 2017 when the Council’s approach to negotiating affordable housing was quashed in the High Court, it is likely that developers have been waiting the outcome of a test case in Craven on the requirements for affordable housing based on the NPPF and an emerging local plan policy.</p> <p>There will often be cross subsidy required for the developer to pay costs in the transfer of</p>		
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	<p>affordable homes to the registered provider, but this has been assessed in the LPVA and profits for the developer remain at an acceptable level for the overall development of the site.</p> <p>Transfer prices of £1000 per sqm were included within the LPVA and the LPVA was the subject of consultation during summer 2017. The current transfer price of £1,000 per sqm is now also included as a footnote to the explanatory text of the Publication Draft Plan Policy H2.</p> <p>Transfer values are not intended to cover build costs, but to enable Registered Providers (RP's – usually housing associations) to deliver affordable homes at rents and sales prices that are within the reach of local people on local incomes. Developer subsidy (in the form of discounted transfer prices) and RP borrowing (based on affordable rents capped by Local Housing Allowance rates) combine to fund affordable homes.</p> <p>Furthermore, alongside the Publication Draft, the Council has published communications from Registered Providers regarding their position and general support for a standard transfer price of £1000 per sqm for the emerging plan policy on affordable homes.</p> <p>The use of transfer values to establish a commuted sum payment is clear and simple;</p>		
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	<p>the commuted sum represents the NPPF required “broadly equivalent value”. Paragraph 50 of the NPPF states that for local planning authorities: “where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified.”</p> <p>The developer’s contribution of onsite affordable housing is delivered at a cost to the developer of the market value less the transfer value. Hence setting out the commuted sum calculation in the same way ensures that the commuted sum is of broadly equivalent value to that of onsite affordable housing.</p> <p>The Council will publish additional practical guidance on the provision of affordable housing in the form of a supplementary planning document (SPD). This will include guidance on(amongst other things) the limited circumstances in which off-site provision or financial contributions will be considered in lieu of on-site provision.</p>		
<p>Object. The central plank of the CDC approach to affordable housing in the draft emerging Local Plan is setting the affordable housing requirement on most new development at 40%. Policy H2 (c) states:</p> <p>“The local planning authority will seek to secure 40% of proposed new dwellings as affordable housing, unless the proposed development is for less than 11 dwellings and does not exceed 1000m2 combined gross floorspace”.</p>	<p>Objection noted. The viability of 40% affordable housing, in combination with open space, sport and recreation, education and highway infrastructure contributions and transfer rates of £1000 per square metre, have been reassessed in an addendum to the Craven Local Plan Viability Assessment (LPVA 2017) . Whilst 40% affordable housing is still</p>	Yes	<p>The draft policy and supporting text have been amended to reflect the recommendations of the Craven Local Plan Viability Assessment: Addendum, November</p>

<p>It then addresses viability in clause (f) of H2 stating:  “in negotiating schemes the local planning authority will look to maximise provision having regard to the circumstances of individual sites and scheme viability. Developers will be expected to conduct negotiations on an “open book” basis and the local planning authority will maintain confidentiality of sensitive financial information.”</p> <p>We have two substantive concerns with this policy: the evidence base on which it is founded; and the wording of the proposed policy. The Evidence Base</p> <p>The derivation of the 40% affordable housing target is unclear. That there is a need for affordable housing is evident from the evidence base prepared for the Council. However, the precise assessment of the scale of affordable housing need is not. Such an assessment is very sensitive to assumptions made about a wide range of variables. The 2016 SHMA identifies a net need for affordable dwellings of 145 dpa, whilst the 2015 SHMA identified a net need for affordable housing of 114 dpa. Different assumptions, data and methodology were used for the 2016 and 2015 SHMA’s.</p> <p>The Council claims that the figure of 40% is realistic, stating “Local Plan Viability Assessment (Draft Report May 2017) has been used to inform the affordable housing targets and site thresholds. The assessment work indicates that the policy targets are realistic, and the policy will be used as a basis for the negotiation of affordable housing through the development management process”. They therefore rely on this report to justify the use of the 40% as a policy target. However, that is not a sound methodology for justifying a percentage requirement for affordable housing as is demonstrated by the fact that the district has failed to deliver both its market and affordable housing needs.</p> <p>There are flaws in the approach taken by Aspinall Verdi</p>	<p>considered a viable proposition in Craven in many cases, a lower affordable housing proportion of 30% has been chosen to better conform with the NPPF and PPG. A good margin now exists between the estimated land value at which landowners should be willing to sell their sites and the residual land value that is estimated to remain after planning obligations and other costs have been taken into account on all site typologies assessed in the LPVA, apart from rural exception sites.</p> <p>As stated by the commentator the high level of need for affordable housing across the District is evident from the Plan’s SHMA. However, variations will arise in iterations of the SHMA which reflect a position at that time. The November 2017 SHMA indicates that the need is 126 dwellings per annum. This remains a high level but a reduction from 2016, due to lettings and delivery between the two SHMA’s.</p> <p>The LPVA is a sound and robust document which follows the guidance given in the NPPF and PPG. The LPVA is based on the most up to date evidence gathered by consultants on land values and additional evidence supports this addendum. It is not correct to say that the LPVA used only 3 sites to analyse land values. This has now been fully clarified in the addendum to the viability assessment which includes a spread sheet containing some 60 data points of land value information.</p>		<p>2017 and to provide greater clarification on site thresholds in the context of the Written Ministerial Statement . The final sentence of paragraph 6.20 (now renumbered 6.24) has been deleted</p>
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<p>Craven Local Plan Viability Appraisal that mean that the proposed level of Affordable Housing is not supported in terms of viability. These flaws are principally contained in the Land Market Review, forming Appendix 2 of the Viability Assessment report. We have the following criticisms: Paragraph d) of the Draft Policy H2 of the Draft Local Plan says that the Council will seek a financial contribution in lieu of 40% on-site affordable housing provision from small scale developments of 6 to 10 dwellings and from developments of less than 6 dwellings where there is more than 1,000m2 of combined gross floor- space. In paragraph 1.41 of Appendix 2 of the Appraisal report Aspinall Verdi acknowledge that on a per hectare basis the land value of smaller sites is substantially more than larger sites, £7,000,000 per hectare compared to an average of £1,245,000 per hectare at larger sites. Nevertheless, the one comparable small site referred to by Aspinall Verdi was removed from their Land Value analysis. And there is no account taken by Aspinall Verdi in the Appraisal work, nor within the Draft Local Plan, of the effect of small site Land Values (per hectare) have on the delivery of affordable housing.</p> <p>In attempting to determining Land Values in Skipton Aspinall Verdi have compiled a small sample of just three comparable sites (albeit this is wrongly referred to as four sites in the last line of paragraph 1.41 of Appendix 2). Not only is this a trivial sample but two of the comparable sites had their sale prices determined by the terms of option agreements. These do not therefore represent market transactions. Consequently, there is only one comparable site where the price has been openly tested in the market.</p> <p>The openly market site had a considerably higher land value of about £1,500,000 per hectare, compared to the sites that were subject to option agreements, that had an average price</p>	<p>Developers have had the opportunity to inform the LPVA on three occasions during the preparation of the plan, following stakeholder engagement in March 2017, Pre-Publication Draft Plan Consultation Summer 2017 and October/November 2017.</p> <p>The LPVA sensitivity analysis is considered an appropriate way to deal with the potential differentiations of Threshold Land Value for site sizes and locations.</p> <p>As well as market value, existing use value (EUV) and Threshold Land Value (TLV) are an important part of the LPVA. Option agreements etc are useful evidence of TLV as these are agreements that landowners have entered into (ie above their 'threshold'). The LPVA approach is both 'bottom up' (EUV plus premium) and 'top down' (Market Value less a policy adjustment).</p> <p>There is no evidence that consented schemes are currently undeliverable. Rather, since March 2017 when the Council's approach to negotiating affordable housing was quashed in the High Court, it is likely that developers have been waiting the outcome of a test case in Craven on the requirements for affordable housing based on the NPPF and an emerging local plan policy.</p> <p>There will often be cross subsidy required for</p>		
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<p>of around £1,117,500 per hectare. The only one address given in the Appraisal work is for the site that was openly marketed, it would have been beneficial for Aspinall Verdi to have openly assessed all of these sites before arriving at a Land Value. There is also a lack of openness and explanation as to why the Land Values given in the viability assessments agreed on detailed planning applications with the Council and used as comparable evidence by Aspinall Verdi were so much lower, at £247,100 to £631,868 per hectare, than the market transaction and option agreement evidence. Such a substantial difference in value is unlikely to have “a slight downward impact on the land value per acre” as claimed by Aspinall Verdi in paragraph 1.44 of Appendix 2.</p> <p>We question whether all the land values given in the evidenced viability assessments are for “residential consented land in Skipton”. Aspinall Verdi ascertain that residential consented land in Skipton generally has a value of £865,000 per hectare – subject to a policy adjustment, even though this figure represents just 58% of the value of the market transaction and 77% of the option agreement Land Values. In respect of Land Values in the rest of Craven, Aspinall Verdi have only identified two comparable sites sold in Giggleswick and Low Bentham; these are sites for only one and 16 dwellings, respectively. Their Sale Prices equated to £750,000 and £654,545 per hectare.</p> <p>Two further sites were found on the market in Hellifield and Lower Bentham, with permission for 21 and 4 dwellings respectively. Their Asking Prices equated to £675,676 and £1,300,000 per hectare. Aspinall Verdi also referred to one Viability assessment for a small site in Settle, where the Valuer had placed a Land Value of £1,045,455 per hectare.</p>	<p>the developer to pay costs in the transfer of affordable homes to the registered provider, but this has been assessed in the LPVA and profits for the developer remain at an acceptable level for the overall development of the site.</p> <p>Transfer prices of £1000 per sqm were included within the LPVA and the LPVA was the subject of consultation during summer 2017. The current transfer price of £1,000 per sqm is now also included as a footnote to the explanatory text of the Publication Draft Plan Policy H2.</p> <p>Transfer values are not intended to cover build costs, but to enable Registered Providers (RP's – usually housing associations) to deliver affordable homes at rents and sales prices that are within the reach of local people on local incomes. Developer subsidy (in the form of discounted transfer prices) and RP borrowing (based on affordable rents capped by Local Housing Allowance rates) combine to fund affordable homes.</p> <p>Furthermore, alongside the Publication Draft, the Council has published communications from Registered Providers regarding their position and general support for a standard transfer price of £1000 per sqm for the emerging plan policy on affordable homes.</p> <p>The use of transfer values to establish a commuted sum payment is clear and simple;</p>		
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<p>Despite this evidence Aspinall Verdi determined that the “market value of residential consent land in the rest of Craven is generally £618,000 per hectare – subject to a policy adjustment. This being just 88% of the average sampled Sale Prices, 63% of the average sampled Asking Prices and 59% of the Land Value given in the one comparable viability appraisal. Again, a detailed explanation and re-appraisal is required to clarify why Aspinall Verdi have assessed that the Land Values applied to determine a 40% affordable housing policy are so much lower than the market evidence they have sourced. The lack of evidence would also support the need to look at land transactions in neighbouring authorities.</p> <p>Accordingly, there can be little confidence in the evidence process that the Council has gone through to assess the imposition of a 40% affordable housing policy. Furthermore, there is a real danger that pursuing this policy could well result in a much lower rate of delivery of all housing due to its impact on scheme viability. Achieving a 40% affordable housing delivery rate on a low rate of housing delivery will do nothing to achieve the aim of meeting affordable housing needs in Craven.</p> <p>Indeed, there is evidence of a number of schemes that are either stalled at present or are significantly delayed because of the need for developers to enter into complex viability negotiations to reduce a standard 40% requirement imposed on an outline permission in order to achieve a viable scheme. Comments on Policy Justification and Wording</p> <p>As noted above, we consider the evidence base does not support a blanket affordable housing policy figure of as high as 40% across all of Craven. In paras 6.13 and 6.14 the draft emerging Local Plan states that the 40% will form the “basis for the negotiation of affordable housing through the development management process” and that “the Council will</p>	<p>the commuted sum represents the NPPF required “broadly equivalent value”. Paragraph 50 of the NPPF states that for local planning authorities: “where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified.”</p> <p>The developer’s contribution of onsite affordable housing is delivered at a cost to the developer of the market value less the transfer value. Hence setting out the commuted sum calculation in the same way ensures that the commuted sum is of broadly equivalent value to that of onsite affordable housing.</p> <p>The ‘rounding’ process is not considered to be cumbersome. For on-site provision there will be a rounding down for fractions of 0.4 or below, and a rounding up for fractions of 0.5 or above.</p> <p>For off site, the calculation for a 7 dwellings site would be</p> <p>£Market Value psm minus £Transfer Value psm equalling £Commuted Sum</p>		
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<p>take full account of the viability of schemes as part of this process”.</p> <p>In para 6.12 the draft Local Plan makes the eminently sensible point that: “it is important that this target is realistic and set at a level that allows housing land to come forward and maintains the delivery of new homes without making schemes unviable. It is also important to ensure that the need to provide affordable housing is balanced with the need for developers of housing sites to contribute to necessary infrastructure improvements and community facilities as well as to build to improved sustainable construction standards. Along with affordable housing contributions these factors all influence the economics of housing schemes and ultimately the decisions of landowners to release sites”.</p> <p>These observations are not reflected properly in the wording of Draft Policy H2: Affordable Housing paragraph (f). It ought to make it clear that subject to viability considerations that the level of affordable housing could be substantially reduced from the policy target and indeed in some instances it could be as low as zero.</p> <p>It is stated in paragraph 6.16 of the Draft Local Plan that: “the value of affordable housing will be determined by the Council’s latest published transfer prices”. The paragraph goes on to set out an explicit calculation to determine the value of off-site commuted sums in lieu of on-site provision.</p> <p>The level of such “transfer prices” is not given in the Draft Local Plan, nor is there a justification for these “transfer prices” given in the background documents. As this will be a key part of determining the level of affordable housing deliverable in Craven, it is essential that this forms part of the public consultation process. In any event, as a matter of principle it is inappropriate for the local authority though the planning system to seek to control the market.</p>	<p><math>7 \times 30\% = 2.1</math>  <math>2.1 \times 70</math> (standard size of 2 bed affordable house) = 147</p> <p>Commuted sum = <math>\text{£CSpsm} \times 147</math>.</p> <p>This can be paid at the same time onsite affordable housing would usually have been delivered - after sale of no more than 50% of the units. The developer is no worse or no better off than with on-site provision.</p> <p>The Council will publish additional practical guidance on the provision of affordable housing in the form of a supplementary planning document (SPD). This will include guidance on (amongst other things) the limited circumstances in which off-site provision or financial contributions will be considered in lieu of on-site provision and the processes for calculating commuted sums.</p>		
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<p>Paragraph 6.16 of the draft emerging Local Plan is also unsound because it sets out a methodology for calculating off-site contributions in lieu of affordable housing being provided on site. The paragraph is describing a policy approach and is not a justification for a policy. The content of paragraph 6.16 is clearly designed to establish strict parameters for a commuted sum calculation by using a 'transfer value' as the basis for the calculation. There is no evidence to justify the use of a 'transfer value' in such a calculation or indeed what an appropriate 'transfer value' might be.</p> <p>The proposed calculation is itself also fundamentally flawed; its application significantly impacts on land value and acts as a disincentive to land owners bring forward small sites under the 10-dwelling threshold. The calculation is not justified and should therefore be deleted from the Local Plan.</p> <p>Draft Policy H2: Affordable Housing paragraph (c). The Council should provide further clarity as to how the level of any financial contribution is to be calculated where the 40% affordable housing generates a fraction of an affordable dwelling, and where a fraction of a dwelling is also calculated through the viability process. This concept of calculating fractions of dwellings is unnecessarily complex/imprecise and in practice is likely to delay the delivery of housing schemes by necessitating complex S106 agreements. The policy should be simplified by rounding down any percentage based affordable housing requirement to the nearest whole number.</p> <p>Policy H2 (criterion d): The origin and rationale for the proposed 40% affordable housing target on sites under 10 dwellings in designated rural areas is not clear or properly justified. In particular, the Council has not adequately tested the impact of such a significant requirement on the values of small sites. This part of the policy is unsound in any event because it does not conform with the thresholds set out in the</p>			
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<p>Planning Practice Guidelines:</p> <p>“There are specific circumstances where contributions for affordable housing and tariff style planning obligations (section 106 planning obligations) should not be sought from small scale and self-build development. This follows the order of the Court of Appeal dated 13 May 2016, which give legal effect to the policy set out in the written ministerial statement of 28 November 2014 and should be taken into account. These circumstances are that; contributions should not be sought from developments of 10-units or less, and which have a maximum combined gross floorspace of no more than 1,000 square metres (gross internal area) in designated rural areas, local planning authorities may choose to apply a lower threshold of 5-units or less. No affordable housing or tariff-style contributions should then be sought from these developments. In addition, in a rural area where the lower 5-unit or less threshold is applied, affordable housing and tariff style contributions should be sought from developments of between 6 and 10-units in the form of cash payments which are commuted until after completion of units within the development. This applies to rural areas described under section 157(1) of the Housing Act 1985, which includes National Parks and Areas of Outstanding Natural Beauty affordable housing and tariff-style contributions should not be sought from any development consisting only of the construction of a residential annex or extension to an existing home</p> <p>Paragraph: 031 Reference ID: 23b-031-20161116 Revision date: 16 11 2016 See previous version” The Practice Guidelines provide further clarity as follows:</p> <p>“Are there any exceptions to the 10-unit threshold?</p> <p>Local planning authorities may choose to apply a lower threshold of 5-units or less to development in designated rural</p>			
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<p>areas being areas as described under section 157 of the Housing Act 1985, which includes National Parks and Areas of Outstanding Natural Beauty. No affordable housing or tariff-style contributions should then be sought from these developments.</p> <p>3.19 Where this lower threshold is applied, local planning authorities should only seek affordable housing contributions from developments of between 6 to 10-units as financial contributions and not affordable housing units on site. Any payments made (whether as an affordable housing contribution or contribution to a pooled funding pot for general infrastructure provision) should also be commuted until after completion of units within the development.</p> <p>Paragraph: 017 Reference ID: 23b-017-20160519 Revision date: 19 05 2016"</p> <p>Criterion (d) introduces an even lower threshold of less than 6 dwellings. This could in fact be interpreted such that a single dwelling would be expected to contribute a commuted sum for affordable housing. Criterion (d) is clearly at odds with the thresholds set out in the Practice Guidelines as Government Policy intended to stimulate local economies by alleviating the burden of planning obligations on small scale house builders. Draft Policy H2: Affordable Housing paragraph (g). Does the Council maintain an intention to deliver "social" affordable housing, at a time when there is a limited chance of grant funding?</p> <p>Paragraph 6.20. The Council seem to fail to recognise that for Rural Exception Sites to come forward without grant support a sufficient financial incentive must be provided to landowners for them to release sites. The introduction of market housing to cross subsidise affordable housing on these sites will therefore not only contribute to the construction cost of the affordable housing but also to the price paid to the</p>	<p>Comment noted . Whilst the Viability Assessment Addendum 2017 concludes there is no viability reason why small sites of less than 6 dwellings could not contribute towards planning obligations, this could only be through site specific S106 for infrastructure or CIL (or in the future potentially the Local Infrastructure Tariff (LIT)) –due to the 10-unit threshold in the Written Ministerial Statement. The Council has no plans at present to introduce a CIL charge so the supporting text and wording of the policy has been revised to clarify interpretation of criterion d)</p> <p>Comment noted. The inclusion of this sentence at the end of paragraph 6.20 was to emphasise that the number of market homes proposed on rural exception sites is to be the minimum required to deliver an appropriate mix of affordable homes whilst ensuring viability of the scheme, not to raise the hope value of the</p>		
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landowner. It is therefore inappropriate to say in the Draft Local Plan, “It is not a policy which has been included in the local plan to encourage the release of sites through the inflation of land values”.	site to full market residential. However, it is recognised that some uplift in land value will occur, so to avoid confusion, the sentence has been deleted.		
<p>Object. Paragraph 6.16 of the draft Local Plan is unsound. It sets out a methodology for calculating off-site contributions in lieu of affordable housing being provided on site. The paragraph is describing a policy approach and is not a justification for a policy. The content of paragraph 6.16 is clearly designed to establish strict parameters for a commuted sum calculation by using a ‘transfer value’ as the basis for the calculation. There is no evidence to justify the use of a ‘transfer value’ in such a calculation or indeed what an appropriate ‘transfer value’ might be.</p> <p>The proposed calculation is itself also fundamentally flawed; it’s application significantly impacts on land value and acts as a disincentive to land owners bring forward small sites under the 10-dwelling threshold.</p> <p>The calculation is not justified and should therefore be deleted from the Local Plan.</p> <p>Policy H2 (criterion c): The origin and rationale for the proposed 40% affordable housing target is not clear or properly justified. The evidence base that allows the Local Plan to conclude that “policy targets are realistic” is flawed. In particular it understates the actual open market land values that should inform viability. The evidence therefore does not support 40% as the policy target for Craven. There is a serious danger that by setting such a target Craven District Council could undermine the delivery of affordable housing by making schemes unviable and so undeliverable.</p> <p>The Council should also provide further clarity as to how the level of any financial contribution is to be calculated where</p>	<p>Transfer prices of £1000 per square metre were included within the Local Plan Viability Assessment (LPVA) and the LPVA was the subject of consultation during summer 2017. The current transfer price of £1,000 per sqm is now also included as a footnote to the explanatory text of the Publication Draft Plan Policy H2.</p> <p>Transfer values are not intended to cover build costs, but to enable Registered Providers (RP’s – usually housing associations) to deliver affordable homes at rents and sales prices that are within the reach of local people on local incomes. Developer subsidy (in the form of discounted transfer prices) and RP borrowing (based on affordable rents capped by Local Housing Allowance rates) combine to fund affordable homes.</p> <p>There will often be cross subsidy required for the developer to pay costs in the transfer of affordable homes to the registered provider, but this has been assessed in the LPVA and profits for the developer remain at an acceptable level for the overall development of the site.</p>	Yes	The draft policy and supporting text have been amended to reflect the recommendations of the Craven Local Plan Viability Assessment: Addendum, November 2017 and to provide greater clarification on site thresholds in the context of the Written Ministerial Statement .

<p>the affordable housing requirement generates a fraction of an affordable dwelling, and where a fraction of a dwelling is also calculated through the viability process. This concept of calculating fractions of dwellings is unnecessarily complex/imprecise and in practice is likely to delay the delivery of housing schemes by necessitating complex S106 agreements. The policy should be simplified by rounding down any percentage based affordable housing requirement to the nearest whole number.</p> <p>Policy H2 (criterion d): The origin and rationale for the proposed 40% affordable housing target on sites under 10 dwellings in designated rural areas is not clear or properly justified. In particular, the Council has not adequately tested the impact of such a significant requirement on the values of small sites.</p> <p>This part of the policy is Unsound in any event because it does not conform with the thresholds set out in the Planning Practice Guidelines:</p> <p>“There are specific circumstances where contributions for affordable housing and tariff style planning obligations (section 106 planning obligations) should not be sought from small scale and self-build development. This follows the order of the Court of Appeal dated 13 May 2016, which give legal effect to the policy set out in the written ministerial statement of 28 November 2014 and should be taken into account. These circumstances are that;</p> <p>contributions should not be sought from developments of 10-units or less, and which have a maximum combined gross floorspace of no more than 1,000 square metres (gross internal area)</p> <p>in designated rural areas, local planning authorities may choose to apply a lower threshold of 5-units or less. No affordable housing or tariff-style contributions should then be</p>	<p>Furthermore, alongside the Publication Draft, the Council has published communications from Registered Providers regarding their position and general support for a standard transfer price of £1000 per sqm for the emerging plan policy on affordable homes.</p> <p>The use of transfer values to establish a commuted sum payment is clear and simple; the commuted sum represents the NPPF required “broadly equivalent value”. Paragraph 50 of the NPPF states that for local planning authorities: “where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified.”</p> <p>The developer’s contribution of onsite affordable housing is delivered at a cost to the developer of the market value less the transfer value. Hence setting out the commuted sum calculation in the same way ensures that the commuted sum is of broadly equivalent value to that of onsite affordable housing.</p> <p>The ‘rounding’ process is not considered to be cumbersome. For on-site provision there will be a rounding down for fractions of 0.4 or below, and a rounding up for fractions of 0.5 or above.</p>		
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<p>sought from these developments. In addition, in a rural area where the lower 5-unit or less threshold is applied, affordable housing and tariff style contributions should be sought from developments of between 6 and 10-units in the form of cash payments which are commuted until after completion of units within the development. This applies to rural areas described under section 157(1) of the Housing Act 1985, which includes National Parks and Areas of Outstanding Natural Beauty affordable housing and tariff-style contributions should not be sought from any development consisting only of the construction of a residential annex or extension to an existing home</p> <p>Paragraph: 031 Reference ID: 23b-031-20161116 Revision date: 16 11 2016 See previous version”</p> <p>The Practice Guidelines provide further clarity as follows: “Are there any exceptions to the 10-unit threshold?</p> <p>Local planning authorities may choose to apply a lower threshold of 5-units or less to development in designated rural areas being areas as described under section 157 of the Housing Act 1985, which includes National Parks and Areas of Outstanding Natural Beauty. No affordable housing or tariff-style contributions should then be sought from these developments.</p> <p>Where this lower threshold is applied, local planning authorities should only seek affordable housing contributions from developments of between 6 to 10-units as financial contributions and not affordable housing units on site. Any payments made (whether as an affordable housing contribution or contribution to a pooled funding pot for general infrastructure provision) should also be commuted until after completion of units within the development. Paragraph: 017 Reference ID: 23b-017-20160519</p>	<p>For off site, the calculation for a 7 dwellings site would be</p> <p>£Market Value psm minus £Transfer Value psm equalling £Commutated Sum</p> <p><math>7 \times 30\% = 2.1</math> <math>2.1 \times 70</math> (standard size of 2 bed affordable house) = 147</p> <p>Commutated sum = £CSpsm x 147.</p> <p>This can be paid at the same time onsite affordable housing would usually have been delivered - after sale of no more than 50% of the units. The developer is no worse or no better off than with on-site provision. The Council will publish additional practical guidance on the provision of affordable housing in the form of a supplementary planning document (SPD). This will include guidance on (amongst other things) the limited circumstances in which off-site provision or financial contributions will be considered in lieu of on-site provision and the processes for calculating commuted sums.</p> <p>Comment noted . Whilst the Viability Assessment Addendum 2017 concludes there is no viability reason why small sites of less than 6 dwellings could not contribute towards planning obligations, this could only be through</p>		
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<p>Revision date: 19 05 2016"</p> <p>Criterion (d) introduces an even lower threshold of less than 6 dwellings. This could in fact be interpreted such that a single dwelling would be expected to contribute a commuted sum for affordable housing. Criterion (d) is clearly at odds with the thresholds set out in the Practice Guidelines as Government Policy intended to stimulate local economies by alleviating the burden of planning obligations on small scale house builders.</p>	<p>site specific S106 for infrastructure or CIL (or in the future potentially the Local Infrastructure Tariff (LIT)) –due to the 10-unit threshold in the Written Ministerial Statement. The Council has no plans at present to introduce a CIL charge so the supporting text and wording of the policy has been revised to clarify interpretation of criterion d)</p>		
<p>Support. The provision for affordable units to be maintained in perpetuity.</p>	<p>Support noted</p>	<p>No</p>	<p>None</p>
<p>The HBF supports the provision of affordable housing and indeed notes that the 2016 SHMA indicates an imbalance of 145 affordable units per annum. This represents an increase upon the 114 affordable homes imbalance identified with the 2015 SHMA, suggesting a worsening problem.</p> <p>It is, however important that when considering affordable housing policies local authorities ensure that the thresholds and targets identified do not place undue burdens upon development (NPPF, paragraph 173). In the case of this policy the HBF has concerns over the 40% target, these were expressed within our previous comments upon the earlier draft of the plan.</p> <p>The 2017 Local Plan Viability Assessment produced by Aspinall Verdi on behalf of the Council suggests that a 40% affordable housing target upon developments of 6 or more units, in designated rural areas, and 11 or more units in other areas is viable. This is, however, based upon the inherent assumptions contained within the report. A key concern relates to the</p>	<p>Support noted and comments welcomed. The SHMA November 2017 Update now identifies the need for affordable housing at 126 dwellings per annum.</p> <p>The viability of 40% affordable housing, in combination with open space, sport and recreation, education and highway infrastructure contributions and transfer rates of £1000 per square metre, have been reassessed in an addendum to the Craven Local Plan Viability Assessment (LPVA 2017). Whilst 40% affordable housing is still considered a viable proposition in Craven in many cases, a lower affordable housing proportion of 30% has been chosen to better conform with the NPPF and PPG. A good margin now exists between the estimated land value at which</p>	<p>Yes</p>	<p>The draft policy and supporting text have been amended to reflect the recommendations of the Craven Local Plan Viability Assessment: Addendum, November 2017.</p>



<p>assumptions regarding land values (appendix 2 of the report), which is based upon limited information. It is strongly recommended that this analysis be supplemented by further transaction details, possibly included those in similar neighbouring areas.</p> <p>Paragraph 6.16 of the Draft Local Plan indicates, that the value of affordable housing will be determined by the Council's latest published transfer prices. However the level of such "transfer prices" are not provided nor is there any justification in the supporting evidence. This will have a significant bearing upon viability and the delivery of affordable housing. Clarity should, therefore be provided.</p> <p>It is also notable from the viability report appendices and particularly the sensitivity analysis small alterations to the build costs or additional Section 106 costs will have significant impacts upon the viability of many of the tested typologies rendering many unviable or at best marginal.</p> <p>The Council will be aware that the PPG (ID 10-008) is clear that;</p> <p>"Plan makers should not plan to the margin of viability but should allow for a buffer to respond to changing markets and to avoid the need for frequent plan updating..."</p> <p>Draft Policy SP12 and INF1 clearly set out that infrastructure costs will be sought from developers. The Infrastructure Delivery Plan identifies a wide range of infrastructure types which go beyond those assessed in the viability study (Table 5.10). Given the likelihood of increasing construction costs and the lack of clear information in relation to likely cumulative Section 106 costs the viability of a 40% affordable housing requirement remains concerning.</p> <p>It is noted that the policy identifies that the Council will negotiate the actual level of contributions sought. Whilst this is welcomed such an approach should not be used to support</p>	<p>landowners should be willing to sell their sites and the residual land value that is estimated to remain after planning obligations and other costs have been taken into account on all site typologies assessed in the LPVA, apart from rural exception sites.</p> <p>The LPVA has been based on the latest evidence gathered by consultants on land values and additional evidence supports this addendum. Some representations suggested that only 3 sites had been used to support the land value conclusions. This is not correct and has now been fully clarified in the addendum to the viability assessment which includes a spread sheet containing some 60 data points of land value information. Developers have had the opportunity to inform the LPVA on three occasions during the preparation of the plan, following stakeholder engagement in March 2017, Pre-Publication Draft Plan Consultation Summer 2017 and October/November 2017.</p> <p>Clarity has now been provided with regard to transfer prices. Transfer prices of £1000 per sqm were included within the Local Plan Viability Assessment (LPVA) and the LPVA was the subject of consultation during summer 2017. The current transfer price of £1,000 per sqm is now also included as a footnote to the explanatory text of the Publication Draft Plan Policy H2.</p>		
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<p>an unsustainable policy position.</p> <p>Information</p> <p>The HBF would be pleased to be kept involved in the Local Plan preparation process as well as the development of other planning documents. I trust the Council will find the comments useful and the HBF would be happy to discuss them further prior to the next stage of consultation.</p>	<p>Transfer values are not intended to cover build costs, but to enable Registered Providers (RP's – usually housing associations) to deliver affordable homes at rents and sales prices that are within the reach of local people on local incomes. Developer subsidy (in the form of discounted transfer prices) and RP borrowing (based on affordable rents capped by Local Housing Allowance rates) combine to fund affordable homes.</p> <p>There will often be cross subsidy required for the developer to pay costs in the transfer of affordable homes to the registered provider, but this has been assessed in the LPVA and profits for the developer remain at an acceptable level for the overall development of the site.</p> <p>Furthermore, alongside the Publication Draft, the Council has published communications from Registered Providers regarding their position and general support for a standard transfer price of £1000 per sqm for the emerging plan policy on affordable homes.</p>		
<p>Support. In several ways the current draft is an improvement on the last draft: we note from the Results of Consultation document that many of the comments by ourselves and others have been taken into account and suitable alterations have been made to the Plan.</p>	<p>Support noted. Further changes have been made following the results of updated evidence on viability.</p>	<p>Yes</p>	<p>The draft policy and supporting text have been amended to reflect the recommendations of the Craven Local Plan Viability Assessment: Addendum, November</p>

			2017.
<p>Object. 40% affordable is not viable, given the rigid and low transfer values required by Craven DC's draft policy. This creates uncertainty and delays the housebuilding delivery process.</p> <p>For typical dwellings, construction costs excluding land are around £1,345 per sqm. (assuming no abnormal or large infrastructure costs). At 40%, a transfer value of £1,000 per sqm leaves a significant financial shortfall (against construction costs), which cannot be made-up by selling the remaining 60% private dwellings.</p> <p>This leaves no site value at all.</p> <p>Sale values for private dwellings (say £2,360 to £2,960 per sqm, sometimes less) are not high enough to support 40% affordable in Craven District.</p> <p>As drafted the policy hits schemes for smaller, lower value homes hardest and encourages house builders to build a small number of high value large homes (in better-off locations) for private sale.</p> <p>Suggestions:</p> <ol style="list-style-type: none"> <li>1. The 40% target is reconsidered (perhaps down to 30% as an aspiration).</li> <li>2. Transfer values are explored, so that they are closer to construction costs (which will make delivery more robust in a time of economic slowdown/recession).</li> <li>3. There is more flexibility in the tenure types required.</li> </ol>	<p>Objection noted. The viability of 40% affordable housing, in combination with open space, sport and recreation, education and highway infrastructure contributions and transfer rates of £1000 per square metre, have been reassessed in an addendum to the Craven Local Plan Viability Assessment (LPVA 2017).</p> <p>Whilst 40% affordable housing is still considered a viable proposition in Craven in many cases, a lower affordable housing proportion of 30% has been chosen to better conform with the NPPF and PPG. A good margin now exists between the estimated land value at which landowners should be willing to sell their sites and the residual land value that is estimated to remain after planning obligations and other costs have been taken into account on all site typologies assessed in the LPVA, apart from rural exception sites.</p> <p>Transfer prices of £1000 per sqm were included within the LPVA and the LPVA was the subject of consultation during summer 2017. The current transfer price of £1,000 per sqm is now also included as a footnote to the explanatory text of the Publication Draft Plan Policy H2.</p> <p>Transfer values are not intended to cover build costs, but to enable Registered Providers (RP's – usually housing associations) to deliver affordable homes at rents and sales prices that are within the reach of local people on local</p>	Yes	<p>The draft policy and supporting text have been amended to reflect the recommendations of the Craven Local Plan Viability Assessment: Addendum, November 2017.</p>

	<p>incomes. Developer subsidy (in the form of discounted transfer prices) and RP borrowing (based on affordable rents capped by Local Housing Allowance rates) combine to fund affordable homes.</p> <p>There will often be cross subsidy required for the developer to pay costs in the transfer of affordable homes to the registered provider, but this has been assessed in the LPVA and profits for the developer remain at an acceptable level for the overall development of the site.</p> <p>Furthermore, alongside the Publication Draft, the Council has published communications from Registered Providers regarding their position and general support for a standard transfer price of £1000 per sqm for the emerging plan policy on affordable homes.</p> <p>The use of transfer values to establish a commuted sum payment is clear and simple; the commuted sum represents the NPPF required “broadly equivalent value”. Paragraph 50 of the NPPF states that for local planning authorities: “where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified.”</p> <p>The developer’s contribution of onsite</p>		
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	affordable housing is delivered at a cost to the developer of the market value less the transfer value. Hence setting out the commuted sum calculation in the same way ensures that the commuted sum is of broadly equivalent value to that of onsite affordable housing.		
<p>40% affordable housing with a contribution towards recreational open space is unviable. There is a historic record of under delivery of housing.</p> <p>The existing policy results in the Council's resources being spent on negotiating contributions on housing developments in the form of staff wages and cost awards on appeal decisions, which would not be required if the policy was viable.</p> <p>In these circumstances it would be expected that the policy being proposed by the draft local plan would be for a reduction in contributions to make for a viable policy. However, instead of a reduction in contributions the draft local plan is proposing to retain 40% affordable housing and recreational contributions as well as adding a contribution towards education. So far from reducing the burden of contributions to allow the delivery of housing, the draft plan is proposing to increase the burden.</p> <p>The Council have failed to take into account of Planning Practice Guidance on Viability and the NPPF.</p> <p>Neighbouring authorities approaches have not been taken into account.</p>	<p>Objection noted. The viability of 40% affordable housing, in combination with open space, sport and recreation, education and highway infrastructure contributions and transfer rates of £1000 per square metre, have been reassessed in an addendum to the Craven Local Plan Viability Assessment (LPVA 2017). Whilst 40% affordable housing is still considered a viable proposition in Craven in many cases, a lower affordable housing proportion of 30% has been chosen to better conform with the NPPF and PPG. A good margin now exists between the estimated land value at which landowners should be willing to sell their sites and the residual land value that is estimated to remain after planning obligations and other costs have been taken into account on all site typologies assessed in the LPVA, apart from rural exception sites.</p>	Yes	<p>The draft policy and supporting text have been amended to reflect the recommendations of the Craven Local Plan Viability Assessment: Addendum, November 2017.</p>
<p>Draft Policy H2 sets out the affordable housing policy for the Craven District and proposes that on development sites of 11 or more homes the Council will seek a minimum of 40% of homes for affordable housing. The Council's Local Plan Viability Assessment (Draft Report May 2017) has been used to inform the affordable housing targets and it is stated,</p>	<p>Objection noted. The viability of 40% affordable housing, in combination with open space, sport and recreation, education and highway infrastructure contributions and transfer rates of £1000 per square metre, have been reassessed in an addendum to the Craven</p>	Yes	<p>The draft policy and supporting text have been amended to reflect the recommendations of the Craven Local Plan</p>

<p>confirms that the policy targets are realistic and viable. Gladman however note, that that this assessment is based upon assumptions made within the report, founded upon limited data, regarding land values in the district. We suggest that this assessment is supplemented by further analysis of land values and transactions in the area. Gladman refer to paragraph 173 and 174 of the Framework in this respect. Paragraph 173 states:</p> <p>“Plans should be deliverable. Therefore, the sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirement likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of normal costs of development and mitigation, provide competitive returns to a willing landowner and willing developer to enable the development to be deliverable.”</p> <p>Beyond the above concerns, Gladman support the flexible approach proposed regarding viability and the delivery of affordable housing. The policy states “In negotiating schemes the local planning authority will look to maximise provision having regard to the circumstances of individual sites and scheme viability.” Gladman support this clause within the policy as there may be instances where the provision of 40% affordable housing on-site, renders a development proposal unviable, potentially impacting upon the ability of the Council to meet its Full OAN.</p>	<p>Local Plan Viability Assessment (LPVA 2017). Whilst 40% affordable housing is still considered a viable proposition in Craven in many cases, a lower affordable housing proportion of 30% has been chosen to better conform with the NPPF and PPG. A good margin now exists between the estimated land value at which landowners should be willing to sell their sites and the residual land value that is estimated to remain after planning obligations and other costs have been taken into account on all site typologies assessed in the LPVA, apart from rural exception sites.</p> <p>The LPVA has been based on the latest evidence gathered by consultants on land values and additional evidence supports this addendum. It is not correct to say that the LPVA used only 3 sites to analyse land values. This has now been fully clarified in the addendum to the viability assessment which includes a spread sheet containing some 60 data points of land value information. Developers have had the opportunity to inform the LPVA on three occasions during the preparation of the plan, following stakeholder engagement in March 2017, Pre-Publication Draft Plan Consultation Summer 2017 and October/November 2017.</p> <p>There is no evidence that consented schemes are currently undeliverable. Rather, since March 2017 when the Council’s approach to</p>		<p>Viability Assessment: Addendum, November 2017.</p>
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	<p>negotiating affordable housing was quashed in the High Court, it is likely that developers have been waiting the outcome of a test case in Craven on the requirements for affordable housing based on the NPPF and an emerging local plan policy.</p> <p>Transfer prices of £1000 per sqm were included within the LPVA and the LPVA was the subject of consultation during summer 2017. The current transfer price of £1,000 per sqm is now also included as a footnote to the explanatory text of the Publication Draft Plan Policy H2.</p> <p>Transfer values are not intended to cover build costs, but to enable Registered Providers (RP's – usually housing associations) to deliver affordable homes at rents and sales prices that are within the reach of local people on local incomes. Developer subsidy (in the form of discounted transfer prices) and RP borrowing (based on affordable rents capped by Local Housing Allowance rates) combine to fund affordable homes.</p> <p>There will often be cross subsidy required for the developer to pay costs in the transfer of affordable homes to the registered provider, but this has been assessed in the LPVA and profits for the developer remain at an acceptable level for the overall development of the site.</p>		
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	<p>Furthermore, alongside the Publication Draft, the Council has published communications from Registered Providers regarding their position and general support for a standard transfer price of £1000 per sqm for the emerging plan policy on affordable homes.</p> <p>The use of transfer values to establish a commuted sum payment is clear and simple; the commuted represents the NPPF required “broadly equivalent value”. Paragraph 50 of the NPPF states that for local planning authorities: “where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified.”</p> <p>The developer’s contribution of onsite affordable housing is delivered at a cost to the developer of the market value less the transfer value. Hence setting out the commuted sum calculation in the same way ensures that the commuted sum is of broadly equivalent value to that of onsite affordable housing.</p>		
<p>CDC’s SHMA Update16 identifies that there is a net shortfall of 145 affordable dwellings pa. The PPDLP identifies a target for affordable housing provision of 40%, which will be insufficient to meet the shortfall. The PPDLP notes that the scale of affordable need in the District would justify a higher target but that it is important that the target itself is “realistic” and maintains general housing delivery. We highlight that the identification of a slightly higher housing requirement would yield a greater amount of affordable housing delivery, whilst</p>	<p>Objection noted. The viability of 40% affordable housing, in combination with open space, sport and recreation, education and highway infrastructure contributions and transfer rates of £1000 per square metre, have been reassessed in an addendum to the Craven Local Plan Viability Assessment (LPVA 2017). 40% affordable housing is still considered a viable proposition in Craven in many cases, a</p>	Yes	<p>The draft policy and supporting text have been amended to reflect the recommendations of the Craven Local Plan Viability Assessment: Addendum, November 2017.</p>



<p>achieving additional economic gains. We strongly encourage CDC to consider such an approach.</p> <p>We agree that it is important that the housing target is deliverable. In this regard, CDC's draft Affordable Housing and Community Infrastructure Viability Study (August 2013) identified that an affordable housing target of 40% – proposed by the PPDLP – was only just viable; indeed, it recommended that a target of 35% was appropriate mindful of the need to retain flexibility. This recommendation is in line with the PPG, which states that:</p> <p>“Plan makers should not plan to the margin of viability but should allow for a buffer to respond to changing markets and to avoid the need for frequent plan updating...” (Reference ID: 10-008-20140306; Turley emphasis)</p> <p>The approach of the PPDLP to plan to the margin of viability is therefore in conflict with the PPG and risks undermining the viability of development, particularly if there is a change in market conditions. The School supports the delivery of affordable housing; however, we encourage CDC to reconsider the scale of the target.</p>	<p>lower affordable housing proportion of 30% has been chosen to better conform with the NPPF and PPG. A good margin now exists between the estimated land value at which landowners should be willing to sell their sites and the residual land value that is estimated to remain after planning obligations and other costs have been taken into account on all site typologies assessed in the LPVA, apart from rural exception sites.</p>		
<p>Support. CPRENY particularly welcomes the retention of the Council's 40% target for affordable home provision on sites for upwards of 1 dwellings and their intention to seek contributions from developers of sites for 6-10 dwellings in rural areas. The introduction of points h) and i) to this policy are particularly welcomed.</p>	<p>Support noted: However, through an addendum to the Craven Local Plan Viability Assessment (LPVA) further work has determined that a proportion of 30% affordable homes on market sites should be sought. The viability of 40% affordable housing, in combination with open space, sport and recreation, education and highway infrastructure contributions and transfer rates of £1000 per square metre, have been reassessed in an addendum to the Craven Local Plan Viability Assessment (LPVA 2017). Whilst 40% affordable housing is still considered a</p>	<p>Yes</p>	<p>The draft policy and supporting text have been amended to reflect the recommendations of the Craven Local Plan Viability Assessment: Addendum, November 2017.</p>

	<p>viable proposition in Craven in many cases, a lower affordable housing proportion of 30% has been chosen to better conform with the NPPF and PPG. A good margin now exists between the estimated land value at which landowners should be willing to sell their sites and the residual land value that is estimated to remain after planning obligations and other costs have been taken into account on all site typologies assessed in the LPVA, apart from rural exception sites.</p>		
<p>Object. The Policy seeks 40 % affordable Housing on all sites &gt; 10 dwellings or 1000sqm of floorspace. We consider this target to be unrealistic and unviable. Experience to date in the district suggests that the Council is rarely able to achieve such a high percentage due to viability issues. A lower, more realistic, target should be adopted.</p>	<p>Objection noted. Through an addendum to the Craven Local Plan Viability Assessment (LPVA) further work has determined that a proportion of 30% affordable homes on market sites should be sought. The viability of 40% affordable housing, in combination with open space, sport and recreation, education and highway infrastructure contributions and transfer rates of £1000 per square metre, have been reassessed in an addendum to the Craven Local Plan Viability Assessment (LPVA 2017). Whilst 40% affordable housing is still considered a viable proposition in Craven in many cases, a lower affordable housing proportion of 30% has been chosen to better conform with the NPPF and PPG. A good margin now exists between the estimated land value at which landowners should be willing to sell their sites and the residual land value that is estimated to remain after planning obligations and other costs have been taken into account on all site typologies assessed in</p>	Yes	<p>The draft policy and supporting text have been amended to reflect the recommendations of the Craven Local Plan Viability Assessment: Addendum, November 2017.</p>

	the LPVA, apart from rural exception sites.		
<p>Object. a) The origin and rationale for the proposed 40% affordable housing target is not clear or properly justified.</p> <p>b) The evidence base that allows the Local Plan to conclude that “policy targets are realistic” is flawed. In particular it understates the actual open market land values that should inform viability. The evidence therefore does not support 40% as the policy target for Craven. There is a serious danger that by setting such a target Craven District Council could undermine the delivery of affordable housing by making schemes unviable and so undeliverable.</p> <p>c) The policy allows, rather grudgingly, that in the “in negotiating schemes” the local authority will have “regard to the circumstances of individual sites and scheme viability”. However, it should be more explicit in stating that in some circumstances this may mean very much reduced or even zero affordable housing on some sites.</p> <p>We would ask that these comments are considered when reviewing the Local Plan to ensure that the finished document is reflective of the current and future housing need and that the Affordable Housing Policy is backed by robust data and reflective of deliverability of future schemes.</p>	<p>Objection noted. The viability of 40% affordable housing, in combination with open space, sport and recreation, education and highway infrastructure contributions and transfer rates of £1000 per square metre, have been reassessed in an addendum to the Craven Local Plan Viability Assessment (LPVA 2017). Whilst 40% affordable housing is still considered a viable proposition in Craven in many cases, a lower affordable housing proportion of 30% has been chosen to better conform with the NPPF and PPG. A good margin now exists between the estimated land value at which landowners should be willing to sell their sites and the residual land value that is estimated to remain after planning obligations and other costs have been taken into account on all site typologies assessed in the LPVA, apart from rural exception sites.</p>	Yes	<p>The draft policy and supporting text have been amended to reflect the recommendations of the Craven Local Plan Viability Assessment: Addendum, November 2017.</p>
<p>Object. Introduction</p> <p>We write on behalf of R N Wooler &amp; Co in relation to the proposals in the plan for affordable housing provision on mixed tenure housing sites in the Craven plan area. R N Wooler &amp; Co as the Council will be aware is one of the most active housing developer s in the plan-area. It is well - respected in the local area and has delivered a number of development over recent decades which have made a valued addition to the plan-area’s settlements .</p> <p>The relevant draft policy for the provision of affordable housing is H2 – AFFORDABLE HOUSING</p>	<p>Objection noted. The viability of 40% affordable housing, in combination with open space, sport and recreation, education and highway infrastructure contributions and transfer rates of £1000 per square metre, have been reassessed in an addendum to the Craven Local Plan Viability Assessment (LPVA 2017). Whilst 40% affordable housing is still considered a viable proposition in Craven in many cases, a lower affordable housing proportion of 30% has been chosen to better</p>	Yes	<p>The draft policy and supporting text have been amended to reflect the recommendations of the Craven Local Plan Viability Assessment: Addendum, November 2017.</p>

<p>This states that :The local planning authority will seek to secure 40% of proposed new dwellings as affordable housing, unless the proposed development is for less than 11 dwellings and does not exceed 1000m2 combined gross floorspace. It then addresses viability in clause ( f ) of H2 stating: in negotiating schemes the local planning authority will look to maximise provision having regard to the circumstances of individual sites and scheme viability. Developers will be expected to conduct negotiations on an “open book” basis and the local planning authority will maintain confidentiality of sensitive financial information.</p> <p>R N Wooler &amp; Co wishes to raise SUBSTANTIAL CONCERNS with the deliverability of 40% affordable housing requirement on- sites in the plan area.</p> <p>Consented Sites with 40% Affordable Housing Requirements</p> <p>R N Wooler &amp; Co has experienced difficulties in meeting the 40% housing requirement on sites in the plan area over recent years .</p> <p>These include a site at Raikes Road for c.50 houses where an appeal has advanced to the Dis trict Valuer on viability grounds . The site, in one of Skipton’s prime residential areas , remains a commenced but stalled site due to the 40% affordable housing targets .</p> <p>R N Wooler &amp; Co is unable to viably progress the site with a reasonable market level of developer profit .</p> <p>R N Wooler &amp; Co is also anticipating viability issues relating to other sites it has secured consent for in the plan area, including at Shires Lane in Embsay, that have a 40% affordable housing requirement . The need for substantial Sustainable Urban Drainage Systems (SUDS) on this site means that R N Wooler &amp; Co anticipates the need to formally submit an application to renegotiate the affordable housing percentage in the near future.</p>	<p>conform with the NPPF and PPG. A good margin now exists between the estimated land value at which landowners should be willing to sell their sites and the residual land value that is estimated to remain after planning obligations and other costs have been taken into account on all site typologies assessed in the LPVA, apart from rural exception sites.</p> <p>There is no evidence that consented schemes are currently undeliverable. Rather, since March 2017 when the Council’s approach to negotiating affordable housing was quashed in the High Court, it is likely that developers have been waiting the outcome of a test case in Craven on the requirements for affordable housing based on the NPPF and an emerging local plan policy.</p>		
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<p>One of the reasons why R N Wooler &amp; Co is experiencing difficulties in meeting 40% affordable housing requirements is due to its (external ) build qualities . R N Wooler &amp; Co builds (market and affordable) houses of the highest quality materials , which meet the standards required by Craven’s communities and will leave a lasting legacy to the plan area. The quality of houses delivered by the company is wholly appropriate to a plan-area which sits on the edge of the Yorkshire Dales National Park, however this quality comes at a cost which mitigates the delivery of 40% affordable housing.</p> <p>Conclusion</p> <p>R N Wooler &amp; Co considers that the policy requirement for 40% affordable housing included in draft policy H2, is not deliverable.</p> <p>Whilst the ‘viability clause’ in the policy is noted, local plan policies should be realistic and achievable and predicated on the assumption that the vast majority of schemes will be able to comply with them. This is not the case with Craven’s affordable housing target .</p> <p>The inclusion of a 40% affordable housing target will serve to delay or negate housing delivery in the plan area over the plan period, particularly at a time when the U.K’s economic outlook is at best uncertain. Developer s will be unable to provide 40% affordable housing, prescribed levels of smaller market housing; and, the high standards of design and material s that are appropriate for some of the country’s most valued market towns and countryside areas (during times of economic uncertainty) on developments .</p> <p>The result of this will be that the delivery of the plan’s objectives and allocated housing and mixed use sites will stall , with the negative social and economic outcomes for the area that this entails , whilst viability discussions take place. It will also result in a situation where the Council will , during the</p>			
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<p>plan period, be unable to demonstrate a five year supply of deliverable housing sites .</p> <p>For the above reasons the draft Local Plans ' approach to the provision of affordable housing is UNSOUND. In particular the plan's 40% housing target responds very poorly when judged against the Effective test of soundness incorporated in para. 182 of the National Planning Policy Framework.</p> <p>R N Wooler &amp; Co urges the Council to reconsider its policy approach to affordable housing and introduce a realistic and achievable affordable housing target .</p>			
<p>1. Introduction</p> <p>1.1 This representation is submitted by Walton &amp; Co (Planning Lawyers) Limited in relation to paragraph 6.14 of the Draft Craven District Council Local Plan Pre- publication Consultation Document.</p> <p>1.2 Craven District Council ("the Council") has published its Pre-publication Draft Local Plan which is out for consultation until 31st July 2017.</p> <p>2. Representations to the Pre-publication Draft Local Plan</p> <p>2.1 This representation is made respect of paragraph 6.14 of the Pre-publication Draft Local Plan. We ask for the following observations to be considered in relation to the final sentence of paragraph 6.14.</p> <p>2.2 The relevant sentence reads as follows:</p> <p>'Whilst negotiations between the Council and developers will need to be conducted on an 'open book' basis, the Council will maintain the confidentiality of any sensitive financial information submitted by developers and will not make such information publicly available.'</p> <p>2.3 If the Council wish to paraphrase their disclosure obligations under the Environmental Information Regulations 2004 ("EIR"), for the benefit of would-be developers considering the submission of financial viability appraisals in</p>	<p>The draft policy and supporting text need improvement around this issue and should reflect relevant legislation governing access to information.</p>		<p>The draft policy and supporting text have been amended and now state that negotiations will be on a 'transparent and open book basis'. A footnote has been added to explain the implications of Environmental Information Regulations and the possibility of information disclosure</p>

<p>support of their applications, the inclusion of this sentence is really quite an extraordinary way of going about it.</p> <p>2.4 First, as the Council well know, where they receive a request for the disclosure of such ‘environmental information’ they are required by law to apply a presumption in favour of the information’s disclosure.</p> <p>2.5 Moreover, whilst there are exceptions to this requirement, the Information Commissioner’s Office (ICO), in their guidance on the ‘confidentiality of commercial or industrial information’, remind public authorities – including local planning authorities – that ‘the EIR are intended to implement the provisions of [EU Directive 2003/04] (and that) article 4 paragraph 2 of the Directive sets out a duty to interpret exceptions in a restrictive way’</p> <p>2.6 It is to be observed too that, in considering whether a request falls within one of the very limited range of circumstances set out in regulation 12(5), the Commissioner has stated that ‘the threshold necessary to justify nondisclosure because of an adverse effect, is a high one’.</p> <p>2.7 Unsurprisingly, then, in offering guidance upon Council undertakings to maintain the confidentiality of submitted information, the ICO have advised as follows: ‘The EIR code of practice makes clear that public authorities cannot contact out of their obligations under EIR, and...[that] information covered by a confidentiality clause will still need to be released unless an exception applies and the public interest test can be satisfied. Signing clauses that provide a false sense of security will only damage relationships if a public authority is obliged to disclose information under the EIR at a later date’.</p> <p>2.8 On the public interest front, too, the First-Tier Tribunal of the General Regulatory Chamber have also made plain their views regarding the handling of requests for the disclosure of</p>			
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<p>information contained in financial viability appraisals:          'We find it particularly hard to accept that the pricing and other assumptions embedded in a viability appraisal are none of the public's business. They are the central facts determining the difference between viability and non-viability. Public understanding of the issues fails at the starting line if such information is concealed...'</p> <p>2.9 For all of the above reasons, it appears to us that no possible justification can be advanced for the retention of such a highly misleading and irresponsible undertaking by the Council in the Plan document.</p> <p>2.10 Accordingly, the relevant sentence should, in our respectful submission, be deleted in its entirety.</p>			
<p>1.0Objection to Proposed Residential Development Contributions</p> <p>The proposed housing policy in Craven is 40% affordable housing with a contribution towards recreational open space and education. This emerging policy is unviable as demonstrated by the historic record of under delivery of housing in the district, when the Council attempted to adhere to the previous 40% affordable housing policy, which was found to be unlawful by the High Court in March 2017. The Council accept that they have an historic record of under delivery of housing. There are a number of schemes in the district that have been approved but have not yet been developed as developers are in viability negotiations with the Council as landowners are unwilling to release their land for the values that the existing policy allows. As a result there will be less development, less community benefit and less affordable housing.</p> <p>The existing policy is therefore unviable and as a result Council resources are having to be spent on negotiating contributions on housing developments in the form of staff wages and cost</p>	<p>Objection noted. The viability of 40% affordable housing, in combination with open space, sport and recreation, education and highway infrastructure contributions and transfer rates of £1000 per square metre, have been reassessed in an addendum to the Craven Local Plan Viability Assessment (LPVA 2017). Whilst 40% affordable housing is still considered a viable proposition in Craven in many cases, a lower affordable housing proportion of 30% has been chosen to better conform with the NPPF and PPG. A good margin now exists between the estimated land value at which landowners should be willing to sell their sites and the residual land value that is estimated to remain after planning obligations and other costs have been taken into account on all site typologies assessed in the LPVA, apart from rural exception sites.</p>	<p>Yes</p>	<p>The draft policy and supporting text have been amended to reflect the recommendations of the Craven Local Plan Viability Assessment: Addendum, November 2017.</p>



<p>awards on appeal decisions, which would not be required if the policy was viable.</p> <p>It would therefore be expected that the policy being proposed by the draft local plan would be for a reduction in contributions to make for a viable policy, which would deliver the required level of housing without development being stalled by expensive negotiations.</p> <p>However, instead of a reduction in contributions the draft local plan is proposing to retain 40% affordable housing (previously found to be unlawful) and recreational contributions, whilst now adding a contribution towards education. So far from reducing the burden of contributions to allow the delivery of housing, the draft plan is proposing to increase the burden.</p> <p>2.0Planning Practice Guidance on Viability in Plan Making and NPPF Policy</p> <p>In developing the policy referred to in section 1.0 above, the Council have failed to consider Planning Practice Guidance on Viability and the NPPF. 2.1DPlanning Practice Guidance on Viability – Paragraph 004</p> <p>“What are the underlying principles for understanding viability in planning?</p> <p>Understanding past performance, such as in relation to build rates and the scale of historic planning obligations can be a useful start. Direct engagement with the development sector may be helpful in accessing evidence.</p> <p>Paragraph: 004 Reference ID: 10-004-20140306, Revision date: 06 03 2014”</p> <p>The proposed policy fails to take account of this guidance as historic rates of under delivery of housing linked to the unviable nature of the existing policy has not been addressed, as the proposed policy adds extra contribution burdens to sites rather than reducing contributions to allow for</p>	<p>The LPVA has been based on the latest evidence gathered by consultants on land values and additional evidence supports this addendum. It is not correct to say that the LPVA used only 3 sites to analyse land values. This has now been fully clarified in the addendum to the viability assessment which includes a spread sheet containing some 60 data points of land value information.</p> <p>Developers have had the opportunity to inform the LPVA on three occasions during the preparation of the plan, following stakeholder engagement in March 2017, Pre-Publication Draft Plan Consultation Summer 2017 and October/November 2017.</p> <p>There is no evidence that consented schemes are currently undeliverable. Rather, since March 2017 when the Council’s approach to negotiating affordable housing was quashed in the High Court, it is likely that developers have been waiting the outcome of a test case in Craven on the requirements for affordable housing based on the NPPF and an emerging local plan policy.</p>		
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<p>development to take place.</p> <p>2.2 Planning Practice Guidance on Viability – Paragraph 010  “How should the viability of planning obligations be considered in plan-making?  The National Planning Policy Framework is clear that local planning authorities, when requiring obligations, should be sufficiently flexible to prevent planned development being stalled. Planning obligations policies should reflect local viability.  Paragraph: 010, Reference ID: 10-010-20140306, Revision date: 06 03 2014”  As the proposed policy doesn’t take account of past housing delivery rates as the burden of planning policy has not been reduced, the policy will lead to development being stalled as viability negotiations take place, which is the presently the case with several development sites across Craven.</p> <p>2.3 NPPF Paragraph 205  “Where obligations are being sought or revised, local planning authorities should take account of changes in market conditions over time and, wherever appropriate, be sufficiently flexible to prevent planned development being stalled.”  The proposed policy fails to take account of current market conditions as the viability study by Aspinall Verdi doesn’t take account of the current market value of land. Instead the study researches the market value of development land (to derive a limited number of values which are themselves questionable) and then, ignoring their own research and without explanation or justification take quite different arbitrary land value figures, to allow the proposed policy to be viable. The explanation for this is that landowners will have to take a lower land value. However, as has been seen by the past low delivery of housing in the district, landowners are unwilling to</p>			
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<p>take such low land values and so development will be stalled as viability negotiations take place.</p> <p>The fact that viability negotiations are available under the policy does mean that flexibility is provided in the policy for changing market conditions, but it doesn't account for current market conditions being wrongly applied in the development of the policy.</p> <p>2.4 Planning Practice Guidance on Viability – Paragraph 014</p> <p>“Land value Central to the consideration of viability is the assessment of land or site value. The most appropriate way to assess land or site value will vary but there are common principles which should be reflected.</p> <p>In all cases, estimated land or site value should:</p> <ul style="list-style-type: none"> <li>•reflect emerging policy requirements and planning obligations and, where applicable, any Community Infrastructure Levy charge;</li> <li>•provide a competitive return to willing developers and land owners (including equity resulting from those building their own homes); and</li> <li>•be informed by comparable, market-based evidence wherever possible. Where transacted bids are significantly above the market norm, they should not be used as part of this exercise.</li> </ul> <p>Paragraph: 014, Reference ID: 10-014-20140306, Revision date: 06 03 2014”</p> <p>The land value used in the Draft Local Plan Viability Study by Aspinall Verdi certainly takes account of the impact the policy would have on land value and so it complies with point one of paragraph 014. However, it fails on the next two points as it would not provide a competitive return to a willing landowner and it is not based on market evidence as an arbitrary figure has been taken for the market development land value to concoct the proposed policy viability. The proposed policy</p>			
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<p>therefore doesn't comply with paragraph 014.</p> <p>Due to the expenses of land promotion and obtaining planning consent for residential development a large proportion of development land is promoted by developers who secure their interest through land promotion agreements or by option agreements. Due to the Council's high development contributions developers are unable to enter into agreements with a minimum land value which is acceptable to a landowner and this is preventing sites being promoted and coming forward for development. This will mean that allocated sites will not come forward and the Council will be unable to deliver its housing target.</p> <p>2.5 Planning Practice Guidance on Viability – Paragraph 015</p> <p>“Competitive return to developers and land owners</p> <p>The National Planning Policy Framework states that viability should consider “competitive returns to a willing landowner and willing developer to enable the development to be deliverable.” This return will vary significantly between projects to reflect the size and risk profile of the development and the risks to the project. A rigid approach to assumed profit levels should be avoided and comparable schemes or data sources reflected wherever possible.</p> <p>A competitive return for the land owner is the price at which a reasonable land owner would be willing to sell their land for the development. The price will need to provide an incentive for the land owner to sell in comparison with the other options available. Those options may include the current use value of the land or its value for a realistic alternative use that complies with planning policy.</p> <p>Paragraph: 015 Reference ID: 10-015-20140306, Revision date: 06 03 2014”</p> <p>The proposed policy doesn't provide market value for a landowner and they would not become a “willing seller”</p>			
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<p>without viability negotiations taking place to reduce the burden of development contributions.</p> <p>2.6 NPPF Paragraph 173: Ensuring viability and deliverability          “Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.”</p> <p>The proposed policy doesn’t provide market value for a landowner and they would not become a “willing seller” without viability negotiations taking place to reduce the burden of development contributions.</p> <p>3.0 Comparison with Neighbouring Authorities          In the recently approved Bradford Core Strategy, Policy H011 states that affordable housing provision will be: “Up to 20% in towns, suburbs and villages’.</p> <p>This is half of the 40% required under the proposed policy in Craven. This explains why the site off Main Road, Eastburn is under development in Bradford District, whereas the site at Green Lane, Glusburn, which gained planning approval before the site in Eastburn, is still in ongoing viability negotiations. These two sites are located close to the boarder of the two districts and are only 2km apart.</p> <p>This gives a strong indication as to what level of affordable housing is viable in the area, as Bradford’s policy has been</p>			
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approved by an inspector and is delivering housing.			
<p>We object to the blanket proposal of a 40% affordable housing across the Local Plan area.</p> <p>Other Local Planning authorities which have been through the Local Plan process have assessed the market and applied a percentage of affordable housing requirements dependent on house values in that particular area.</p> <p>This has been considered a more realistic approach to the delivery of affordable housing.</p> <p>It is evident that house prices vary significantly between different settlements with the Craven District area – and the Affordable housing policy should be tailored to accommodate this.</p> <p>In lower value areas, the affordable housing contributions should vary accordingly (and this has been done in other Local Authority Areas) to include 5%-30% affordable housing provision. This in itself is subject to viability.</p> <p>Many other Local Planning authorities have reduced a previous blanket 40% affordable contribution approach to between 5%-30% and this has successfully delivered affordable housing in areas where development was deemed unviable by a 40% contribution.</p> <p>We object to a 40% affordable housing requirement across the Craven District area to developments of more than 10 dwellings or 1000 sq m combined gross floor space. We request that this policy is adjusted to reflect house values in each area and the 5% - 30% requirement is considered.</p> <p>Developers (and in particular regional and national house builders) will otherwise be attracted to alternative Local Authority areas where the requirement is considerably lower.</p> <p>Other local planning authorities have accepted that it is critical that they work and negotiate with housebuilders to achieve the maximum number of affordable dwellings that is</p>	<p>Objection noted. The viability of 40% affordable housing, in combination with open space, sport and recreation, education and highway infrastructure contributions and transfer rates of £1000 per square metre, have been reassessed in an addendum to the Craven Local Plan Viability Assessment (LPVA 2017).</p> <p>Whilst 40% affordable housing is still considered a viable proposition in Craven in many cases, a lower affordable housing proportion of 30% has been chosen to better conform with the NPPF and PPG. A good margin now exists between the estimated land value at which landowners should be willing to sell their sites and the residual land value that is estimated to remain after planning obligations and other costs have been taken into account on all site typologies assessed in the LPVA, apart from rural exception sites.</p> <p>The LPVA has been based on the latest evidence gathered by consultants on land values and additional evidence supports this addendum. The LPVA includes a spread sheet containing some 60 data points of land value information across the plan area. This evidence indicates that a plan area wide approach to the policy remains appropriate.</p>	Yes	<p>The draft policy and supporting text have been amended to reflect the recommendations of the Craven Local Plan Viability Assessment: Addendum, November 2017.</p>

<p>reasonable and practicable for individual development sites. For example, an area where house prices are significantly lower a Local Planning Authority has a 5% requirement for affordable housing. In another area, which is the highest value area, a 25% contribution is required.</p> <p>We strongly urge Craven DC to review the proposal which will in turn attract developers to the area and provide realistic affordable housing delivery during the plan period.</p>			
<p>Unless CDC can get developers to follow the proportion of affordable housing set out in these policies, there will be a failure to provide for the young, working age families we need in the district. Developers should not be allowed to ride roughshod over the districts need in the pursuit of profit.</p>	<p>Support noted: However, the viability of 40% affordable housing, in combination with open space, sport and recreation, education and highway infrastructure contributions and transfer rates of £1000 per square metre, have been reassessed in an addendum to the Craven Local Plan Viability Assessment (LPVA 2017). Whilst 40% affordable housing is still considered a viable proposition in Craven in many cases, a lower affordable housing proportion of 30% has been chosen to better conform with the NPPF and PPG. A good margin now exists between the estimated land value at which landowners should be willing to sell their sites and the residual land value that is estimated to remain after planning obligations and other costs have been taken into account on all site typologies assessed in the LPVA, apart from rural exception sites.</p>	Yes	<p>The draft policy and supporting text have been amended to reflect the recommendations of the Craven Local Plan Viability Assessment: Addendum, November 2017.</p>
<p>The policy set out is acceptable, but the implementation will be key. CDC have a history of allowing developers to ignore the requirements for affordable housing in their developments, and I would expect the council to rigorously enforce this policy. I am unhappy that some information will be kept secret on commercial confidentiality grounds. I</p>	<p>Support noted: However, the viability of 40% affordable housing, in combination with open space, sport and recreation, education and highway infrastructure contributions and transfer rates of £1000 per square metre, have been reassessed in an addendum to the Craven</p>	Yes	<p>The draft policy and supporting text have been amended and now state that negotiations will be on a 'transparent and open book basis'. A</p>

believe this to be not necessary and has the potential for corrupt practices to be engaged in between developers and councillors.	<p>Local Plan Viability Assessment (LPVA 2017). Whilst 40% affordable housing is still considered a viable proposition in Craven in many cases, a lower affordable housing proportion of 30% has been chosen to better conform with the NPPF and PPG. A good margin now exists between the estimated land value at which landowners should be willing to sell their sites and the residual land value that is estimated to remain after planning obligations and other costs have been taken into account on all site typologies assessed in the LPVA, apart from rural exception sites.</p> <p>The draft policy and supporting text need improvement around this issue and should reflect relevant legislation governing access to information.</p>		footnote has been added to explain the implications of Environmental Information Regulations and the possibility of information disclosure
<p>Page 41 Affordable 1 and 2 bed units – comment</p> <p>Your target of 40% affordable is to be applauded but unlikely to be met.</p> <p>Similarly, the demand for 1/2 bed houses is high and you propose that 39.4% will be in this category. I fear that you have little chance of achieving this and should alter the figures to reflect reality - whether politically expedient or not.</p>	<p>Support noted: However, the viability of 40% affordable housing, in combination with open space, sport and recreation, education and highway infrastructure contributions and transfer rates of £1000 per square metre, have been reassessed in an addendum to the Craven Local Plan Viability Assessment (LPVA 2017). Whilst 40% affordable housing is still considered a viable proposition in Craven in many cases, a lower affordable housing proportion of 30% has been chosen to better conform with the NPPF and PPG. A good margin now exists between the estimated land value at which landowners should be willing to sell their sites and the residual land value that</p>	Yes	<p>The draft policy and supporting text have been amended to reflect the recommendations of the Craven Local Plan Viability Assessment: Addendum, November 2017.</p> <p>The policy's supporting text now refers to 'the most up-to-date evidence of a need, including the SHMA'. A</p>



	<p>is estimated to remain after planning obligations and other costs have been taken into account on all site typologies assessed in the LPVA, apart from rural exception sites.</p> <p>The point is noted and it is acknowledged that the SHMA is not the only source of evidence regarding affordable housing need and this should be reflected in the supporting text of policy (see similar amendment to draft policy SP3).</p>		<p>cross-reference to Policy SP3 has also been added, as this policy provides a guide to the overall mix of dwelling sizes needed across all tenures.</p>
Support. The requirement for 40% affordable housing.	<p>Support noted: However, the viability of 40% affordable housing, in combination with open space, sport and recreation, education and highway infrastructure contributions and transfer rates of £1000 per square metre, have been reassessed in an addendum to the Craven Local Plan Viability Assessment (LPVA 2017). Whilst 40% affordable housing is still considered a viable proposition in Craven in many cases, a lower affordable housing proportion of 30% has been chosen to better conform with the NPPF and PPG. A good margin now exists between the estimated land value at which landowners should be willing to sell their sites and the residual land value that is estimated to remain after planning obligations and other costs have been taken into account on all site typologies assessed in the LPVA, apart from rural exception sites.</p>	Yes	<p>The draft policy and supporting text have been amended to reflect the recommendations of the Craven Local Plan Viability Assessment: Addendum, November 2017.</p>

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## June – July 2017 Draft Local Plan

## Policy Response Paper – Policy Ref: H3 Gypsies, Travellers, Showmen &amp; Roma

<b>Policy: H3 Gypsies, Travellers, Showmen &amp; Roma</b>			
<b>Aim of the Policy: To meet the housing requirements of Gypsies, Travellers, Showmen &amp; Roma by maintaining an adequate supply of private sites to occupy, in line with current evidence of existing and future need.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan</b>
The route to Appleby Fair runs through Craven therefore there is an obvious need for a secure site if only twice a year during the summer. It is not reasonable to pretend the issue doesn't exist because it is hard to identify a site.	There are traditional, informal stopping off points used by travellers on route to and from the Appleby Horse Fair, which provide for the temporary need of this community. Whilst the current evidence concludes that more formal arrangements, such as the development of permanent transit sites, are unlikely to be justified or necessary, there may be opportunities for travellers, the district council, parish councils to collaborate on better management of temporary stop off sites. Alternatively the supporting text of the policy suggests that local communities may wish to consider opportunities offered by neighbourhood planning, including the possibly of designating land and setting local policies for a transit site.	No	
It is important that the LP seeks to meet the district's full need for G&T and Showpeople, as identified through a proper, appropriate assessment. Recommend CDC revisit this	CDCs evidence relating to Gypsies, Travellers, Showmen & Roma is contained within in independent traveller needs survey and report (Feb 2013), technical note relating to Gypsy	No	

<p>policy to ensure that the intention to meet the full identified need in the District is clearly demonstrated within the policy.</p>	<p>and Traveller Household Formation &amp; Growth Rates (March 2015) and information gathered by the Council on a regular basis, including the department of Communities and Local Government (DCLG) Bi-annual Caravan Count and the Council's Services &amp; Housing Records of Unauthorised Encampments.</p> <p>This evidence base concludes that there is no evidence of a requirement for a public site in Craven and found no evidence of any deficiencies in service provision for any of the gypsy &amp; Traveller families within Craven.</p> <p>Therefore the Local Plan does not propose to make a specific allocation of land for a public site for use by this community.</p>		
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\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## June – July 2017 Draft Local Plan

## Policy Response Paper – Policy Ref: Policy: EC1: Employment &amp; Economic Development

<b>Policy: EC1: Employment &amp; Economic Development</b>			
<b>Aim of the Policy: To provide a context for the consideration and assessment of employment proposals in Craven</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan</b>
<p>Policy EC1, first Paragraph, Criterion (c) . Support. We support the requirement that new employment development will be supported where the proposals do not adversely affect the significance of a designated heritage asset.</p> <p>This will assist in ensuring that development to meet the employment needs of the community is delivered in a manner which also conserves its heritage assets.</p>	The comment and support for the policy is noted.	No	None.
<p>Changes to working practices and withdrawal from the EU will result in increased mechanisation. Some employment sites will result in few jobs being created. Permission for employment uses that create few jobs should be refused in favour of those that create more.</p> <p>Need to recognise that houses are 'employment sites'. Building new houses</p>	<p>Comments are noted.</p> <p>For employment proposals., the number of jobs created is a consideration when assessing individual planning applications and this is taken into account as part of that process. The acceptability of proposals and extent of job creation will be considered as part of the planning balance in the determination of planning applications. The extent of job creation is a consideration, but is not the sole</p>	No	None.

<p>also provides extra jobs.</p> <p>The plan does not recognise the vital importance of unpaid employment such as volunteering and volunteer caring, even though these jobs make vital contributions to Craven's economic growth and prosperity. Many formerly paid jobs are now done by volunteers. An increasing number of unpaid younger people are in internships. Large numbers of retired people provide caring services for the elderly and for grandchildren.</p> <p>**</p> <p>The Plan assumes that 'highly paid' jobs are going to be the most necessary to Craven in the coming 15 years. Highly-paid jobs are likely to diminish. Low-paid and unpaid jobs are most necessary in Craven in the coming 15 years. That means that cheaper housing for the low paid and those on low incomes is vital.</p>	<p>determinant of the acceptability of proposals, as all material considerations should be taken into account.</p> <p>It is acknowledged that house building in itself is an economic activity that creates associated employment.</p> <p>The contribution of voluntary work to Craven is recognised in the plan and is an essential part of the overall employment mix in Craven, the balance of employment types, and the roles and functions of community spaces (see policy INF 2 and INF3) and facilities in Craven.</p> <p>A principal aim of the policy is to enhance economic activity, performance, prosperity and wage levels. The voluntary/unpaid sector has an important role in the plan alongside paid employment as part of the overall employment mix which includes a proportion of higher paid jobs.</p> <p>The plan vision recognises that a broad range of employment types and levels of pay is necessary in the future. Section 7.3 and evidence presented in the Employment Land Review also refers. However, lower paid work has an important role in Craven along with higher paid employment and associated opportunities. The plan seeks to address below average income levels in Craven by enhancing the overall employment mix and seeking to</p>		
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	<p>enhance wage levels overall.</p> <p>The affordability of housing is an associated issue and is a key consideration that is addressed in the plan, and policy approaches provide a response to the issue. Policy H2 in particular refers.</p>		
<p>This policy sets out the criteria that applications on site allocations will be weighed against, this is critical in bringing forward development to meet the plan period requirements and not inhibiting much needed development. This policy will apply to applications brought forward on site SK049 and is broadly supported.</p>	Support is noted.	No	none
<p>3.3 Economics</p> <p>Natural England is pleased to see the modification to criteria c) and f) of policy EC1 which we consider to be particularly pertinent and relevant in this context.</p>	Support is noted.	no	none
<p>Support the contention that any economic development should be in strict accordance with Paragraphs a-f.</p>	Support is noted.	no	none

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## June – July 2017 Draft Local Plan

## Policy Response Paper – EC2: Safeguarding Existing Employment Areas

<b>Policy: EC2 – Safeguarding Existing Employment Areas</b>			
<b>Aim of the Policy: Ensure an adequate supply of employment locations in Craven for 'B' Class Uses.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan</b>
Object - The policy is insufficiently flexible. Policy EC2 should also make provision for allowing ancillary and sui generis uses on employment sites and non B1, B2, B8 uses where such development delivers significant levels of employment and/ or would support and supplement the vitality and viability of such areas.	Policy EC2 is supported by evidence in the Employment Land Review, which assessed the designated sites and found them to be worthy of protection for B class uses. Other sites were not found to be strategically important, so were not designated. Development on these sites could be more flexible and allow for alternative uses.	No	
Supportive of Draft Policies on Business and Tourism Growth at Broughton and the protection and expansion of Broughton Hall's existing business offer and new employment development in the locality. Policy EC2 (along with policy EC4: Tourism) supports the Plan's Vision. Support the identification of Broughton Hall Business Park as a safeguarded employment area and the acknowledgement of the growing contribution that the Broughton Estate is able to make to the economy of the area over the plan period.	Support noted	No	

<p>To the west of the Ingleton Viaduct, Thornton Station Yard is an existing occupied employment site, extending to approximately 2.8 hectares. The site is not proposed to be allocated as an existing employment site under policy SP2 or EC2 and was omitted from the 'Craven Employment Land Review and Future Requirements for Economic Growth (March 2017) commissioned by the District Council and written by planning consultants, Lichfields. It is recommended that consideration is given to allocating this site as an 'Existing Employment Site' in the Local Plan through policy SP2 and EC2. This would ensure the site contributes to requirement for the District to continue to make available a minimum of 28 hectares of employment land during the Plan period and that the site is safeguarded from non 'B' Class uses.</p>	<p>Thornton Station Yard was not assessed in the Employment Land Review (ELR). The Planning Policy Team has therefore carried out an assessment of the site using the same methodology and criteria used in the ELR for the assessment of sites. A site visit has also been carried out (19<sup>th</sup> September 2017). The results of the assessment are as follows:  Area: North  Settlement: Ingleton  Site Name: Thornton Station Yard  Gross Area (ha): 2.914 ha  Net Developable Area (ha) (estimated): 2.144 ha  Site Status: Unallocated  Strategic Road Access: Good – Less than 1km from A65, but accessed via a local B-road through Thornton-in-Lonsdale.  Local Accessibility: Average – Bus stop 800m away at Ingleton Community Centre. Close to Ingleton town centre, but local roads can be busy. Access by car is easier through Thornton-in-Lonsdale.  Rail Access: Very Poor – No potential.  Proximity to Urban Areas and Access to Labour and Services: Very Good – walking distance to residential areas and town centre.  Site Characteristics and Development Constraints: Average – relatively flat, attractive site, well screened by mature trees along site boundaries (some trees covered by TPO Ref Interim No1 Ingleton). Flood zone 1. Site occupied with majority B2 and B8 uses (stone</p>		<p>Thornton station Yard, Ingleton, will be added to the policies map as an allocated EC2 site.</p> <p>Policy wording will be amended to clarify that the safeguarding under EC2 only applies to employment sites hatched on the policies map.</p> <p>The assessment of Thornton Station Yard has been included in the evidence base as an addendum to the Employment Land Review, carried out by Craven District Council.</p> <p>The addition of Thornton Station Yard to the existing available supply of employment land will be reflected in the supporting text to Policy SP2.</p>
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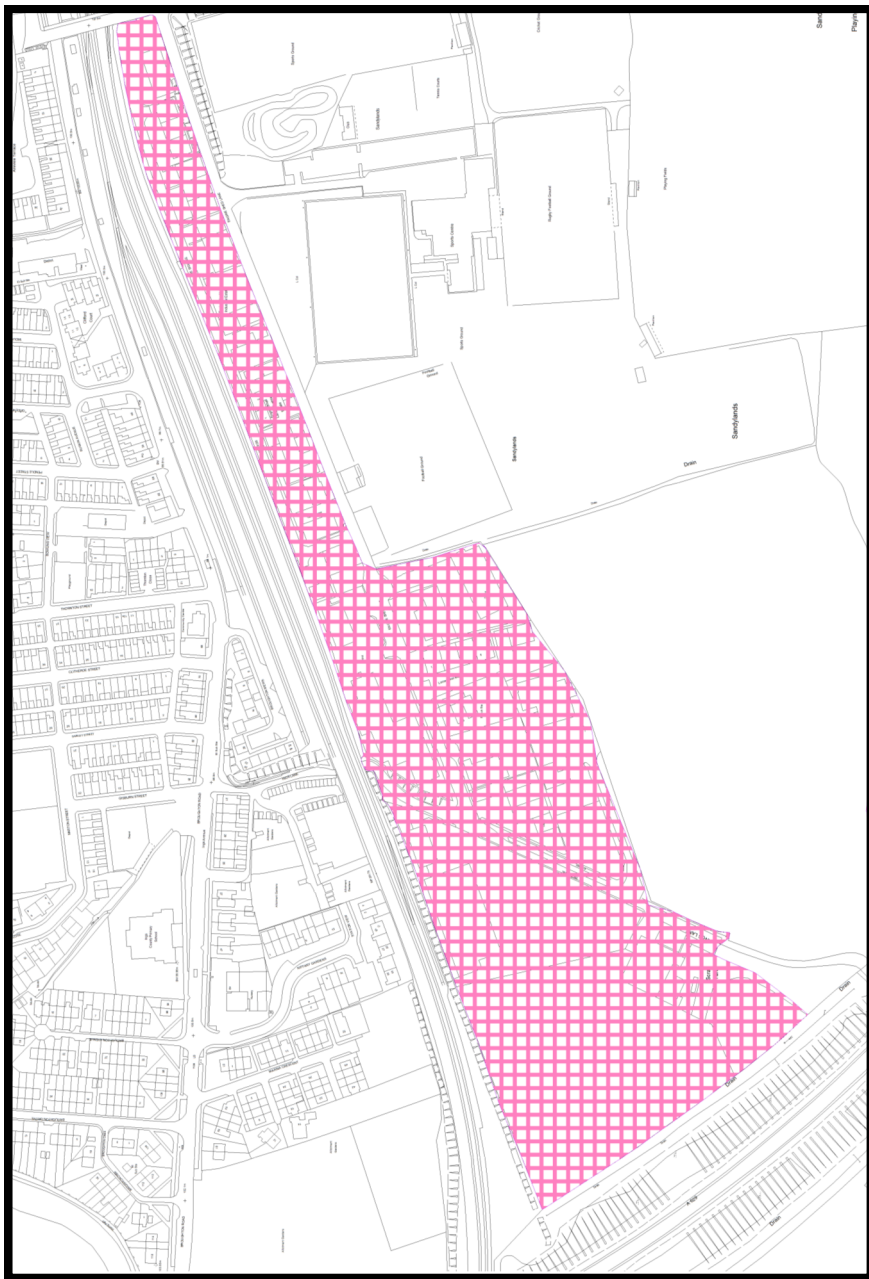
	<p>masons yard, vehicle storage and associated cabin and shed type buildings. Bordered by Yorkshire Dales National Park to the north, Ingleton town centre to east and agricultural land to south and west. Site has little scope for expansion beyond existing boundaries.</p> <p>Proximity to incompatible uses: Average – Some town centre and residential uses to the east of the site, but the site is well screened and the access avoids Ingleton centre.</p> <p>Market Attractiveness: Good – Site is fully occupied. Low quality units and unattractive uses but in an attractive setting.</p> <p>Overall Site Grade: Good</p> <p>Market Interest: No lettings boards visible.</p> <p>Planning Factors: site is bordered by the Yorkshire Dales National park to the north and Ingleton Viaduct to the east.</p> <p>Barriers to Delivery: N/A – site already occupied.</p> <p><b>Recommendation: Existing site to be protected for employment use.</b></p> <p>Further discussion has taken place with CDC Economic Development and they have confirmed that allocation of the site for exclusively B class uses would not undermine the intention to develop the Ingleton Viaduct area for tourism under policy EC4. CDC Economic Development Team is of the opinion that Thornton Station Yard provides an important supply of employment land in the Ingleton area, and should be protected as such.</p>		
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	The analysis of the policy has shown that the policy wording could be improved by clarifying that the safeguarding applies only to those sites shown on the policies map, and not all sites currently in employment use.		
Inset Map 2 shows both the active employment site at Hayfield Mills and the land that is surplus to requirements, to the south and west of Hayfield Mills (i.e. Site SC014) as an Existing Employment Area to which Draft Policy EC2 applies. The land to the south and west of Hayfield Mills has been surplus to the requirements of the company for some time. It should be allocated for housing development and excluded from any land to be safeguarded by Policy E2 accordingly. The land in question is readily available for redevelopment for alternative uses. It should be removed from the designated employment land to be safeguarded by Draft Policy EC2 regardless of whether the Council propose to allocate the land for housing development, as this would allow the site to come forward as a windfall development on previously developed land.	The area to the south and west of Hayfield Mills are considered to provide amenity space necessary to the operation of the employment site. Development of housing on this site is not considered to be compatible with the existing industrial use of the Mill building. If, in the fullness of time, the current operators of the Mill cease trading from the site, consideration could be given to changing the whole site to residential use or an alternative employment use. At present the land around the Mill building will be protected for its contribution to the operation of the larger site.	No	
The latest pre-publication policy map for Sowarth Industrial Estate appears to include an error. The 'Kings Mill' site to the west of the Industrial Estate, adjacent to the River Ribble is a residential area and as such needs	Error noted	Yes	Amend the policies map for Settle to remove the Kings Mill area of Sowarth Industrial Estate which is no longer in employment use. Re-calculate the area of 'Existing

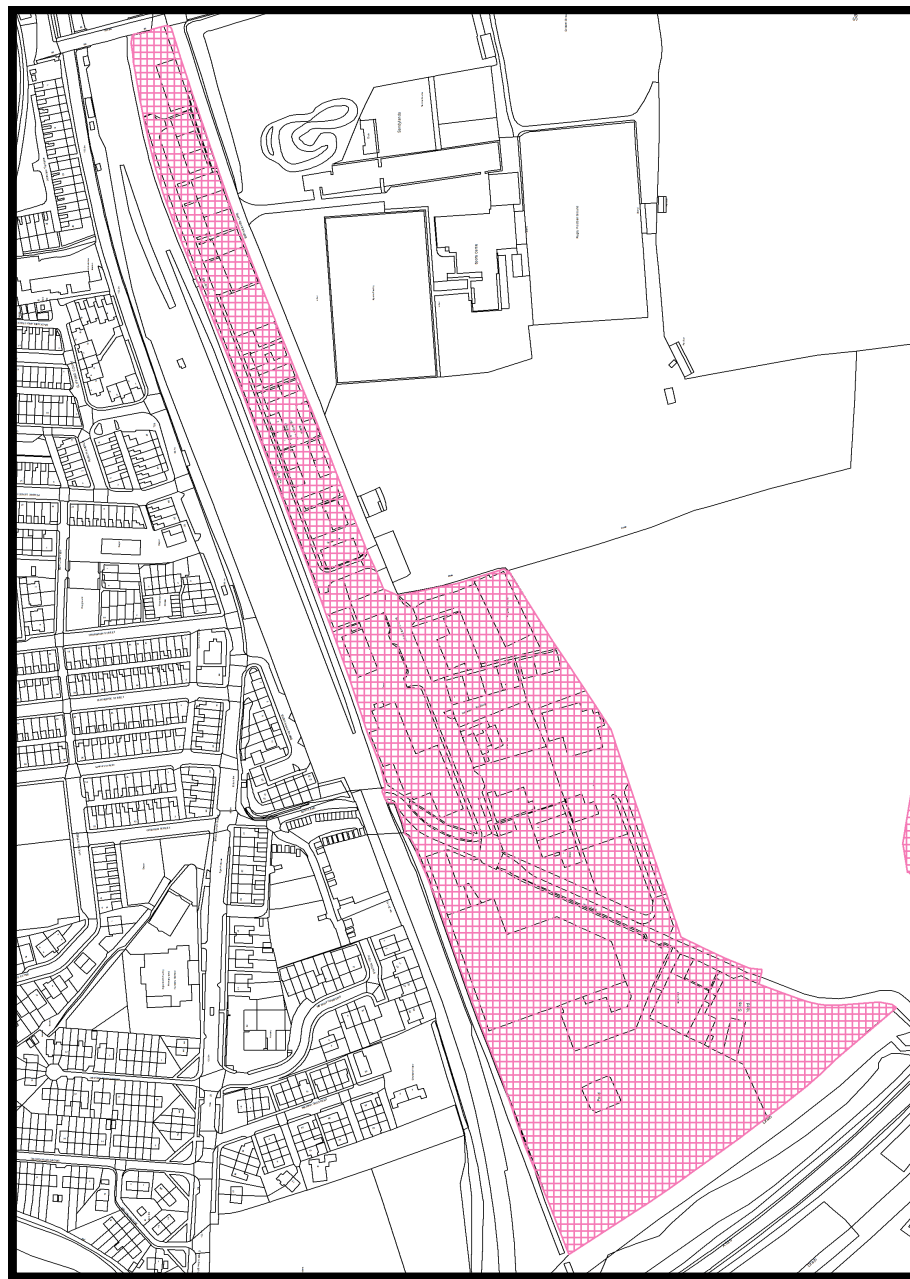
the hatching removing and the calculated area of 'Existing Employment Land' for this site reducing.			Employment Land' as necessary.
There is a part of the former Scrapyard (at the end of Ings Lane), which has not been protected for employment. The area was used by the former owner as part of the business, and therefore should be protected for continued use as an employment site.	The part of the former scrapyard referred to by the representor is very small (0.1ha) and the policies map boundary can be slightly adjusted to bring this small part under the provisions of policy EC2: Safeguarding Existing Employment Areas.	Yes	The boundary of the safeguarded area at Ings Lane under Policy EC2 will be amended on the policies map and the additional site area of available existing supply of employment land (0.1ha) will be reflected in the supporting text to Policy SP2.

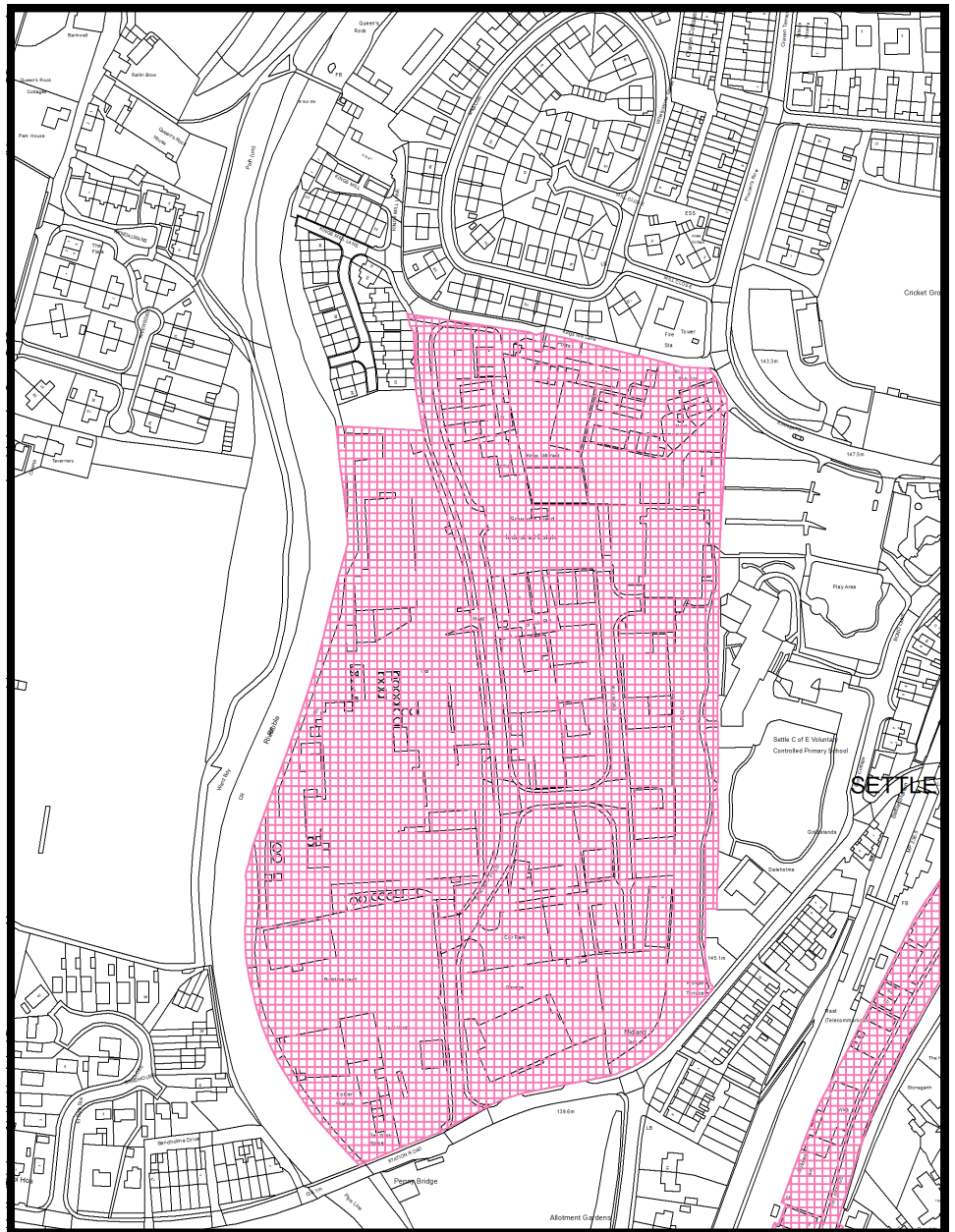
\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

EC2: Existing Employment Area: Ings Lane, Skipton (Pre-Publication Local Plan 2017)

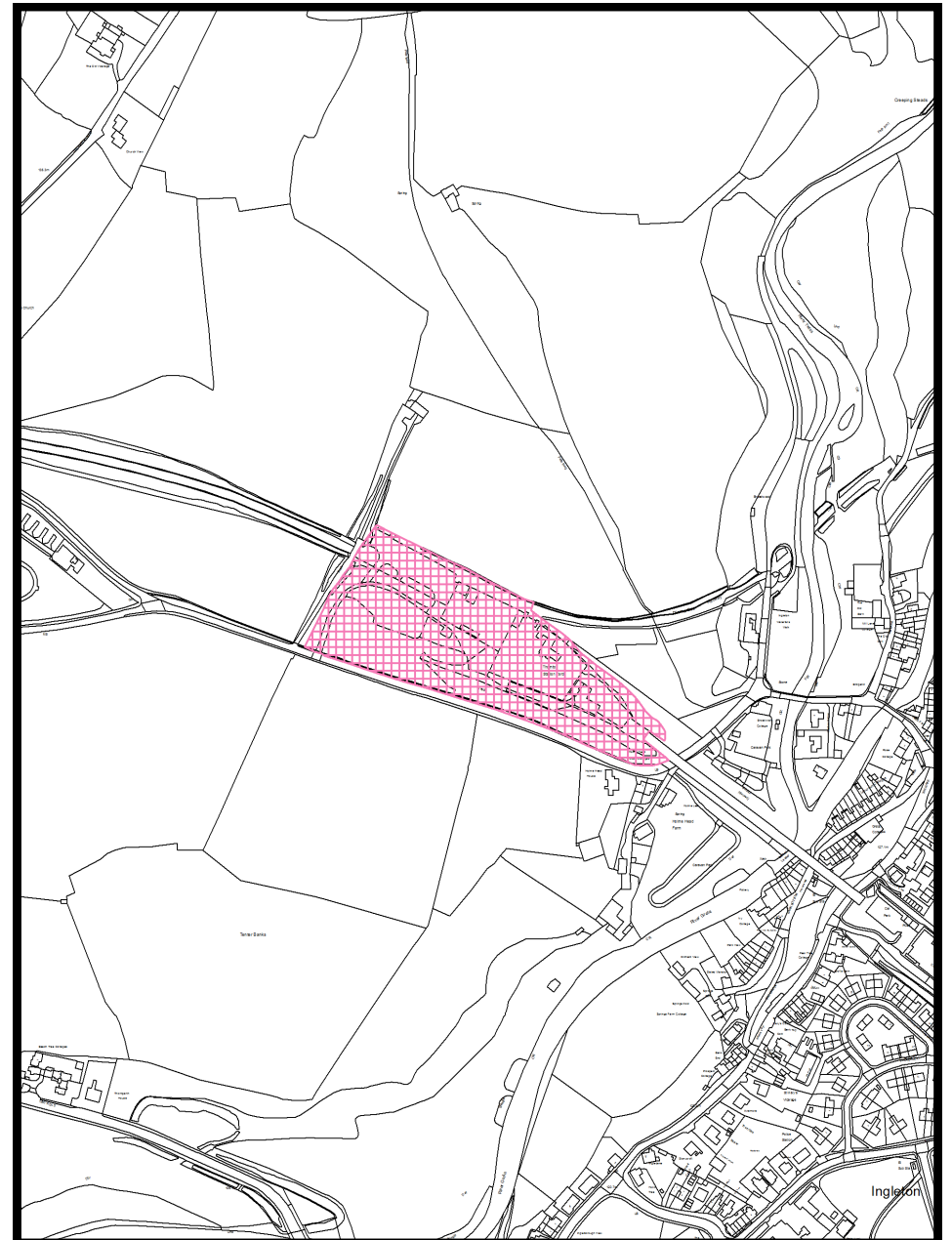


EC2: Existing Employment Area: Ings Lane, Skipton (Publication Local Plan 2018)









## June – July 2017 Draft Local Plan

## Policy Response Paper – Policy Ref: EC3

<b>Policy: EC3</b>			
<b>Aim of the Policy: To support the rural economy so that it may grow and diversity in a sustainable way to provide long term economic, environmental and social benefits for local communities.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan</b>
The figures quoted relating to The Superfast Broadband Project are incorrect. Website indicate that 89% of North Yorkshire should have coverage by mid 2017 (phase 2). Communication between SFNY and Stirton with Thorlby in March 2017 state that Phase 3 will provide coverage in North Yorkshire to 95% of the county and be completed by 2019/20,	The Superfast North Yorkshire Project website state that “By the middle of 2017, SFNY will have completed Phase 2 of our rollout and brought superfast broadband to 89% of the county’s homes and businesses. SFNY is currently working on a Phase 3 procurement to further extend superfast coverage.”	Yes	The sentence currently included in paragraph 7.10 of the plan will be amended to include the following:  “By the middle of 2017, SFNY will have completed Phase 2 of our rollout and brought superfast broadband to 89% of the county’s homes and businesses. SFNY is currently working on a Phase 3 procurement to further extend superfast coverage.”
Policy shows lack of recognition of the need to preserve the landscape supporting working farms. Any changes to this landscape may threaten local tourism.	Para 7.9 recognises the contribution farming (along with industry, tourism, cultural, transportation, shops, pubs, community services, small businesses and self-employment) make to the rural economy that helps to maintain the vitality and viability of the countryside, the quality of its landscapes and villages and the sustainability of rural life. Para 7.13 states that Craven’s landscape, heritage, culture and quality of life depend on a living and working countryside.	No	

	<p>Criteria a) enable enterprise, welcome innovation, support economic development that will benefit the local environment. Criteria b) recognises opportunities to use farmland and buildings in new and different ways to support farm businesses and to diversity the wider rural economy.</p> <p>It is considered that the elements of both the policy EC3 and supporting text set out above show how this draft policy recognises the need to preserve the landscape supporting working farms whilst providing opportunities for the growth and diversification of the rural economy in a sustainable way.</p>		
Support for CDCs ambition to support the rural economy, which is in line with para 18 & 28 of the NPPF.	Support is noted and welcomed.	No	
Pleased that criterion c) has been updated to state “helping existing and new rural businesses”. Disappointed that CDC has not recognised the contribution traditional farming and agricultural practises make to the rural economy of Craven and their need to be protected.	<p>Support is noted and welcomed.</p> <p>Para 7.9 will amended to recognise the contribution farming and agricultural practises make to the rural economy of Craven.</p>	Yes	<p>The following sentence will be added to Para 7.9 of the supporting text to draft policy EC3:</p> <p><i>“The contribution traditional farming and agricultural practises have made and continue to make to the rural economy of Craven are recognised. This policy aims to support all types of economic activity that contribute to Craven’s rural economy, provided they meet the requirements of policy EC3.”</i></p>
Support for criterion c), which provides further recognition of the benefits of tourism to the rural economy of Craven	Support is noted and welcomed.	No	
This policy is quite limited in its scope, in	Disagree that this policy is limited in its scope.	No	



that it really only looks at diversification of agricultural land. There should be a policy that supports both innovative farming methods, consistent with animal welfare concerns, and there should be policies which use agricultural land to enhance environmental policies.	The aim of this draft policy is to support the rural economy of Craven. The policy is worded in fairly general terms, which recognises the wide range of economic activities that make up the rural economy of Craven and can consider a range of specific proposals relating to any aspect of the rural economy. , which include a wide range of businesses including agriculture. Any proposals relating to innovative farming methods would be assessed against this draft policy, including criterion a) which aims to enable enterprise, welcome innovation and support economic development proposals the will benefit the local economy, environment and quality of life.		
NYCC welcome Policy EC3, which helps contribute the delivery of County Council Priorities of <i>'Enhancing the environment and developing tourism and the green economy – by promoting and improving the county's environmental, ecological and heritage assets to deliver a high quality natural and built environment, and by supporting low carbon energy generation and the development of economically, socially and environmentally sustainable local communities.'</i>	Support is noted and welcomed.	No	

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## June – July 2017 Draft Local Plan

## Policy Response Paper – Policy EC4: Tourism

<b>Policy EC4: Tourism</b>			
<b>Aim of the Policy: To help secure a thriving economy, vibrant town centres, cultural experiences, active recreation, rich biodiversity, beautiful landscapes and well-preserved historic places, which will be both attractive to visitors and beneficial to local communities.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan</b>
Suggested additional wording: To encourage the growth of non-car tourism, especially from East Lancashire, the Local Plan supports the re-instatement of the Skipton to Colne rail link. {linking the Embsay railway to Skipton station may also have some relevance here, but perhaps they should suggest appropriate wording}	Noted. Draft policy SP2 supports reinstatement of the Skipton-Colne railway and it would be appropriate to highlight the relevance of this to sustainable tourism, in the supporting text of draft policy EC4.	Yes	References to policy SP2 and the Skipton-Colne railway line have been added to the 'Public transport, walking and cycling' section of the supporting text.
Paragraph 7.20 to 7.24. Support. This Paragraph provides a good overview of the multiple significances of Bolton Abbey, the challenges it faces and the contribution that this area might play in the economic wellbeing of this area.	The support is noted.	No	
Policy EC4, Criterion (g) and Paragraph 7.28 to 7.34. Support. All of the places which have been put forward as areas where the Council will support, in principle, proposals for future tourist development could also assist in encouraging investment into and, therefore, conservation of the District's heritage assets.	The support is noted.	No	
Policy EC4, Criterion (h)(II). Support. We support the requirement that alternative tourism developments on the site at Hellifield and Long Preston conserve heritage assets (including the Long Preston Conservation Area and the Settle-	The support is noted.	No	

Carlisle Conservation Area). This will help to ensure that the future tourism development in this area is delivered in a manner consistent with the conservation of the historic environment.			
Object. I would like to support this [HE-LGS1] being a Green Space for our village. However Draft Policy EC4 tourism is very worrying in the proposed draft plan it would appear to be the total opposite of protection for this bio diverse Rich area and could allow for the door to be open for destructive development in the name of local Tourism.	Draft policy EC4 acknowledges an existing 'tourism development commitment', which already has planning permission and includes biodiversity safeguards. The commitment does not intrude into proposed local green space and LGS cannot be designated where conflict with an existing planning permission would arise.	No	
Object. Tourism 7.19 We are disappointed to see that land to the west of Hellifield is subject to a Tourism Commitment Development designation. We note from paragraph 7.19 (Page 165) that this is based on an extant permission granted in 2005. As we have previously pointed out, the legal requirement to provide an Environmental Impact Assessment on the outline planning application (42/2002/2763) was not complied with, therefore we consider the validity of this permission to be flawed. Reference note #45, seeks to support this extant permission, but in order to be balanced we feel it should also reference the concerns regarding validity. Reference note #46 refers to a management plan, to be implemented Prior to any work commencing, which was a condition of permission being granted. To date no evidence of the implementation of this plan is evident. Note #46 does reference the Habitats and species recorded on The NEYEDC data base (2016) but omits to reference the large amount of ecological data and records submitted to the latest	The planning permission has not been invalidated by any legal or other relevant determination and is therefore extant. Any suggestion to the contrary within a local plan policy would be unjustified and inappropriate.  The draft policy's reference to a management plan is correct.  NEYEDC data is compiled from a number of sources (including field notes made locally and submitted to recording bodies) and avoids duplication. However, information submitted in response to planning applications does help to reinforce the council's evidence base.	Yes	Footnotes 46, 47 and 48 have been removed and supporting text in the Tourism Development Commitment section now sets out the relevant issues of landscape, heritage, archaeology, biodiversity, local green space and public rights of way and cross-references to local plan policies ENV1, ENV2, ENV4, ENV10 and ENV12.

<p>planning application submitted for this site in October 2016 (42/2016/17496)</p> <p>Note #48 does however reference the Settle- Carlisle Conservation Area appraisal (2016)</p> <p>Note #47 references partial archaeological surveys in 1999 and 2007 but omits the more detailed survey undertaken in 2017. In conclusion we have to question why such weight is being given to, extant permissions, in order to give justification to an inappropriate Committed Tourism policy when they have been superseded by subsequent planning applications.</p> <p>We believe the local plan should be forward looking and use the latest known information when establishing policy.</p> <p>Tourism</p> <p>7.33 (page 170) Hellifield Railway station.</p> <p>In this summary, the areas around the station buildings are described as mainly operational land.</p> <p>This is misleading. We believe the areas are subject to an extant planning permission and mostly in private ownership. The uncompleted Shed is subject to a planning/building enforcement notice and a condition of the extant permission requires the reinstatement of the original landscape. There are also the issues of the incomplete access road, extending Waterside Lane ( known as the Road to nowhere) to the Station, and the European regeneration Grant Monies supporting this access road.</p> <p>Whilst we understand the historic difficulties with the site owner, we feel the integrity of the local plan could be diminished by not referencing the extant permissions and issues, following the precedent of reference notes set in section 7.19.</p> <p>Comments submitted by the Committee of Save OUR Craven Countryside</p>	<p>As the comment highlights, evidence is always subject to review and there is always a preference for the most robust and up-to-date evidence available at the time. Therefore, it would be better for the supporting text to set out the relevant issues rather than attempt to catalogue an evolving evidence base.</p> <p>The planning permission is extant, has not been superseded and is a matter of fact not policy. Draft policy EC4 acknowledges that the planning permission exists and that the approved development is therefore a commitment, which is both appropriate and necessary.</p> <p>Operational railway land is subject to specific acts, regulations and bylaws and the reference is therefore correct and not misleading. With respect to 'Hellifield – railway station area', references to ownership, planning history, building control history and legal history are not relevant or necessary to justify the draft policy or supporting text. Footnote 45 relating to the 'tourism development commitment' is both relevant and necessary in that regard and other footnotes (46, 47, 48) are to be removed, as agreed above.</p>		
Object. 7.1-7.34 Tourism	Noted. The market town plan will be	Yes	A new section on 'Local

Settle is a massive tourist draw to Craven District, yet in the whole section on tourism it is not even mentioned. Businesses in the Settle District and all the products and services they supply to local residents are fundamentally reliant on tourism. Settle Town Council and Chamber of Trade are jointly working on a 'Market Town' plan to attract both visitors and new businesses to the Settle district, and this should be acknowledged in the Local Plan.	examined and, if appropriate, a reference will be added to the supporting text and part k) of the draft policy will be amended.		strategies and action plans' has been added to the supporting text and part k) of the policy now encourages and supports business organisations, as well as communities, to promote tourism through local initiatives, as well as Neighbourhood Plans.
Tourism 7.30 Support enhancing the tourist experience – but surely this should include adopting the neighbourhood village plan which has a number of local green space proposals which would achieve this.	The support is noted. Neighbourhood plans are addressed in paragraph 7.36 and part k) of the draft policy.	No	
Hellifield tourism commitment area will undoubtedly endeavour to expand into what is hoped will be designated a LGS. I understand that the restrictions relating to LGS would then apply and to remove doubt, it is necessary that this is made clear within this policy.	This should be clear in part h) of the draft policy, but the comment is noted and further clarity can be added.	Yes	Local green space is now referred to in the supporting text. Part h) of the policy refers specifically to development of non-designated (white) land.
We support the following new inclusions in the new draft: More recognition of the importance of tourism to the Craven economy	The support is noted.	No	
Object. Tourism Allocations Draft Policy EC4 proposes to allocate 8 sites for tourism development (including at Hellifield). However, these sites are not clearly illustrated on the Proposal Maps. In particular, draft Policy EC4 identifies Bolton Abbey/Bolton Abbey Railway Station for tourism development. The Proposal Map identifies 3 potential areas for tourism development however, it is clear from the supporting text to draft Policy EC4 that specific sites at Bolton Abbey cannot be allocated due to planning	Draft policy EC4 does not allocate sites, but designates broader key locations for tourism development. This is clearly set out in the supporting text and draft policy. Draft policy EC4A relates specifically to Bolton Abbey. Again, sites are not allocated, but general locations are identified. Sensitive development – subject to several	No	

restrictions and whether particular areas of land can be developed. The Council cannot therefore rely on the Bolton Abby area to provide a substantial amount of tourism development that will be required.	safeguards set out in the policy and supporting text, including the requirement for a collaborative masterplan – is achievable in planning terms and deliverable by the estate (see supporting comments from CST, below).		
<p>Firstly CST has 450,000 visitors per annum to its CVA, which acts as a southern gateway for many of the 3.5 million visitors per year to the National Park, and wishes to SUPPORT the introduction of a policy that provides general support for multiple types of tourism development. The tourism sector and economy covers many areas including holiday cottages, day visitor attractions, eating and drinking establishments, countryside access etc., as reflected at Bolton Abbey, and as needed in the interests of rural diversification and regeneration. In the view of CST it is entirely preferable that a single overarching tourism policy is included in the Local Plan, as proposed by CDC, as opposed to numerous individual detailed policies on different types of tourism development. Secondly, of particular relevance to Bolton Abbey the policy states that:</p> <p>“Tourism will grow in a sustainable way, so that it helps to improve the economy, environment and quality of life. Such growth will be achieved by:</p> <p>...</p> <p>g) Supporting, in principle, proposals for tourism development and for achieving synergies of co-location, in the following key locations for tourism development identified on the policies map: Bolton Abbey/Bolton Abbey Railway Station” (our emphasis)</p> <p>The wider policy has seen amendments and additions since the second draft pre-publication draft Local Plan although not in a</p>	The support is noted.	No	

<p>way which has impacted on the above reference.</p> <p>CST supported the policy and its reference to Bolton Abbey during the last consultation, only going on to object to the lack of inclusion of any additional more detailed policy guidance relating to Bolton Abbey. This is now addressed by the inclusion of policy EC4a, in the current draft Local Plan.</p> <p>CST SUPPORTS the positively framed tourism policy EC4 as it relates to its interests in, and contribution to, the tourism sector.</p>			
<p>Object. The Trust is of the opinion that the Hellifield area should not be included in the list of tourism development areas for Craven. There is an undecided planning application for the site and there are many unresolved objections to the development. The Trust has an outstanding objection to the current development application on a number of grounds, the objection is included with this response. Also Natural England have requested further information on hydrological impacts on the Pan Beck Fen SSSI from the current application. Unless these impacts can be mitigated a large tourist development may not be deliverable.</p> <p>If the site is to be included as a key tourism development site the Trust would like to see clear policies to ensure no loss of biodiversity. Since the original planning permissions on the site were given there have been major changes in national policy, for example the NPPF was not in place in the year 2000 and paragraphs 9 and 118 in the NPPF charge local authorities with ensuring no net loss of biodiversity. To ensure that a development at Hellifield Flash does not have a damaging impact on wildlife in Craven the local plan will need a policy to ensure that there is a full assessment of the loss of habitat and biodiversity due to the development, and a mitigation plan for off-site habitat creation if necessary. The Trust would also expect a detailed plan to show what areas of the site might be</p>	<p>The comments are noted, but the proposed designation of a 'tourism development commitment' is an acknowledgement of the extant planning permission and is not related to the much larger-scale proposal put forward in the current planning application. The extant permission, which includes safeguards for biodiversity, is a relevant fall-back position that is necessarily and appropriately reflected in the draft policy. Any alternative proposals put forward for land covered by the 'tourism development commitment' designation would be judged against part h) of the draft policy, which again includes safeguards for biodiversity and other important matters, including local green space. These matters are also referred to in paragraph 7.19 of the supporting text. Furthermore, part l) of the draft policy makes it clear that proposals must accord with other</p>	No	

developed as this is not clear within the mapped areas. YWT has submitted its original representation to the current planning application on the site (42/2016/17496) dated Nov 2016.	relevant local plan policies, which would include draft policy ENV4: Biodiversity, and must help to achieve sustainable development. Therefore, it is considered that draft policy EC4 provides both an appropriate acknowledgment of an existing development commitment and an appropriate means to safeguard biodiversity from potentially harmful alternative proposals, in a way that accords with the NPPF.		
The Trust is pleased to see that Nature Tourism will be supported. The Trust would like to see a specific mention of Nature Tourism in Policy EC4, either as a specific point or included in points c) or d).	Noted. Inserting the word 'wildlife' into part d) would work well, but inserting the phrase 'Nature Tourism' would require more significant changes. Paragraph 7.35 could also be amended so that 'wildlife' and 'Nature Tourism' are referenced together.	Yes	'Wildlife' has been added to part d) of the policy and 'wildlife activities' have been added to the 'Rural and countryside areas' section of the supporting text.
Natural England notes the reference in para 7.19 to supporting tourism development west of Hellifield and advises that we have an outstanding objection to planning application 42/2016/17496 - outline application for a leisure centre including swimming pool, hotel, up to 300 lodges and a park & ride facility at Land to the west of Hellifield, Skipton, BD23 4HJ. We have outstanding concerns about the impact on birds which are notified features of River Ribble (Long Preston Deeps) SSSI which use the Hellifield Flashes. We are also concerned about potential hydrological impacts on Pan Beck Fen SSSI and impacts on the setting and special qualities of the Yorkshire Dales National Park. Without further information Natural England has concerns regarding whether this proposal in the plan is deliverable. We	The proposed 'tourism development commitment' is a designation (rather than an allocation) which acknowledges the extant planning permission described at paragraph 7.19. This designation is not related to the much larger-scale proposal put forward in the current planning application. Part h) of draft policy EC4 should be clear, particularly if read in conjunction with the supporting text at paragraph 7.19 and Diagram EC4 on page 174. The policy is assessed in the Sustainability Appraisal of Draft Policies	No	

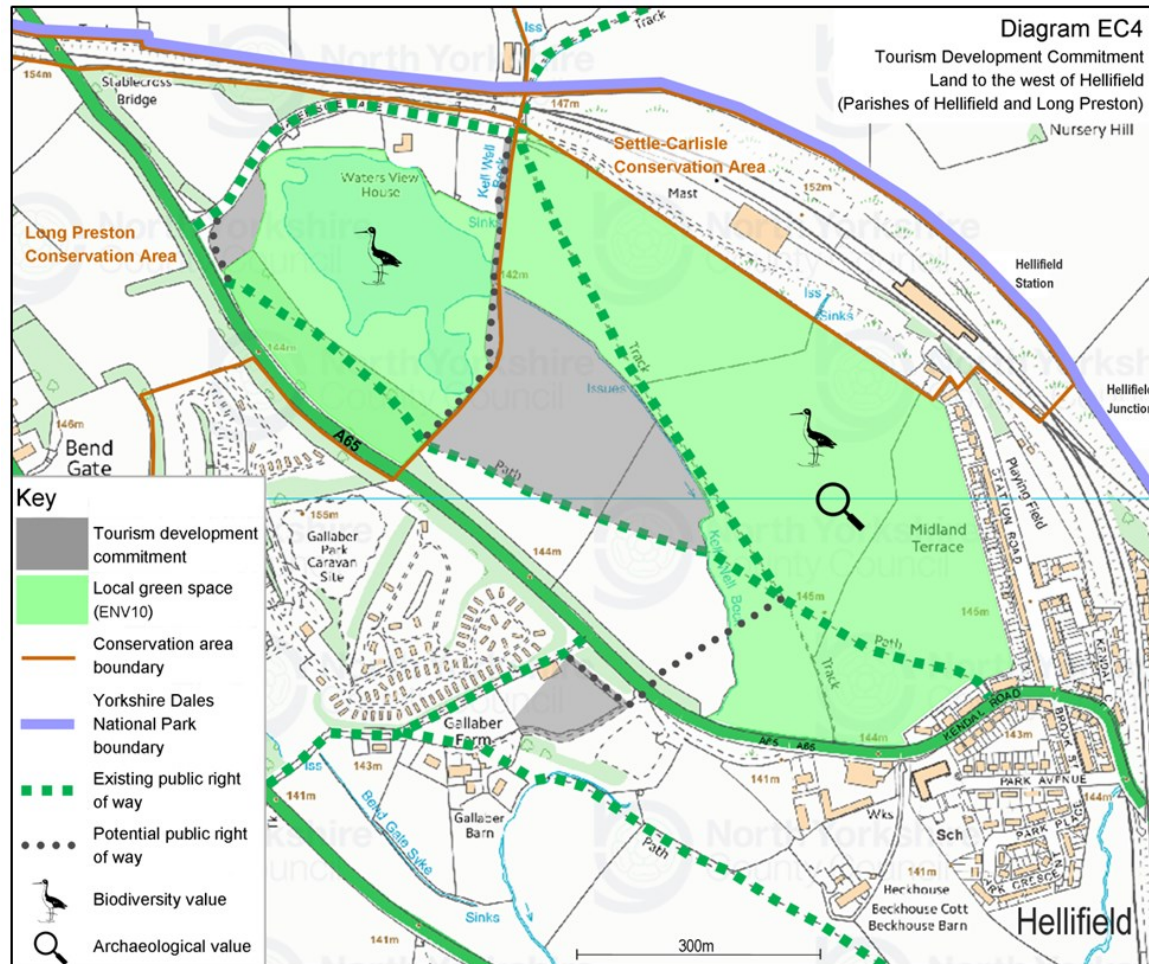


are unclear from the proposal map and the plan policies whether this proposal is an allocation in the plan but note that para 7.19 supports this proposal and therefore needs to be assessed in the Sustainability Appraisal and Habitats Regulations Assessment.	(June 2017), which accompanied the draft local plan, and Natural England's comments will inform the HRA. (NB. The response to comments from YWT, above, may also be of interest.)		
Object. Paragraph 7.19 is correct in saying that it has extant planning permission (Hellifield Flashes), but does not say that this planning permission has been in place for many years with no significant progress, and therefore could be considered as now redundant. If the developer had wanted to progress the plans, he could have done so in the "boom years" in the early 2000's rather than wait till now when we are still suffering austerity and seem likely to suffer another recession due to excessive borrowing. Paragraph 7.33 is very unambitious in that there appears to be no policy to take back control of the area round Hellifield Station for development from West Coast Railways who have let the site become overgrown and an eyesore. There should be a forced takeover of the site for appropriate development. Agree with the conditions placed on developments in Paragraph h of EC4, but am concerned about CDCs ability to enforce this.	The extant planning permission is not redundant and continues to be a relevant fall-back position for the landowner and any developer. This is necessarily and appropriately reflected in the draft policy.  The draft policy would not be justified or achievable if it were to be based on the compulsory purchase of operational railway land and would undermine the soundness of the local plan.  The support for part h) of the policy is noted.	No	
Allocated development sites. The Draft Local Plan proposes to allocate a range of sites for housing and employment development, including some in close proximity to the National Park. The Authority is concerned to ensure that impacts upon the National Park have been fully and robustly assessed prior to the allocation of these sites. Based upon the information provided, both in the Draft Local Plan itself, and the accompanying Residential Site Selection Process background paper, the Authority does not consider that the process followed has fully assessed these impacts.	The comments are noted, but the proposed 'tourism development commitment' is a designation (rather than an allocation) which acknowledges the extant planning permission described at paragraph 7.19. This designation is not related to the much larger-scale proposal put forward in the current planning application. Nevertheless, it would be appropriate to add conservation of the	Yes	Supporting text in the Tourism Development Commitment section now highlights landscape as an important matter and part h) i) of the policy includes a requirement for 'Conservation of the landscape and of the setting and special qualities of the Yorkshire Dales

<p>The Authority has already expressed concern about, or objected to development of, some of these sites as part of consultations on planning applications, or comments on previous iterations of the Local Plan and its accompanying evidence documents. Pre-application advice has also been offered to the prospective developers of some of these sites in relation to their impact upon the National Park. In particular, the following sites are highlighted:</p> <ul style="list-style-type: none"> <li>•Hellifield Station tourism development commitment - the Authority commented last year on an outline planning application (42/2016/17496) for leisure development on a larger site encompassing the area now proposed for allocation in the Local Plan as tourism-led development. The Authority considered that that particular proposal would result in a moderately adverse impact on the National Park. With the reduction in site area proposed for allocation, and extensive adjoining area proposed to be designated as local green space, the impact of this allocation is likely to be significantly reduced. Nonetheless the potential impact of this allocation upon the National Park would benefit from a fuller investigation.</li> </ul>	<p>national park setting to part h) of the draft policy and to the supporting text at paragraph 7.19.</p>		<p>National Park’.</p>
<p>We welcome Policy EC3, and the contribution that tourism can make to the local economy in Policy EC4 is also welcomed. This helps contribute the delivery of County Council Priorities of ‘Enhancing the environment and developing tourism and the green economy – by promoting and improving the county’s environmental, ecological and heritage assets to deliver a high quality natural and built environment, and by supporting low carbon energy generation and the development of economically, socially and environmentally sustainable local communities.’</p>	<p>The support is noted.</p>	<p>No</p>	

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

# EC4: Tourism Development Commitment (Pre-Publication Local Plan 2017)



## EC4: Tourism Development Commitment (Publication Local Plan 2018)



## June – July 2017 Draft Local Plan

## Policy Response Paper – Policy EC4A: Tourism-Led Development at Bolton Abbey

<b>Policy EC4A: Tourism-Led Development at Bolton Abbey</b>			
<b>Aim of the Policy: To help address current issues within the Bolton Abbey Core Visitor Area, which diminish the visitor offer and the owner's ability to support ongoing environmental management and architectural conservation, by providing a framework for the delivery of sensitive and sustainable tourism-led mixed-use development.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan</b>
Support. The Bolton Abbey Estate contains some of the most important heritage assets in the plan area, it is one of the key attractions of this part of North Yorkshire, and makes a considerable contribution to the tourism economy of the surrounding area. However, as Paragraph 7.22 notes, this area is underperforming. In order to help ensure the long-term conservation of this area and its assets, it is also important that the economic potential of this area is also realised. This Policy provides an appropriate framework in which to consider future development proposals and will help to ensure that proposals for future tourism and mixed-use development in this area are delivered in a manner which will also conserve the numerous significances of this area that are set out in Paragraph 7.20.	The support is noted.	No	
As well as STRONGLY SUPPORTING draft policy EC4a, CST CONSIDERS the policy (and the approach of the CDCLP to delivering development at Bolton Abbey) is sound. In relation to the tests of soundness incorporated in the NPPF at paragraph 182 we note as follows: “● Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from	The support is noted.	No	

<p>neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;”</p> <p>The policy and approach to delivering development at Bolton Abbey has been positively prepared following years of engagement between CST and CDC (and the YDNPA as neighbouring planning authority) following an internal review of the Bolton Abbey operation in 2012. The development requirements and management requirements of Bolton Abbey have been assessed via numerous surveys and assessments which have been produced and shared with CDC and other stakeholders. These include:</p> <ol style="list-style-type: none"> <li>1. The Bolton Abbey Heritage Capacity Assessment (by FAS)</li> <li>2. The Bolton Abbey Landscape Capacity Assessment (by Gillespies)</li> <li>3. The Bolton Abbey Transport Statement (by Arup)</li> <li>4. The Bolton Abbey village Masterplan (by CST)</li> <li>5. The Bolton Abbey Visitor Accommodation Needs Assessment (by Frey Consulting)</li> <li>6. The Bolton Abbey Staff Accommodation Needs Assessment (by Frey Consulting)</li> <li>7. The Bolton Abbey Ecological Statement (by BLE)</li> <li>8. The Preliminary Bolton Abbey Heritage Assessment (by ArchHeritage)</li> <li>9. The Preliminary Bolton Abbey Landscape Appraisal (by Gillespies)</li> <li>10. The Bolton Abbey Estate Tourism Development Strategy (by CST)</li> <li>11. Bolton Abbey Heritage Landscape Management Plan (by English Nature et al).</li> </ol> <p>Furthermore, all of these documents have informed the BADOAS document by Lichfields (2017), whilst some of the documents informed a Bolton Abbey Village Masterplan by Rural Solutions (2015).</p> <ul style="list-style-type: none"> <li>● Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;</li> </ul> <p>CDC has been presented with various strategies for delivering</p>			
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<p>development at Bolton Abbey including a large site allocation. It has determined that a specific policy based route is the most appropriate route. Liaising with CDC has also led to CST: reducing the scale of its development aspirations; adjusting the proposed layout so as to respect medieval features; increasing the amount of planting to screen development from sensitive views (including some in the YDNP).</p> <p>The SA of the policy by CDC has identified no reasonable alternatives. This is the view also of the BADOAS report which considered four development options and found only one realistic option to accommodate development.</p> <p>CST considers that CDC has justified why the policy based approach outlined in EC4a is the most appropriate strategy for delivering development at Bolton Abbey.</p> <ul style="list-style-type: none"> <li>●Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; Proposals for delivering development at Bolton Abbey have been brought forward via a Masterplan which has formed the basis of discussion with CDC, YDNPA, HE and other organisations. The policy wording incorporated within EC4a has been the subject of informal consultation with CST, YDNPA and HE prior to its inclusion for public comment. The policy wording is broadly or entirely supported by all consulted and it therefore presents an effective framework for the delivery of development over the plan-period.</li> </ul> <p>Furthermore, in terms of delivery the BADOAS includes a specific section (eight) on how development will be delivered in the CVA in terms of Design; Delivery Mechanisms; and, Phasing, demonstrating the effectiveness of the policy.</p> <p>The SA of the policy identifies that the policy will be effective when considered against a number of objectives of the CDCLP.</p> <ul style="list-style-type: none"> <li>●Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</li> </ul>			
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<p>The policy is considered to accord with national policy. It is positively framed and gives import to tourism development, the rural economy and protection of heritage and environmental assets, all of which are given import in the Framework. Both CDC and HE have accepted that heritage, as confirmed by the NPPF, is only one factor in providing for sustainable development and the policy reflects this balance. The SA of the policy notes that there will be Major Positive Effects in terms of heritage interests in Bolton Abbey.</p>			
<p>CST STRONGLY SUPPORTS this policy which has been introduced since the last pre-publication draft was released for consultation. The policy positively addresses many of the weaknesses and threats identified in the Bolton Abbey Tourism Development Strategy 2014 which followed on from a wider review of the Bolton Abbey operation by CST in 2012. These weaknesses and threats are identified as follows in the BADOAS report (2017):</p> <p>“Weaknesses: lack of sense of arrival (and departure); visitor operation dependent on weather and school holidays; brief trips with little or no secondary spend; major planning constraints limit growth; high maintenance costs; loss-making entities (e.g. Post Office); staff cannot afford local house prices (i.e. long journeys to work); limited visitor accommodation; the CVA therefore has a limited and low value offer to visitors</p> <p>Threats: wetter summers; limited staff/other accommodation; increased competition; rising costs; planning constraints; listed buildings at risk.”</p> <p>CST’s comments on the last pre-publication draft in 2016 included an objection to the lack of certainty that the plan provided for development at Bolton Abbey, to which CDC has noted its support. For context CST’s consultation response dates May 31st 2016, noted as follows:</p> <p>“Specific Comments on Local Plan Approach to Bolton Abbey Village CST supports the inclusion of Bolton Abbey within the settlement hierarchy. However, without an allocation, or at the very least a</p>	<p>The support is noted.</p>	<p>No</p>	

<p>specific policy supporting development in Bolton Abbey, development in this specific village, the future growth of the settlement and community is left open to inference. It is unacceptable to CST for the future growth of Bolton Abbey to be led to the interpretation by Development Management of individual assessment of policies SP1, H1 and EC4. There is nothing to suggest that Officers would not take an overly cautious view in relation to heritage assets in the village.</p> <p>The Framework states that:</p> <p>“15. Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay.”</p> <p>The submitted draft Bolton Abbey Village Masterplan outlines why development on the site it identifies in the village is sustainable and CST requires that the Local Plan positively promotes development in Bolton Abbey village.</p> <p>Development on the site as set out in the Masterplan has clear objectives with numerous Plan Objectives of the Local Plan. Conformity of the Masterplan with these objectives is set out in tabular form at Appendix1of this letter.</p> <p>While CST supports draft policies SC4 and EC4 as they relate to the identification of the village as a suitable location to receive development, CST strongly objects to the failure of the Local Plan draft to provide plan led certainty on how this development will be delivered and to identify the Bolton Abbey Village Masterplan site for development.”</p> <p>CST considers that the introduction of the policy fully responds to the issues raised in the previous consultation response on the Local Plan and reflects its engagement with CDC since the review of the Bolton Abbey operation in 2012. The policy wording of CDC has been the subject of input from CST, HE, YDNPA and all organisations are in general agreement in relation to it.</p>			
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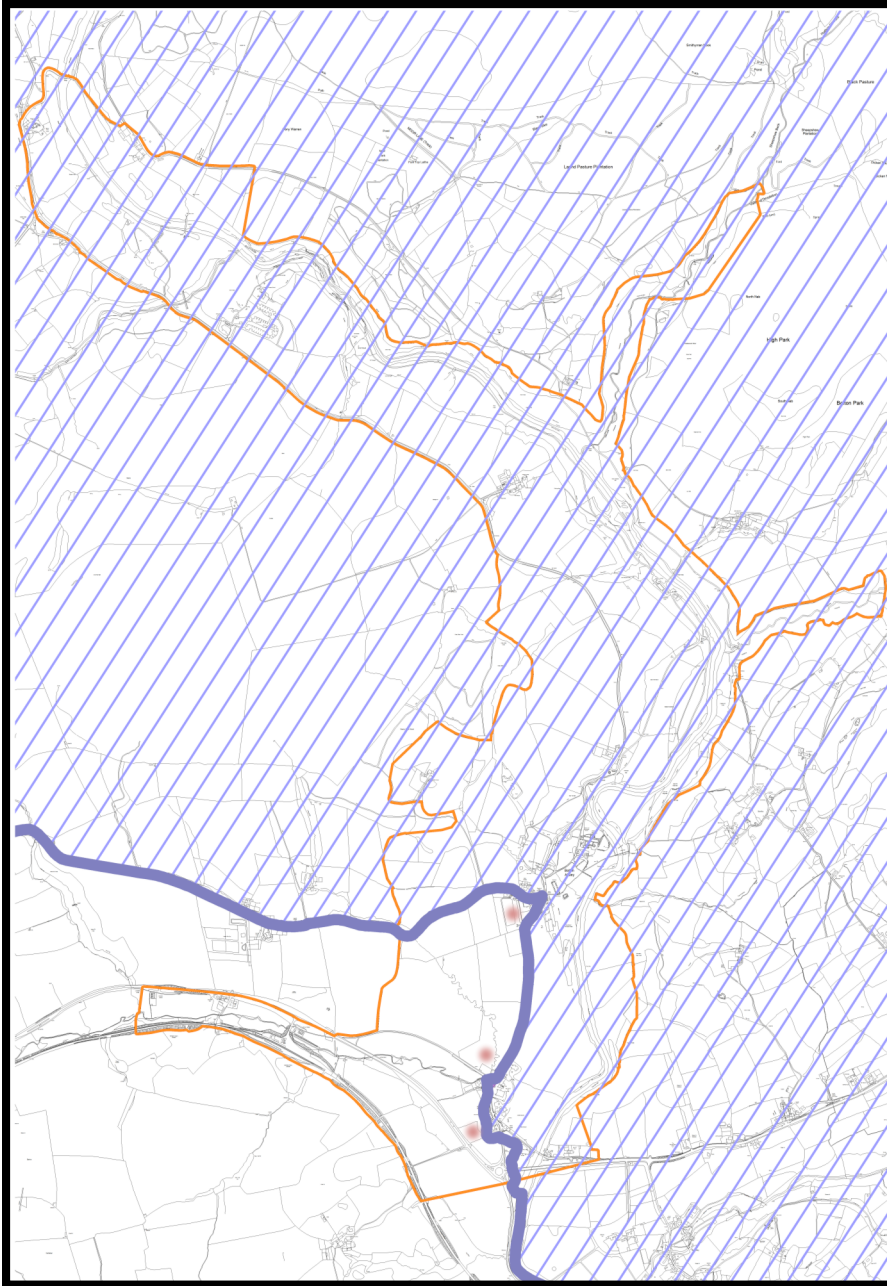


<p>Object. Natural England notes the ‘General locations for development within the Core Visitor Area t Bolton Abbey EC4a’ in the policies map and Policy EC4a. We broadly welcome the consideration of biodiversity and landscape constraints and the commitment to producing a masterplan in collaboration with Natural England, along with other key stakeholders.</p> <p>However we are concerned that the Bolton Abbey and Bolton Bridge area is particularly constrained, particularly in terms of impacts on the setting and special qualities of the Yorkshire Dales National Park. We note that the general locations appear to be on open green field sites in very close proximity to the boundaries of the National Park and are concerned whether the development types proposed will be deliverable in these locations without significant impacts on the National Park. We therefore advise that Landscape Capacity/Sensitivity Assessments should be undertaken in this area in order to identify what capacity there is for such development to be incorporated without significant impacts on the setting and special qualities of the Yorkshire Dales National Park. We also recommend that the policy is clear that any development proposals will need to be accompanied by LVIA and be very carefully designed to take into account views into and out of the National Park. Notwithstanding these specific concerns we broadly welcome the references to landscape and biodiversity constraints in the Tourism chapter.</p>	<p>The comment is noted, but it is considered that assessments undertaken as part of the landowner’s Bolton Abbey Development Options Appraisal Study (BADOAS) – which includes input from independent stakeholders – provide robust evidence to support the draft policy. However, it would be appropriate to add a reference to that document in the draft policy’s supporting text.</p> <p>NB. Letter and reminder sent to NE, including link to on-line BADOAS, but no response received at time of writing.</p>	Yes	A reference to the Bolton Abbey Development Options Appraisal Study (BADOAS) has been added as a footnote to the draft policy’s supporting text.
<p>Para 7.21 – update to refer to the adopted Yorkshire Dales Local Plan (2016).</p>	Noted - the reference will be updated.	Yes	The draft policy’s supporting text has been updated and now refers to the adopted Yorkshire Dales Local Plan (2016).
<p>In its broadest sense, this policy seeks to provide overall support for tourism development at Bolton Abbey subject to careful</p>	<p>The support and concerns are noted. However, it is considered that the draft</p>	Yes	A reference to the Bolton Abbey

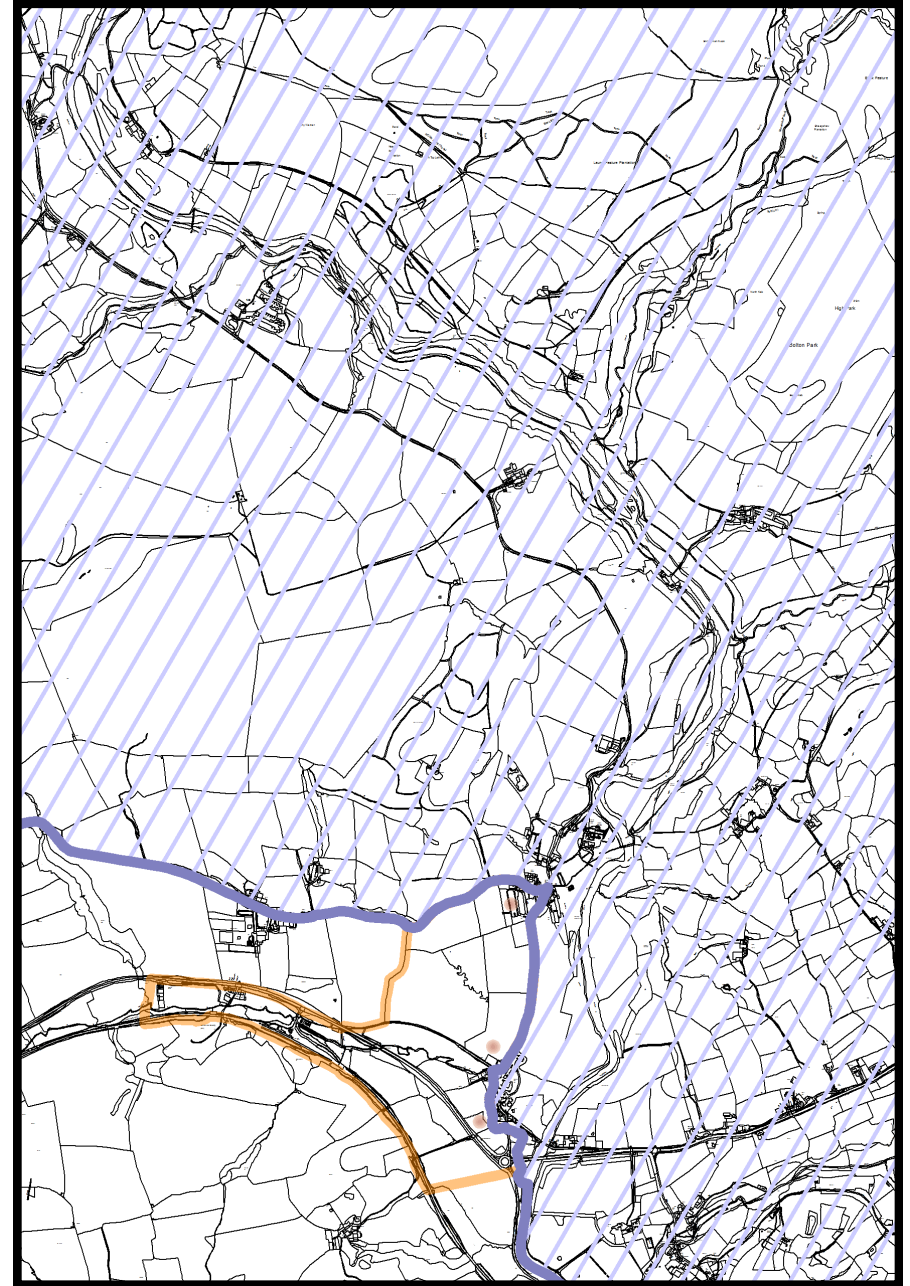
<p>consideration of a range of issues commensurate with its obvious sensitivity. In this respect, the Authority has no issue with the policy. Issues start to arise, however, in the degree to which the policy concedes support for certain fundamental aspects of potential development at Bolton Abbey, without knowing what much of it means in practice. In particular, the 'larger scale development' at two locations adjoining the National Park boundary, the 'new build visitor accommodation', the 'mixed use development', and a very broad range of acceptable uses at other sites within the Core Visitor Area. Whilst accepting that these are not formal land allocations, the direction of travel is clear. The Authority considers that the policy undermines the value of the subsequent 'comprehensive strategy and masterplan process' that the policy itself then requires. In short, the cart is coming before the horse.</p> <p>If the council believes there is justification for a location-specific tourism policy it needs to be fully and independently assessed in terms of the potential impacts (the analysis in the sustainability appraisal of the draft policies is too cursory for this purpose). The assessment could build on some of the work commissioned by the Bolton Abbey Estate as part of the Development Options Appraisal Study. Rather than trying to second guess a bespoke policy now, a simpler approach would be to adopt the masterplan/strategy as a supplementary planning document 'hung' from the Local Plan's general policies on tourism, business and housing.</p> <p>Finally, on a technical point, the policies map should not delineate the extent of the Core Visitor Area within the National Park boundary, for the avoidance of doubt and because the Yorkshire Dales Local Plan makes no specific provision for this.</p>	<p>policy provides a necessary, appropriate and clear framework for the formulation and consideration of subsequent and detailed proposals, and does not undermine the required strategy and masterplan process by putting the cart before the horse. It is also considered that assessments undertaken as part of the landowner's Bolton Abbey Development Options Appraisal Study – which includes input from independent stakeholders including Craven District Council, YDNPA, Historic England, Natural England, the Environment Agency and the local community – provide robust evidence to support the draft policy. However, it would be appropriate to add a reference to that document in the draft policy's supporting text. The alternative suggestion of an SPD is also noted, but it is considered that the collaborative approach, as envisaged in paragraphs 7.23 to 7.27 of the supporting text, is likely to be served better by the draft policy and its requirement for a strategy and masterplan. The extent of the Core Visitor Area is relevant and important, but this could be adequately described and explained in the supporting text, rather than shown on the policies map.</p>		<p>Development Options Appraisal Study (BADOAS) and a description of the Core Visitor Area (CVA) have been added, as a footnote, to the draft policy's supporting text. The policies map (inset map no.24) has been amended and now only shows the CVA outside the YDNP.</p>
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\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

(Pre-Publication Local Plan 2017)



(Pre-Publication Local Plan 2018)



## June – July 2017 Draft Local Plan

## Policy Response Paper – EC5: Town, District and Local Centres

<b>Policy: EC5: Town, District and Local Centres</b>			
<b>Aim of the Policy: To support and promote town centres and to ensure the health of retail centres is not adversely affected by out of centre retail proposals.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan</b>
Statements are much too weak to give the planning committee any realistic chance of opposing inappropriate shopping developments. Suggest that the policy is strengthened, e.g. require developers to demonstrate it is not possible to reasonably meet the shopping need in a town centre location.	The Craven District Council Retail and Leisure Study 2016-2032(prepared by Nathaniel Lichfield and Partners) provides evidence of the Districts needs in terms of comparison and convenience floorspace. Policy EC5 requires developers to demonstrate that there are no locations available in the town centre that could accommodate that need, as suggested.	No	
The Theatres Trust supports the additional references to 'culture' through this and other policies in the draft plan. It now reflects guidance in Para. 70 of the NPPF relating to the safeguarding of community and cultural facilities.	Support is noted.	No	
Page 179, Table 5 - Key Settlement Specific Challenges. Table 5 does not recognise that the 'environmental quality of Settle suffers from traffic movements and road layout'.	The Council's evidence on town and village centres in the District (The Craven District Council Retail and Leisure Study 2016-2032, Nathaniel Lichfield and Partners) shows that, whilst the level of traffic in Settle may be	No	

<p>Disagree. The independent Settle town study published by START in 2012 and the petition of over 600 signatures collected by Friends of Upper Ribblesdale (FOUR) demonstrate that the volume and nature of traffic through Settle Town Centre (a conservation area) is detrimental to the local visitor economy. There is also a detrimental effect on buildings through chemical erosion of stonework from vehicle emissions and undermining of foundations caused by repeated vibration.</p> <p>We would like to see this Plan include the recommendation that the centre of Settle should be an HGV free zone (except for access/off-loading).</p>	<p>objectionable to local residents, it is not to the extent that it is detrimental to visitor numbers. Declaring an HGV free zone is outside the remit of the Council. If the local community wanted to pursue this course of action they would have to approach the Local Highways Authority at North Yorkshire County Council.</p>		
<p>Concern raised by Skipton Civic Society about Skipton's civic facilities and heritage of built and natural environment. Skipton Town Centre has thrived for many centuries as a retail and entertainment centre, providing employment as well as a place to meet, shop and relax. Its buildings and spaces reflect this history.</p> <p>Trends in the economy, in business practices and incomes, in age structure, in work and consumption patterns, put retail in Skipton Town Centre in peril. The Society does not see High Street retail surviving unless government policy changes. Government policy has been to encourage the switch away from High Street retail to online</p>	<p>Craven District Council cannot influence the investment decisions of central Government, and trends in globalisation and economics are beyond the control of central Government and the Local Plan.</p> <p>Policy EC5 has been prepared based on evidence that considers the changing trends in retailing. It is the aim of policy EC5 to allow town and village centres to adapt to changing times by promoting an appropriate balance of town centre uses including commercial, leisure, tourism, cultural and community, whilst retaining the primary retail function. They also allow for residential use, where it is considered appropriate.</p>	<p>No</p>	

shopping and banking. Billions of pounds of public money have been poured into broadband rollout, improvement of roads and development of driverless vehicles, and planning restrictions on out-of-town warehousing have been reduced. There has been no investment in high street retail. Skipton town centre is marginally in decline. Local initiatives and events, the efforts of local people and the town's heritage features have prevented the major downturn seen in many similar towns. The town centre retail is reducing and is bound to reduce further in the life of the Plan. Do not believe that the plan takes enough account of these changes in retailing and in transport.	The Local Plan will be monitored on an on-going basis and reviewed after five years. If policy EC5 is found to be ineffectual it can be revised at that time.		
New small retail businesses rarely survive long and if they do, it is often their internet sales that enable them to do so. Demand for retail space is likely to continue to fall as businesses move online. Believe the Council's previous policy to boost retail by limiting downstairs cafes has contributed to Skipton's success. At present, the decline of retail in Skipton means a rise in cafes and bars in spaces that were retail, but that cannot continue indefinitely.	Noted. The Primary Retail Area in Skipton has been identified on the Policies Map and the primary retail function will be safeguarded within this area.	No	
Skipton Civic Society - Outside of special event days, demand for town-centre parking is likely to fall rather than grow, as delivery	Support is noted.	No	

direct from warehouses to homes or a collection point is rising. It is noted that this has been taken account of to some extent in the proposed loss of the Cavendish Street car park. The Castle has already provided additional car park space. Therefore, the proposals to develop the Cavendish Street car park site are supported, although it would be preferable to see housing on the site. It is important that it is developed with heritage in mind, as part of the Conservation Area.			
The vitality and viability of the good range of local amenities at the Crosshills Level 3 District Centre would be enhanced by the development of additional housing in Glusburn/Crosshills. Additional housing would help to achieve the objectives of Draft Policy EC5 insofar as this District Centre is concerned.	The local housing requirements for the District represent the minimum number of new homes needed in Craven over the plan period. Additional homes can be provided on unallocated sites under the provisions of Policy H1: New Homes on Unallocated Sites.	No.	
We support the recognition of the range of amenities at Glusburn and Crosshills by way of the identification of Crosshills as a Level 3 District Centre.	Support is noted.	No.	

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## June – July 2017 Draft Local Plan

## Policy Response Paper – EC5a: Residential Use in Town and Village Centres

<b>Policy: EC5a: Residential Use in Town and Village Centres</b>			
<b>Aim of the Policy: To safeguard and protect the primary retail function of town and village centres.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan</b>
Policy EC5A, final Paragraph. Historic England supports the encouragement given to residential use of the upper floors of properties within the District's primary shopping areas. Making better use of vacant or underused floorspace within Craven's town centres can assist in not only meeting the District's housing needs but also, through encouraging more activity for a longer period in these areas, can improve the vitality and viability of its retail areas. Given that the Market Towns are all Conservation Areas each containing many historic properties, such an approach can also help ensure that these historic properties remain in use and encourage continued investment in their repair and maintenance.	Support is noted	No	
The Plan relies on retail in the Town Centre. Skipton Civic Society does not believe this is	Policy EC5A has been prepared based on evidence that considers the changing trends in	No	



<p>realistic based on current trends. It is important that the planning authority is ready to encourage and allow residential use in the Town Centre within the life of the Plan if its plans to sustain retail in the Town Centre fail.</p> <p>Public festivities will continue to be important in future, both for community cohesion and to help Skipton's economy. It is vital that public spaces and public heritage context for the events is retained. The economy is likely to rely more rather than less on tourism and leisure over the life of the Plan. Alongside this, pop-up shopping (including stalls) needs to be allowed to grow as traditional retail declines.</p> <p>Heritage buildings and spaces are vital to Skipton town centre as the context for both tourist and community uses. The Local Plan needs to be flexible enough to allow a return of town centre buildings to residential uses, if heritage buildings are not to become empty and derelict as retail falls.</p> <p>Commercial rents have been pushed upwards during the early 2000s by commercial property speculation and historic buildings have been sadly neglected. The Civic Society welcome continued or strengthened protection for heritage buildings and spaces between them.</p>	<p>retailing and town centre usage. It is the aim of policy EC5A to allow town and village centres to adapt to changing times by promoting an appropriate balance of town centre uses including commercial, leisure, tourism, cultural and community, whilst retaining the primary retail function. They also allow for residential use, where it is considered appropriate.</p> <p>The Local Plan will be monitored on an on-going basis and reviewed after five years. If policy EC5 is found to be ineffectual it can be revised at that time.</p>		
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\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## June – July 2017 Draft Local Plan

## Policy Response Paper – Policy Ref: INF1: Planning Obligations

<b>Policy: INF1: Planning Obligations</b>			
<b>Aim of the Policy: to provide a context for the use of and entering into planning obligations to mitigate the effects of development and the securing of contributions.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan</b>
The Education Skills and Funding Agency (ESFA) welcome in broad terms the approach outlined within the Vision for Craven (page 23) and within Policy INF1: Planning Obligations towards meeting the infrastructure needs arising from new developments. It would be helpful if the policy also included support for the allocation of land for the expansion of existing schools, and/or the provision of new schools, where new housing developments are likely to place additional pressure on existing or new schools within the district.	Support for the policy is noted. Policy INF1 provides the general context for other INF policies which deal with specific land use needs such as education. With regard to the addition sought, it is policy INF6 that considers education provision. It is within policy INF6 where the matter is dealt with and developer contributions sought for education facilities where appropriate. Furthermore, the Local Plan, has responded to the comments provided by the ESFA and proposes to allocate land for two new primary schools in Skipton and land to accommodate an extension to Bentham primary school. Nonetheless the addition of cross references to other policies in the plan will provide additional clarity and avoid misinterpretation.	Yes	Replace paragraph 1 of the policy EC5a as follows: <i>“Where necessary, planning obligations will help to mitigate the impact of Craven’s growth, support the provision of local infrastructure as identified under policies INF2, INF3, INF5 and INF6, secure community benefits and achieve sustainable development. This will be done in the following ways.”</i>
There is a need to ensure that education contributions made by developers are sufficient to cover the increase in demand for school places that are likely to be	See comments above. The Council will continue to work with the EFSA on addressing the impact of growth on school provision and when preparing any supplementary documents	Yes	See above.

<p>generated by major developments. The ESFA note that Craven District Council is not currently planning to introduce a CIL charging regime.</p> <p>The ESFA would be particularly interested in responding to any update to the Infrastructure Delivery Plan or review of infrastructure requirements, which will inform any emerging CIL documents / Developer Contributions SPD. As such, please add the ESFA to the database for future CIL and/or s106 SPD consultations.</p> <p>Conclusion</p> <p>Finally, I hope the above comments are helpful in shaping Craven's Local Plan, with particular regard to the provision of land for new schools. Please advise the ESFA of any proposed changes to the emerging Local Plan policies, supporting text, site allocations and/or evidence base arising from these comments.</p> <p>Please do not hesitate to contact me if you have any queries regarding this response. The ESFA looks forward to continuing to work with Craven District Council to aid in the preparation of the Local Plan.</p>	on this matter.		
Affordable housing may be required if the site is not 100% affordable housing?	Policy H2 currently sets out the policy framework for requiring affordable housing as part of large development schemes. This is usually sought 'on site' .Policy INF1 sets a context for detailing the nature of contributions.	No	None.
Section 8 of the Local Plan deals with	Support for the approach is noted.	No	None.

infrastructure, services and facilities. Campaign for the Protection of Rural England North Yorkshire (CPRENY) remain supportive in general of this section of the emerging Local Plan therefore, all of the comments made by CPRENY in this regard remain the same as in the previous consultation response (2016)			
There are too many “may be”s too few “will”s in this policy. It needs rewriting with firmer provisions for developers to contribute to the local infrastructure and established housing needs.	Disagree, rewording the policy as sought will result in a prescriptive approach to contributions which would be prejudicial to delivering the planned for growth.	No	None.
I particularly agree with paragraph b as to contributions from developers, but would urge CDC to try to negotiate some contribution from the smaller developments exempt in this policy, even though it may be relatively small. This could be a monetary contribution to local public facilities, or a contribution in kind, such as labour, materials, etc. towards a local project.	Support noted. Policies H2, INF1 and INF6 set thresholds where on site provision or payments in lieu would be required. These thresholds are considered reasonable for development in Craven.	No	None.
Policy INF 1 – The use of planning obligations to secure necessary infrastructure that arises as a result of the proposed development is supported. There is compelling evidence of an infrastructure funding gap that means that the County Council is not in a position to fully fund all relevant future infrastructure needs associated with new development. There should be clear links set out in the ‘Development Principles’ for each site, identified in Policies SP5 to SP11, of the likely	Support in principle for the policy is noted. Where development of an identified site requires contributions for or the provision of highway and education infrastructure, reference will be added to in the site development principles set out under policies SP5-SP11.  Modifications to policies are identified in the relevant response paper.	Yes	See response papers to sites identified under policies SP5-SP11 for textual changes.

required infrastructure contributions, particularly in relation to education provision and highways improvements. The proposed approach of developing a number of smaller sites, rather than larger sites capable of delivering infrastructure on sites, gives rise to the need for pooling of developer contributions. As highlighted in previous responses, pooling raises significant issues for the County Council as major infrastructure provider, particularly in relation to schools and highways.			
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\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.  
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## June – July 2017 Draft Local Plan

## Policy Response Paper – Policy Ref: INF2 Community Facilities and Social Spaces

<b>Policy: INF2 Community Facilities and Social Spaces</b>			
<b>Aim of the Policy: To allow opportunities for existing community facilities to be improved, and new ones created, to meet the needs of the local community as it grows and changes over time.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan</b>
Para 8.13 outlines the need for the provision of extra care facilities for the elderly but there is no specific mention of it in the policy.	<p>Comments noted and accepted.</p> <p>This policy does not specifically refer to the types of community facilities/spaces the policy applies to e.g., extra care. The supporting text at para 8.6, however does list the types of community facilities and social spaces the policy applies to, which includes extra care facilities.</p> <p>The draft policy sets out requirements for proposals for new facilities and improvements to existing facilities. The policy also aims to safeguard existing facilities and spaces, including extra care facilities. The loss of existing facilities would have to be justified by meeting the requirements set out at e) – h) of the draft policy.</p> <p>It is not explicit within policy INF3 that community facilities/spaces may include specialist forms of accommodation to meet the diverse housing needs of older people.</p> <p>Sites HB011 at Bentham, GA009 at Gargrave</p>	Yes	<p>Replace Policy H1 (and supporting text): New Homes on Unallocated Sites with <b>new supporting text and Policy H1: Specialist Housing for Older People.</b></p> <p><b>The diverse housing needs of older people in the area will be met by:-</b></p> <p><b>a) encouraging and supporting the provision of specialist housing for older people across all tenures in sustainable locations, provided proposals accord with Policy SP4;</b></p> <p><b>b) encouraging developers to build new homes to the ‘Lifetime Homes’ standard so that they can be readily adapted to meet the needs of those with disabilities and the elderly as well as assisting independent living at home;</b></p>

	<p>and SG035 at Settle are specifically identified as being suitable for such forms of specialist housing for older people, including extra care housing in draft policies SP6, SP7 &amp; SP10.</p> <p>It is considered that the local Plan would be improved by the inclusion of a specific policy to encourage the delivery of specialist forms of accommodation to address the housing needs of older people across all housing tenures. This new policy will be titled Policy H1: Specialist Housing for Older People.</p>		<p><b>c) allocating specific sites in Settle, Bentham and Gargrave within Policies SP6, SP7 and SP10 respectively for delivering specialist forms of residential accommodation to meet the housing needs of older people.</b></p>
Support that recognition is given to the importance of community assets and civic and cultural venues in the draft Local Plan, including the 'local pub'. Policy INF2 is welcomed.	Support is noted and accepted.	No	

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## June – July 2017 Draft Local Plan

## Policy Response Paper – Policy Ref: INF3 Sport, Open Space and Recreation Facilities

<b>Policy: INF3 Sport, Open Space and Recreation Facilities</b>			
<b>Aim of the Policy: To promote health, well being and equality by safeguarding and improving sport, open space and built sports facilities through planned growth for Craven.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan</b>
<p>Settle Town Council consider it essential to retain Settle Swimming Pool. It has potential for increased sports facilities to make a viable and sustainable sports complex for the future of Settle &amp; Giggleswick.</p> <p>Support for Paras 8.22 &amp; para 9: Settle Swimming Pool. The importance of the pool and the need for its upgrade is correctly acknowledged in the plan and that financial support for the pool should be recognised as a good possible CIL funding.</p> <p>Considered that more could be said as to how to promote future development of the pool e.g. through promoting a feasibility study for development (including costings) to provide a realistic assessment of funds required to underpin CIL requirements. It is extensively supported by volunteers in the community.</p> <p>The pool is a central leisure amenity of great worth to much of the northern part of</p>	<p>Comments and support noted and welcomed. Draft policy INF3 and current evidence relating to this policy recognises the need for the improvement or replacement of facilities at Settle Pool.</p> <p>Any future development proposals relating to Settle swimming pool proposed during the plan period will be assessed against policy INF3, which aims to safeguard existing facilities, such as this pool and support improvement.</p> <p>Paragraph 9 of Appendix A to draft policy INF3 sets out that developments within the north sub area of Craven will be required to make a contribution towards improvements of Settle Swimming Pool as it is a facility that serves the needs of existing and future residents of this sub area.</p> <p>At present CDC has no current plans to adopt a CIL, however if a CIL charge is adopted in the future Settle Pool could be considered for inclusion under Regulation 123. Regulation 123</p>	No	



Craven District (both that covered by the Plan and in the National Park).	provides for the Council to set out a list of those projects or types of infrastructure that it intends will be, or may be, wholly or partly funded through the Community Infrastructure Levy (CIL).		
The draft LP contains an entire section on sport and open spaces but neglects the other needs of the community i.e., improving village/town halls, public art/civic spaces/public realm. More emphasis should be placed on using contributions from new housing development to fund such improvements.	<p>Draft LP policy INF2 relates to community facilities and social spaces, which include civic spaces, community centres, town and village halls, other cultural venues, schools, colleges, nurseries, church halls places of worship, health services, care homes and extra care facilities, libraries, public houses, village/community shops and hubs or Post Offices that cater for day to day needs in both urban and rural communities. The aim of this policy is to support the retention and improvement of existing facilities and spaces, and the provision of new ones, to help safeguard the social well-being of communities and specifically to ensure that older people can avoid isolation and loneliness.</p> <p>Existing and any town/village action and improvement plans prepared in the future will be used to inform the implementation of Policy INF3.</p> <p>Policy SP12: Infrastructure, Strategy and Development Delivery aims to identify the infrastructure required to support the plan. This policy sets out that development proposals are expected to either provide, or enable the provision of infrastructure which is directly relating to or made necessary by that development, through developer contributions</p>	No	

	<p>or CIL.</p> <p>Appendix C to Draft Policy SP12 includes the Infrastructure Delivery Plan, which sets out these infrastructure requirements, including those relating to public realm and civic spaces. The Local Plan has identified a number of site allocations which could provide public art and public realm improvements as part of their development. These are set out within the development principles for these sites.</p>		
<p>The draft policy is supported. The conclusions of the various CDC studies into current and future needs and is supported together with the protection and enhancement of these facilities.</p>	<p>Support is welcomed and noted.</p>	<p>No</p>	

<p>There are several anomalies on the policies maps in respect of open space and playing pitch sites. A list and maps have been submitted showing the minor amendments required to sites to ensure accuracy in designation.</p> <p>The following errors on the policies map have been identified relating to 3 INF3 sites in Rathmell:</p> <ul style="list-style-type: none"> <li>• The primary school playing field is not owned by the school and since the primary school has not closed, it is the Parish Council's understanding that it will be assimilated into the adjoining pasture.</li> <li>• The area to the south was once Rathmell cricket pitch, but it is no longer used as such and has reverted to pasture.</li> <li>• The area to the east is the church graveyard, which has no sporting or recreational purpose. It remains an open space though it is filling up.</li> </ul> <p>Allotments &amp; bowling Green (Map No GS4) on Marton Road, Gargrave has been drawn with incorrect boundary. Please amend to show correct boundary (see B Dinsmore). PC would like to reinstate allotments due to high demand. Landowner is The Brewery who are happy for allotments to be reinstated.</p>	<p>These suggested amendments to sites will be considered. The policies map will be updated accordingly in respect of INF3 designations. Within Rathmell the former school playing fields will not be designated as an INF3 Graveyards are included in the definition of open space, therefore they are designated as INF3 sites.</p>	<p>Yes – were necessary</p>	<p>The policies map will be updated accordingly in respect of INF3 designations.</p>
<p>Support the designation of Low Bentham Cedar House school playing field as it is an</p>	<p>Support is noted and welcomed.</p>	<p>No</p>	

important historical approach to Low Bentham, with Roman archaeology. The Grade 2 listed church of St John the Baptist is mentioned in the Domesday Book, making the area of Historical significance.			
<p>Draft policy INF3 sets out a proposed requirement for all development of 11 or more dwellings to provide or contribute towards new or improved sport, open space and built facilities. CDC are reminded that para 173 of the NPPF states that policies detailed in a plan should not act to restrict development by imposing unviable and unachievable obligations.</p> <p>It is considered that the proposed affordable housing policy (H2) is 40% affordable housing with a contribution towards recreational open space and education. It would be expected that the policy being proposed by the draft LP would be for a reduction in contributions to make for a viable policy, which would deliver the required level of housing without development being stalled by expensive negotiations.</p> <p>Policy should be consistent with PPG on Viability in Plan Making (paras 004, 010, 014, 015,) and NPPF (paras 205, 173)</p>	<p>The Council has undertaken a Local Plan Viability Assessment (LPVA) for the Craven Local Plan and, in accordance with the PPG and the NPPF, this has taken into account the plan's proposed planning obligations, including open space, education, highway improvements and affordable housing. This LPVA has assessed the impact of these obligations on a number of types of housing site, by size and location across the plan area, and concluded that the scale of obligations proposed do not threaten the ability of the plan's housing allocations to be developed viably.</p>	No	
Historic England supports policy INF3 as a number of the District's open spaces (such as its Parks & Gardens, amenity greenspaces, Cemeteries and Civic Spaces) makes a positive contribution to the character of	Support is noted and welcomed.	No	

Craven's Conservation Areas or the setting of its other heritage assets. HS supports this policy which will assist in helping to ensure that those open areas which contribute to the distinctive character of the plan area are safeguarded.			
Sport England originally objected to criterion D3 as originally worded it was not consistent with NPPF. This has now been amended to allow the partial redevelopment of playing field and sports facilities where a robust and up to date evidence base shows that the site is facility is surplus. This will allow for improvements into the remaining playing field or sport facility. This is consistent with para 74 of the NPPF and Sport England's Playing Fields Policy.	Support and comments noted and welcomed.	No	
Generally it has been noted that school playing field sites have been classified as 'Open Space, Sport and Recreation Facilities', NYCC would welcome the removal of this designation on the school sites to ensure there is flexibility of use in the event that growth of the number of pupils in the school leads to a requirement to develop some of the land adjoining the school or in the event of school closures, to ensure a flexible approach to the future use of these sites.	School playing fields are designated as existing recreation/amenity space in the adopted Local Plan (1999). These school playing fields, together with other existing pitches have been included in the Playing Pitch Strategy (PPS) (2016), which forms part of the Council's evidence base for the Local Plan. The PPS has assessed all existing pitches, including school playing fields and is a strategic assessment which provides an up to date analysis of supply and demand regarding playing pitches. This evidence has informed draft Local Plan policy INF3: Sport, Open Space and Recreation Facilities, which aims to safeguard and improve these facilities, including school playing fields and pitches. In terms of pitch provision this	No	

	<p>policy aims to maintain the current level of pitch provision for cricket, football and hockey and increase the level of rugby pitch provision. Safeguarding existing school fields/pitches is crucial in achieving this aim.</p> <p>The Department for Education has published advice relating to the disposal or change of use of playing field and school land (2015). It sets out the Secretary of State's policy to protect school playing fields and the Secretary of State's powers to protect land for academies and maintained schools.</p> <p>This advice describes the main circumstances in which local authorities, academy trusts, governing bodies and diocesan bodies need to obtain the prior written consent of the Secretary of State for Education to dispose of, or change the use of, land used by maintained schools and academies, including playing field land.</p> <p>Sport England is a statutory consultee on all planning applications that affect sports pitches and it has a long established policy of playing pitch retention. Sport England's Playing Fields Policy is set out in 'Planning Policy Statement – A Sporting Future for the Playing Fields of England'.</p> <p>Any future applications relating to the disposal or change of use of any existing school playing fields within Craven would have to meet the requirements of both the Secretary of State and Sport England, in addition to the</p>		
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	requirements of draft Local Plan policy INF3.		
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\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## June – July 2017 Draft Local Plan

## Policy Response Paper – INF4: Parking Provision

<b>Policy: INF4: Parking Provision</b>			
<b>Aim of the Policy: To minimise congestion, encourage sustainable transport modes and reduce conflict between road users.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan</b>
Suggest inclusion of a policy to restrict householder developments to discourage increases in kerbside parking arising from an increase in bedroom numbers, due to the extension or conversion of non-habitable parts of existing housing, where no scope for off road parking currently exists OR a policy to require the provision of additional parking spaces within the curtilage of houses wishing to extend to three or four bedrooms (see Blackburn with Darwen Borough Council and Swale Borough Council for examples). This would reduce pressures for kerbside parking and the problem of more cars being parked on narrow village streets.	<p>The type of policy suggested would be better suited to a supplementary Planning Document on householder development/ design guidance for house extensions. The Council will set out a timetable for the production of this kind of additional guidance and policy document once the Local Plan is adopted.</p> <p>‘North Yorkshire County Council – Parking Standards for Development’ sets out maximum parking spaces required for various types of development, including residential properties of differing sizes. These standards are applicable to developments in Craven.</p>	No	
Additional wording suggested at para 8.35 of the accompanying text: [The level of parking provision required can be influenced by the location of new development, accessibility to public	The Council can support improvements in public transport but not require them. Such decisions are made by North Yorkshire County Council and the private companies who run the bus and rail services. The wording of paragraph	Yes	Amend wording of para 8.35 as follows: ... The Local Plan recognises that improvements to public transport can reduce the requirement for



transport, provision for cyclists and the availability of public parking.] The Local Plan recognises that improvements to public transport can reduce the requirement for parking provision, and have a beneficial impact on "anti-social" parking, particularly with respect to commuting. It will therefore support all improvements in public transport that have a positive impact on existing problems of parking provision and congestion at key "pinch points"...	8.35 could be amended as suggested to reflect this.		parking provision, and have a beneficial impact on "anti-social" parking, particularly with respect to commuting. It will therefore support all necessary improvements in public transport that have a positive impact on existing problems of parking provision and congestion at key "pinch points"...
Concern that visitor parking is currently inadequate for Skipton and the surrounding parishes (particularly those bordering the YDNP where tourism demands are increasing) and additional facilities are essential. Embsay with Eastby Parish Council would support multi-tier parking schemes, developed in architecturally sympathetic styles.	Noted	No	
Skipton Civic Society – Suggestion: Insert "secure" before storage of cars, cycles and motorcycles. Also, secure level storage for disability scooters and motorised wheelchairs is a considerable problem for those with disabilities.	Noted	Yes	Add the word "secure", as suggested, for emphasis.
General comment: In areas with high tourism footfall, the attraction in question should be made to contribute to parking provision. For example, at Hellifield Station	The Local Plan cannot introduce parking restrictions for existing tourist attractions/ businesses. Any new facilities would be subject to the policy requirements set out in INF4,		

on some “steam days” parking is provided by West Coast Railways by opening up their land. On days when this is not provided there are problems with congestion and local residents are unable to access their houses at busy times.	which should ensure that they provide adequate parking to meet their visitor numbers.		
<p>The LHA is supportive of draft policies to further encourage the use of sustainable modes of transport.</p> <p>The LHA supports Draft Policy INF4 - Parking Provision and as such the loss of on-street parking provision through site allocation would not be seen favourably. Any loss of parking provision will need to ensure displacement parking onto residential street leading to 'anti-social parking' does not occur.</p>	Noted	No	

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## June – July 2017 Draft Local Plan

## Policy Response Paper – Policy Ref: INF5: Communications Infrastructure

<b>Policy: INF5: Communications Infrastructure</b>			
<b>Aim of the Policy: to provide a context for the consideration of communications infrastructure and associated incorporation into development proposals.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan</b>
Is it wise to specify a broadband speed in a plan with a 30 year duration? Surely we should be requiring developers to ensure the connectivity they provide significantly exceeds residents speed requirements for the foreseeable future and indicate what this means at the moment?	<p>The policy does not specify or prescribe connection speeds in new developments as a balance needs to be struck between a rapidly changing technology and a plan that covers a 20- year period.</p> <p>Rather, the policy sets out an expected <u>minimum</u> download speed (10Mbit at the present time) but it is recognised that minimum connection speed standards are likely to change rapidly, where next generation access connections are not viable, whilst providing for a next generation access connection at a future date.</p> <p>The policy seeks to accommodate rapidly changing minimum connection speeds and developing new technologies. However, some rewording to criterion e will provide additional clarity as to the policy approach within a rapidly changing technological context.</p>	Yes	<p>Replace criterion e with the following:</p> <p><i>“e. All new development will be required to enable a Next Generation Access broadband connection (or its equivalent) where viable. Where it can be demonstrated that the provision of a Next Generation Access broadband connection (or its equivalent) is not viable, proposals should provide a minimum download connection of 10Mbps or the requirements of any universal service commitment, whichever is greater, and incorporate suitable infrastructure to support delivery of Next Generation Access broadband (or its equivalent) at a future date.”</i></p>
Policy INF5 Criterion (c). Support. We support the requirement that new	Support is noted.	No	None

communications infrastructure should avoid harm to sensitive areas in line with the provisions of Policy ENV2. This will ensure that such developments do not detract from those elements which help to give the District its special character,			
Gladman are pleased to note that draft Policy INF5 states that “All new development proposals will be required to enable Next Generation Access broadband connection where viable.’ We consider that the policy includes sufficient flexibility as to ensure that proposals are not rendered unviable as a result of obligations to provide broadband access and are content that suitable alternatives have been outlined. We consider that this policy is in conformity with Paragraph 173 of the Framework.	Support for the policy is noted.	No	None.
The policy should have a specific programme for the roll-out of broadband throughout the district.	Disagree. The rollout of broadband infrastructure is to a significant extent commercially driven, and it is for the plan to enable this to happen. The nature of upgrades to broadband infrastructure is fast moving and the Council does not have control over a matter that is unlikely to require planning permission in any event. However, the policy can allow for the provision of broadband infrastructure to be designed into development schemes through site layout and infrastructure provision.	No	None.
Policy INF 5 –Measures that will enable the roll out of broadband and telecommunications infrastructure, including	Support for the policy is noted.	No.	None.

innovative approaches for hard-to- reach areas are supported.			
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\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## June – July 2017 Draft Local Plan

## Policy Response Paper – Policy Ref: INF6: Education Provision

<b>Policy: INF6: Education Provision</b>			
<b>Aim of the Policy: To provide a context for the consideration of obligations relating to education provision arising from development proposals.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan</b>
The inclusion of a requirement for North Yorkshire County Council to identify need is out of date because of academy policy. Education funding for school rebuilding sits with the Education Funding Agency and they never comment on local housing developments but expect a contribution if a school needs to expand because of extra housing. The requirement should be reversed it should be down to the developer to demonstrate no need not to North Yorkshire County council to comment.	Comments are noted. The responsibility for school place planning continues to sit with the local education authority and as such North Yorkshire County Council has a statutory responsibility to ensure there are sufficient school places across all schools including Academies. Funding for additional school places is allocated to local education authorities who have responsibility for securing developer contributions where increased need for places is a result of additional housing. There has been a Free School Programme through which some new schools have been directly funded by the Education and Skills Funding Agency but there is no certainty this will continue.	No	None
The need to identify a central location for the increased demand on Health Care and Education is paramount.	The plan identifies where education provision is to be made through land allocations as part of wider allocations. The policy also sets a framework for securing contributions from developments that would result in increased	No	None

	demand for services.		
<p>10. Draft Policy INF6: Education Provision outlines the use of trigger point levels of housing development, at which education contributions will be sought. The ESFA supports this approach which provides useful clarification and certainty to the development industry.</p> <p>11. We note that Policy INF6: Education Provision states that education contributions will only be sought where North Yorkshire County Council (NYCC) states there is a need. It would be helpful if the Local Plan text includes either a summary of this data setting out anticipated need over the plan period or links to the relevant documents used by NYCC to assess need and demand for additional school places.</p>	<p>Support for the policy is noted.</p> <p>The methodology used to forecast pupil numbers relies on data from a number of sources. This data can fluctuate over time as updated information is received. A single data set published at a specific date in time could not be relied upon for the whole plan period and would be misleading. The policy and Appendix B of the plan sets out the methodology used to assess the need for places and calculation of contributions.</p>	No	None.
<p>INF6: Education Provision.</p> <p>With Ings Primary School closing in 2017, the Ings site is likely to be available for housing development in the lifetime of the Plan. Can a new primary school at the top of Raikes Road be justified in the near future if there are so few primary pupils in Skipton that another school is closing for lack of them? The number of new houses projected is unlikely to generate enough primary-age children to fill a whole new school.</p>	<p>The closure and restructuring of education provision is not solely related to growth proposals as it is the fitness for purpose of existing stock that is a factor.</p> <p>The proposed closure of Ings CP School is not the result of too few pupils in the Skipton Town area, rather the quality of education currently being offered and the choices made by families to attend alternative schools.</p> <p>Based on current forecasts and projected housing numbers, by 2029/30, there is likely to be a shortfall of 480 places for primary aged pupils in Skipton Town. NYCC require two new</p>	Yes	Amend the policies map to show new school allocations

	sites for primary school provision of 210 places each. Additional places are also likely to be required within one or more existing schools.		
Educational provision must be included in consideration of developments. In particular, I see no pressure from CDC on NYCC to keep schools open (Rathmell, Horton, Ings) when there are large proposed residential developments in the pipeline within a short distance of the school (Ingfield Lane in Settle & various sites in Skipton). I also think there should be pressure on transport providers in the area for bus links to enable people in rural areas access adult education.	<p>NYCC has responded as follows:</p> <p>The number of proposed houses within the catchment areas of Rathmell and Horton (which is not in the plan area) is small and would not generate sufficient pupils to keep the schools open. The proposed closure of Ings CP School is not a result of too few pupils within the area.</p> <p>Comment noted on bus links for rural areas. North Yorkshire is a rural county and NYCC have been subjected to a number of budget cuts to its transport services over recent years. Within the Craven District there are demand responsive transport services to serve those smaller settlements that do not have a regular bus service, information can be found on the NYCC website:</p> <p><a href="http://www.northyorks.gov.uk/demand-responsive-transport">www.northyorks.gov.uk/demand-responsive-transport</a></p> <p>NYCC is committed to working with community transport operators to increase the availability of these lifeline services where public transport is not available.</p>	No	None.
Draft Policy INF6: Education Provision We welcome the proposed S106 policy for education provision.	Support for the policy is noted	No.	None.

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.



## June – July 2017 Draft Local Plan

## Policy Response Paper – Policy Ref: Appendix A (to draft policy INF3: Sport, Open Space and Recreation Facilities)

<b>Policy: Appendix A (to draft policy INF3: Sport, Open Space and Recreation Facilities)</b>			
<b>Aim of the Policy: Sets out standards and formula relating to the provision of new or improvements to existing sports, open space and built sports facilities</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan</b>
<p>Support for Paras 8.22 &amp; para 9: Settle Swimming Pool. The importance of the pool and the need for its upgrade is correctly acknowledged in the plan and that financial support for the pool should be recognised as a good possible CIL funding.</p> <p>Considered that more could be said as to how to promote future development of and the pool e.g. through promoting a feasibility study for development (including costings) to provide a realistic assessment of funds required to underpin CIL requirements. It is extensively supported by volunteers in the community.</p> <p>The pool is a central leisure amenity of great worth to much of the northern part of Craven District (both that covered by the Plan and in the National Park).</p>	<p>Comments and support noted and welcomed. Draft policy INF3 and current evidence relating to this policy recognises the need for the improvement or replacement of facilities at Settle Pool.</p> <p>Any future development proposals relating to Settle swimming pool proposed during the plan period will be assessed against policy INF3, which aims to safeguard existing facilities, such as this pool and support improvement.</p> <p>Paragraph 9 of Appendix A to draft policy INF3 sets out that developments within the north sub area of Craven will be required to make a contribution towards improvements of Settle Swimming Pool as it is a facility that serves the needs of existing and future residents of this sub area.</p> <p>At present CDC has no current plans to adopt a CIL, however if a CIL charge is adopted in the future Settle Pool could be considered for inclusion under Regulation 123. Regulation 123</p>	No	

	provides for the Council to set out a list of those projects or types of infrastructure that it intends will be, or may be, wholly or partly funded through the Community Infrastructure Levy (CIL).		
Adopted standards for allotments – there is no mention of the provision of a water source as required for an allotment site.	Table 1 of appendix A sets out the adopted standards for open space, including allotments. It sets out quality standards for allotment sites. These quality standards do not include the requirement for the provision of a water source for allotment sites.	Yes	The quality standards relating to allotment gardens included in Table 1 of Appendix A to the Local Plan will be updated to include the following: “Sites should have direct access to a water source.” The annual update to the Open Space Assessment 2016 will allow for this quality standard to be included in the up to date evidence base relating to open spaces.
Allocation & provision of open space – there should be a formal CIL scheme so that the facilities outlined and space allocation listed become a reality rather than just an aspiration.	At present the Council has no plans to adopt a CIL in Craven. This is likely to be considered following adoption of the Local Plan.	No	

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## June – July 2017 Draft Local Plan

## Policy Response Paper – Appendix B to draft policy INF6

<b>Policy: Appendix B to draft policy INF6</b>			
<b>Aim of the Policy: To provide a context for the consideration of obligations relating to education provision arising from development proposals.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan</b>
Craven District Council should have some communication at planning stage with developments in the Bradford Met area which will impact the Craven District Area.	The council has prepared the Local Plan in cooperation with neighbouring planning authorities on strategic cross-boundary matters through the duty to cooperate, and associated discussions. Strategic cross boundary effects arising from development and growth in adjacent districts/planning authority areas are already taken into account through existing ongoing interactions and discussions. The forthcoming Duty to Cooperate statement that will accompany the publication plan, will elaborate on, and provide detail to this issue.	No.	None.

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## June – July 2017 Draft Local Plan

## Policy Response Paper – Appendix C to draft policy SP12

<b>Policy: Appendix C to draft policy SP12</b>			
<b>Aim of the Policy: to provide a context for the provision of infrastructure arising from growth proposals and plan delivery</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan</b>
Any proposed developments small or large should be looked at as a whole with regards to the Aire Valley Sewage system and not individually to ensure that adequate capacity can be provided at the receiving waste water treatment works.	The infrastructure constraints associated with the Aire Valley Trunk Sewer (AVTS) are known and accounted for in the plan strategy.	No.	None.
No protection of the route of the Skipton to Colne railway. The route needs specifying as inappropriate for development.	Policy SP2 (c) of the plan safeguards the route of the Skipton to Colne railway for future transport use, and the line protection is shown on the proposals map. As such, the route is safeguarded from inappropriate development. Reference is also made in the IDP at section 3 – paragraph 3.21 in particular refers.	No	None.
Bentham Library is now a community library	Comment noted and the IDP will be updated to reflect this. Para 10.15 has been updated to reflect this.	Yes.	Amend 10.15 of the IDP (emphasis added) to read:  “North Yorkshire Library and Information Service currently supports seven libraries across Craven

			district, plus a further three locations receive fortnightly visits from the Supermobile. Gargrave and Embsay libraries have been community managed since April 2012, in April 2017 Crosshills (now South Craven), Settle, <b>Bentham</b> and Ingleton transferred to community management. Skipton Library serves as the core library for the district, overseeing and giving additional support to the community libraries. NYCC provides some front-line staffing, professional support, IT devices and network (including wi-fi), and books for the community libraries which remain part of the wider library network."
The newly built Primary School in Bentham will not meet the needs of the local plan, but does not detail how this will be resolved	Table 10 of the IDP identifies Bentham school as having potential insufficient capacity over the plan period. Issues of capacity will be examined and addressed as proposals come forward in Bentham.	Yes	The IDP will be updated and rolled forward.
Omission - No reference is made to B4RN (Bentham)	Comment is noted. A reference will be added to provide additional context.	Yes	Add the following text as a section 8.4 of the IDP:

			<p>“Broadband for the Rural North (B4RN) is another initiative that provides fibre optic broadband to parts of Craven and high-speed connections in the north and west of the plan area.”</p> <p>And</p> <p>“such as B4RN”</p> <p>After section 8.5</p>
Roads - Reference is made to solving the Main St / Station road bottle neck in Bentham, but no details are actually disclosed on how this is to be attempted.	<p>It will be for detailed proposals to determine detailed solutions to the issue, not the IDP.</p> <p>As and when detailed design solutions are examined, these will be consulted upon accordingly.</p>	No	None
Bentham is served by the B6480 to the west and east, crossing the boundary into Lancashire. The route from the A65 is good, but the route to the M6 is not. Roads are unsuitable for large vehicles. There should be provision to improve roads.	Comments noted. Highway requirements arising as a result of implementing plan proposals are examined as part of the IDP and required improvements identified.	No	None.
Several references are made to rail and its’ importance. Rail traffic is scheduled to increase. The local plan should go further than this and seek on additional services and improvements. Bus services are poor and with an aging population this should also be a priority.	<p>Comment noted. However it is not for the plan to direct the provision of additional services/improvements as that is the role of the rail/bus operator.</p> <p>it should be noted that the direction of growth to a location will provide a basis for decision making about future investment in improvements in the future.</p>	No	None.

More detail required on infrastructure requirements arising from the plan proposals.	The IDP addresses this point and sets out infrastructure requirements in sufficient detail for plan making purposes.	No	None.
Currently the schools are at almost at full capacity. Dialogue is needed between NYCC and CDC in the granting of further housing consents. Consider use of Community Infrastructure Levy arrangements to secure funding for schools.	There is ongoing dialogue under Duty to Cooperate discussions between CDC and NYCC on this issue and NYCC Education have provided detailed comments about school capacity which have been taken into account in the next iteration of the plan and associated documents. There are no current plans to introduce CIL as a mechanism for securing contributions for improvements, ahead of adoption of the local plan. However, plan policy INF6 provides another mechanism for securing funding for contributions to education in addition to that potentially provided by CIL.	No	None.
Proposals to reduce traffic congestion and effects arising from plan proposals are not adequate.	Disagree.  The proposals have been subject to consultation and testing, and the objector does not state the nature of the perceived inadequacy. The infrastructure requirements set out in the IDP have indicative costs associated with schemes and sources of funding. Where it can, the plan then puts mechanisms in place to secure contributions to funding for schemes. The IDP considers highways and	No	None.

	transport infrastructure and junction modelling has been undertaken in Skipton, where most growth is directed and is of a scale sufficient to require traffic modelling. - Elsewhere in the plan area, impacts will be more limited. Nonetheless Transport Assessments (TA) will still be required for individual planning applications of the larger residential schemes across the plan area. A TA will ensure that a detailed assessment of the impact of each individual application will be made and where necessary mitigation measures will be funded by the developer. The proposals are considered adequate.		
Rail retention, reinstatement and enhancement is supported but should be strengthened.	Comment noted. The IDP will be revised to take account of other comments made. However, the objector does not state how the IDP should be strengthened.	Yes	the IDP will be updated accordingly.
Whilst the aspiration to re-instate the railway line between Colne and Skipton is noted, it should be recognised that there are a number of challenges to other parts of the network that re-opening of the line would bring, particularly for freight. The Aire Valley route from Skipton to Leeds is near to capacity, particularly at Leeds, and opportunities to run additional freight paths are very limited. In paragraph 3.21 the quoted costs of £43m - £81m are not Network Rail costs and references to Network Rail as the source for this should be removed. Note that lines around Manchester are not directly relevant to links between Central Lancashire & Leeds which are served via the 'Copy Pit' and Calder Valley line which links central Lancashire	Comments noted, and references will be removed from the IDP.	Yes	Delete "avoids congested lines in and around Manchester and" from third sentence of para 3.21  Delete final sentence from para 3.21.



and West Yorkshire and the text should remove reference to Manchester. In addition, the Council may wish to consider this Policy Statement: ( <a href="http://council.lancashire.gov.uk/ieDecisionDetails.aspx?Id=7838">http://council.lancashire.gov.uk/ieDecisionDetails.aspx?Id=7838</a> ) published by Lancashire County Council in March 2016 in terms of the strategic value of the re-instated line and in the context of finalising the local plan.			
In terms of paragraph 3.22 reference is made to Kildwick Level Crossing. The reference to the level crossing being a barrier to delivery of a station at Crosshills requires more explanation. Although a station is technically possible the comment made in the Plan is a reference to the barrier down time at the crossing, which would be extended if a station were to be provided in the vicinity. However the Authority has to accept that, if it wishes to see more use of the railway, there has to be a balance struck with the effects it will have, with an increase in barrier down time at the level crossings in the District. Nevertheless we recognise the impacts increased down time can have on road traffic and we would welcome discussions on how such existing crossings can be eliminated or replaced if possible. The Kildwick crossing has been identified in the past as a possible candidate for replacement with a bridge, though it is noted no reference is made to any possible enabling allocation to finance the construction of such a bridge.	<p>Comments are noted.</p> <p>Further explanation of the circumstances relating to Crosshills railway station and potential barriers to delivery would be worthwhile in the IDP.</p> <p>A key factor is that during any typical one-hour period, the Crosshills level crossing is closed for a considerable period in the hour, causing congestion. The implications of the delivery of a new railway station require further investigation and is being undertaken in conjunction with WYCA and NYCC. Enhancing rail connectivity is supported in principle. However, this needs to be balanced against potential negative effects arising and this requires further investigation as to how issues could be overcome.</p> <p>The possibility of directing a higher proportion of development towards South Craven to fund a potential</p>	Yes	<p>Add the following to the end of paragraph 3.22 of the IDP:</p> <p><i>“Consequently, more detailed consideration of the business case for a station at Crosshills will be undertaken, including assessing how potential barriers to delivery could be overcome”</i></p>

	<p>solution is limited by other constraints including flood risk. This affects the deliverability of significant growth and brings with it implications for the plan itself, if this were to be pursued.</p> <p>The delivery of a solution to overcome the constraint is likely to require a public sector intervention as receipts from development contributions alone are unlikely to be sufficient.</p>		
<p>The document states: “Hellifield – railway station area...In this key location, appropriate proposals to develop facilities and services and to enhance linkages and relationships with the surrounding area will be supported in principle.”</p> <p>Also, “Hence for the purposes of meeting the requirements of paragraph 47 of the NPPF, the FOAN for the preparation of the Craven Local Plan is the provision of 3,640 new dwellings between 2012 and 2032 equating to an annual average of 182 dwellings.”</p> <p>Development should also take into account their impact upon footfall at railway stations and trip generation data. Where proposals are likely to increase footfall at railway stations the Local Planning Authority should consider developer contribution (either via CIL, S106 or unilateral undertaking) to provide funding for enhancements as stations.</p>	<p>Comments are noted and the comments on developer contributions to are noted. It will however be difficult to measure the extent of footfall increase arising from growth proposals. As such the level of contribution will be difficult to measure and unlikely to be significant.</p>	No	None.
<p>3.18-3.25</p> <p>Strategic issues for Settle &amp; District, contained in the Settle &amp;</p>	<p>Comments are noted</p> <p>A reference to the satrategic plan</p>	Yes.	Add the following to the list of key documents in IDP section 3, Highways and

<p>District Chamber of Trade Strategic Plan (2016, 2017) are not adequately represented. Specifically:</p> <p>Road: The widening of the bridge on the A59 at Coniston Cold should be high priority due to the frequent accident damage and severe disruption caused throughout mid and north Craven</p> <p>Rail: The Friends of the Settle to Carlisle Railway (FOSC) study that established the investment business case and strategic importance to the economic development of all settlements along the Settle-Carlisle line of introducing passenger services from the Manchester/Blackburn/ Ribble Valley corridor commensurate with the services from the Leeds/Bingley/Skipton corridor should be considered by Craven as a strategic priority for the District. Unlike the Skipton-Colne link, which is apparently a priority to Craven, such services do NOT require tens of millions of pounds investment in new lines (all twin track lines already exist), although may require investment in support infrastructure (sidings etc) on the route. The Settle-Carlisle line is a tourist attraction of national and international importance and barely gets a mention in the whole Local Plan, save for Hellifield Station. It is a driver for economic prosperity and the opening up of services all the way from Manchester Airport could eventually lead to more than a doubling of the significant influx of visitors from the Leeds corridor.</p> <p>8.1-8.15</p> <p>The District Council's broadband strategy fails to recognise the strategic importance to rural communities &amp; businesses (or hinterland* as CDC call it) that RELY on high speed services for survival and growth of community projects such as B4RN, which delivers Gigabit level bandwidth at affordable cost. The strategy should specifically recognise the potential of such schemes and state that planning priority and support will be afforded to future connection proposals, where requested.</p>	<p>would be helpful in providing context to the IDP as a background document.</p> <p>NYCC are investigating long term solutions to address the pinch point at Coniston Cold Bridge. Any solution is likely to have considerable financial implications of which funding would need to be sourced and be subject to a planning application due to the bridges listed nature.</p> <p>.</p> <p>The policy approach for broadband connectivity is considered within draft policy INF5: Communications Infrastructure. This technology neutral policy supports the expansion of existing and new communications infrastructure including the rollout of next generation access broadband to new developments across the Plan area, where viable. The policy also notes that for major development proposals, the applicant should engage with communication providers and local broadband groups to explore how Next Generation Access broadband (or its equivalent) can be provided and how the development may contribute to and integrate with active broadband projects within the local area. Where appropriate it is anticipated that this</p>		<p>Transport:</p> <ul style="list-style-type: none"> <li>• Settle &amp; District Chamber of Trade Strategic Plan (2016, 2017).</li> </ul>
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hinterland - can this term please be dropped – it means ‘beyond what is visible or known’ and makes it look as though CDC is very Skipton focused	engagement would include Broadband for the Rural North (B4RN). This is already recognised and accounted for in other responses to plan consultation.		
<p>Para 2.8</p> <p>Objection to statement on good transport.</p> <p>Do you really believe that 4 buses per day each way only on weekdays represent good public transport connections? Furthermore I note the buses do not even connect with the similarly poor Lancaster – Skipton train</p>	Objection is noted.	No	None.
<p>Paragraph 3.24: I support the regular use of the line from Hellifield to Clitheroe for passenger use, in particular, the re-opening of stations at Gisburn and Chatburn (outside CDC, but you could encourage to increase potential tourism).</p> <p>Paragraph 3.25: Provision has been made for a mini-roundabout Hellifield/Long Preston, but there is no indication as to where, who it would benefit and who would pay. Similarly, there is mention of a Hellifield to Long Preston Cycleway, with no indication where this would be and who would pay.</p> <p>Paragraph 4.5 and Paragraph 4.12: The local water supply in Hellifield will need major upgrading if CDC pass the proposed Leisure Centre with water-guzzling swimming pool and over 2000 residents. Similarly, no mention has been made of the assessment by United Utilities that the sewage treatment works serving Hellifield is nearing capacity, so if the leisure park proposal is passed, with a doubling of the number of people it will be serving, then a major upgrade will be essential.</p>	<p>Support for the use of the Hellifield to Clitheroe line is noted.</p> <p>The effect of individual proposals on water supply infrastructure and sewerage can be considered at the time of application. Water supply and sewerage reinforcement can then be factored into work programmes and developer contributions.</p> <p>Comments received from United Utilities indicate that: <b>xxxxx</b></p> <p>NYCC has raised in its last consultation response a number of schemes identified within the IDP that were not highlighted by the modelling work or officers within highways. As such highways are unable to provide further response to the point made over the mini-roundabout.</p>		

Para. 3.8 etc. Rail. Support development of the missing Skipton-Colne rail link. These should be done in much less than 20 years. Also the provision of regular services Hellifield-Clitheroe in both directions on 7 days per week. Station improvements are essential, e.g. access to Carlisle/Morecambe bound platform at Gargrave.	Support is noted. See comments as above.  Note to CDC - Highways/Transport will be providing further comment on the draft IDP, these will pick up rail issues		
Para. 3.20. Road. Comment. The recurring problems at the A65 River Aire bridge at Coniston Cold must be addressed.	Bridge maintenance and repair fall under the strategic maintenance and improvements budget. See earlier comment and response on Coniston Cold Bridge	No	None.
Table 7. Support. Improvements to LL Canal towpath and links.	Support is noted.	No	None.
There are a few details that could be updated within section 9. Section 9.8- There are 26 primary schools including Embsay and Long Preston with a combined total number of pupils on roll in January 2017 of 3,606 Table 9 – we don't feel this table is necessary but it could be stated there are a few primary schools within the local plan area that have a current capacity deficit. None of these add up to more than 15 places. Section 9.9 Table 10 - we don't feel this table is necessary. It could be stated that there will be a number of schools that will have insufficient capacity to accommodate needs arising from the proposed allocations over the whole plan period and table 11 sets out provisional requirements based on the housing allocations within the Local Plan. Please could the following text be added after section 9.10: "This is not an exhaustive list, and needs may change over the course of the plan depending on the pace of housing and pupils numbers. All pupil demographics are reviewed on a termly basis. Organisationally, the County Council may need to look at adding additional classrooms to provide a half or full form of entry at schools."	The comments are noted, and the IDP will be updated to account for this commentary	Yes	The IDP will be updated to reflect the comments raised.

<p>Table 10. Due to revised housing allocations, the requirements based on the housing allocations in the Local Plan are now:</p> <p>Settle 2 classrooms  Bentham 2 classrooms  Glusburn/Crosshills 1 classroom  Ingleton 1 classroom  Gargrave 1 classroom  Cononley 1 classroom</p> <p>The additional classrooms at Sutton in Craven, Carleton and Cowling are unlikely to be required.</p> <p>In Table 11, 'Basic Capital Funding' should read 'Basic Need Capital Funding' and please remove the references to Capital Receipts as these are unlikely to be available.</p> <p>Section 9.22 There are 5 secondary schools with a combined total number of pupils on roll in October 2016 of 4331.</p> <p>Please add South Craven School provides places for pupils who live in the area served by the primary schools at Cononley, Cowling, Glusburn, Kildwick, Lothersdale and Sutton in- Craven. South Craven School also serves the area of the Bradford Metropolitan District Council for those pupils whose main home is in the electoral areas of Eastburn, Silsden and Steeton.</p> <p>Section 9.24 Table 12 – Again, we don't feel this table is necessary. It could be stated that table 13 sets out provisional requirements based on the housing allocations within the Local Plan.</p> <p>Table 13. Due to revised housing allocations, the requirements based on the housing allocations in the Local Plan are now:</p> <p>South Craven School 1 additional classroom</p> <p>There is a likely to be a need for other additional classrooms at this school to meet demand from existing housing permissions, demographic growth, and housing allocations in the Bradford Local Plan area served by South Craven School. The Bradford Local Plan (Allocations Development Plan Document, May 2016)</p>			
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<p>includes a target of 1,200 homes in Silsden and 700 homes in Steeton and Eastburn which would require approximately 8 additional classrooms on the site.</p> <p>The LHA has reviewed the draft Infrastructure Delivery Plan published as part of the consultation documents, the following comments relate to that document.</p> <p>Section 3 Infrastructure Requirements – Highways and Transportation. This section highlights a number of key documents, some of which are no longer valid.</p> <p>The NYCC documents for the Settle Service Centre Transportation Strategy and Skipton Service Centre Transportation Strategy are no longer active documents, and any reference to these documents or schemes identified should be removed from infrastructure requirements.</p> <p>NYCC has recently produced “A Strategic Transport Prospectus for North Yorkshire” where NYCC sets out how it would like to work with the Government, Transport for the North and the Northern City Regions to ensure that improved transport connections allow England’s largest County to both contribute to and share in the economic benefits of The Northern Powerhouse. Three Strategic Transport Priorities have been identified:-</p> <p>Improving east – west connectivity (including Trans Pennine links)</p> <ul style="list-style-type: none"> <li>- Improving access to High Speed and conventional rail</li> <li>- Improving long distance connectivity to the north and south.</li> </ul> <p>A number of these key east-west routes are within Craven District such as A59 and A6068.</p> <p>NYCC with Lancashire Local Enterprise Partnerships and West Yorkshire Combined Authority (WYCA) have commissioned an East – West Connectivity Study which will focus on a ‘Central’ Trans Pennine Corridor, including key road routes such as the M65 / A59 /A65 and rail routes such as the Calder Valley and</p>			
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<p>Skipton – Colne Lines. The study will aim to develop a strategic economic narrative to the case for potential intervention in road /rail based connectivity. Craven District Council is a key stakeholder in this study and as such has been involved in consultation and engagement sessions. Section 3.4 discusses the Skipton highway modelling work - the LHA would ask that this is reworded to highlight that it is the cumulative impact on the surrounding local road network that has been assessed.</p> <p>A number of highway schemes have been identified within the draft Infrastructure Delivery Plan (IDP), these are listed in Table 5 of the document. These include schemes in Skipton identified by the highway modelling work and schemes in the wider district. The LHA has previously discussed and will continue to advise CDC on the highway infrastructure improvements required to mitigate the cumulative impact of development within Skipton.</p> <p>The other improvements Table 5 identifies are:-</p> <ul style="list-style-type: none"> <li>- Sutton Lane and Holme Lane junction improvements</li> <li>- Bentham Station Road and Main Street junction, Bentham</li> <li>- Hellifield and Long Preston mini roundabout</li> <li>- Falcon Manor junction, Settle mini roundabout.</li> </ul> <p>The delivery mechanism of some of the highway schemes has suggested potential funding sources through LTP. NYCC do not have proposals within the plan period to deliver a number of the schemes highlighted and as such the LHA would welcome further discussions over the listed schemes and identified delivery mechanisms.</p> <p>'Who is responsible for providing new infrastructure?' the LHA requests that this section is updated to reflect County Council processes. The County Council annual maintenance schemes are approved by the Corporate Director for Business and Environmental Services in consultation with the Portfolio Holder for Highways &amp; Transportation. The Craven Area Committee has</p>			
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<p>a number of responsibilities which are outlined within North Yorkshire County Council Constitution.</p> <p>The LHA is meeting with CDC later this month to discuss highway matters in relation to Craven's Local Plan, this will include discussions over the draft IDP. The LHA seeks to continue to work closely with CDC on the development of their supporting highway evidence and IDP.</p> <p>Library and Community Services</p> <p>The Infrastructure Delivery Plan, paras 10.17 to 10.20 are about the library service and need updating as this was obviously written sometime last year. This will need to be updated to reflect the current position. The text below provides a suggested alternative:</p> <p>'North Yorkshire Library and Information Service currently supports seven libraries across Craven district, plus a further three locations receive fortnightly visits from the Supermobile. Gargrave and Embsay libraries have been community managed since April 2012, in April 2017 Crosshills (now South Craven), Settle, Bentham and Ingleton transferred to community management. Skipton Library serves as the core library for the district, overseeing and giving additional support to the community libraries. NYCC provides some front-line staffing, professional support, IT devices and network (including wi-fi), and books for the community libraries which remain part of the wider library network.</p> <p>The six community libraries are all in either new or recently refurbished premises and in general are fit for purpose for some time to come. Skipton Library, whilst potentially in the ideal location, remains in need of improvements to fully provide a library fit for the 21st Century. However, all services offered across the county are available, working around the space and other building restrictions.</p> <p>The Supermobile visits Cowling, Kettlewell and Buckden, on a</p>			
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fortnightly basis. Stops last for 2 hours enabling the provision of books, internet access (satellite wi-fi) as well as acting as a hub for information for other agencies such as Social Care, Police etc. It is not considered that there is a need for expansion of the library service to meet any additional requirements, options for Skipton Library will be evaluated as they arise.'			
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\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## June – July 2017 Draft Local Plan

## Policy Response Paper – Policy Ref: Policy: duty to cooperate

<b>Policy: Duty to Cooperate</b>			
<b>Aim of the Policy: to review and respond to issues raised regarding the duty to cooperate.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan</b>
<p>Memorandum of Understanding - lack of equivalent for Pendle, NYCC, and WYCA. Equivalent documents are needed for other bodies than the National Park. This should specifically cover the Skipton-Colne railway which spans the Craven/Pendle boundary, and is also supported by WYCA and NYCC. I hope these documents are in preparation, as the lack of them might cause the plan to fail the examination in public - see appendix b for relevant clauses in the NPPF.</p> <p>On transport matters, more reference to LCC, NYCC, WYCA and the LEPs would provide more "soundness" to the Local Plan. The socio-economic report and related decision by LCC and Lancashire LEP can be found at <a href="http://council.lancashire.gov.uk/ieDecisionDetails.aspx?AllId=48557">http://council.lancashire.gov.uk/ieDecisionDetails.aspx?AllId=48557</a>. Note that this has also been endorsed by WYCA, and NYCC.</p>	<p>Comments are noted. Preparation of the plan has taken place in the context of extensive and ongoing discussions and engagement with duty to cooperate partners on strategic cross boundary matters including Pendle Council, WYCA and NYCC. These discussions have informed the shaping of plan policy.</p> <p>The Skipton-Colne railway trackbed is an acknowledged strategic cross-boundary issue that is reflected in duty to cooperate discussions with Pendle Council and this has resulted in acknowledgement in the plan. A duty to cooperate statement will however accompany the publication plan and will detail the nature and extent of cooperation on cross boundary matters.</p>	No	None.

	Memoranda of understanding is one mechanism of engagement on strategic cross boundary matters that is used, and this is dependent on the issues raised. The council has taken such an approach with the YDNPA owing to the issues at play, and similar approaches have been taken with WYCA, as combined sub regional authority and South Pennine authorities regarding renewable energy. Where it is appropriate and effective to do so, similar approaches will be considered for use with other duty partners.		
<p>Duty to Cooperate Statement deficiency in "Duty to Cooperate Statement"</p> <p>The only statement in the Local Plan suite relevant to the "Duty to Cooperate" refers to the YDNP alone (see "Memorandum of Understanding" below). The NPPF implies that there needs to be an equivalent understanding with Pendle District Council [not to mention Bradford and Harrogate]. On transport matters, more reference to LCC, NYCC, WYCA and the LEPs would provide more "soundness" to the Local Plan. The socio-economic report and related decision by LCC and Lancashire LEP can be found at <a href="http://council.lancashire.gov.uk/ieDecisionDetails.aspx?AllId=48557">http://council.lancashire.gov.uk/ieDecisionDetails.aspx?AllId=48557</a>. Note that this has also been endorsed by WYCA, and NYCC. There also needs to be a wider "duty to co-operate" in the matter of housing.</p>	See above response.	No	None.
7. In light of the above, the ESFA encourages close working with local authorities during all stages of planning policy development to help guide the development of new school infrastructure and to	Comments are noted. The ESFA is identified as a duty to cooperate partner.	No	None.

meet the predicted demand for primary and secondary school places. The ESFA note your Statement of Community Involvement was published in 2006. In line with the Duty to Cooperate, please add the ESFA to your list of relevant organisations with which you engage in preparation of the plan.			
<p>I have reviewed the latest draft consultation version of Craven's Local Plan. As you would expect, my 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.</p> <p>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.</p> <p>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.</p> <p>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</p>	Comments are noted, and will be reflected in the forthcoming duty to cooperate statement.	No	None.

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.			
Thank you for consulting us on this matter. The Council has no further comment to add at this stage. Please confirm receipt of this email.	Comments noted.	No	Non.
<p>Section 33A of the Planning &amp; 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."</p> <p>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.</p> <p>Other than those set out in this letter (see comments attributed to other sections of the plan) 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.</p>	Comments noted.	No	None.

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

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## Craven District Council

1 Belle Vue Square | Skipton | BD23 1FJ | [www.cravendc.gov.uk](http://www.cravendc.gov.uk)

**Planning Policy Team** | 01756 706472 | [localplan@cravendc.gov.uk](mailto:localplan@cravendc.gov.uk)



If you would like to have this information in a way that's better for you, please telephone **01756 700600**.



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