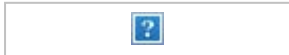


From: [REDACTED]
To: [Local Dev. Framework](#)
Subject: FW: CRAVEN LOCAL PLAN: REGULATION 19 CONSULTATION OBO [REDACTED] [CJ-
WORKSITE.FID218013]
Date: 13 February 2018 13:20:11
Attachments: [image2820ec.JPG](#)
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[imagebe6ea7.JPG](#)
[image00ff5a.JPG](#)
[image2de059.JPG](#)
[image255764.JPG](#)
[CRAVEN LOCAL PLAN SK089 & SK090 \[REDACTED\] REPRESENTATION FINAL.PDF](#)
[\[REDACTED\] APPENDIX compressed.PDF](#)

[REDACTED] MRTPI
Associate, Partner

For and on behalf of Carter Jonas LLP

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Please consider the environment - do you really need to print this email?

From: [REDACTED]
Sent: 13 February 2018 12:03

To: 'localplan@craven.gov.uk' <localplan@craven.gov.uk>

Subject: CRAVEN LOCAL PLAN: REGULATION 19 CONSULTATION OBO [REDACTED] [CJ-WORKSITE.FID218013]

Dear Sirs

Following a meeting with [REDACTED] and the [REDACTED], and discussions with the County Education Authority (NYEA) please find enclosed representations to the current Local Plan Publication Draft. These are submitted on behalf of [REDACTED] and form two documents, a written report and a second document comprising the layouts and the representation forms.

Overall progress on the Local Plan is welcomed as a positive step forward; however, there are elements of the document that are considered to be unsound. A number of amendments are put forward which we consider would address those concerns. These relate to general policies but also to site SK089 & SK090 which is promoted mixed use for residential and education. It is acknowledged that part of the site is owned by Craven Council.

A place at the Examination Hearings is requested so that these important matters can be discussed and debated. It may well be that these matters can be addressed prior to the Examination. We would welcome further discussion and in particular to inform the preparation of additional studies as set out in the representation.

We would welcome acknowledgement of receipt that these representations have been "made".

Yours faithfully

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CRAVEN LOCAL PLAN REGULATION 19 PUBLICATION DRAFT

REPRESENTATION

For [REDACTED]

Land at SK089 & SK090 Elsey Croft, Skipton

Date: 13th February 2018

Quality Management

Prepared by:	Carter Jonas LLP
Authorised by:	██████████
Date:	13 th February 2018
Job Number:	482275v1

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- A2 OPTION 1 SITE ASSESSMENT
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- A5 AMENDED SP5 TABLES
- A6 LTP HIGHWAYS FEASIBILITY ASSESSMENT
- A7 REPRESENTATION FORMS

1 INTRODUCTION

1.1 Carter Jonas LLP represents the interests of [REDACTED] in respect of the emerging development plan for Craven. [REDACTED] are major land and property owners in the District, particularly around the market town of Skipton.

1.2 Comments have been submitted to previous versions of the emerging Local Plan, notably the Regulation 18 Pre-Publication Draft version of Summer 2017. Representation to that document was submitted in respect of Site SK089 & SK090: Land north of Elsey Croft which was identified in the document as a Preferred Housing Allocation. The purpose of the representation was to demonstrate the suitability of Site SK089 for allocation on the basis:

- It is fully deliverable within the meaning of paragraph 47 of the Framework and therefore capable to start delivering residential completions in the first 5 years of the plan period; and
- It represents the most appropriate option for allocation when considered against reasonable alternatives.

1.3 With the production of the Regulation 19 Publication Draft Local Plan, this is a document the planning authority considers to be “sound” and suitable for submission to the formal Examination process. As a consequence, the format of the consultation and representation process is required to consider the various provisions of Government policy and in compliance with the procedural and soundness tests as set out in the Framework (Paragraph 182) and the accompanying Planning Practice Guidance; as well as emerging policy in the form of provisions of the Housing White Paper (February 2017).

1.4 These representations are structured with the following format:

- Section 2 outlines the prevailing policy context, in particular the Framework and PPG;
- Section 3 sets out some general considerations and commentary about the Plan;
- Section 4 sets out our response to the issues and matters raised in the policy section of the draft Craven Local Plan;
- Section 5 responds to site specific issues raised in Policy SP5 Spatial Strategy for Skipton; and
- Section 6 identifies our conclusions and recommendations to what actions (we consider) are required to make the Plan sound.

1.5 It is hoped that the Council will find the comments made through this process helpful and constructive.

- 1.6 Completed representation forms are appended to this statement, which give full details of the client and Carter Jonas.

2 POLICY MATTERS

National Planning Policy Framework

2.1 Paragraphs 150 to 185 of the Framework set out the Government's view on the plan-making process and reiterates the primacy of the development plan in decision making.

2.2 All local planning authorities are expected to produce a Local Plan which is prepared through a process of early and meaningful engagement and collaboration. Such documents are intended to be aspirational but realistic, seeking opportunities to achieve each of the three dimensions (social, economic and environmental) of sustainable development, with net gains across all three. In that regard the document Local Plan should be consistent with the principles and policies within the Framework. It advocates that significant adverse impacts should be avoided wherever possible; where such impacts are unavoidable appropriate mitigation should be considered.

2.3 Paragraph 156 identifies what strategic priorities should be out in the Local Plan. These include:

- policies to deliver the homes and jobs needed in the area;
- provision of retail, leisure and other commercial development;
- infrastructure for transport, telecommunications, waste management, fresh water, waste water flood risk and energy (including heat);
- provision of health, education, security, community and cultural infrastructure and other local facilities; and
- conservation and enhancement of the natural and historic environment, including landscape.

2.4 Paragraph 157 sets out some fundamental requirements and parameters. These include:

- the need to plan positively for the development and infrastructure required in the area;
- drawn up over an appropriate timeframe preferably a 15 year time horizon, taking account of longer term requirements, and kept up to date;
- based on a policy of co-operation with neighbouring authorities, public private and voluntary sector organisations;
- indicate broad areas of growth for strategic development on a key diagram and land use designations on a proposals map;
- Allocate sites for development and the flexible use of land; and,

- identify where it is appropriate to limit change, and specify land where development would be inappropriate, justifying why this should be so.

2.5 A number of key matters are then set out which require the Council to use a proportionate evidence base, which is adequate, up-to-date and relevant setting out the characteristics of the area and prospects taking full account of market and economic signals. Subsequent issues relate to planning strategically across local boundaries and the examination of local plans.

2.6 Examination of the Plan will be the next stage and it is worth briefly reiterating the four tests of soundness insofar as these inform these (and earlier) representations submitted to the Council: These require that when submitted for examination the Council considers the Local Plan to be:

- Positively prepared;
i.e. the Plan should be prepared based on a strategy which seeks to meet objectively assessed and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development
- Justified;
i.e. the Plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.
- Effective;
i.e. the Plan should be deliverable across its period based upon joint working on cross boundary strategic priorities;
and
- Consistent with national policy.
i.e. the Plan should enable the delivery of sustainable development in accordance with the policies in the Framework

Planning Practice Guidance (PPG)

2.7 Advice is provided in the PPG about the publication and examination of the Local Plan, suggesting that the Publication Stage Plan (Regulation 19) is the documents that the local authority considers is ready for examination. It sets out an iterative process whereby the planning authority can submit the Local Plan and any proposed changes it considers appropriate along with supporting documents and a Statement of Representations Procedure.

2.8 With regard to the identification and allocation of sites the PPG is clear that the assessment of land availability is an important step in the preparation of Local Plans. It stresses the need for Local Planning Authorities to prepare land assessments for housing development in order to identify land to meet their objectively assessed needs. This assessment will principally involve assessing a site's suitability for development and the likelihood of the development coming forward.

2.9 In doing so it states that the planning authority should seek to find out the following information from respondents as part of their land assessment:

- Site location;
- Suggested potential type of development;
- Scale and timing of development
- Constraints on development.

2.10 The list of sites derived from the 'call for sites' exercise should be assessed against national policies and designations to establish which has reasonable potential for development. This will involve determining the suitability, availability and achievability of sites.

2.11 The Practice Guidance states that the suitability of sites for development should be guided by:

- The development plan, emerging planning policy and national policy,
- Market and industry requirements in that housing market or functional economic market area;

2.12 When assessing the suitability of sites for development the PPG states account should be taken of how up-to-date the plan policies are and consider the appropriateness of identified constraints on sites and whether such constraints can be overcome. In addition to these considerations, the following factors should be considered to assess suitability now and in the future:

- physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;
- potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation;
- appropriateness and likely market attractiveness for the type of development proposed;
- contribution to regeneration priority areas;

- environmental / amenity impacts experienced by would be occupiers and neighbouring areas.

- 2.13 In terms of availability, a site is considered available for development, when, on the best information available, there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips tenancies or operational requirements of landowners. This will often mean that the land is controlled by a developer or landowner who has expressed an intention to develop, or the landowner has expressed an intention to sell.
- 2.14 Finally, in regards to achievability, the guidance is clear that a site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. It acknowledges that this is essentially a judgement about the economic viability, and the capacity of the developer to complete as well as let or sell the development over the certain period.
- 2.15 Both the Framework and the PPG are clear that LPA's should meet their objectively assessed needs and where they have been unable to identify sufficient sites to do so, they should revisit their assessment of supply for example by changing the assumptions on the development potential on particular sites (including physical and policy constraints).
- 2.16 It is imperative that the Craven Local Plan embraces the Framework's aspirations to facilitate growth and meeting its full objectively assessed development needs.

3 PREVIOUS REPRESENTATION

3.1 Previous representations in Summer 2017 supported the Council's proposal to allocate land at Elsey Croft Skipton under references SK089 and SK090: SK089 & SK090 Land to the north of Airedale Avenue & Elsey Croft and east of railway line, Skipton. Our client agrees that Site SK089 'Land at Elsey Croft' is an appropriate development site. Discussion with officers confirm that land at SK089 is within the ownership of Craven District Council (CDC) and it is available; CDC would wish to see the two ownerships progress together. This is supported by [REDACTED] as a pragmatic approach.

3.2 In submitting comments in Summer 2017, the principal aim of the representation was to demonstrate that Site SK089/SKO90 is fully deliverable and is one of the most appropriate sites for allocation within the town. In supporting that position, it highlighted that the land is an urban fringe site surrounded by hard development on three sides and therefore is well related to the existing built up area. The development edge would follow the established line created by development of land to the south by Skipton Properties, a site that has been granted planning permission for 107 dwellings (LPA reference 63/2010/11062). That scheme has proved extremely popular and is nearly complete.

3.3 An assessment was set out considering suitability of the site in respect of the meaning of Paragraph 47 and Footnote 11 of the Framework and therefore whether it is appropriate for identification as a housing allocation. In brief the assessment suggested:

Availability

3.4 It is within the ownership and freehold control of the landowner. There is therefore a "willing" landowner. There are no legal impediments, need for land in third party ownership, investment constraints or risks associated with the site, or known constraints that would impede deliverability. The site can be brought forward when required by the Council. A number of developers and house builders have expressed an interest in the site.

Suitability

3.5 The 'Residential Site Selection Process' Background Paper includes an assessment of the merits of Site SK089 against a number of different criteria in order to determine its suitability for allocation. In order to aid the Council, we have carried out our own assessment of the site against the key criterion:

Environmental Considerations

3.6 At present, the site is heavily farmed and therefore has little ecological or environmental value. Equally there are no known environmental or ecological designations covering the land. We are currently preparing a preliminary ecological assessment, which will be submitted to the Council shortly, which will demonstrate that there are no ecological constraints present on the site that cannot be accommodated through good design.

3.7 The proposed development will incorporate a number of Green Infrastructure Corridors, which will provide an interlinked network of high quality habitats that will enhance the wildlife and ecological value of the site. This would deliver significant betterment over and above existing levels.

Connectivity

3.8 It was suggested that SK089/SK090 is conveniently located near to a number of local facilities and amenities as summarised in the table below:

FACILITY	DISTANCE (METRES)	AVERAGE WALK (DISTANCE) 5KM/HR
NEAREST BUS STOPS ON OTLEY ROAD (KINGSWAY)	160 METRES	2 MINUTES
SKIPTON TRAIN STATION	1,800 METRES	22 MINUTES
SKIPTON TOWN CENTRE	1,100 METRES	13 MINUTES
SANDYLANDS SPORT CENTRE	2,260 METRES	27 MINUTES
SKIPTON LIBRARY	1,200 METRES	14 MINUTES
NEAREST SUPERMARKET	1,200 METRES	14 MINUTES
SKIPTON HOSPITAL	1,800 METRES	22 MINUTES
SKIPTON BUILDING SOCIETY MAIN OFFICE (MAJOR EMPLOYER IN THE TOWN)	870 METRES	10 MINUTES
SKIPTON PARISH CHURCH OF ENGLAND PRIMARY SCHOOL	980 METRES	12 MINUTES
SKIPTON ERMYSTED'S GRAMMAR SCHOOL	1,800 METRES	22 MINUTES
SKIPTON GIRL'S HIGH SCHOOL	2,000 METRES	24 MINUTES
THE SKIPTON ACADEMY	2,700 METRES	33 MINUTES

3.9 It is evident that the majority of these facilities are within reasonable walking distance of the site (1.5 to 2.00 km based IHT guidelines) and therefore any future residents would be able to meet their day to day needs without recourse to a private vehicle. The site enjoys good access to public transport with bus stops located within easy walking distance of Otley Road. Equally, the train station is accessible by walking and there is a regular bus service from the site. The nearby bus stops provide a regular service to Skipton Bus Station, Clitheroe, Harrogate, Ilkley, Keighley, Leeds and Otley.

Impact on the Character and Form

3.10 Good design is central to achieving sustainable development, paragraph 8 of the Framework highlights that “*well designed buildings and places can improve the lives of people and communities*”. Site SK089/SK090 is located on the edge of an existing residential area, which is characterised by relatively modern detached and semi-detached properties arranged in a medium density suburban layout. In assessing the site it was considered to be contiguous with the existing built up area as evident by the fact that the proposed allocation is surrounded to the south and west by existing development. Otley Road to the north provides a clear boundary and delineation between the site and the land to the north. The site itself was considered to have little intrinsic landscape value.

3.11 Site SK089/SK090 is well related to the existing pattern of development and would represent an appropriate consolidation and rounding off of the eastern side of the town. The site would be visually contained and would respect the traditional form and character of the area. As previously stated the site will be bordered by built development along its entire southern boundary and therefore its allocation will not lead to the significant outward spread of the settlement or any significant encroachment in to the open countryside.

3.12 Views of the proposed allocation from the surrounding countryside would simply be interpreted as part of the town and against the existing backdrop of modern development in this locality. Any views from Otley Road would be protected by the provision of the green infrastructure corridor.

Impact on the Historic Assets

- 3.13 Paragraph 132 of the Framework states that the “significance (of a Heritage Asset) can be harmed or lost through development within its setting”. The proposed development would not impact on any designated or non-designated heritage assets, such as listed buildings, conservation areas, scheduled monuments etc.

Flooding

- 3.14 Detail on the Environment Agency Flood Risk map shows that the majority of the site is located in Flood Zone 1 and is thus considered to be at a low risk of flooding from fluvial sources (less than 1 in 1000 annual probability of river flooding). Part of the SK089 area is affected by Flood Risk Zone 3 and 4, which consequently is excluded from the developable area. As a result, it is a sequentially preferable site for allocation in flood risk terms. This is confirmed in the Craven’s Strategic Flood Risk Assessment (SFRA).
- 3.15 Some potential issues with flooding from surface water are identified within in the SFRA. Nevertheless, it is considered that the site could accommodate a range of sustainable drainage measures to ensure that any surface water is appropriately controlled within the site and does not exceed existing greenfield run off rates. Given the size of the site this could include the use of appropriate landscape features such of swales, attenuation ponds etc.

Highways

- 3.16 We consider that the site is fully deliverable in terms of highway access and capacity. The previous planning application (planning reference no: 63/2008/8466) for residential development on the site was accompanied by a detailed Transport Assessment. The Assessment showed that an appropriate access could be achieved from Otley Road as well as through the adjoining residential estate roads such as Elsey Croft and Wensleydale Avenue. Additional pedestrian access could be provided from Wensleydale Avenue, which would provide a convenient route to Skipton Town Centre with its services, facilities and public transport links. The Assessment demonstrated that the local highway network had adequate capacity to accommodate the traffic likely to be generated by the proposed allocation.

Achievability

3.17 Paragraph 47 of the Framework states that for a site to be achievable there should be a reasonable prospect that housing will start being delivered on the site within the first five years of the plan period. As demonstrated, the site is fully achievable and there are no constraints that would impede its delivery. Furthermore, as a leading property consultancy in the area, Carter Jonas LLP considers that there is clear market demand for housing development on the site because of its location and attractive locality. This is exemplified by the developer interest in the site and development commencing on the commitment to the south.

4 GENERAL CONSIDERATIONS

4.1 As a starting point before dealing with the policies and proposals, we have a number of general comments to make regarding the Publication Plan:

Duty to Cooperate (DTC)

4.2 Within Craven it is clear that there are a number of competing matters and key issues dependent upon cross boundary co-operation to inform the Local Plan process. There are numerous political organisational and service relationships apparent across many levels. These comprise the Yorkshire Dales National Park to the north (which is a distinct plan making authority), along with the Metropolitan District of Bradford to the south; Lancashire planning authorities of Lancaster City, Pendle and Ribble Valley adjoin to the west. North Yorkshire County Council is also an important factor in the provision of services such as education, social care and highways. The catchments of infrastructure, service and utility providers also generate cross-boundary issues.

4.3 A Paper on “Cross Boundary Strategic issues and Duty to Co-operate Statement”, dated December 2017 sets out the Council's obligations on this matter. Correspondence and responses from adjoining authorities explain the extent to which there has been consultation, joint working and on-going engagement on a variety of matters. That correspondence suggests that on many of the key strategic and cross-boundary issues that the Council has undertaken appropriate consultation and responded accordingly

4.4 Within the conclusions of the Paper Craven Council considers that its obligation on this matter are satisfied. We would generally agree with this position with the exception of some minor matters:

4.5 An MOU (Memorandum of Understanding) has been signed with the Yorkshire Dales National Park Authority on a number of matters, agreeing on the housing figure for the Housing Market Area (HMA), and suggesting a high degree of self-containment within the HMA. It does not however provide details on how the full objectively assessed housing need will be delivered, nor does it set out how the two authorities will work together to ensure the need is met. It is considered that further work is required on this issue.

- 4.6 City of Bradford Council to the south is ahead of Craven with an adopted Core Strategy in place. That said, their ambitious housing and employment growth strategy is dependent upon the review and roll back of the Green Belt, a process which may become embroiled in politics, with a consequent delay to the Plan making process. CDC will need to keep this issue under review if Bradford Council do not achieve their numbers, as it may add to pressures in South Craven.
- 4.7 Furthermore, a series of proposed amendments in the Housing White Paper (September 2017) suggest the requirement for a Statement of Common Ground following changes to the Framework. These may emerge over the next six months and we reserve our right to submit further comments on this issue.
- 4.8 On a site specific matter for SK089/090 there is an issue with regard to the North Yorkshire Education Authority, given the requirement at Elsey Croft to provide land (1.8 has or 4.5 acres) for a primary school. We are aware that the County Council have submitted representation supporting the identification of land at Elsey Croft for a Primary School, but have done no site specific investigation. For the reasons set out in Section 5 of this representation we consider the Local Plan to be unsound. Amendments are proposed which could address this matter.

Plan Period

- 4.9 It is noted that the draft Local Plan has a twenty year time frame for the period 2012 to 2032. Whilst it is positive that the Council has already proposed a modest extension to the Plan period from 2030 to 2032, our view is that such an aspiration would have been appropriate five years ago. Consequently an end date to the Local Plan period of 2032 is not supported by the respondents as it is not a justified position.
- 4.10 Assuming adoption of the Local Plan document by early 2019, a remaining plan period of twelve years falls short of the fifteen year period advised in the Framework. This is particularly so as it appears that the Plan does not appear to take into account longer term requirements as envisaged at Paragraph 157.
- 4.11 To address this point we consider that the planning authority should extend the Plan period to 2035 which would be consistent with the aims of the Framework and would be commensurate with adjoining (North

Yorkshire) authorities, for example Harrogate Borough Council to the north which is working on a similar time frame for adoption of the Local Plan.

Plan Review

- 4.12 Associated with the comments made on the Plan period above, Section 9 of the Draft Plan states that Monitoring is an essential part of the plan making process to ensure the Plan objectives are being delivered and to identify any negative effects from the implementation of a policy.
- 4.13 Such an approach is supported in principle, however, it would be appropriate for the section to include a periodic review or to express the circumstances where the policies may be reviewed. For example, the failure to achieve the Plan objectives and Vision for example through under delivery of development or infrastructure.
- 4.14 At this stage the Local Plan does not include a housing trajectory to demonstrate how it will deliver the objectively assessed housing needs over the Plan period. This is considered to be a failing and may render the Plan unsound as it is not effective. One of the principal purposes of the planning system is to significantly boost the delivery of housing; in the absence of delivery rates/yields there would seem to be no reliable method for assessing the success or otherwise (i.e. effectiveness) of the Plan's policies. In this regard, as published we consider the Plan to be unsound.
- 4.15 Discussion with the Authority suggests that the Council's processes are "out of kilter" and officers will be requesting such detailed information about the timing and delivery of housing development, after the closure of the Regulation 19. It is suggested that any such information is collated quickly and included with any material and consulted upon prior to formal Submission of the Local Plan to the Planning Inspectorate.
- 4.16 Furthermore within the provisions of the Framework it recommends that Local Plans are reviewed as a matter of course every five years, simply to ensure that the evidence base, policies and proposals remain up to date. We would recommend the draft Local Plan should include such a provision.

5 LOCAL PLAN DOCUMENT

- 5.1 The comments and observations contained in the following section mirror the structure of the Local Plan so far as it is relevant.

SECTION 1: INTRODUCTION

- 5.2 Setting out a background to the preparation of the Local Plan, this provides a useful summary of the context for the Local Plan process, structure of the Plan and supplementary documents (DtC) and appraisals (SA) which have been prepared or are being drafted to inform and guide the spatial strategy in the Plan and for the production of neighbourhood planning documents.
- 5.3 Comments upon the Plan period (paragraphs 1.1 and 1.8) are raised elsewhere.

SECTION 2: CONTEXT

- 5.4 Setting out the prevailing position for the Local Plan, this section identifies the key issues and challenges facing the area. It may be appropriate that this part of the plan should include an improved set of diagrams to indicate Craven's location and the main settlements.
- 5.5 Without repeating the matters the key issues across the Plan area appear to be:

Falling resident Workforce – An attractive location to live combined with limited new housing stock has resulted in existing housing stock being under occupied. New housing is required to encourage younger families to improve the supply of labour to local businesses and to enable older household to downsize and free up larger housing units.

Affordable housing need – connected with the above there has been a disjoint between local wage growth and increases in house prices and rents.

Need for green field development – Previous patterns of development have consumed underutilised and vacant brownfield sites and premises, requiring the release of green field sites to meet objectively assessed need for housing and employment development, along with the necessary infrastructure

High quality environment – Within the District are high quality natural and historic assets which require an appropriate level of protection;

Transport and connectivity – the District has relative proximity to major urban centres for jobs and services and there are opportunities to improve economic links by road and rail, including public transport.

5.6 We are in general agreement with these issues.

SECTION 3 SUSTAINABLE DEVELOPMENT

5.7 Here the document sets out the Vision for the Plan area to be achieved by 2032. Largely the narrative reflects a strategy of promoting the growth of existing settlements as the focus for homes, jobs and services, and making the area a distinctive and attractive place to live. In line with the comments elsewhere we would suggest that the Vision should be dated to 2035.

5.8 A series of ten Plan objectives are then set out (PO1 to PO10); as a general point these are supported.

DRAFT POLICY SD1: PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT:

5.9 As stated this policy reflects verbatim the matters as set out in the Framework. It may be that this will need to take into account forthcoming changes in the Framework. Draft changes are anticipated in March or April, after the close of the consultation period. Further comments may be required on this matter.

DRAFT POLICY SD2: MEETING THE CHALLENGE

5.10 It is considered that Policy SD2 is unnecessary in its present form and should be deleted. The provisions in relation to flood risk could be transposed into an “SP” or “ENV” policy; for example Draft Policy ENV6.

SECTION 4 STRATEGIC POLICIES AND SPATIAL STRATEGY

5.11 Within this section the Council sets out how much development will be progressed over the Plan period and the spatial distribution of that development, including the specific sites for delivering the strategy.

Key Diagram

- 5.12 There appears to be no Key Diagram at a District wide scale identifying the main settlement hierarchy and areas of general restraint. We would suggest that provision of such a diagram/pictorial may help with the flow of the document. Such a map would not be of a scale for identifying individual development sites or allocations.

DRAFT POLICY SP1 MEETING HOUSING NEED

Housing Requirement

- 5.13 Provision is made within the Draft Policy for a minimum 4,600 additional dwellings over the Plan period, equating to a minimum of 230 net dwellings annually. Consistent with our earlier comments we consider the Plan period should be extended to 2035 and the provision increased to a minimum of 5,300 net additional dwellings (based upon the 230 net dwellings per annum). We do consider however, that the housing requirement should be increased over the current (or extended) Plan period.
- 5.14 An Update SHMA (Arc4) was published in November 2017 (2017 Update) to inform the Local Plan preparation. This highlights that Craven District sits within two Strategic Housing Market Areas; namely the Lancaster and another extending across Craven, Bradford and Calderdale. It identifies that the Southern part of the District (around Skipton) interacts strongly with Bradford. Given that relationship, the 2017 Update suggests that economic growth and development activity in and between Bradford and Skipton should explore potential interactions and consequences through the Duty to Co-operate.
- 5.15 Nevertheless, the 2017 Update identifies that the District should be defined as a distinct Housing Market Area (HMA) for planning purposes. The 2017 Update which covers the Craven HMA identifies an OAN of 242 dwellings; an increase from the 2016 SHMA figure of 214 dpa. That is subsequently split with 206 dwellings attributed to Craven Local Plan Area and 36 dwellings to the National Park. Adopted in 2016 the Yorkshire Dales Local Plan predates the 2017 Update. It seeks to increase supply in the National Park by 55 dwellings each year. However the Yorkshire Dales covers more than the Craven HMA extending into adjacent Districts of Richmondshire and South Lakeland. It is not clear how much of Craven's OAN (Update 2017) will be provided for within the National Park, nor is this covered in the DtC Statement.

5.16 It is important that the OAN should also seek to deliver the need for affordable homes set out in the SHMA 2017 Update at 126 dwellings. Elsewhere in the Plan, qualifying sites are anticipated to deliver 30% of units (subject to viability) as affordable housing. A simple extrapolation of the Local Plan requirement suggests that it will only deliver a maximum of 69 units per annum (30% of 230), around 55% of the need. Policies in the Framework seek to boost housing supply to increase choice of high quality homes, to address affordability and to meet objectively assessed need in full. It would appear therefore that the basis of this policy is unsound as it is not consistent with National Policy.

5.17 Consideration should be given to increasing the minimum housing requirement.

Housing Delivery

5.18 There is some concern regarding housing delivery, given the final part of the draft policy. "Housing Monitoring" indicates that 768 net dwellings have been completed between 1st April 2012 and 30th September; a 5.5 year period. This suggests that within the Plan period to date the Council has only delivered a net additional 140 dwellings per annum, from all tenures. For the remaining plan period (to 2032), this suggests a requirement for 3,832 new dwellings.

5.19 As a basic position the Council will need to double the present rate of the housing delivery to around 265 dwellings per annum over the remainder of the Plan period (to 2032) to deliver the housing requirement. There appears to be no mechanism to indicate how the Local Plan may seek to achieve this.

5.20 Material contained at page 18 in the Annual Monitoring Report (published December 2017) sets out a potential Housing Trajectory against the draft requirement. On the face of it this appears somewhat unrealistic peaking at 2020/21 at 425 before dipping to 250 at 2023/24, then peaking at 420 at 2025/26, before falling away to 220dpa towards the end of the Plan period. As presented the housing trajectory appears to be a "roller coaster ride". We would suggest that this is unsound as it does not represent positive planning. It would be more appropriate that the trajectory enables a continuous delivery of housing across the plan period to give certainty.

5.21 There is no phasing proposed in the Local Plan policies which is welcomed. However, the Council must take measures to ensure that a continuous supply of suitable housing land is made available, from a wide range of outlets across the District (and Skipton in particular) removing any policy burdens or other obstacles to delivery and ensure a continuous supply of sites.

DRAFT POLICY SP2: ECONOMIC ACTIVITY AND BUSINESS GROWTH

5.22 Building a strong competitive economy is one of the key themes of Government policy and the Framework places a strong emphasis upon proactive planning to identify business and development needs and ensure that the economy is fit for the future. Government advises that the planning system should not act as a brake on economic growth aspirations. To this end the policy and provisions are broadly supported.

5.23 Within this policy the evidence suggests a current shortfall in provision of between 11 and 16ha of employment land to be provided over the Plan period. It is important that the selection of sites is consistent with the spatial hierarchy and focuses growth into those areas where housing growth will occur.

DRAFT POLICY SP3: HOUSING MIX AND DENSITY

5.24 An approach which promotes a diverse mix of house types and sizes is supported where it is flexible, not overly prescriptive and requiring of significant evidence and analysis. It is important that any policy is workable and ensures that housing delivery can be increased in line with the requirement for the remainder of the Plan period.

Housing Mix

5.25 It is important that the housing market in Craven has a balance of housing types and sizes. The SHMA sets out a requirement for the District as a whole. Whilst the need for a mix of house types and tenures is appreciated, it is important that the Council does not seek to compromise or stall much needed housing by overly prescriptive policy requirements or the need to provide disproportionate level of additional evidence.

5.26 Similar comments were issued to the previous consultation supporting the policy but suggested it should be workable. CDC have made modest changes so the policy is less prescriptive and the final mix of housing types and sizes will be secured through negotiation with the applicant.

5.27 Such changes are welcome but concerns still remain. It is considered that the approach to housing mix in Provision (a) is specific and overly prescriptive requiring developers to provide evidence where they diverge from the policy. A rigid approach may simply delay delivery of much needed homes, given that most housing is provided by the private sector. It is not justified and therefore unsound; the provision should be deleted.

Density

5.28 Provision (b) relates to a density requirement of 32 dph (dwellings per hectare). Government policy promotes the efficient use of land and higher densities of development are consistent with this aim. Securing higher densities within defined centres is a suitable aspiration in the town and city centres and in locations with good access to public transport. However, seeking net densities of 32 dwellings per hectare across the District appears to be a blanket policy with no finesse for local characteristic and good design principles. The requirement for demonstrating variations to the policy does not suggest how evidence of detriment etc. should be provided. It is unclear what the justification for this approach is nor how it will be applied in practice.

5.29 To address these comments it is suggested that a more positive statement is included wherein:

“the planning authority will work with developers to deliver housing that contributes to identified needs taking account of local variations in housing need, local characteristics, scheme viability or other site specific circumstances which may indicate that a different housing mix or density is required to meet local plan objectives.”

DRAFT POLICY SP4: SPATIAL STRATEGY AND HOUSING GROWTH

5.30 There are concerns that this policy is overly prescriptive and is not positively prepared or effective. In broad terms, we consider that the policy should seek to positively deliver growth which is commensurate with the settlement in question and its ability to accommodate growth. We would suggest that the phrases “limited”, “limited” and “low” are removed from provisions D, E and F, respectively.

5.31 For the tabulation at the end of the policy (Page 51 onwards) in line with our other comments we would suggest that reference to “230 net dwellings per annum” is removed from the third column heading. With the fourth column we consider that this should suggest “Minimum” Housing Provision, along with the removal of “approximately”, as this would more accurately reflect a positive approach.

DRAFT POLICY SP5: STRATEGY FOR SKIPTON

- 5.32 Tables 3, 4 and 5 set out the pattern of development in the District in the form of completions (to 30th September 2017) and extant planning permissions for the same period. These suggest that in addition to the 768 completions, there are extant consents for 1,549 dwellings.
- 5.33 Overall this would suggest whilst there has been a slow delivery of housing to date a healthy supply of sites is evident. However in the absence of a detailed housing trajectory it is difficult to understand how those permissions will contribute to the delivery of the spatial strategy over the Plan period or what mechanism is put in place should the sites fail to come forward as expected.
- 5.34 Given the Framework seeks to significantly boost the supply of housing through positively prepared Plans which have flexibility to deal with changing circumstances, then a buffer is required. Advice from the Local Plan Expert Group recommends the use of a 20% buffer to ensure the Plan can maintain a five year supply and responds rapidly and flexibly to change. Such an approach is consistent with Carter Jonas' and our client's position and it is suggested that the Council takes this stance and includes a buffer accordingly.
- 5.35 At Table 3 CDC calculates that there is 12% difference between gross and net completions. This suggests a net to gross of 12% should be applied to the housing requirement, which is CDC's approach as suggested in Table 5. This is unsound and it is suggested that a 20% buffer is added.
- 5.36 Table 5 sets out on a settlement wide basis the summary of the Requirement and Supply by Settlement. As a headline this demonstrates that the distribution of delivery and consents is not in accordance with the settlement hierarchy. At its most basic, the requirement for Skipton at 50% of dwellings suggests delivery of 334 dwellings to 30th September 2017, resulting in a net delivery of 61 dwellings annually against a minimum requirement of 115 dpa. The supply side suggests that there are planning permissions for around 800 units; however, it is not clear if those sites will come forward to deliver the housing requirement.
- 5.37 As a contrast some of the smaller settlements and villages appear to have sufficient completions and approvals to meet the minimum requirements of Policy SP4. We do not advocate that the Council imposes a "moratorium" on granting permission of those settlements, as clearly these settlements are contributing to

current (albeit low) levels of completions. What is required is a more ambitious strategy to deliver housing in the main settlements along with a supportive approach to new housing in the smaller settlements to maintain their sustainability and viability.

5.38 Focussing upon Skipton, we consider that the planning authority's approach is not sound; it is not positively prepared, justified nor effective. For example Table 5 suggests that the Council's expectation is that the minimum housing requirement for Skipton is 1,399 units over the Plan period, then proposes sufficient land for allocation for 1,402 units; a less than 0.2% over-provision. In our view this does not indicate positive planning or sufficient flexibility.

5.39 As it is we suggest that the Council should apply a 20% buffer not the 12% proposed. This would suggest (on the current 230 unit requirement) a minimum buffer of 450 units. This would set a residual requirement in the Plan for Skipton of 1,650 units. CDC should then seek to identify this as a minimum.

5.40 Indeed as we set out in Section 5 of this representation we have substantive concerns about the likely yield of the sites proposed by the Council. Taking SK089/090 as one example, our own appraisal work suggests that the Council's estimate that site will yield in the region of 220 dwellings is unrealistic. Noting our concerns with Policy SP3 (Density) the Council has calculated the yield of the site based on net area of 6.8 has and a density of 32dph. Set out at Appendix 1 is a specialist architect's appraisal of the draft allocation (Principles Plan) which indicates a yield of 130 dwellings on the site, taking into consideration potential topography and other constraints (wayleaves, flood risk, etc.); some 60% of the suggested yield. In isolation this would suggest the Council is not allocating sufficient land in Skipton' with a shortfall of 90 units. If this were extrapolated across all fifteen (greenfield) housing and mixed use regeneration allocations; it could indicate a shortfall of around 570 units. This equates to between 10 and 15% of the housing requirement over the Plan period and may have consequences for the delivery of infrastructure.

5.41 A number of the allocations are hemmed in by other development or infrastructure such as roads, the A65 and A629, and the railway. However, there may be some flexibility in the Plan through reducing Green Infrastructure, social and community infrastructure or employment uses. Such an approach may conflict with

other elements of the Local Plan; for example economic growth and landscape, habitat and biodiversity enhancement.

- 5.42 Discussion with the Council suggests that a number of the Draft Site Allocations are subject to pre-application engagement and planning applications which provides a degree of certainty. None of this evidence is presented in the draft Plan. As a consequence we consider that the Policy as drafted is unsound. We suggest that the Council reviews the draft allocations, confirms the likely yields through engagement with the developers/ landowners and their agents, prior to formal Submission and seeks to identify additional development land. The contribution of land at Elsey Croft and suggested changes to the draft Local Plan are discussed in Section 5 of this representation.

DRAFT POLICY SP12: INFRASTRUCTURE, STRATEGY AND DEVELOPMENT DELIVERY

- 5.43 This policy seeks to ensure that in parallel with the delivery of growth that there is capacity in existing local infrastructure to accommodate growth or where necessary it is reinforced, upgraded or new capacity is installed.
- 5.44 With Draft Allocation SK089/090, there is a requirement for some 1.8ha to be “reserved” for the provision of a primary school. Notwithstanding any site specific issues, no evidence has been provided in the draft Local Plan to explain the justification for the requirement, timetable for delivery and how it is being financed. This is a particular concern given the anticipated reduction in yield off the site.
- 5.45 At this stage the draft Local Plan is considered unsound as it is not justified, in terms of whether it comprises the most appropriate strategy in the circumstances (given the understanding that a Primary School has been closed elsewhere in the town). Engagement with the Education Authority has elicited a response and it is expected that this will result in changes to the Plan prior to formal Submission. As published however, we consider the Local Plan to be unsound.

SECTION 5: ENVIRONMENT

- 5.46 This section sets out a series of specific policies and requirements. Below we set out initial comments which may evolve over the coming months.

DRAFT POLICY ENV1: COUNTRYSIDE AND LANDSCAPE

5.47 At present we have no comment upon this policy requirement but wish to register our interest given Provision d) which suggests great weight should be given to the setting of the National Park. A more detailed commentary is provided in Section 5.0 of this representation. However, we reserve our right to comment upon this policy if necessary.

DRAFT POLICY ENV3: GOOD DESIGN

5.48 Good design goes to the heart of sustainable development. Our principal concern is to ensure that the policy does not replicate what may be deemed as Building Regulation considerations.

5.49 Otherwise we have no comment upon this policy requirement but wish to register our interest. A more detailed commentary is provided in Section 5.0 of this representation. However, we reserve our right to comment upon this policy if necessary.

DRAFT POLICY ENV4: BIODIVERSITY

5.50 At present we have no comment upon this policy requirement but wish to register our interest as the Site SK089/090 is listed within the Policy and requires the provision of on-site improvements. A more detailed commentary is provided in Section 5.0 of this representation. However, we reserve our right to comment upon this policy if necessary.

DRAFT POLICY ENV5: GREEN INFRASTRUCTURE

5.51 At present we have no comment upon this policy requirement but wish to register our interest as the Site SK089/090 which is listed within the Policy and requires the provision of on-site improvements. A more detailed commentary is provided in Section 5.0 of this representation. However, we reserve our right to comment upon this policy, if necessary.

DRAFT POLICY ENV6: FLOOD RISK

5.52 At present we have no specific comment upon this policy requirement (beyond our point on Policy SD2) but wish to register our interest as the Site SK089/090 will require the provision of on-site mitigation. A more

detailed commentary is provided in Section 5.0 of this representation. However, we reserve our right to comment upon this policy, if necessary.

DRAFT POLICY ENV12: FOOTPATHS, BRIDLEWAYS, BYWAYS AND FOOTPATHS

- 5.53 At present we have no specific comment upon this policy requirement (beyond our point on Policy SD2) but wish to register our interest as the Site SK089/090 will require the provision of on-site mitigation. A more detailed commentary is provided in Section 5.0 of this representation. However, we reserve our right to comment upon this policy, if necessary.

SECTION 6: HOUSING

- 5.54 A number of key facts and figures are set out at the beginning of the section highlighting a series of particular concerns which inform policy; these include an aging population which will increase nearly 50% over the plan period. Whilst affordability issues are not as substantive as the neighbouring North Yorkshire District of Harrogate, the District's affordability ratio is the high with a mismatch between local incomes and the cost of buying or renting a home. A second point is the requirement for 2,520 affordable homes for the Plan period 2012 -2032 (at 126dpa).

DRAFT POLICY H1 SPECIALIST HOUSING FOR OLDER PEOPLE

- 5.55 Craven District is noted as having an aging population. It is appropriate that the Local Plan recognises the need to provide appropriate accommodation. A requirement for homes which meet the needs for older and disabled people is recognised and supported.
- 5.56 It would be helpful for the policy and evidence base to ascertain the ability for people to stay in their own homes and to adapt existing housing stock to suitable standards. This should be investigated and the policy updated accordingly.

DRAFT POLICY H2: AFFORDABLE HOUSING

- 5.57 A substantive requirement for affordable homes to buy and rent is recognised and the provision of affordable housing is supported. However it is considered that the Council's constrained requirement will fail to address the issue.

- 5.58 This policy sets out a requirement for 30% affordable on sites of 11 or more dwellings, with a number of variations in line with national policy. Any need for affordable housing must be balanced against viability implications of the policy requirements and market consideration across the District.
- 5.59 One of the key considerations for viability relates to the likely contribution to infrastructure costs arising from the development and also as a consequence of potential Community Infrastructure Levy. With no surprise viability gets worse the greater the contribution required.
- 5.60 Within Provision a) I, a viability clause is included. Such an approach, whilst supported, should not be used to justify an unrealistic affordable housing target.
- 5.61 Given viability concerns across different parts of the District a variable contributions approach may be appropriate based upon geography and/or other criteria. An affordable housing market uplift can then be applied to housing targets.
- 5.62 It is not clear from the policy how self-build, custom building and starter homes will be treated.

SECTION 8: INFRASTRUCTURE, SERVICES AND FACILITIES

- 5.63 It is important that the Council meets the objectively assessed needs for the District and ensures that sufficient infrastructure is provided. In this regard the introduction of the requirement for a primary school at this stage of the Plan preparation is questioned. Whilst the principle is supported (if the evidence suggests it is required) more clarity and certainty is required.

DRAFT POLICY INF1: PLANNING OBLIGATIONS

- 5.64 At present, we have no comment upon this policy requirement but wish to register our interest as the Site SK089/090 falls to be considered under its provisions. A more detailed commentary is provided in Section 6.0 of this representation. However, we reserve our right to comment upon this policy, if necessary

DRAFT POLICY INF2: COMMUNITY FACILITIES AND SOCIAL SPACES

5.65 At present we have no comment upon this policy requirement but wish to register our interest as the Site SK089/090 may require the provision of on-site improvements. A more detailed commentary is provided in Section 6.0 of this representation. However, we reserve our right to comment upon this policy, if necessary.

DRAFT POLICY INF6: EDUCATION PROVISION

5.66 Set out in Section 5 is the expectation that land will be reserved in Draft Allocation SK089 /SK090 for the provision of a two form entry Primary School along with Nursery provision; one of two strategic sites in the town. It is important that this policy provides sufficient certainty to ensure that adequate contributions are provided (pooled) to facilitate construction of the school.

5.67 Engagement with the North Yorkshire Education Authority has informed the relevant consideration of this matter in Section 6.

SECTION 9 MONITORING

5.68 Setting out the proposals for measuring the delivery of the draft Local Plan, this section sets out the Council's proposed strategy. For the reasons set out earlier we are of the view that the proposals set out in the Local Plan are broadly unsound as the Council has not demonstrated that it can meet the full objectively assessed needs for the District.

5.69 It is important that the Council gives realistic consideration to the likely sources for achieving the housing requirement consistently over the Plan period.

Policies Map

5.70 A number of changes are suggested to the Policies Map for Skipton through this representation. These are explained at Section 6 and changes included at Appendix 3.

6 SITE SPECIFIC PROPOSALS: SK089/090

6.1 Previous representations set out in Section 3.0 remain relevant to the consideration of the site and a series of further reports were specified at that time. However, whilst the site area has remained the same within the Draft Local Plan, the requirement has changed substantively. In this regard the Council has indicated the reservation of a substantial portion of the site for a primary school. As a consequence a number of those reports have not been commissioned until the general development principles underlying the draft Allocation have been established.

6.2 At this stage we are of the view that the Draft Allocation narrative, policy and the Policy/Proposals Map are not sound for a number reasons. Broadly this is in terms of inconsistency of narrative, policy requirements, a wider issue with the number of sites identified and the deliverability of the SK089/SK090 allocation. Our reasoning is set out below and amendments to the Policy and Proposals Map suggested in Appendix 4 and 5 attached.

School Use

6.3 A major change from the Summer 2017 consultation is the inclusion of an education requirement on the site. Discussion with the Education Authority (NYEA) suggests a potential requirement over the plan period for two additional Primary Schools to serve Skipton. NYEA suggest that school provision in the town is at or close to capacity and existing school sites “dated” and constrained in terms of the potential to further develop or extend; i.e. the sites are simply not large enough. NYEA advise that:

“by 2029/30 there are forecast to be 1,062 primary aged pupils in Skipton Town based on forecast birth rates as of May 2017. Additionally, there are forecast to be 189 additional pupils from existing housing permissions, and 348 pupils from the proposed Local Plan allocations. By 2029/30 there is likely to be a shortfall of 480 places for primary aged pupils in Skipton Town. This figure includes the capacity provided by Skipton Ings Primary School prior to its closure in December (2017).”

6.4 NYEA consider the Local Plan as the appropriate route to identify new potential sites and they have advised CDC that it would be “prudent” to identify two sites for new primary schools. In this regard, NYEA have indicated the need for a site to the west of Skipton and a second site to the east of the town, prescribing a site of around 1.8has. As a comment this is somewhat larger than usually required, previous requests elsewhere suggest around 1.0 to 1.2 hectares is required per school. NYEA however, suggest that this is in

line with Department for Education Standards to enable adequate primary provision with room for expansion, but also a combined nursery/intake facility and play areas.

6.5 Land to the north of Gargrave Road, partially within NYCC and CDC ownership has been identified as the likely site to provide a primary school to serve the west of the town. To the east of the town there are four draft allocations, with Site SK089/SK090 one identified to accommodate the primary school use. NYEA's response to the current consultation is to "welcome" the inclusion of a site to the east of the town. They have however suggested the wording of the development principles be amended to:

"A new primary school may potentially need to be provided on 1.8ha of the total site area of sites SK089 & SK090 to meet the educational requirements for Skipton over the plan period."

6.6 It is not clear that the NYEA's comments add to the certainty and clarity required in the Local Plan.

6.7 In terms of acquisition of the site NYEA suggest that:

"We would be seeking to acquire these sites, where required, at no cost to NYCC, and in addition to the S106 financial contribution, through a S106 planning obligation. We would envisage that a Section 106 agreement would set out the timing and terms of transfer of the education land to the County Council for a term of years after which if the school is not constructed or development has not commenced, the owners may require the land to be transferred back to them."

6.8 It is clear from discussion that NYEA have not undertaken any detailed site assessment yet to inform their decision. They have however, provided an Education Site Suitability Criteria Checklist which contains a number of requirements to investigate; these include

- Suitability- slope and topography;
- Location – accessibility and catchment;
- Adjacent land uses;
- Site and surrounding area clear of pollution and contamination and similar risk factors;
- Free of encumbrances /obligations;
- Suitable and safe access; and
- Availability of services/utilities (to the boundary)

6.9 Having considered the other sites to the east of Skipton, a high level appraisal would suggest that:

- **SK087** at 1.1 hectares, the site is too small and the triangular shape and location adjoining the A65 bypass raise amenity and suitability concerns
- **SK088** at 4.5 hectares the site is large enough; however there is a slope across it which may deem it unsuitable;.
- **SK013**: at 3.1 hectares the site is large enough but is long and thin and possibly not the most appropriate; and
- **SK089/090** remains for further consideration.

6.10 On the face of it SK089 /SK090 is potentially large enough and the most centrally located of the options put forward. In principle the landowner considers the identification and reservation of part of the SK089/SK090 as a potential location for a Primary School as acceptable. As such it is considered that the description of uses on Page 58 and page 68/69 should be consistent; one describes C3 and D1 whilst one excludes the D1 (education use). This should be amended.

6.11 That being said, the site is not without issues against the checklist considerations including:

- topographical constraints; and
- areas that are subject to reservations on the freehold.

6.12 Along the northern and western boundaries of SK089/SK090 there are issues of severe slope which may be acceptable for housing but less so for a school site; or with a substantial impact upon build costs. The flatter part of the part of the draft allocation is toward the southern edge of the site. Also, there are two way leaves running north-south across the site comprising a gas main and a water main, each the subject of a no-build zone. There is also a watercourse which runs across the site which may result in complications for drainage and /or culverting required.

Residential Use

6.13 Whilst further work will be carried out (subject to discussion on the matter with CDC) an initial options exercise is included at Appendix 1. Development Principles **Option 1** by PRA Architects sets out the site principles where a school could be located within the draft allocation. It identifies the part of the site which is due to being broadly level and avoids the two wayleaves. Applying these results in a net developable area of 4.99has.

6.14 A high level assessment of the yield of the site using a broad mix of housing types (in general accord with Draft Policy SP3) results in the following:

- 30% Low density 4 & 5 bed dwellings at 20dph;
- 40% Medium Density 3 bed dwellings at 25dph
- 30% High Density 1,2 & 3 bed dwellings at 35dph

6.15 Transposing this onto the site suggests:

Density	Area (Ha)	Dwelling Yield
Low	1.5	30
Medium	2.0	50
High	1.5	52
Total	4.99	132

6.16 Assessing the above yield would suggest a yield of 132 units with an average density 26.45ha. This is much lower than the Local Plan assumption. Applying the SP3 Policy 32dph would suggest a yield of 190 dwellings still some 15% below the Local Plan yield.

6.17 Whilst more detailed assessment may increase the yield, this would still be below the figure (of 218 units) in the draft Local Plan. Similar concerns should be applied to other sites to the east of Skipton SK087, SK088 and SK013, which may have reduced yields of 29, 120 and 82 dwellings respectively. This would compound the shortfall by 45 units.

6.18 There are two consequences to this, in that the Council will fail to deliver the housing numbers required for much needed market and affordable housing. Furthermore lower housing numbers would also have consequences for the viability of the Local Plan and the ability to deliver infrastructure; for example the new primary school.

Alternative Proposals

6.19 Given the concerns raised with regards to the current draft allocation we have explored two further options, these are included at Appendix 2 and 3. These are based on the scenario of “flipping” the school proposal on to the family’s land to the east.

6.20 A Principles Plan prepared by PRA Architects demonstrates what an **Option 2** could look like. This suggests placing the draft school provision on land to the east which is generally level on a plateau without significant topographical issues, wayleaves or other encumbrances. In order to address any potential landscape concerns the mass of buildings and education facilities, along with hard surfaces, access roads and service areas could be focussed within the western part of the site area, adjacent the urban edge. Playing fields could be established in the eastern part of the site. In the broadest terms, this solution would not project further east than the existing urban area, or the eastward extent SK088 and SK013 when seen from strategic viewpoints such as Embsay Reservoir and Embsay Crag (as a general representation of the National Park). Indeed the school buildings would be seen against an urban backdrop.

6.21 As a consequence the potential yield using the same assumptions as set out in paragraph 6.13 above would result in the following yields:

Density	Area (Ha)	Dwelling Yield
Low	2.04	41
Medium	2.72	68
High	2.03	71
Total	6.79	180

6.22 This yield still falls 20% below that set out in the Local Plan. Again as an initial response the yield may be higher; however, if the yield across SK087, SK088 and SK013 achieve similar shortfalls then the Council will fail to achieve the housing targets.

6.23 **Option 3** suggests a bolder solution extending the SK089/090 allocation further to the east to include two parcels of land either side (north and south) of the public right of way – footpath. A Principles Plan by PRA Architects is included at Appendix 3. This suggests an extension to the site area of 11.58 hectares with an additional nett area for housing of 6.47has, could be achievable in addition to the 1.8has reserved for the proposed school.

6.24 There are fewer topographical issues on the land to the east, so different housing mix could be achieved:

- 30% Low density 4 & 5 bed dwellings at 20dph;
- 30% Medium Density 3 bed dwellings at 25dph

- 40% High Density 1, 2 & 3 bed dwellings at 35dph

6.25 Using the assumptions set out at Paragraph 6.13 above results in the following yields:

Density	Area (Ha)	Dwelling Yield
Low	1.94	38
Medium	1.94	48
High	2.59	90
Total	6.47	176

6.26 Combining the outputs together would result in the following yield from Option 3:

Density	Area (Ha)	Dwelling Yield
Low	3.98	79
Medium	4.68	116
High	4.62	161
Total	13.26	356

6.27 Dependent upon the timescale for approval of any planning permissions it is considered that Option 3 would make up the anticipated shortfall in housing numbers in the settlement of Skipton. It is expected that the site could deliver housing across the Plan period and, subject to delivery rates, beyond. We consider that inclusion of the Option 3 scenario as the SK089/SK090 draft allocation would go some way to address concerns regarding the soundness of the strategy for Skipton in the draft Craven Local Plan. The proposed development limit should be amended accordingly.

Other Matters

6.28 Representation to the Regulation 18 consultation during the Summer 2017 suggested that a number of reports would be prepared to support the draft SK089/SK090 allocation. These included

- a masterplan;
- highways and access strategy;
- phase 1 ecology and walkover survey;
- landscape and visual appraisal;
- landscape plan;
- flood risk/drainage and services/utilities and ownership constraints mapping; and
- topographic survey.

6.29 With the inclusion of the primary /nursery school proposal, however, the majority of those studies have been put on hold until the Council provides some certainty and confirms its position with regards to the extent of the SK089/SK090 allocation and the distribution of uses within it.

Highways

6.30 That being said a Preliminary Highway Feasibility Assessment has been prepared by Local Transport Projects, (highways consultants) to consider the highways and access strategy for the enhanced site allocation and mix of uses. Their report is attached as Appendix 5 and includes modelling outputs for both the housing and primary school uses.

6.31 Draft Policy text suggests that:

“Access to SK090 is to be gained from Wensleydale Avenue, Otley Road and Elsey Croft.”

6.32 Their appraisal using, the North Yorkshire Residential Highway Design Guide (NYCC, 1999), MfS and MfS2, considers the policy content taking a view upon the following access points:

- Otley Road (A6069) to the north
- Airedale Avenue (via Hurrs Road) from the west
- Wensleydale Avenue (via Hurrs Road)
- Elsey Croft (via Moorview Way)

6.33 In concluding this suggests that subject to detailed design and clarification of third party landownership that, Elsey Croft, Wensleydale Avenue and Airedale Avenue in combination can serve the development traffic including the extended site area. It does however suggest a desirable solution would be for a new primary access on to the A6069 to the north to serve the development site, supplemented by the other access points.

7 CONCLUSIONS AND RECOMMENDATIONS

- 7.1 These representations have been prepared on behalf of [REDACTED] to the draft Local Plan in general and the proposals as they affect their land and property at Elsey Croft, off Otley Road to the east of Skipton.
- 7.2 These representations seek to raise a number of general concerns regarding the "soundness" of the Local Plan document in terms of the Plan period, the Duty to Co-operate, housing numbers and whether the Council has allocated sufficient land to deliver housing across the Plan period and beyond, particularly around Skipton the principal settlement. In particular whilst it is welcomed that a phasing policy is not being implemented it is important that the Council presents a realistic trajectory and site assessment to ensure that there is a constant supply of sites delivering housing across the Plan period and beyond. This is both for consistency and to ensure that there is certainty for infrastructure planning, investment and funding.
- 7.3 Land at north of Elsey Croft (SK089 and SK090) is in [REDACTED] and Craven District Council's ownership. Both are willing land owners and the site is available. In principle the allocation of the site is accepted and welcomed; the family will work positively and collaboratively with the planning authority in bringing the site forward. This general area is suitable (with mitigation), available, achievable and deliverable.
- 7.4 That said since the Regulation 18 consultation of Summer 2017, the addition of a proposal for a primary school and nursery has changed the nature of the draft allocation. Having considered the effect of a 1.8ha requirement upon the site and the constraints of topography, slope and a watercourse/flood risk it is expected that the housing yield calculated from the site (218 units) is likely to be over optimistic; our assessment indicates 130 units (Option 1), Appendix 2. Given that the Council has only identified sufficient land to deliver the housing requirement for Skipton, we consider that the draft Local Plan is unsound.
- 7.5 To address this point two options have been explored and presented in the Appendices. Option 2 (Appendix 3) considers flipping the draft school site to the east on to land which better meets the Education Authority's site selection criteria and cost constraints. A third option (Option 3) included at Appendix 4 seeks to extend the entire allocation on to land to the east. It is considered that this should be the option submitted for Examination. It provides more certainty that the Plan's objectives (in respect of housing delivery) will be met

and provides more certainty for the delivery of infrastructure, such as the primary school with nursery provision.

- 7.6 Amendments to Policy SP5 are proposed, which we suggest should include an individual plan showing the extent of the draft allocations. Proposed changes to the wording of the relevant parts of SP5 are set out at Appendix 5.
- 7.7 Of the series of supporting studies set out in the Regulation 18 representations, only the highways study has been commissioned at this stage and is attached at Appendix 6. This suggests that access into the extended (SK089/SK090) Elsey Croft allocation should not be problematic, through the residential estates to the south and west, and with potential for a principal access point from the A6069 Otley Road to the north. Additional studies will be completed once these representations have been submitted and the Council has reflected upon them.
- 7.8 A series of the response forms are included at Appendix 7. These request an opportunity to attend the relevant Hearings of the Examination process. The need for attendance will be informed by the extent to which the suggested changes are taken on board and whether more general concerns on soundness are addressed.
- 7.9 It is hoped that Craven Council find these comments helpful in progressing a sound Local Plan towards Examination and adoption. Carter Jonas and [REDACTED] look forward to working cooperatively with the Council to bring the site forward.

CARTER JONAS
FEBRUARY 2018

Carter Jonas

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T: [REDACTED]

F: [REDACTED]

CRAVEN LOCAL PLAN REGULATION 19 PUBLICATION DRAFT

REPRESENTATION APPENDICES

For [REDACTED]

Land at SK089 & SK090 Elsey Croft, Skipton

Date: 13th February 2018

Quality Management

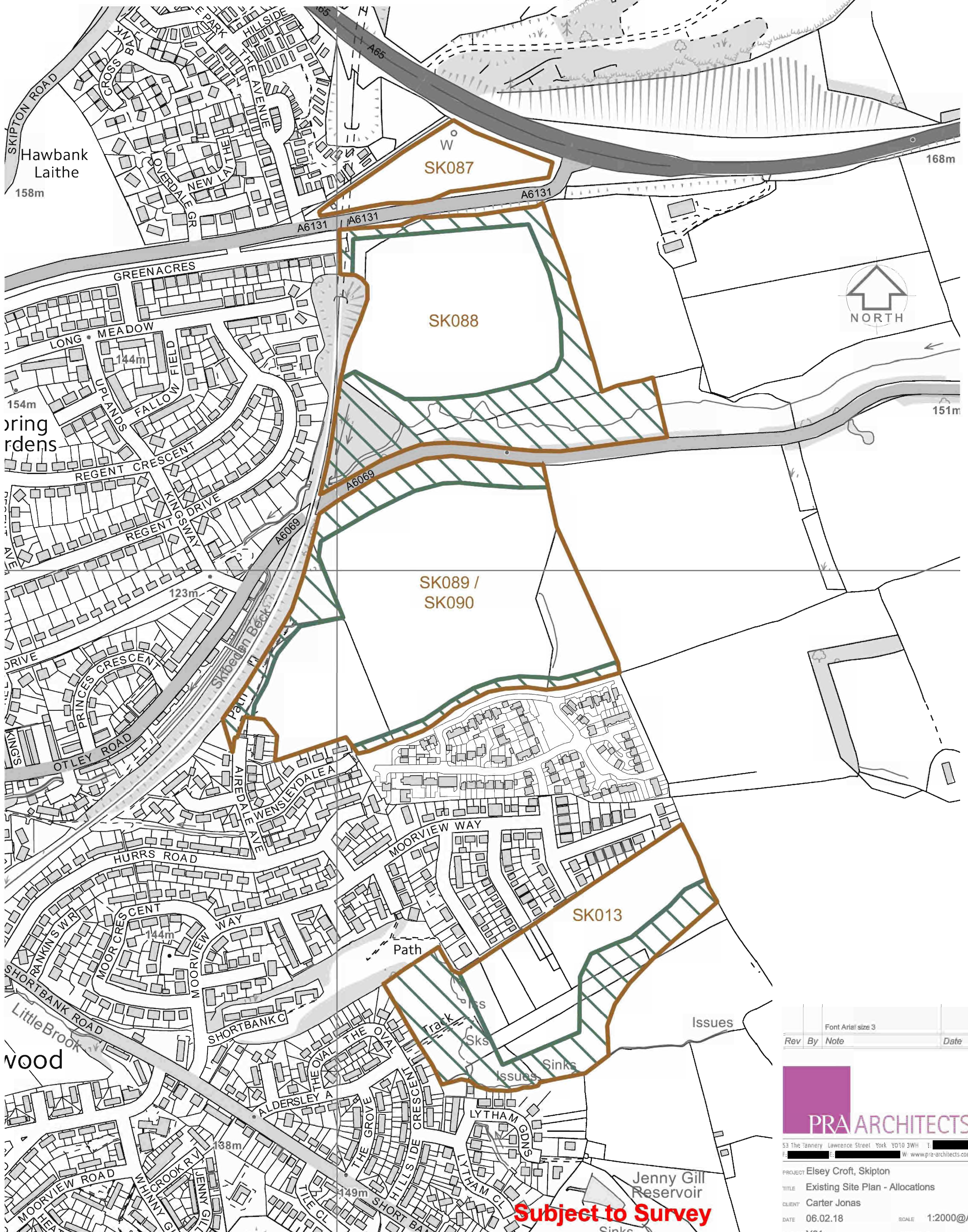
Prepared by:	Carter Jonas LLP
Authorised by:	██████████
Date:	13 th February 2018
Job Number:	4291842v1

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- 2. OPTION 1 SITE ASSESSMENT**
- 3. OPTION 2 SITE ASSESSMENT**
- 4. OPTION 3 PREFERRED ALLOCATION**
- 5. AMENDED SP5 TABLES**
- 6. LTP HIGHWAYS FEASIBILITY ASSESSMENT**
- 7. REPRESENTATION FORMS**

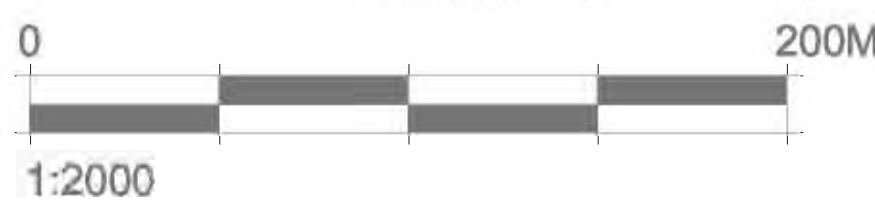
APPENDIX 1
EXISTING DRAFT ALLOCATIONS PLAN

Proposed Residential Development at Elsey Croft, Skipton



Existing Site Plan - Allocations

Subject to Survey



Rev	By	Note	Date



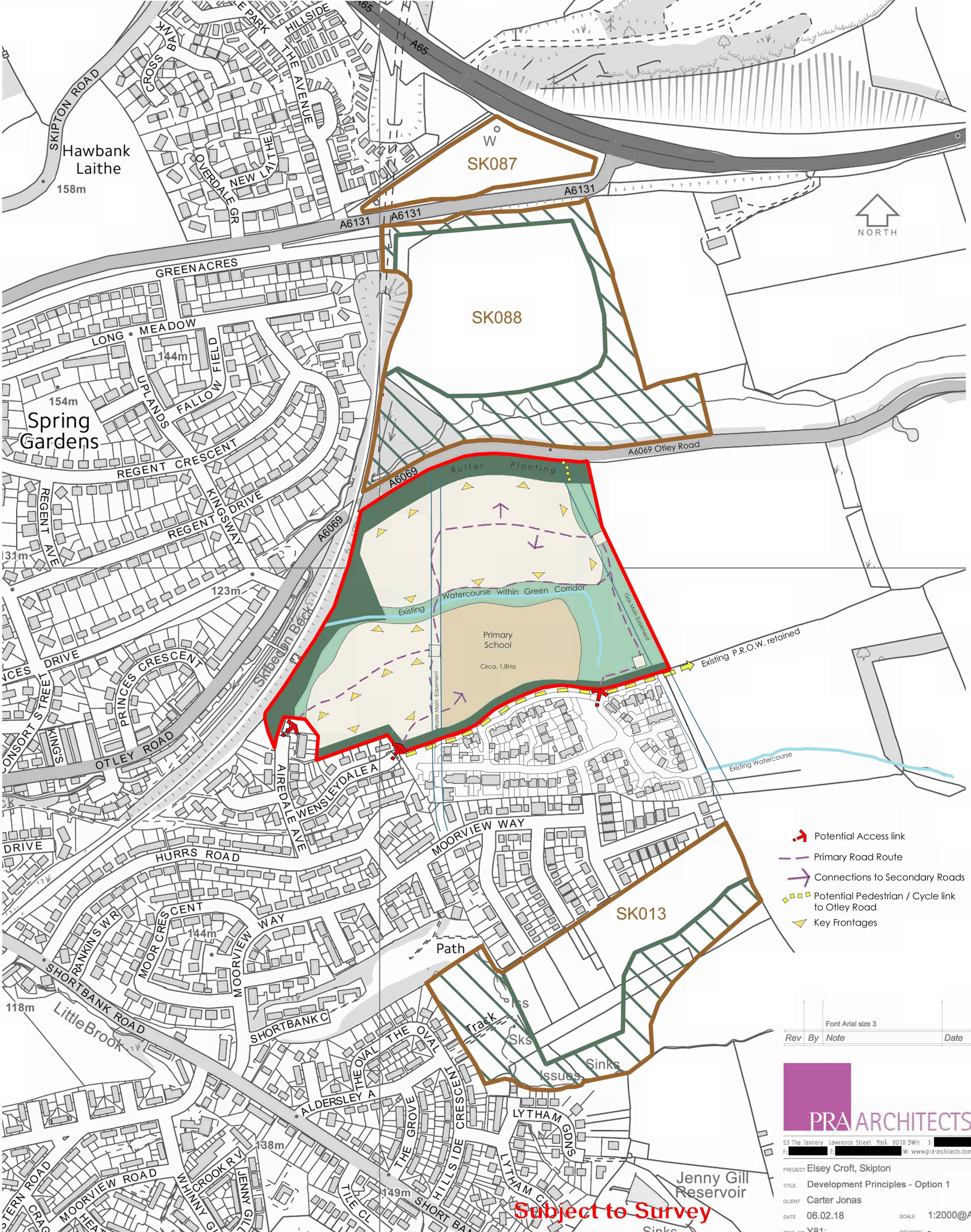
53 The Tannery Lawrence Street York YO10 3WH T: [REDACTED] F: [REDACTED] E: [REDACTED] W: www.pra-architects.com

PROJECT Elsey Croft, Skipton
 TITLE Existing Site Plan - Allocations
 CLIENT Carter Jonas
 DATE 06.02.18 SCALE 1:2000@A1
 DWG. NO Y81: REVISION -
 DRAWN [REDACTED] CHECKED [REDACTED]

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APPENDIX 2
DRAFT OPTION 1 SITE ASSESSMENT

Proposed Residential Development at Eley Croft, Skipton



- Potential Access link
- Primary Road Route
- Connections to Secondary Roads
- Potential Pedestrian / Cycle link to Otley Road
- Key Frontages

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Rev	By	Note	Date

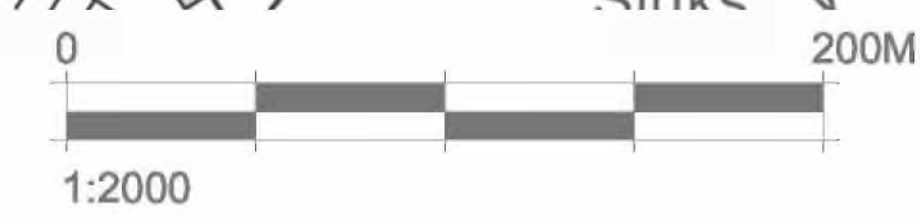
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 53 The Tannery, Lawrence Street, York, YO10 3WH, UK
 F: [Redacted] E: [Redacted] W: www.pra-architects.com

PROJECT: Eley Croft, Skipton
 TITLE: Development Principles - Option 1
 CLIENT: Carter Jonas
 DATE: 06.02.18 SCALE: 1:2000@A1
 DWG. NO: Y81: REVISION: -
 DRAWN: CHECKED:

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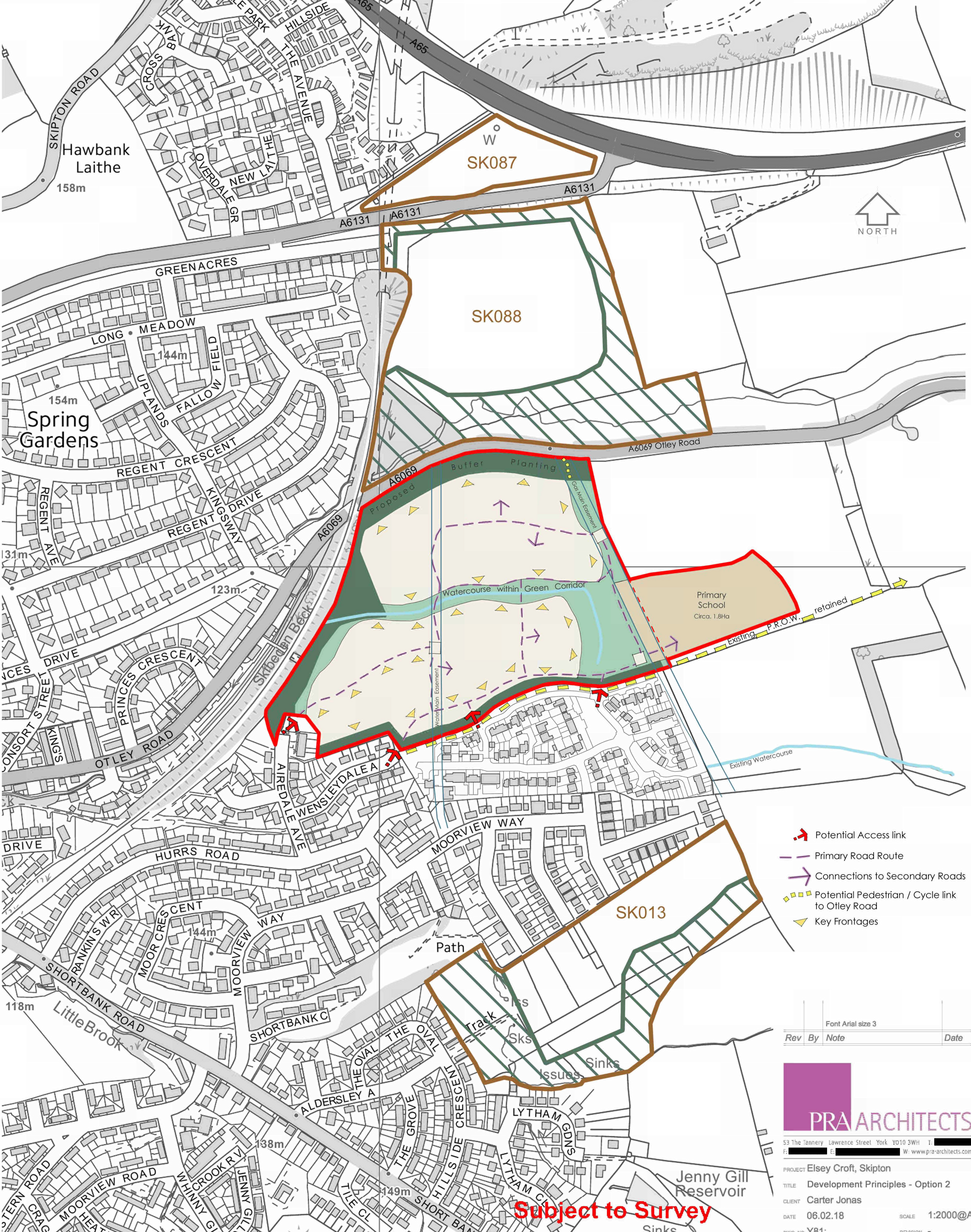
Development Principles - Option 1

Subject to Survey



APPENDIX 3
OPTION 2 SITE ASSESSMENT

Proposed Residential Development at Eelsey Croft, Skipton



Development Principles - Option 2

Subject to Survey

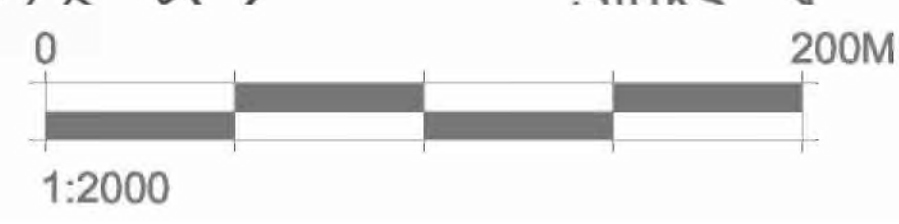
- Potential Access link
- Primary Road Route
- Connections to Secondary Roads
- Potential Pedestrian / Cycle link to Otley Road
- Key Frontages

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Rev	By	Note	Date

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 53 The Tannery, Lawrence Street, York, YO10 3WH, UK
 F: [Redacted] E: [Redacted] W: www.pra-architects.com

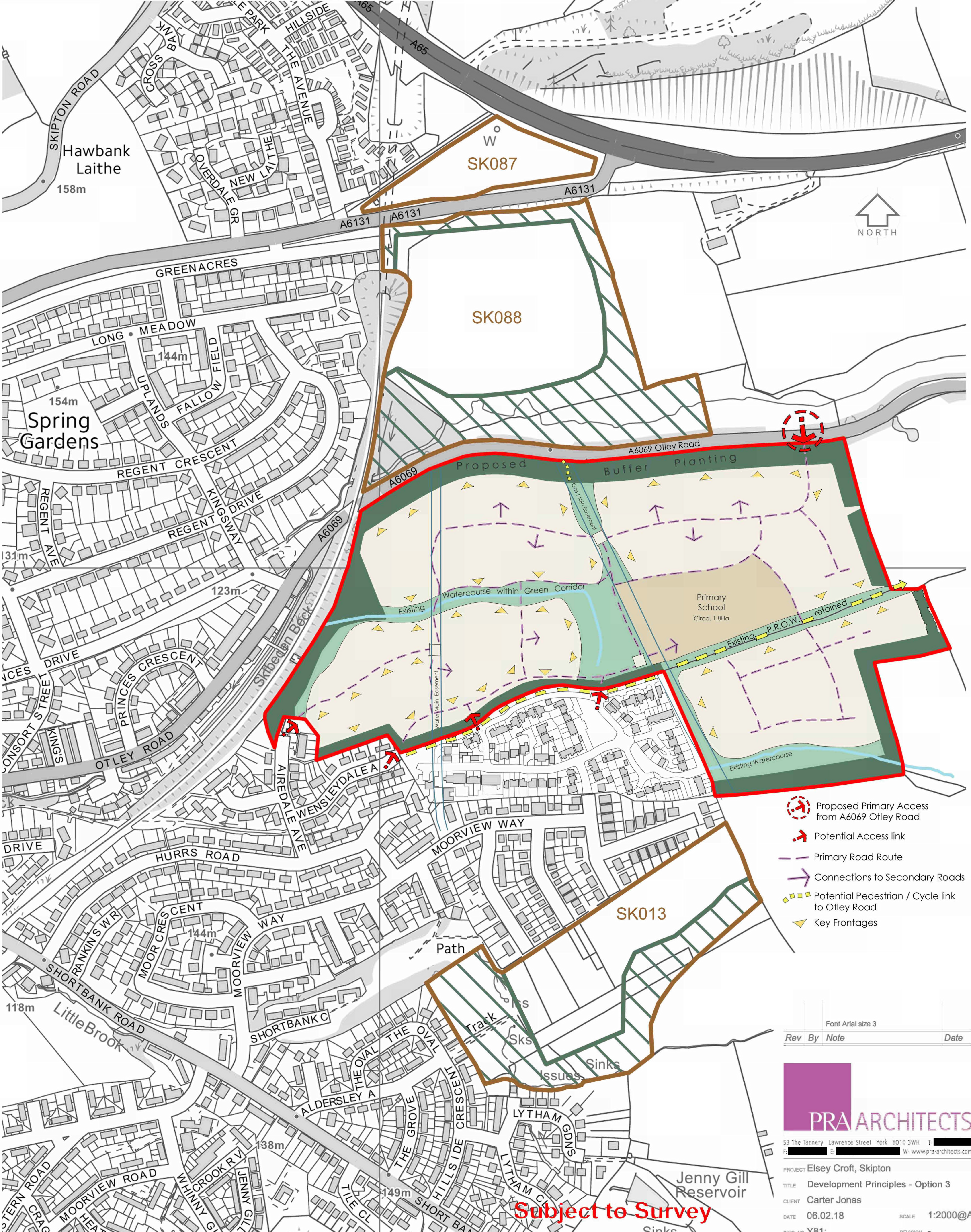
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 DATE: 06.02.18 SCALE: 1:2000@A1
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APPENDIX 4
OPTION 3 PREFERRED ALLOCATION

Proposed Residential Development at Eley Croft, Skipton



- Proposed Primary Access from A6069 Otley Road
- Potential Access link
- Primary Road Route
- Connections to Secondary Roads
- Potential Pedestrian / Cycle link to Otley Road
- Key Frontages

Rev	By	Note	Date

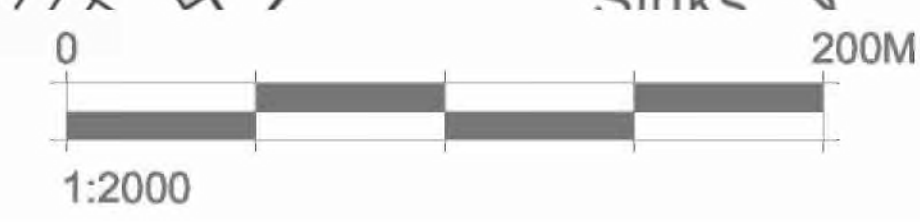
PRA ARCHITECTS
 53 The Tannery, Lawrence Street, York, YO10 3WH, UK
 F: 01904 616161 E: info@pra-architects.com W: www.pra-architects.com

PROJECT: Eley Croft, Skipton
 TITLE: Development Principles - Option 3
 CLIENT: Carter Jonas
 DATE: 06.02.18 SCALE: 1:2000@A1
 DWG. NO: Y81: REVISION: -
 DRAWN: CHECKED:

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Development Principles - Option 3

Subject to Survey



APPENDIX 5
AMENDED SP5 TABLES

DRAFT POLICY SP5: STRATEGY FOR SKIPTON –TIER 1

Skipton is the primary focus for growth and provision is made for the following development areas to meet the housing needs, commercial and employment space in the town:

Housing Sites:

Site Ref	Location	Net Dev Area (Ha)	Yield
SK089 & SK090	Land to the north of Airedale Avenue & Elsey Croft and east of railway line, Skipton	C3 13.26 D1 1.8	356
Total		C3 – 47.45 D1 – 3.6	1540

Site Ref.	Location	Uses
SK089 & SK090	Land to the north of Airedale Avenue & Eley Croft and east of railway line, Skipton	C3 Residential D1 Education
Site Allocation Area:22.27 ha [net developable area 13.26 ha; 1.8 ha for the provision of a new school in Skipton; green infrastructure area 7.01 ha].		
Number of Dwellings Generated: 356 dwellings [13.26 ha x 26.8 dwellings per ha].		
<p>Development Principles:</p> <ul style="list-style-type: none"> <li data-bbox="177 533 1362 591">□ A new primary school will be provided on 1.8ha of the total site area of sites SK089 & SK090 to meet the educational requirements for Skipton over the plan period. <li data-bbox="177 622 1362 712">□ A Flood Risk Assessment is required, as a fluvial and/or surface water hazard has been identified within part of the site area. Proposals for development on this site will incorporate Sustainable Urban Drainage Systems (SUDS), unless this is not possible or feasible; <li data-bbox="177 743 1362 1137">□ The site is a greenfield site in a prominent position on the edge of Skipton, in relatively close proximity to the Yorkshire Dales National Park boundary. Development proposals for this site will incorporate landscape mitigation(s) including green infrastructure corridors. A green infrastructure corridor along the northern boundary of the site adjacent the A6069 Otley Road will be provided to maintain the existing open, rural feel of this approach to Skipton up to the railway bridge. Existing woodland belts along the eastern and south eastern boundaries will be supplemented and strengthened. A green infrastructure corridor will also be provided to the south west of site SK090 incorporating an existing footpath running within the site adjacent to the south west boundary, providing links to the east of Skipton and beyond. A third green infrastructure corridor will also be created adjacent to the south boundary, providing a buffer between existing residential development at Eley Croft and new residential development on sites SK089 & SK090. This area will also maintain an open feel to the existing PROW running along the southern boundary and through the eastern portion of the site. <li data-bbox="177 1169 1362 1236">□ Ground work assessment will be required as part of the on-site works to investigate areas thought to be of archaeological significance; <li data-bbox="177 1267 1362 1357">□ Development proposals will be carefully and sensitively designed to minimise visual impact on the character and appearance of the area, and include measures to minimise impacts on air quality, noise and light pollution. <p data-bbox="177 1388 1362 1514">A Landscape Visual Impact Assessment (LVIA) is required to assess the likely effects of change on the landscape as a result of the development, specifically on views into and out of the Yorkshire Dales National Park. The LVIA will help locate and design the development so that negative landscape effects are avoided, appropriately reduced or offset.</p> <ul style="list-style-type: none"> <li data-bbox="177 1545 1362 1671">□ There is a requirement for a Biodiversity Appraisal to assess the existing ecological conditions on the site. This is to be accompanied by a standardised Biodiversity Mitigation Plan (BMP) which must cover matters of both habitat and protected species, with the aim that negative effects on biodiversity are avoided or suitably offset, and enhancement effects are implemented. <li data-bbox="177 1702 1362 1769">□ Access to site SK089/ SK090 is to be gained from Airedale Avenue, Wensleydale Avenue and Eley Croft. A principal access from the A6069 Otley Road to the north should be considered. <li data-bbox="177 1800 1362 1890">□ Development proposals for this site must accord with local plan policies H2, INF3 and INF6 (which set out requirements for contributions towards affordable housing, education provision and sport, open space and recreation facilities) and all other relevant local plan policies. 		

APPENDIX 6
LTP HIGHWAYS FEASIBILITY ASSESSMENT

Carter Jonas

**Potential Residential Development
& Primary School
Land North of Elsey Croft, Skipton
Highway Feasibility Assessment**

February 2018

Armstrong House
The Flemingate Centre
Armstrong Way
Beverley
HU17 0NW



www.local-transport-projects.co.uk

Registered No. 5295328

Carter Jonas

Potential Residential Development & Primary School

Land North of Eley Croft, Skipton

Highway Feasibility Assessment

February 2018

Client Commission

Client:	Carter Jonas	Date Commissioned:	January 2018
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LTP Quality Control

Job No:	LTP/17/3109	File Ref:	Land at Eley Croft HFA Final Issue 1
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Issue	Revision	Description	Originated	Checked	Date
1	-	Final Issue	ET/JH	AM	12/02/2017
				Authorised for Issue:	AM

LTP PROJECT TEAM

As part of our commitment to quality the following team of transport professionals was assembled specifically for the delivery of this project. Relevant qualifications are shown and CVs are available upon request to demonstrate our experience and credentials.

Team Member	LTP Designation	Qualifications
██████████	Director (Project Manager)	BA(Hons) MSc FIHE CMILT FCIHT
██████████	Head of Transport Planning	BSc(Hons) MSc(Eng) MCIHT MIHE
██████████	Senior Transport Planner	BA(Hons) MIHE
██████████	Transport Planner	BSc(Hons) MSc AMIHE

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POTENTIAL RESIDENTIAL DEVELOPMENT & PRIMARY SCHOOL

LAND NORTH OF ELSEY CROFT, SKIPTON

HIGHWAY FEASIBILITY ASSESSMENT

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I. INTRODUCTION

I.1 Background

- 1.1.1 Local Transport Projects Ltd (LTP) has been commissioned to undertake a Highway Feasibility Assessment (HFA) in connection with a potential residential development and primary school at land located to the south of Otley Road (A6069) and north of the Elsey Croft residential development, Skipton in North Yorkshire.
- 1.1.2 The aim of this report is to provide preliminary advice on the potential highway access options at the site and should be used to inform how proposals are advanced at the site.
- 1.1.3 The local planning authority for the site is Craven District Council (CDC) and the highway authority is North Yorkshire County Council (NYCC).
- 1.1.4 If the proposals for the site advance to the planning application stage, it is likely that a Transport Statement (TS) or Transport Assessment (TA), depending on the scale of the development, will be required to provide a detailed appraisal of all transport aspects associated with the proposals.

I.2 Scope

- 1.2.1 The scope of the report has been agreed with the client, as outlined below:
 - **Background** – Context and background to the report, with a description of any existing uses and planning history;
 - **Site assessment** – Initial desktop assessments to determine key features of the surrounding local highway network;
 - **Development traffic potential** – Calculation of the expected traffic generation potential of the residential development, based on a methodology that applies trip rates derived from the nationally recognised TRICS database, to the potential indicative development quanta;
 - **Potential traffic impact** – Initial consideration of the expected traffic flow impact of the various access options as a result of developing the site for residential use;
 - **Highway access option appraisal** – Desk-based assessments to establish the expected feasibility of various different access options at the site, culminating in the production of an access option appraisal table; and
 - **Key benefits, issues and potential next steps** – Summary of the key benefits, issues and potential next steps associated with the different access options for the site.

1.3 Site Location & Draft Local Plan Allocation

1.3.1 The potential development site is located on the eastern outskirts of the town of Skipton, in the Craven district of North Yorkshire. The site is bound by Otley Road (A6069) to the north, agricultural land to the east, a recently constructed residential development (Elsey Croft) to the south, and the Skipton to Embsay disused railway line to the west. The boundary of the total site area being considered for development is shown in Figure 1:

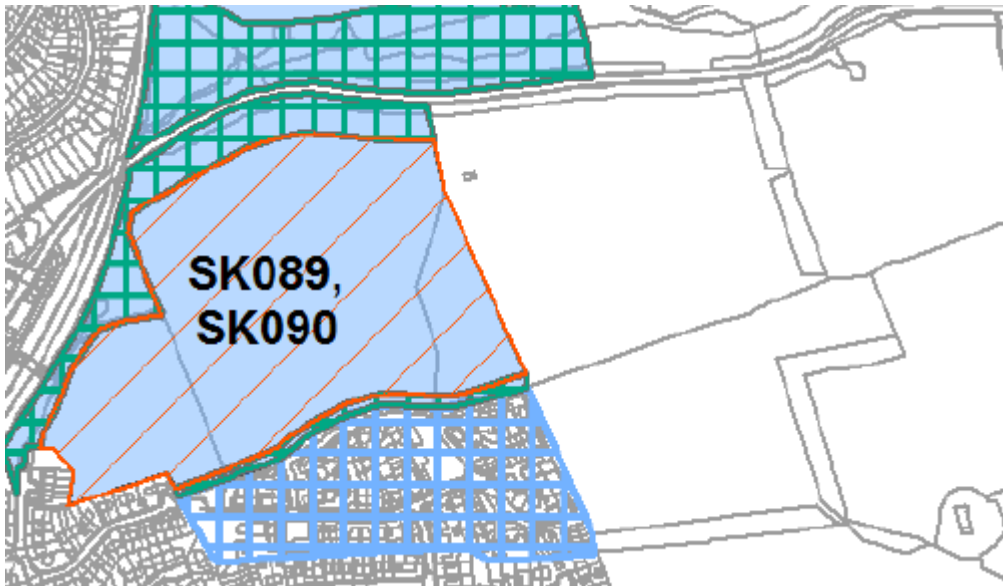
Figure 1: Site Location



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1.3.2 The western part of the potential development site is proposed to be allocated for residential development and a primary school (site refs: SK089 and SK090) within the 'Publication Draft Craven Local Plan' (CDC, 2018a), with a potential for 218 residential dwellings. The boundary of the SK089/SK090 site is shown within Figure 2.

Figure 2: SK089 & SK090 Site Boundary



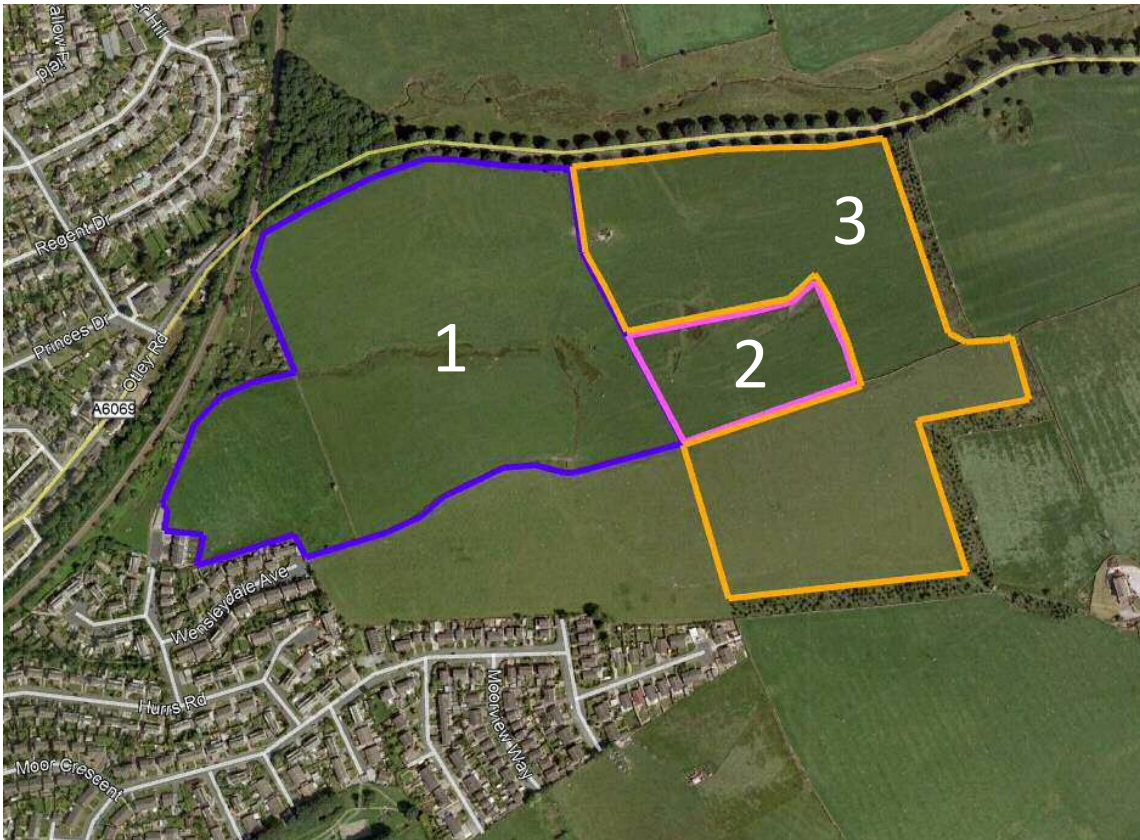
Ref: Publication Draft Craven Local Plan - Inset Map 1 (Skipton) (CDC, 2018b)

- 1.3.3 The supporting text for the proposed site allocation states that “Access to site SK090 is to be gained from Wensleydale Avenue, Otley Road and Elsey Croft” (CDC, 2018a). An assessment of each highway access option is provided within Section 3 of this HFA.
- 1.3.4 A planning application which sought to provide a residential development at the site with means of access from Otley Road was submitted to CDC in March 2008 (application ref: 63/2008/8466), however the application was subsequently withdrawn.
- 1.3.5 There are no other relevant previous planning applications relating to the potential development site.

1.4 Development Proposals

- 1.4.1 A number of potential development options are being considered, relating to different parcels of land, including the following options:
 - 1) 132 residential dwellings plus primary school;
 - 2) 180 residential dwellings plus primary school;
 - 3) 356 residential dwellings plus primary school.
- 1.4.2 Option 1 relates to the proposed SK089/SK090 allocation only, whilst Option 2 relates to this and a parcel of additional land to the east, and Option 3 relates to the full boundary of the site, as shown indicatively within Figure 3. The recently constructed Elsey Croft development is located to the south-west of the site, but is not shown within Figure 3.

Figure 3: Potential Development Options



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- 1.4.3 There are a number of potential highway access options to the site, including from Otley Road (A6069) to the north, Hepworth Way within the Eley Croft residential development to the south, and from Wensleydale Avenue and Airedale Avenue to the west. Each access option is considered in detail within Section 3 of this HFA.

2. TRIP GENERATION PROJECTIONS

2.1 Peak Hours

2.1.1 It is assumed that the peak hours of the highway network local to the site reflect the typical weekday AM (08:00-09:00) and PM (17:00-18:00) peak hours; therefore these periods have been considered as part of this feasibility assessment, in order to ensure that the traffic impact of the potential development is assessed relative to the ‘worst-case’ scenario. To provide an indication of the full daytime vehicle trip generation, the 12-hour weekday period (07:00-19:00) flow projections are also considered.

2.2 Potential Residential Trip Generation

2.2.1 The TRICS database is a nationally recognised collection of traffic counts and trip generation statistics for calculating trip rates at development sites. The TRICS database (v7.4.4) has been interrogated to find suitable data to assist in projecting the trip generation of the potential residential development. The trip generation of each of the three potential development options has been considered.

2.2.2 In order to derive reflective trip rates, vehicle trip generation statistics within the ‘Houses Privately Owned’ category (03-A) of the TRICS database have been interrogated. To ensure that only trip generation statistics for comparable sites were used in calculations, the TRICS sites were filtered to the following criteria:

- Survey type: Multi-modal sites;
- Size: 50 to 400 dwellings;
- TRICS location type: ‘Edge of Town’;
- Regions: England (excluding Greater London sites), Wales and Scotland;
- Weekday survey data only (exclusion of Saturday and Sunday surveys); and
- Recent survey data only (exclusion of surveys undertaken prior to 01/01/2009).

2.2.3 As there were less than 20 comparable sites in the database after filtering (5 survey sites), mean trip rates (as weighted and calculated by the TRICS software) have been used to project the vehicle trip generation of the development, in accordance with good practice guidelines (TCL, 2016). Details of the site selection and trip rates taken from the TRICS database are attached in full within Appendix 1, with the projected vehicle trip rates and resultant traffic generation for each development option shown in Table 1.

Table 1: Projected Residential Vehicle Trip Generation

	AM Peak (08:00-09:00)		PM Peak (17:00-18:00)		Daily (07:00-19:00)	
	Arrivals	Departures	Arrivals	Departures	Arrivals	Departures
Houses Privately Owned (03-A)						
Vehicle Trip Rates (per dwelling)	0.154	0.359	0.326	0.131	2.240	2.308
Option 1 Vehicle Trips (132 dwellings)	20	47	43	17	297	303
Option 2 Vehicle Trips (180 dwellings)	28	65	59	24	405	417
Option 3 Vehicle Trips (356 dwellings)	55	128	116	47	797	823

2.2.4 The trip generation projections shown in Table 1 indicate that a total development of up to 356 residential dwellings could be expected to generate 183 two-way trips during the AM peak hour and 163 during the PM peak hour.

2.3 Potential Primary School Trip Generation

2.3.1 The TRICS database (v7.4.4) has been interrogated to find suitable data to assist in projecting the trip generation of the potential primary school. Although the school is expected to cover a circa. 1.8 hectare area of the site, the size of the school to be provided has yet to be determined, therefore for the purposes of this assessment, it is assumed that the school will be 1 form of entry (1FE) and therefore have a capacity of 210 pupils.

2.3.2 In order to derive reflective trip rates, vehicle trip generation statistics within the 'Education – Primary' category (04-A) of the TRICS database have been interrogated. To ensure that only trip generation statistics for comparable sites were used in calculations, the TRICS sites were filtered to the following criteria:

- Survey type: Vehicle only;
- Size: 100 to 500 pupils;
- TRICS location type: 'Edge of Town';
- Regions: England (excluding Greater London sites), Wales and Scotland;
- Weekday survey data only (exclusion of Saturday and Sunday surveys); and
- Recent survey data only (exclusion of surveys undertaken prior to 01/01/2009).

2.3.3 As there were less than 20 comparable sites in the database after filtering (9 survey sites), mean trip rates (as weighted and calculated by the TRICS software) have been used to project the vehicle trip generation of the primary school, in accordance with good practice guidelines (TCL, 2016). Details of the site selection and trip rates taken from the TRICS database are attached in full within Appendix 2, with the projected vehicle trip rates and resultant traffic generation shown in Table 2.

Table 2: Projected Primary School Vehicle Trip Generation

Primary School (04-A)	AM Peak (08:00-09:00)		PM Peak (17:00-18:00)		Daily (07:00-19:00)	
	Arrivals	Departures	Arrivals	Departures	Arrivals	Departures
Vehicle Trip Rates (per pupil)	0.238	0.161	0.018	0.033	0.673	0.659
Vehicle Trips (210 pupils)	50	34	4	7	142	140

2.3.4 The trip generation projections shown in Table 2 indicate that the proposed primary school could be expected to generate 84 two-way trips during the AM peak hour and 11 during the network PM peak hour. Given the proximity of the school to the potential residential development, it could be expected that a number of trips will be made by sustainable modes.

2.4 Total Potential Traffic Generation

2.4.1 The total potential vehicle trip generation of each development option (including the residential development and primary school) on a typical weekday is outlined within Table 3 for the AM peak hour (08:00-09:00), PM peak hour (17:00-18:00) and daily 12 hour (07:00-19:00) period.

Table 3: Total Potential Vehicle Trip Generation

	AM Peak (08:00-09:00)		PM Peak (17:00-18:00)		Daily (07:00-19:00)	
	Arrivals	Departures	Arrivals	Departures	Arrivals	Departures
Option 1 (132 dwellings)	20	47	43	17	297	303
Primary School	50	34	4	7	142	140
TOTAL	70	81	47	24	439	443
Option 2 (180 dwellings)	28	65	59	24	405	417
Primary School	50	34	4	7	142	140
TOTAL	78	99	63	31	547	557
Option 3 (356 dwellings)	55	128	116	47	797	823
Primary School	50	34	4	7	142	140
TOTAL	105	162	120	54	939	963

2.4.2 As demonstrated in Table 3, development Option 1 would generate a total of 882 two-way vehicle trips during the daily (07:00-19:00) period, with Option 2 generating a total of 1,104 daily trips and Option 3 generating a total of 1,902 daily trips.

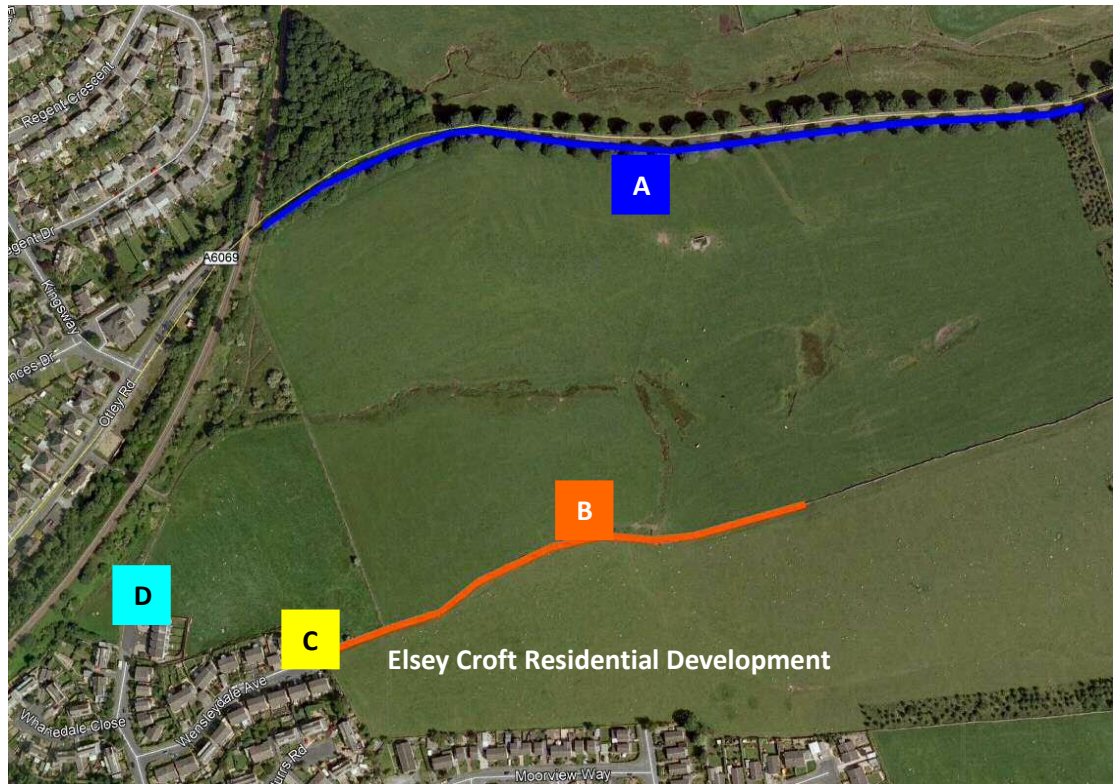
3. ACCESS OPTIONS APPRAISAL

3.1 Introduction

3.1.1 The potential to provide vehicular access via the four highway boundaries of the site has been explored to identify viable access options, as summarised in this section. Preliminary analysis of the four highway access options has been undertaken and appraised within this report. These are listed below and identified within Figure 4:

- Access A – Otley Road (A6069);
- Access B – via the Elsey Croft residential development;
- Access C – Wensleydale Avenue;
- Access D – Airedale Avenue.

Figure 4: Highway Access Options



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3.1.2 For the purpose of this HFA, appropriate design requirements have been referenced from the ‘North Yorkshire Residential Highway Design Guide’ (NYCC, 1999). However, it is noted that this design guide itself is not particularly recent, somewhat general and often signposts to other, national guidance documents. Many of these, such as Design Bulletin 32 (DETR, 1992), have been cancelled/superseded since publication.

3.1.3 More recent and widely accepted national guidance documents include ‘Manual for Streets’ (MfS) (DfT, 2007) and ‘Manual for Streets 2 – Wider Application of the Principles’ (MfS2) (CIHT, 2010). Given this, where relevant, reference is also made to MfS and MfS2 principles within this report.

3.2 Access Option A (Otley Road)

- 3.2.1 Otley Road (A6069) forms the northern boundary of the site and the primary route to/from Skipton to the west and the A59/A65 to the east. The proposed site allocation (SK089/SK090) borders Otley Road over a distance of approximately 300m, and the additional potential development land to the east borders Otley Road over approximately an additional 300m.
- 3.2.2 **General Design Considerations** – The topography of the site within the Otley Road site frontage generally reduces from the highest point to the west of the site, to the lowest point to the east. It is likely that significant earthworks will be required in order to facilitate an access to the site from Otley Road, although the extent of these works would reduce the further east an access could be provided. It is recognised that the cost of these earthworks may be significant, although it is considered that a suitable access could still be formed to serve the development.
- 3.2.3 **Carriageway Width** – The carriageway width on Otley Road varies between approximately 6.8m and 7.2m and is therefore considered to be suitable to accommodate two-way traffic. The nature of the route means that there are no parked cars within the immediate vicinity of the site.
- 3.2.4 Based on the standards within the NYCC Residential Highway Design Guide, a ‘Major Access Road’ (to serve 100 to 400 dwellings) is likely to be required to serve the development. A minimum carriageway width of 5.5m (6.0m where a bus route is provided) will therefore be required within the proposed development site.
- 3.2.5 **Connectivity** – Although not prescribed within the current Residential Highway Design Guide (NYCC, 1999), NYCC Highways would typically request the provision of two site access points when over 200 dwellings are to be provided from a single point of access, in order to maintain access for emergency vehicles if one access becomes blocked. However, there is no definitive limitation on the number of units that may be served from a single access within current national guidance.
- 3.2.6 The provision of a single point of access from Otley Road is therefore likely to be suitable to serve up to 200 dwellings, although given that the site access would link with a ‘Distributor Road’, the NYCC Residential Highway Design Guide suggests that a ‘Transition Road’ with no direct frontage access could be provided, connecting with an internal loop road that could serve up to 400 dwellings. Subject to agreement with NYCC Highways, the provision of a single access from Otley Road is therefore likely to be suitable to serve all 3 potential development options, although there would be permeability benefits of providing a secondary access from an alternative site boundary.

- 3.2.7 **Junction Form** – MfS2 outlines that “TD 42/95 recommends that consideration should be given to providing a right turn lane at priority junctions where the side road flow exceeds 500 vehicles per day, but this advice relates to trunk roads, where there is an emphasis on providing an unimpeded route for through traffic. It [500] is a relatively low flow, and junctions without right turn lanes will often be able to cater for higher levels of turning traffic without resulting in significant congestion. Right turning lanes make it more difficult for pedestrians to cross major roads and lead to higher traffic speeds and authorities should therefore consider carefully all of the effects before deciding to provide them” (CIHT, 2010).
- 3.2.8 As identified in Section 2.4, the estimated daily (07:00-19:00) traffic flow for all development options is significantly in excess of the 500 vehicle threshold discussed above, although it should be noted that not all trips would pass through the Otley Road access if a secondary access is provided from an alternative site boundary.
- 3.2.9 It is recommended that junction type is discussed with NYCC Highways as part of pre-application scoping discussions, although it is considered that access to the potential development site could be achieved by a priority T-junction, both with or without a ghost-island right-turn lane.
- 3.2.10 **Visibility Splays** – Based on the existing derestricted (60mph) speed limit on Otley Road, visibility splays of 4.5m x 215m are likely to be required at any site access point. If frontage development is provided within the site, it may be suitable to reduce the speed limit within the site frontage, subject to agreement with NYCC Highways. A reduction in speed limit would also result in a reduction in visibility splay requirements.
- 3.2.11 It has not been possible to conduct a full visibility assessment at this early feasibility stage, however it should be noted that the bend in the carriageway towards the western extents of the SK089/SK090 allocated site frontage may limit the potential to provide the required visibility splays. It is therefore likely that an access towards the central/eastern extents of the site frontage would be most conducive to achieving required visibility splays. Given the alignment of the carriageway and junction spacing requirements, it is unlikely that two accesses could be provided to serve the development from the Otley Road boundary.
- 3.2.12 It is recommended that a preliminary design exercise, ideally based upon a topographical survey and measured vehicle speeds on Otley Road is undertaken to determine an appropriate location for a site access.
- 3.2.13 **Wider Network** – A connection with Otley Road would place all trips directly on the primary road network, which is considered to be of a suitable width and standard to accommodate the additional trips likely to be generated by the potential development.

- 3.2.14 The majority of trips utilising an access route from Otley Road would either travel east via the Otley Road/A65 priority junction or west via the Shortbank Road/Otley Road/Newmarket Street mini-roundabout, therefore the impact of the potential development at these junctions would need to be assessed within any future TA for the site, depending on the number of trips likely to pass through the junctions during the peak hours. It should be noted that a traffic modelling study undertaken as part of the Local Plan process has not identified a requirement for improvements at the Shortbank Road/Otley Road/Newmarket Street mini-roundabout as a result of the sites allocated within the Local Plan.
- 3.2.15 **Footway Provision** – There are currently no footways on either side of the carriageway on Otley Road within the site frontage. The closest footway connection is adjacent to the railway bridge to the west of the site. It is likely that a footway of a minimum 2.0m width will need to be provided on one side of the carriageway between any site access location and the existing provision to the west, unless alternative footway connections can be made with other site boundaries that provide suitably direct pedestrian connections.
- 3.2.16 **Summary** – It is therefore considered that, subject to earthworks within the site, a preliminary design exercise to determine an appropriate access location and agreement with NYCC Highways on junction type, that a suitable highway access to the site could be constructed from Otley Road. The provision of a single access from Otley Road is likely to be achievable for all development options, although a secondary access from an alternative site boundary would benefit permeability.

3.3 Access Option B (Elsey Croft)

3.3.1 Existing housing within the Elsey Croft residential development is situated to the south of the site, with an access road (Hepworth Way) forming the majority of the southern boundary. There are two potential access routes to the proposed development site through the Elsey Croft residential development, as shown within Figure 5.

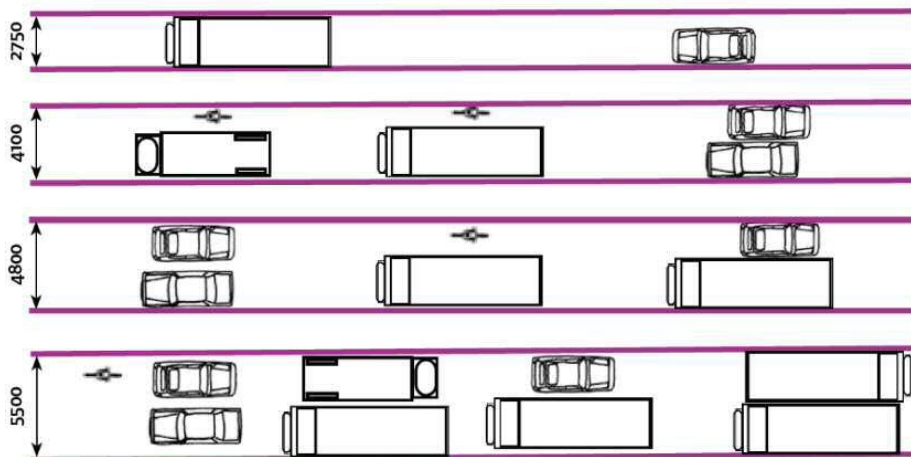
Figure 5: Elsey Croft Development Access Routes



Source: PRA Architects Existing Site Layout Plan

3.3.2 **Carriageway Width** – The carriageway width on the Elsey Croft access routes varies between 5.5m and 6.6m. Guidance on the carriageway widths required to accommodate various road user types is provided within MfS (DfT, 2007), as reproduced in Figure 6.

Figure 6: Carriageway Width Requirements



Ref: (DfT, 2007)

- 3.3.3 Figure 6 demonstrates that a carriageway width of 5.5m is suitable to accommodate the comfortable passing of two cars and is also suitable to accommodate the passing of two Heavy Goods Vehicles (HGVs). The NYCC Residential Highway Design Guide (NYCC, 1999) also advocates a minimum carriageway width of 5.5m for Major Access Roads which serve between 100 and 400 dwellings. It is therefore considered that the carriageway width within the Eley Croft development is suitable to accommodate the trips likely to be generated by the proposed development. A minimum carriageway width of 5.5m is therefore also likely to be required within the proposed development.
- 3.3.4 **Connectivity** – Although not prescribed within the current Residential Highway Design Guide (NYCC, 1999), NYCC Highways would typically request the provision of two site access points when over 200 dwellings are to be provided from a single point of access, in order to maintain access for emergency vehicles if one access becomes blocked. However, there is no definitive limitation on the number of units that may be served from a single access within current national guidance.
- 3.3.5 The Eley Croft residential development accommodates a total of 103 dwellings, served from a single point of access with Moorview Way. It is therefore likely that up to an additional 97 dwellings could be provided via a single access connecting with the Eley Croft residential development.
- 3.3.6 All development options propose in excess of 97 residential dwellings (along with a primary school), therefore it is considered that the Eley Croft development is likely to be suitable as a secondary point of access only, complemented by an additional access to the development provided from an alternative site boundary.
- 3.3.7 Although it is acknowledged that two points of access could be formed with the Eley Croft development, the site would ultimately be served via a single point of access at Moorview Way and is therefore likely to be unsuitable as a sole primary access.
- 3.3.8 **Junction Form** – As the provision of a site access at this location would simply involve the extension of the existing stub road carriageway (and not involve the creation of a new access junction) there are no specific visibility splay or junction form requirements that need to be assessed. It should be noted however that the visibility splays at the existing Asquith Drive/Hepworth Way junction would need to meet the requirement for the design speed of the site access road, as the eastern and western arms would likely operate under priority control if the existing carriageway is extended into the site.
- 3.3.9 **Wider Network** – Moorview Way would form the primary access route to the wider highway network and has a carriageway width of approximately 7.0m. From on-site observations, there appear to be limited instances of on-street parking on Moorview Way, and the available carriageway width allows two-way traffic to be maintained, even with parked cars on one side of the carriageway. On-street parking also does not appear to restrict the free-flow of traffic within the Eley Croft development, with parking on one side of the carriageway representing a traffic calming feature. It is therefore considered that the wider network is suitable to accommodate a number of additional trips to and from the potential development.

- 3.3.10 The majority of trips utilising the route via Elsey Croft would emerge onto the wider network at the Moorview Way/Shortbank Road priority junction and would travel via the Shortbank Road/Otley Road/Newmarket Street mini-roundabout; therefore the impact of the potential development at these junctions would need to be assessed within any future TA for the site, depending on the number of trips likely to pass through the junctions during the peak hours. It should be noted that a traffic modelling study undertaken as part of the Local Plan process has not identified a requirement for improvements at the Shortbank Road/Otley Road/Newmarket Street mini-roundabout as a result of the sites allocated within the Local Plan.
- 3.3.11 **Footway Provision** – Footways are provided on at least one side of the carriageway within the Elsey Croft development and on both sides of the carriageway on Moorview Way. These footways appear to be of a suitable width to accommodate pedestrian trips to/from the potential development site and any footway provision within the proposed site would connect with this existing provision.
- 3.3.12 **Summary** – It is considered that it is feasible to provide a suitable highway access to the development site via the Elsey Croft development, but that any new access would need to be complemented by an additional access on an alternative site boundary.

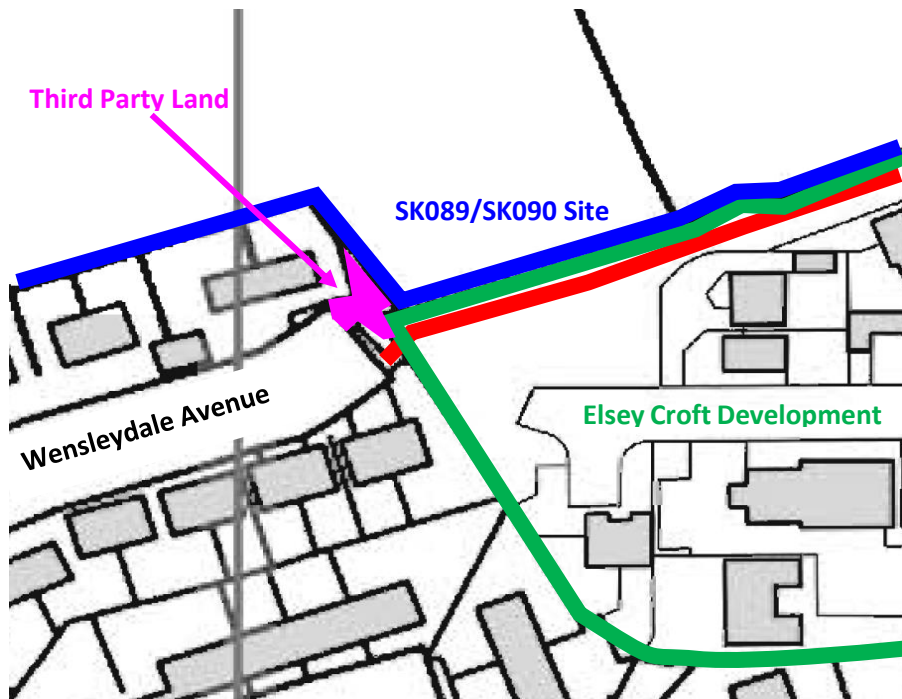
3.4 Access Option C (Wensleydale Avenue)

- 3.4.1 Wensleydale Avenue is located to the south-west of the proposed development site. It serves 29 existing residential dwellings and a Public Right of Way (PRoW) runs in an east-west alignment along the northern side of the carriageway and through the adjacent Elsey Croft development.
- 3.4.2 **General Design Considerations** – It appears that the ability to form a vehicular access to the proposed development site from Wensleydale Avenue is limited by the existing alignment of the PRoW (shown in red) and third party land (shown in magenta), as demonstrated within Figure 7 and Figure 8.

Figure 7: Potential Wensleydale Avenue Access Limitations



Figure 8: Potential Wensleydale Avenue Access



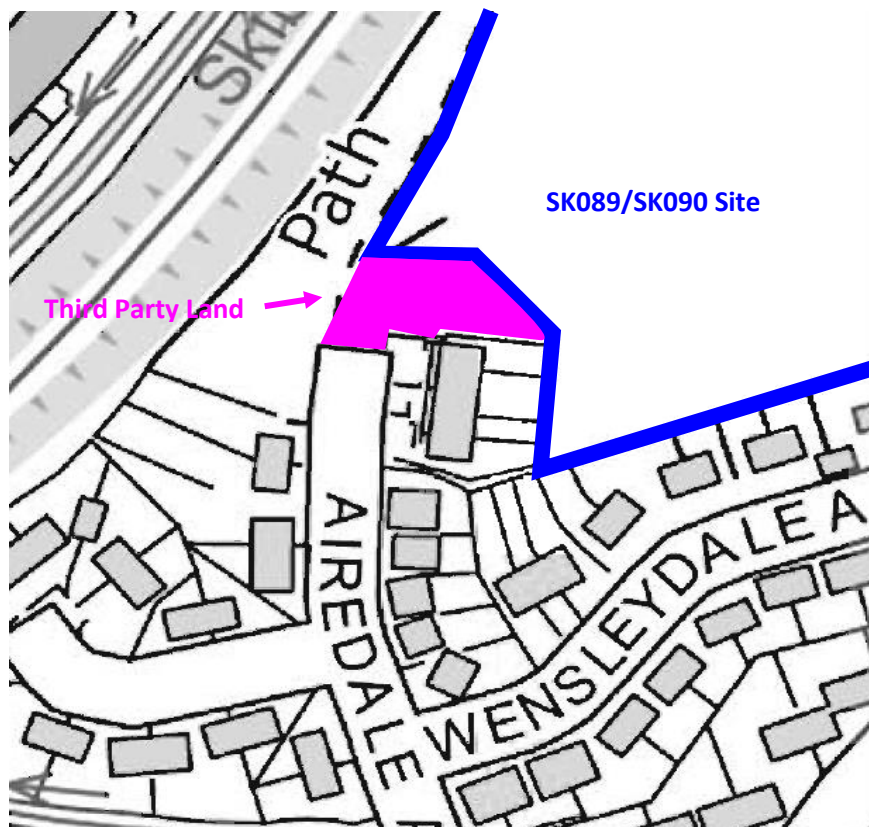
Source: PRA Architects Existing Site Layout Plan

- 3.4.3 In order to achieve a vehicular access to the site from Wensleydale Avenue, the existing PRow would need to be realigned or extinguished to facilitate a vehicular access to the proposed development site, via land within the existing Eley Croft development. Third party land to the north-east of Wensleydale Avenue may also need to be purchased to extend the carriageway into the proposed site, particularly if the existing PRow is to be retained. Although not insurmountable, this is unlikely to represent a 'first choice' vehicular access option, particularly given the availability of alternative site boundaries for vehicular access. There are likely to be significant costs in obtaining third party land, along with significant risk in amending or extinguishing a PRow.
- 3.4.4 **Footway Provision** – Footways are provided on both sides of the carriageway on Wensleydale Avenue and on connecting streets including Airedale Avenue and Hurrs Road. These footways appear to be of a suitable width to accommodate pedestrian trips to/from the potential development site. As previously outlined, there is a PRow connection between the Eley Croft development and Wensleydale Avenue. A pedestrian connection between the site and the PRow could be provided as part of the development in order to provide connectivity between the site and Wensleydale Avenue.
- 3.4.5 **Summary** – It is therefore considered that although a vehicular access to the site could be provided from Wensleydale Avenue, there are likely to be significant constraints in doing so. An appropriate pedestrian connection between the development and the PRow within the Eley Croft development could be provided to facilitate pedestrian access between the site and Wensleydale Avenue to enhance site permeability.

3.5 Access Option D (Airedale Avenue)

- 3.5.1 Airedale Avenue is located to the south-western boundary of the proposed development site. It is a cul-de-sac that serves 16 existing residential dwellings directly and also forms the sole vehicular access to Wensleydale Avenue and Wharfedale Close, serving a total of 63 dwellings. Airedale Avenue connects with Hurrs Road to the south, which in turn connects with Moorview Way and Shortbank Road.
- 3.5.2 **General Design Considerations** – As identified within Figure 9, there is a parcel of third party land which is understood to be within CDC ownership that forms a buffer between the development site and Airedale Avenue.

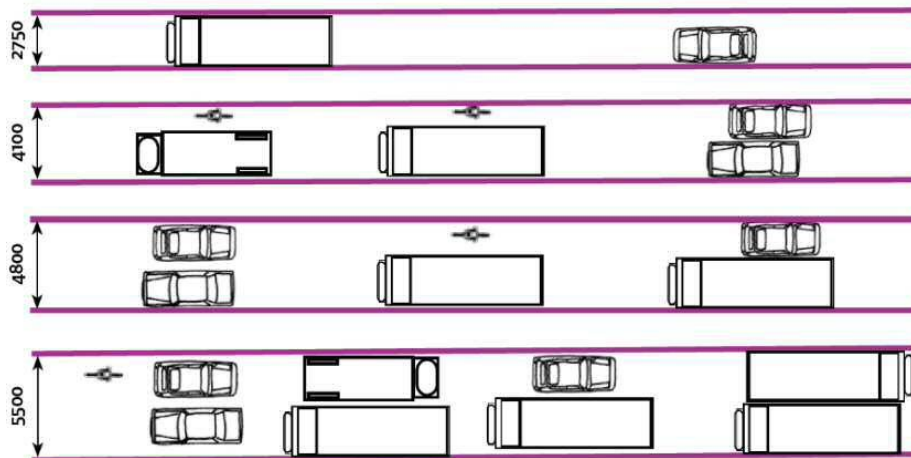
Figure 9: Potential Airedale Avenue Access



Source: PRA Architects Existing Site Layout Plan

- 3.5.3 The available corridor width at the highway boundary appears to be suitable to provide access to the site, therefore it is considered that a suitable highway access to the site could be provided via an extension to Airedale Avenue, subject to obtaining third party land.
- 3.5.4 **Carriageway Width** – The carriageway width on Airedale Avenue varies between 7.2m and 7.6m. Guidance on the carriageway widths required to accommodate various road user types is provided within MfS (DfT, 2007), as reproduced in Figure 10.

Figure 10: Carriageway Width Requirements



Ref: (DfT, 2007)

- 3.5.5 Figure 10 demonstrates that a carriageway width of 5.5m is suitable to accommodate the comfortable passing of two cars and is also suitable to accommodate the passing of two Heavy Goods Vehicles (HGVs). The NYCC Residential Highway Design Guide (NYCC, 1999) also advocates a minimum carriageway width of 5.5m for Major Access Roads which serve between 100 and 400 dwellings. It is therefore considered that the existing carriageway width on Airedale Avenue is more than suitable to accommodate two-way traffic. From on-site observations, there appear to be limited instances of on-street parking on Airedale Avenue, and the available carriageway width allows two-way traffic to be maintained, even with parked cars on one side of the carriageway.
- 3.5.6 A minimum carriageway width of 5.5m (6.0m where a bus route is provided) will be required within the proposed development to fulfil the design criteria for a 'Major Access Road' (NYCC, 1999).
- 3.5.7 **Connectivity** – Although not prescribed within the current Residential Highway Design Guide (NYCC, 1999), NYCC Highways would typically request the provision of two site access points when over 200 dwellings are to be provided from a single point of access, in order to maintain access for emergency vehicles if one access becomes blocked. However, there is no definitive limitation on the number of units that may be served from a single access within current national guidance.
- 3.5.8 Airedale Avenue currently serves a total of 63 dwellings, served from a single point of access with Hurrs Road. It is therefore likely that up to an additional 137 dwellings could be provided via a single access connecting with Airedale Avenue.
- 3.5.9 Development Option 1 proposes a total of 132 dwellings plus a primary school at the site and it is considered that this may be served via a single point of access connecting with Airedale Avenue, subject to agreement with NYCC Highways.
- 3.5.10 Development Options 2 and 3 would push the number of dwellings served from a single access point to over 200, therefore Airedale Avenue would likely only be suitable as a secondary point of access only in these scenarios, with an additional access to the development provided from an alternative site boundary.

- 3.5.11 **Junction Form** – As the provision of a site access at this location would simply involve the extension of the existing stub road carriageway (and not involve the creation of a new access junction) there are no specific visibility splay or junction form requirements that need to be assessed.

Figure 11: Existing Stub Road Carriageway on Airedale Avenue



- 3.5.12 **Wider Network** – Hurrs Road would form the primary access route to the wider highway network and has a carriageway width of between 6.3m and 7.6m. Although there were some instances of on-street parking observed on Hurrs Way upon visiting the site, the carriageway width does not appear to restrict the free-flow of traffic, with parking on one side of the carriageway representing a traffic calming feature. It is therefore considered that the wider network is suitable to accommodate a number of additional trips to and from the potential development.
- 3.5.13 The majority of trips travelling via Airedale Avenue and Hurrs Road would emerge at the wider network at the Hurrs Road/Shortbank Road priority junction and would travel via the Shortbank Road/Otley Road/Newmarket Street mini-roundabout, therefore the impact of the potential development at these junctions would need to be assessed within any future TA for the site, depending on the number of trips likely to pass through the junctions during the peak hours. It should be noted that a traffic modelling study undertaken as part of the Local Plan process has not identified a requirement for improvements at the Shortbank Road/Otley Road/Newmarket Street mini-roundabout as a result of the sites allocated within the Local Plan.
- 3.5.14 **Footway Provision** – Footways are provided on both sides of the carriageway on Airedale Avenue and on connecting streets including Hurrs Road. These footways appear to be of a suitable width to accommodate pedestrian trips to/from the potential development site. It should be noted that a footpath appears to run along the western boundary of the third party land and the site, however this could be retained as existing whilst vehicular access to the development site is also provided.

3.5.15 **Summary** – It is considered that it is feasible to provide a suitable highway access to the development site from Airedale Avenue, subject to obtaining third party land. It is likely to be suitable as the sole highway access to the site under development Option A, but would need to be complemented by an additional access from an alternative site boundary under development Options B and C.

3.6 Summary

3.6.1 It is considered that viable access options could be provided at all of the assessed access locations to accommodate a level of development, as summarised in Table 4.

Table 4: Access Appraisal Summary

	Option A	Option B	Option C	Option D
Suitable as a Primary Vehicular Access	✓	✗	✗	✗
Suitable as a Secondary Vehicular Access	✓	✓	✗	✓
Suitable for Pedestrian Access	○	✓	✓	✓

3.6.2 A residential development of the size proposed (132 to 356 dwellings), including the SK089/SK090 site and land to the east, may require several connections to the local highway network. Separate access points could take the form of either two separate highway access points, or one primary highway access complemented by a secondary or emergency vehicle access.

3.6.3 As there are a number of potential access locations, it is considered that two access junctions could be provided, connected via a suitable internal link road within the site.

3.6.4 The requirement to provide capacity improvements at the key local junctions, as mitigation for development proposals at the site, would be determined based on the proposed access arrangements and expected distribution of development traffic across the local network, and may be subject to detailed junction modelling and consultation with NYCC as part of any planning application.

4. REFERENCES

- CIHT (Chartered Institution of Highways and Transportation), 2010. Manual for Streets 2: Wider Application of the Principles.
- CDC (Craven District Council), 2018a. Publication Draft Craven Local Plan – Regulation 19 Draft Document for Publication.
- CDC, 2018b. Publication Draft Craven Local Plan – Inset Map 1 (Skipton).
- DCLG (Department for Communities and Local Government), 2014. Planning Practice Guidance – Travel Plans, Transport Assessments and Statements in Decision-Taking (ID: 42-06/03/2014) [online: <http://planningguidance.planningportal.gov.uk>].
- DCLG, 2012. National Planning Policy Framework.
- DETR (Department for Environment Transport and the Regions), 1992. Design Bulletin 32.
- DfT (Department for Transport), 2007. Manual for Streets.
- HA (Highways Agency), 1995. TD 42/95 Geometric Design of Major/Minor Priority Junctions.
- NYCC (North Yorkshire County Council), 1999. North Yorkshire Residential Highway Design Guide.
- TCL, 2016. TRICS Good Practice Guide 2016.

Appendix I – Residential TRICS Output

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 03 - RESIDENTIAL
 Category : A - HOUSES PRIVATELY OWNED
 MULTI-MODAL VEHICLES

Selected regions and areas:

02	SOUTH EAST	
	SC SURREY	1 days
	WS WEST SUSSEX	1 days
06	WEST MIDLANDS	
	SH SHROPSHIRE	1 days
07	YORKSHIRE & NORTH LINCOLNSHIRE	
	NY NORTH YORKSHIRE	1 days
09	NORTH	
	CB CUMBRIA	1 days

This section displays the number of survey days per TRICS® sub-region in the selected set

Secondary Filtering selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: Number of dwellings
 Actual Range: 54 to 151 (units:)
 Range Selected by User: 50 to 400 (units:)

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/09 to 27/11/17

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Tuesday	1 days
Thursday	3 days
Friday	1 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count	5 days
Directional ATC Count	0 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.

Selected Locations:

Edge of Town	5
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This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

Residential Zone	3
No Sub Category	2

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Secondary Filtering selection:

Use Class:

C3	5 days
----	--------

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order 2005 has been used for this purpose, which can be found within the Library module of TRICS®.

Secondary Filtering selection (Cont.):

Population within 1 mile:

5,001 to 10,000	3 days
10,001 to 15,000	2 days

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

25,001 to 50,000	2 days
75,001 to 100,000	2 days
100,001 to 125,000	1 days

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

0.6 to 1.0	1 days
1.1 to 1.5	4 days

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Travel Plan:

Yes	1 days
No	4 days

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

No PTAL Present	5 days
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This data displays the number of selected surveys with PTAL Ratings.

LIST OF SITES relevant to selection parameters

1	CB-03-A-04	SEMI DETACHED		CUMBRIA
	MOORCLOSE ROAD			
	SALTERBACK			
	WORKINGTON			
	Edge of Town			
	No Sub Category			
	Total Number of dwellings:		82	
	Survey date: FRIDAY		24/04/09	Survey Type: MANUAL
2	NY-03-A-10	HOUSES AND FLATS		NORTH YORKSHIRE
	BOROUGHBRIDGE ROAD			
	RIPON			
	Edge of Town			
	No Sub Category			
	Total Number of dwellings:		71	
	Survey date: TUESDAY		17/09/13	Survey Type: MANUAL
3	SC-03-A-04	DETACHED & TERRACED		SURREY
	HIGH ROAD			
	BYFLEET			
	Edge of Town			
	Residential Zone			
	Total Number of dwellings:		71	
	Survey date: THURSDAY		23/01/14	Survey Type: MANUAL
4	SH-03-A-05	SEMI-DETACHED/TERRACED		SHROPSHIRE
	SANDCROFT			
	SUTTON HILL			
	TELFORD			
	Edge of Town			
	Residential Zone			
	Total Number of dwellings:		54	
	Survey date: THURSDAY		24/10/13	Survey Type: MANUAL
5	WS-03-A-04	MIXED HOUSES		WEST SUSSEX
	HILLS FARM LANE			
	BROADBRIDGE HEATH			
	HORSHAM			
	Edge of Town			
	Residential Zone			
	Total Number of dwellings:		151	
	Survey date: THURSDAY		11/12/14	Survey Type: MANUAL

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL VEHICLES

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	5	86	0.089	5	86	0.294	5	86	0.383
08:00 - 09:00	5	86	0.154	5	86	0.359	5	86	0.513
09:00 - 10:00	5	86	0.138	5	86	0.172	5	86	0.310
10:00 - 11:00	5	86	0.133	5	86	0.179	5	86	0.312
11:00 - 12:00	5	86	0.149	5	86	0.177	5	86	0.326
12:00 - 13:00	5	86	0.152	5	86	0.154	5	86	0.306
13:00 - 14:00	5	86	0.182	5	86	0.159	5	86	0.341
14:00 - 15:00	5	86	0.172	5	86	0.177	5	86	0.349
15:00 - 16:00	5	86	0.254	5	86	0.189	5	86	0.443
16:00 - 17:00	5	86	0.277	5	86	0.170	5	86	0.447
17:00 - 18:00	5	86	0.326	5	86	0.131	5	86	0.457
18:00 - 19:00	5	86	0.214	5	86	0.147	5	86	0.361
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			2.240			2.308			4.548

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.

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Parameter summary

Trip rate parameter range selected:	54 - 151 (units:)
Survey date date range:	01/01/09 - 27/11/17
Number of weekdays (Monday-Friday):	5
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	0
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

Appendix 2 – Primary School TRICS Output

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 04 - EDUCATION
 Category : A - PRIMARY
 VEHICLES

Selected regions and areas:

03	SOUTH WEST	
	BR BRISTOL CITY	1 days
05	EAST MIDLANDS	
	DS DERBYSHIRE	1 days
	LE LEICESTERSHIRE	1 days
06	WEST MIDLANDS	
	WM WEST MIDLANDS	1 days
07	YORKSHIRE & NORTH LINCOLNSHIRE	
	NE NORTH EAST LINCOLNSHIRE	1 days
08	NORTH WEST	
	CH CHESHIRE	1 days
	GM GREATER MANCHESTER	1 days
11	SCOTLAND	
	FA FALKIRK	1 days
	SR STIRLING	1 days

This section displays the number of survey days per TRICS® sub-region in the selected set

Secondary Filtering selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: Number of pupils
 Actual Range: 147 to 457 (units:)
 Range Selected by User: 100 to 500 (units:)

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/09 to 05/05/17

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Monday	3 days
Tuesday	4 days
Thursday	2 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count	9 days
Directional ATC Count	0 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.

Selected Locations:

Edge of Town	9
--------------	---

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

Residential Zone	9
------------------	---

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Secondary Filtering selection:

Use Class:

D1 9 days

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order 2005 has been used for this purpose, which can be found within the Library module of TRICS®.

Population within 1 mile:

1,001 to 5,000	2 days
10,001 to 15,000	1 days
15,001 to 20,000	4 days
20,001 to 25,000	1 days
25,001 to 50,000	1 days

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

5,001 to 25,000	1 days
50,001 to 75,000	1 days
75,001 to 100,000	1 days
125,001 to 250,000	2 days
250,001 to 500,000	4 days

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

0.6 to 1.0	3 days
1.1 to 1.5	6 days

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Travel Plan:

Yes	1 days
No	8 days

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

No PTAL Present	9 days
-----------------	--------

This data displays the number of selected surveys with PTAL Ratings.

LIST OF SITES relevant to selection parameters

1	BR-04-A-01 SCHOOL CLOSE WHITCHURCH BRISTOL Edge of Town Residential Zone Total Number of pupils: Survey date: TUESDAY	PRIMARY SCHOOL 208 22/09/15	BRISTOL CITY Survey Type: MANUAL
2	CH-04-A-01 WESTON GROVE UPTON CHESTER Edge of Town Residential Zone Total Number of pupils: Survey date: MONDAY	PRIMARY SCHOOL 219 17/11/14	CHESHIRE Survey Type: MANUAL
3	DS-04-A-01 VICARAGE ROAD MICKLEOVER DERBY Edge of Town Residential Zone Total Number of pupils: Survey date: THURSDAY	PRIMARY SCHOOL 387 25/06/15	DERBYSHIRE Survey Type: MANUAL
4	FA-04-A-03 GLENDEVON DRIVE MADDISTON FALKIRK Edge of Town Residential Zone Total Number of pupils: Survey date: MONDAY	PRIMARY SCHOOL 452 03/06/13	FALKIRK Survey Type: MANUAL
5	GM-04-A-01 ROCH MILLS CRESCENT ROCHDALE Edge of Town Residential Zone Total Number of pupils: Survey date: TUESDAY	PRIMARY SCHOOL 457 20/10/15	GREATER MANCHESTER Survey Type: MANUAL
6	LE-04-A-02 BEAUFORT WAY OADBY LEICESTER Edge of Town Residential Zone Total Number of pupils: Survey date: THURSDAY	PRIMARY SCHOOL 380 30/10/14	LEICESTERSHIRE Survey Type: MANUAL
7	NE-04-A-01 SUNNINGDALE ROAD SCUNTHORPE Edge of Town Residential Zone Total Number of pupils: Survey date: TUESDAY	PRIMARY SCHOOL 147 20/05/14	NORTH EAST LINCOLNSHIRE Survey Type: MANUAL
8	SR-04-A-01 PULLAR AVENUE BRIDGE OF ALLAN STIRLING Edge of Town Residential Zone Total Number of pupils: Survey date: MONDAY	PRIMARY SCHOOL 386 16/06/14	STIRLING Survey Type: MANUAL
9	WM-04-A-02 HAZEL ROAD RUBERY BIRMINGHAM Edge of Town Residential Zone Total Number of pupils: Survey date: TUESDAY	PRIMARY SCHOOL 234 10/11/15	WEST MIDLANDS Survey Type: MANUAL

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

TRIP RATE for Land Use 04 - EDUCATION/A - PRIMARY
VEHICLES

Calculation factor: 1 PUPILS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. PUPILS	Trip Rate	No. Days	Ave. PUPILS	Trip Rate	No. Days	Ave. PUPILS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	9	319	0.039	9	319	0.009	9	319	0.048
08:00 - 09:00	9	319	0.238	9	319	0.161	9	319	0.399
09:00 - 10:00	9	319	0.038	9	319	0.057	9	319	0.095
10:00 - 11:00	9	319	0.015	9	319	0.014	9	319	0.029
11:00 - 12:00	9	319	0.033	9	319	0.027	9	319	0.060
12:00 - 13:00	9	319	0.038	9	319	0.042	9	319	0.080
13:00 - 14:00	9	319	0.022	9	319	0.030	9	319	0.052
14:00 - 15:00	9	319	0.074	9	319	0.031	9	319	0.105
15:00 - 16:00	9	319	0.106	9	319	0.176	9	319	0.282
16:00 - 17:00	9	319	0.040	9	319	0.066	9	319	0.106
17:00 - 18:00	9	319	0.018	9	319	0.033	9	319	0.051
18:00 - 19:00	9	319	0.012	9	319	0.013	9	319	0.025
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.673			0.659			1.332

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

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The Company accepts no responsibility for loss which may arise from reliance on data contained in the TRICS Database. [No warranty of any kind, express or implied, is made as to the data contained in the TRICS Database.]

Parameter summary

Trip rate parameter range selected:	147 - 457 (units:)
Survey date date range:	01/01/09 - 05/05/17
Number of weekdays (Monday-Friday):	9
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	0
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

APPENDIX 7
REPRESENTATION FORMS

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Publication Stage Representation Form

Publication draft Craven Local Plan public representations period runs from Tuesday 2nd January 2018 – Tuesday 13th February 2018.

Regulation19-Townand Country Planning (Local Planning) (England) Regulations 2012

Representations must be received no later than 5pm on Tuesday 13th February 2018

Please return completed forms to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	██████████
First Name:	
Last Name:	██████████
Job Title (where relevant):	
Organisation (where relevant):	████████████████████ C/o Agent
Address 1:	
Address 2:	
Address 3:	
Address 4:	
Postcode:	
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	██████████
Address:	Carter Jonas LLP Regent House 13-15 Albert Street Harrogate HG1 1JX
Telephone number:	██████████
Email:	████████████████████

Part B

Please fill in a separate form for each representation

The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the legal and procedural requirements, and whether it is sound.

Section 3

Name or Organisation:	Carter Jonas LLP obo ██████████
To which part of the Local Plan does this representation relate?	
Section and Paragraph	DUTY TO COOPERATE PARA 1.11
Policy	
Policies Map	

Section 4: Legal Compliance & Duty to Cooperate

Do you consider the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant		
2. Sound		No
3. In Compliance with the Duty to Cooperate		No

Please refer to the Council's representation guidance notes at <http://www.cravenc.gov.uk/newlocalplan>

Section 5: Details of Representation

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

Please see attached representation.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which section, paragraph, policy or element of the policies map your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination) You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See attached representation.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which section, paragraph, policy or element of the policies map your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not be a subsequent opportunity to make further representations based on the original representation at publication stage.

After the representations period of the Publication Craven Local Plan has closed, further submissions will only be at the request of the Inspector, based on the matters and issues debated at the examination.

Section 7: Participation at the Examination

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (please select one answer with a tick)	
Yes, I wish to participate at the oral examination	Yes
No, I do not wish to participate at the oral examination	
If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:	
Issues raised in this representation go to the heart of the soundness of the Local Plan and the delivery of the strategy for the principal settlement of Skipton. It is important that these matters are discussed in an appropriate manner in front of the Inspector so that due weight and consideration can be given.	


Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Section 8: Being Kept Informed

Would you like to be kept informed of the progress of the Craven Local Plan through to adoption? (please select one answer with a tick)	
Yes, I want to be informed	Yes
No, I don't want to be informed	

Please note that if you do not wish to be kept informed of the progress of the Craven Local Plan through to adoption, you will not receive any subsequent updates relating to the Local Plan examination etc.

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	13th FEBRUARY 2018

After the end of the representation period the Council will submit all individual representations received to the Secretary of State, together with a summary of the main issues raised during the representations period.

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

If you wish your personal details to be treated in confidence and not published please tick the box below:	
I wish to request that the personal details submitted with this representation are treated in confidence and not published.	<input type="checkbox"/>
Please explain below, why you have made this request:	

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ |
www.cravencd.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravencd.gov.uk



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

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Publication Stage Representation Form

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Title :	██████████
First Name:	
Last Name:	██████████
Job Title (where relevant):	
Organisation (where relevant):	████████████████████ C/o Agent
Address 1:	
Address 2:	
Address 3:	
Address 4:	
Postcode:	
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	██████████
Address:	Carter Jonas LLP Regent House 13-15 Albert Street Harrogate HG1 1JX
Telephone number:	██████████
Email:	████████████████████

Part B

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The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the legal and procedural requirements, and whether it is sound.

Section 3

Name or Organisation:	Carter Jonas LLP obo ██████████
To which part of the Local Plan does this representation relate?	
Section and Paragraph	PLAN PERIOD PARA 1.1 and 1.8 et al
Policy	
Policies Map	

Section 4: Legal Compliance & Duty to Cooperate

Do you consider the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant		
2. Sound		No
3. In Compliance with the Duty to Cooperate		No

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No, I do not wish to participate at the oral examination	
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Date	13th FEBRUARY 2018

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If you wish your personal details to be treated in confidence and not published please tick the box below:	
I wish to request that the personal details submitted with this representation are treated in confidence and not published.	<input type="checkbox"/>
Please explain below, why you have made this request:	

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Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	██████████
First Name:	
Last Name:	██████████
Job Title (where relevant):	
Organisation (where relevant):	████████████████████ C/o Agent
Address 1:	
Address 2:	
Address 3:	
Address 4:	
Postcode:	
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	██████████
Address:	Carter Jonas LLP Regent House 13-15 Albert Street Harrogate HG1 1JX
Telephone number:	██████████
Email:	████████████████████

Part B

Please fill in a separate form for each representation

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Section 3

Name or Organisation:	Carter Jonas LLP obo ██████████
To which part of the Local Plan does this representation relate?	
Section and Paragraph	PLAN REVIEW – Para 1.1., 1.8 and Section 9
Policy	
Policies Map	

Section 4: Legal Compliance & Duty to Cooperate

Do you consider the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant		
2. Sound		No
3. In Compliance with the Duty to Cooperate		

Please refer to the Council's representation guidance notes at <http://www.cravenc.gov.uk/newlocalplan>

Section 5: Details of Representation

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

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Please see attached representation.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which section, paragraph, policy or element of the policies map your representation relates)

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If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (please select one answer with a tick)	
Yes, I wish to participate at the oral examination	Yes
No, I do not wish to participate at the oral examination	
If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:	
Issues raised in this representation go to the heart of the soundness of the Local Plan and the delivery of the strategy for the principal settlement of Skipton. It is important that these matters are discussed in an appropriate manner in front of the Inspector so that due weight and consideration can be given.	


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Section 8: Being Kept Informed

Would you like to be kept informed of the progress of the Craven Local Plan through to adoption? (please select one answer with a tick)	
Yes, I want to be informed	Yes
No, I don't want to be informed	

Please note that if you do not wish to be kept informed of the progress of the Craven Local Plan through to adoption, you will not receive any subsequent updates relating to the Local Plan examination etc.

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	13th FEBRUARY 2018

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I wish to request that the personal details submitted with this representation are treated in confidence and not published.	<input type="checkbox"/>
Please explain below, why you have made this request:	

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www.cravencd.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravencd.gov.uk



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Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	██████████
First Name:	
Last Name:	██████████
Job Title (where relevant):	
Organisation (where relevant):	████████████████████ C/o Agent
Address 1:	
Address 2:	
Address 3:	
Address 4:	
Postcode:	
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	██████████
Address:	Carter Jonas LLP Regent House 13-15 Albert Street Harrogate HG1 1JX
Telephone number:	██████████
Email:	████████████████████

Part B

Please fill in a separate form for each representation

The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the legal and procedural requirements, and whether it is sound.

Section 3

Name or Organisation:	Carter Jonas LLP obo ██████████
To which part of the Local Plan does this representation relate?	
Section and Paragraph	Section3
Policy	SD2
Policies Map	

Section 4: Legal Compliance & Duty to Cooperate

Do you consider the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant		
2. Sound		No
3. In Compliance with the Duty to Cooperate		

Please refer to the Council's representation guidance notes at <http://www.cravenc.gov.uk/newlocalplan>

Section 5: Details of Representation

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

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(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which section, paragraph, policy or element of the policies map your representation relates)

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Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	██████████
First Name:	
Last Name:	██████████
Job Title (where relevant):	
Organisation (where relevant):	████████████████████ C/o Agent
Address 1:	
Address 2:	
Address 3:	
Address 4:	
Postcode:	
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	██████████
Address:	Carter Jonas LLP Regent House 13-15 Albert Street Harrogate HG1 1JX
Telephone number:	██████████
Email:	████████████████████

Part B

Please fill in a separate form for each representation

The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the legal and procedural requirements, and whether it is sound.

Section 3

Name or Organisation:	Carter Jonas LLP obo ██████████
To which part of the Local Plan does this representation relate?	
Section and Paragraph	SECTION 4
Policy	
Policies Map	KEY DIAGRAM

Section 4: Legal Compliance & Duty to Cooperate

Do you consider the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant		
2. Sound		No
3. In Compliance with the Duty to Cooperate		

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Section 5: Details of Representation

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

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Signature	
Date	13th FEBRUARY 2018

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Part A

Section 1: Personal Details

Title :	██████████
First Name:	
Last Name:	██████████
Job Title (where relevant):	
Organisation (where relevant):	████████████████████ C/o Agent
Address 1:	
Address 2:	
Address 3:	
Address 4:	
Postcode:	
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	██████████
Address:	Carter Jonas LLP Regent House 13-15 Albert Street Harrogate HG1 1JX
Telephone number:	██████████
Email:	████████████████████

Part B

Please fill in a separate form for each representation

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Section 3

Name or Organisation:	Carter Jonas LLP obo ██████████
To which part of the Local Plan does this representation relate?	
Section and Paragraph	SECTION 4
Policy	SP1: MEETING HOUSING NEED
Policies Map	

Section 4: Legal Compliance & Duty to Cooperate

Do you consider the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant		
2. Sound		No
3. In Compliance with the Duty to Cooperate		

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Section 5: Details of Representation

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Title :	██████████
First Name:	
Last Name:	██████████
Job Title (where relevant):	
Organisation (where relevant):	████████████████████ C/o Agent
Address 1:	
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Section 3

Name or Organisation:	Carter Jonas LLP obo ██████████
To which part of the Local Plan does this representation relate?	
Section and Paragraph	SECTION 4
Policy	SP3 HOUSING MIX AND DENSITY
Policies Map	

Section 4: Legal Compliance & Duty to Cooperate

Do you consider the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant		
2. Sound		No
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Title :	██████████
First Name:	
Last Name:	██████████
Job Title (where relevant):	
Organisation (where relevant):	████████████████████ C/o Agent
Address 1:	
Address 2:	
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Section 3

Name or Organisation:	Carter Jonas LLP obo ██████████
To which part of the Local Plan does this representation relate?	
Section and Paragraph	SECTION 4
Policy	SP5: STRATEGY FOR SKIPTON
Policies Map	Proposals Map for Skipton

Section 4: Legal Compliance & Duty to Cooperate

Do you consider the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant		
2. Sound		No
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Section 5: Details of Representation

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

Please see attached representation.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which section, paragraph, policy or element of the policies map your representation relates)

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If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (please select one answer with a tick)	
Yes, I wish to participate at the oral examination	Yes
No, I do not wish to participate at the oral examination	
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Section 8: Being Kept Informed

Would you like to be kept informed of the progress of the Craven Local Plan through to adoption? (please select one answer with a tick)	
Yes, I want to be informed	Yes
No, I don't want to be informed	

Please note that if you do not wish to be kept informed of the progress of the Craven Local Plan through to adoption, you will not receive any subsequent updates relating to the Local Plan examination etc.

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	13th FEBRUARY 2018

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If you wish your personal details to be treated in confidence and not published please tick the box below:	
I wish to request that the personal details submitted with this representation are treated in confidence and not published.	<input type="checkbox"/>
Please explain below, why you have made this request:	

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www.cravencd.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravencd.gov.uk



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Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	██████████
First Name:	
Last Name:	██████████
Job Title (where relevant):	
Organisation (where relevant):	████████████████████ C/o Agent
Address 1:	
Address 2:	
Address 3:	
Address 4:	
Postcode:	
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	██████████
Address:	Carter Jonas LLP Regent House 13-15 Albert Street Harrogate HG1 1JX
Telephone number:	██████████
Email:	████████████████████

Part B

Please fill in a separate form for each representation

The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the legal and procedural requirements, and whether it is sound.

Section 3

Name or Organisation:	Carter Jonas LLP obo ██████████
To which part of the Local Plan does this representation relate?	
Section and Paragraph	SECTION 4
Policy	SP12: INFRASTRUCTURE, STRATEGY AND DEVELOPMENT DELIVERY
Policies Map	

Section 4: Legal Compliance & Duty to Cooperate

Do you consider the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant		
2. Sound		No
3. In Compliance with the Duty to Cooperate		

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First Name:	
Last Name:	██████████
Job Title (where relevant):	
Organisation (where relevant):	████████████████████ C/o Agent
Address 1:	
Address 2:	
Address 3:	
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Postcode:	
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Part B

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Section 3

Name or Organisation:	Carter Jonas LLP obo ██████████
To which part of the Local Plan does this representation relate?	
Section and Paragraph	SECTION 5 ENVIRONEMENT
Policy	ENV1, ENV23, ENV4, ENV5, ENV6, ENV12. FOR COMMENT
Policies Map	

Section 4: Legal Compliance & Duty to Cooperate

Do you consider the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant		
2. Sound		No
3. In Compliance with the Duty to Cooperate		

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Title :	██████████
First Name:	
Last Name:	██████████
Job Title (where relevant):	
Organisation (where relevant):	████████████████████ C/o Agent
Address 1:	
Address 2:	
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Telephone number:	██████████
Email:	████████████████████

Part B

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Section 3

Name or Organisation:	Carter Jonas LLP obo ██████████
To which part of the Local Plan does this representation relate?	
Section and Paragraph	SECTION 6
Policy	H1 SPECIALIST HOUSING
Policies Map	

Section 4: Legal Compliance & Duty to Cooperate

Do you consider the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant		
2. Sound		No
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Section 5: Details of Representation

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Title :	██████████
First Name:	
Last Name:	██████████
Job Title (where relevant):	
Organisation (where relevant):	████████████████████ C/o Agent
Address 1:	
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Name or Organisation:	Carter Jonas LLP obo ██████████
To which part of the Local Plan does this representation relate?	
Section and Paragraph	SECTION 6
Policy	H2 AFFORDABLE HOUSING
Policies Map	

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This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	██████████
First Name:	
Last Name:	██████████
Job Title (where relevant):	
Organisation (where relevant):	████████████████████ C/o Agent
Address 1:	
Address 2:	
Address 3:	
Address 4:	
Postcode:	
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	██████████
Address:	Carter Jonas LLP Regent House 13-15 Albert Street Harrogate HG1 1JX
Telephone number:	██████████
Email:	████████████████████

Part B

Please fill in a separate form for each representation

The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the legal and procedural requirements, and whether it is sound.

Section 3

Name or Organisation:	Carter Jonas LLP obo ██████████
To which part of the Local Plan does this representation relate?	
Section and Paragraph	SECTION 8 INFRASTRUCTURE, SERVICES AND FACILITIES
Policy	INF 1, INF 2 and INF 6 COMMENTS
Policies Map	

Section 4: Legal Compliance & Duty to Cooperate

Do you consider the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant		
2. Sound		No
3. In Compliance with the Duty to Cooperate		

Please refer to the Council's representation guidance notes at <http://www.cravenc.gov.uk/newlocalplan>

Section 5: Details of Representation

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

Please see attached representation.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which section, paragraph, policy or element of the policies map your representation relates)

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Section 7: Participation at the Examination

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (please select one answer with a tick)	
Yes, I wish to participate at the oral examination	Yes
No, I do not wish to participate at the oral examination	
If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:	
Issues raised in this representation go to the heart of the soundness of the Local Plan and the delivery of the strategy for the principal settlement of Skipton. It is important that these matters are discussed in an appropriate manner in front of the Inspector so that due weight and consideration can be given.	


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Section 8: Being Kept Informed

Would you like to be kept informed of the progress of the Craven Local Plan through to adoption? (please select one answer with a tick)	
Yes, I want to be informed	Yes
No, I don't want to be informed	

Please note that if you do not wish to be kept informed of the progress of the Craven Local Plan through to adoption, you will not receive any subsequent updates relating to the Local Plan examination etc.

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	13th FEBRUARY 2018

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I wish to request that the personal details submitted with this representation are treated in confidence and not published.	<input type="checkbox"/>
Please explain below, why you have made this request:	

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www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



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Publication Stage Representation Form

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Title :	██████████
First Name:	
Last Name:	██████████
Job Title (where relevant):	
Organisation (where relevant):	████████████████████ C/o Agent
Address 1:	
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Agent name:	██████████
Address:	Carter Jonas LLP Regent House 13-15 Albert Street Harrogate HG1 1JX
Telephone number:	██████████
Email:	████████████████████

Part B

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Section 3

Name or Organisation:	Carter Jonas LLP obo ██████████
To which part of the Local Plan does this representation relate?	
Section and Paragraph	SECTION 9 MONITORING
Policy	COMMENT ON DELVIERY AND REVIEW
Policies Map	

Section 4: Legal Compliance & Duty to Cooperate

Do you consider the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant		
2. Sound		No
3. In Compliance with the Duty to Cooperate		

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Section 5: Details of Representation

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No, I don't want to be informed	

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Signature	
Date	13th FEBRUARY 2018

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Title :	██████████
First Name:	
Last Name:	██████████
Job Title (where relevant):	
Organisation (where relevant):	████████████████████ C/o Agent
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Section 3

Name or Organisation:	Carter Jonas LLP obo ██████████
To which part of the Local Plan does this representation relate?	
Section and Paragraph	POLICIES MAP
Policy	GENERAL COMMENT
Policies Map	SKIPTON. NEED FOR SEPARATE MAP FOR EACH ALLOCATION

Section 4: Legal Compliance & Duty to Cooperate

Do you consider the Local Plan is: (tick as appropriate)		
	Yes	No
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2. Sound		No
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Title :	██████████
First Name:	
Last Name:	██████████
Job Title (where relevant):	
Organisation (where relevant):	████████████████████ C/o Agent
Address 1:	
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Section 3

Name or Organisation:	Carter Jonas LLP obo ██████████
To which part of the Local Plan does this representation relate?	
Section and Paragraph	SPARE
Policy	
Policies Map	

Section 4: Legal Compliance & Duty to Cooperate

Do you consider the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant		
2. Sound		No
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