

From: [REDACTED]
To: [Local Dev. Framework](#)
Subject: Regulation 19 Consultation Deadline today
Date: 13 February 2018 08:06:36
Attachments: [PastedGraphic-4.pdf](#)
[CPRENY_FormA_CDC_PublicationDraftLP_Feb2018.pdf](#)
[CPRENY_FormB1_CDC_PublicationDraftLP_Feb2018.pdf](#)
[CPRENY_FormB2_CDC_PublicationDraftLP_Feb2018.pdf](#)
[CPRENY_FormB3_CDC_PublicationDraftLP_Feb2018.pdf](#)
[CPRENY_FormB4_CDC_PublicationDraftLP_Feb2018.pdf](#)
[CPRENY_FormB5_CDC_PublicationDraftLP_Feb2018.pdf](#)
[CPRENY_FormB6_CDC_PublicationDraftLP_Feb2018.pdf](#)
[CPRENY_FormB7_CDC_PublicationDraftLP_Feb2018.pdf](#)
[CPRENY_FormB8_CDC_PublicationDraftLP_Feb2018.pdf](#)
[CPRENY_FormB9_CDC_PublicationDraftLP_Feb2018.pdf](#)
[CPRENY_FormB10_CDC_PublicationDraftLP_Feb2018.pdf](#)
[CPRENY_FormB11_CDC_PublicationDraftLP_Feb2018.pdf](#)
[CPRENY_FormB12_CDC_PublicationDraftLP_Feb2018.pdf](#)
[CPRENY_FormB13_CDC_PublicationDraftLP_Feb2018.pdf](#)
[CPRENY_FormB14_CDC_PublicationDraftLP_Feb2018.pdf](#)
[CPRENY_FormB15_CDC_PublicationDraftLP_Feb2018.pdf](#)

from the Chairman CPRE North Yorkshire Branch

The North Yorkshire Branch of the Campaign to Protect Rural England (CPRENY) CIO 1174989

www.cprenorthyorkshire.co.uk [REDACTED]

% [REDACTED]

Dear Sirs

Please find attached the completed forms from CPRENY (CIO) in relation to Regulation 19 Consultation for the Craven District Council Draft Local Plan.

Regards
CPRENY

**CCP
REE**



**CAMPAIGN TO PROTECT
RURAL ENGLAND**

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.

Regulation 19-Town and 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):	Chair
Organisation (where relevant):	Campaign to Protect Rural England North Yorkshire CIO (CPRENY)
Address 1:	██████████
Address 2:	██████████
Address 3:	██████████
Address 4:	
Postcode:	██████████
Telephone:	c/o agent

Email:	c/o agent
---------------	-----------

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:	██████████ (MRTPI)
Address:	KVA Planning Consultancy 8 Acres Close Helmsley Yo62 5DS
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:	CPRENY
To which part of the Local Plan does this representation relate?	
Section and Paragraph	Duty to Co-operate
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		
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.

Having had the opportunity to read the Duty to Cooperate (DtC) Statement for the first time as part of the Publication Local Plan Regulation 19 Consultation, CPRENY have a number of concerns relating to the evidence presented.

The Statement sets out correctly who the 'duty bodies' and partners are that the Council must have on-going engagement with to adequately address cross boundary issues and matters of significance within the wider area.

Section 5 of the Statement sets out the engagement that the Council has had with the relevant bodies and organisations, briefly explaining what issues may have arisen. Section 6 leads on to give a score of significance against certain issues which may have arisen, and Section 7 sets out how certain issues may have influenced the Plan preparation.

However, CPRENY are primarily concerned that there has been no presentation of evidence in the Statement to detail where and when any of the 'ongoing' meetings and communication took place over a number of months or years. This has been a requirement and been demonstrated to date within DtC Statements for Local Planning Authorities within the other districts of North Yorkshire. The evidence presented in the appendices set out a MOU between the Council and the National Park Authority (NPA), which, while helpfully agreeing to housing numbers within their respective areas, does nothing to show how other issues have been adequately addressed between the two authorities including matters of landscape, setting and encroachment of allocations within the Park boundaries. Indeed, it is noted that the NPA have objected to a number of allocations on the border of the National Park which they believe may impact on its setting – these have been detailed with responses in the Council's December 17 Response Forms to the previous consultation. If these had been discussed under the DtC surely the NPA would have been satisfied and not needed to object?

The evidence presented in letters from Bradford Metropolitan District Council, Pendle Council and the Local Nature Partnership appear to be statutory responses to the 3rd pre-publication draft local plan consultation in July 2017 and do not offer any evidence that they have been consulted with on previous drafts or regarding matters arising in any other format other than during this statutory consultation period.

Whilst the email correspondence evidences that there have been some meetings between Lancaster Council and Craven District Council updating each other on plan progress, it is not clear that this has been an on-going matter and not merely undertaken prior to publication of the Regulation 19 draft Local Plan and the first publication of the Duty to Cooperate Statement.

Whilst CPRENY understand that Craven District Council may well have had on-going engagement with organisations and Duty Partners under the Duty to Cooperate for a number of years and therefore could meet the requirements of section 20 (5) (c) of the Act, the lack of evidence to support this presented within the Statement does not lead one to conclude that this has been the case.

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.

(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

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:

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

✓

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	10th 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.

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:	CPRENY
To which part of the Local Plan does this representation relate?	
Section and Paragraph	Section 3 Vision
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	✓	
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.

CPRENY welcomes the reference in brackets within the second paragraph of the vision statement, setting out that:

“most new homes are situated within and around market towns and villages (on previously developed land where it has been possible and appropriate), between extensive public open spaces, connecting people to the countryside and creating corridors for wildlife.”

This is considered to be in conformity with the NPPF which sets out at paragraph 111 that planning policies should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value, which reiterates a core planning principle set out again at paragraph 17 of the Framework.

CPRENY also welcome and support the sentence setting out that: *“Craven’s high-quality landscapes and treasured environmental assets are conserved and are enjoyed by everyone.”*

This is in general conformity with the NPPF at paragraph 17 which sets out that planning should *“take account of the different toles and character of different areas, promoting the vitality of our main urban areas, protecting the green belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it”* and also the general thrust of Section 11 which seeks to conserve and enhance the natural environment.

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.

(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	
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:	

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	✓
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	10th 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.cravenc.gov.uk

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



INVESTOR IN PEOPLE



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

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:	CPRENY
To which part of the Local Plan does this representation relate?	
Section and Paragraph	Section 3
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		✓
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.

Whilst supportive of this policy thrust in general, CPRENY believe that the policy is missing a sentence in relation to air quality.

Currently the policy refers to supporting the move to a low carbon future and flood risk.

The flood risk element of this policy is taken further via policy ENV6 and both interact well. However, no such paragraph exists for air quality matters which would seek to reinforce policy ENV7 dealing specifically with both land and air quality.

CPRENY believe that a reference to air quality in Policy SD2 would make the plan more robust in light of the recent Wealden Judgement *Wealden District Council v. Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority [2017]* and also following the Government's commitment to produce Air Quality Plans. This is also compatible with paragraph 109 and 120 of the Framework which both seek to avoid and prevent unacceptable risks from pollution on health and wellbeing.

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.

CPRENY believe that the addition of the following sentence within the bullet point list of the first paragraph of SD2 would ensure that the policy is more robust and thus both effective and consistent with national policy:

- Proposes new development in locations which prevent an unacceptable risk from air pollution on health, the natural environment or general amenity for both new and existing developments.

It is suggested that this would be inserted between existing points 2 and 3 and the current numbering system be revised to recognise 5 new points.

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	
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:	

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	✓
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	10th 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.

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:	CPRENY
To which part of the Local Plan does this representation relate?	
Section and Paragraph	Section 4 Paragraphs 4.1-4.18
Policy	SP1
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		✓
3. In Compliance with the Duty to Cooperate		

Please refer to the Council's representation guidance notes at

<http://www.cravendc.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.

Section 4 deals with 'meeting the housing need'.

In the response to the third draft pre-publication local plan (July 2017), CPRENY set out that although they welcomed the lower housing requirement in general to previous drafts, they were concerned that the proposed number of units per year would prove to be unviable at 214dpa given the persistent under delivery experienced throughout the district.

CPRENY understand that since that consultation, the Council have since produced an Addendum to the Local Plan Housing Growth Options Paper (which was produced for the 2017 consultation), which has been published as part of this consultation.

Upon reading this document the Council have selected a new growth option which sets a requirement of 230dpa. CPRENY believe that this figure is too high given the past 17 years under delivery as set out at Table 5.16 of the Addendum report. CPRENY believe that the Council have thus selected a new requirement, based on pressure from industry rather than defend their preferred option which was already 'high' in comparison with the actual deliverables on the ground. Whilst the Council needs to plan positively for growth they also need to be 'realistic' and take account of local constraints when determining a housing requirement figure.

CPRENY are also aware that the DCLG published its Housing White Paper a draft standard methodology to be used for calculating fully objectively assessed need for England's local planning authorities recently. The figure for Craven district is 165dpa (for the period 2016-2026) – whilst this may be subject to change and is purely the FOAN and not a housing requirement, this FOAN is significantly lower than the Council's calculation of 206 (for the area outside of the National Park). It is understood that DCLG wish to approve the standard methodology as soon as possible after the 31st March 2018 . The Council however have stated in the Addendum, at paragraph 4.14, that they want to submit their draft plan to the Secretary of State prior to the deadline of 31st March 2018. CPRENY are therefore, concerned that the Council are submitting the Local Plan 'under pressure' rather than wait and potentially incorporate the Government's figures into the Plan. It is acknowledged that these may be subject to change and that the Council's Plan timescale is different to that of the Government's, however, not waiting for the outcome of the consultation may trigger either an early review of housing figures to be required (i.e. immediately after adoption) or, could easily warrant the Examination in Public to be deferred until the impact of DCLG's standard methodology is understood which would seem to be potentially short-sighted and a waste of time for all involved in preparation activities.

Of further concern to CPRENY is the Council's acknowledgement that the 40% affordable target figure has been lowered to 30%. This combined with the higher annual housing requirement figure means that the full objectively assessed need for affordable housing (FOANAH) will not be met. The Council appear to be relying on other initiatives to bridge the gap and lower the actual 'affordable need' for the District, however, CPRENY believe this is a risky strategy. Whilst in theory the schemes mentioned in the Addendum report and in the Local Plan (paras 4.15-4.17) may help reduce this need and for example help return vacant properties into use (which CPRENY are fully supportive of), the reliance on them to deliver is such that should any scheme fail, or funding not be delivered, then the percentage of people in need of such homes within the district will increased.

Furthermore, it is well documented that developers agree to the delivery of such homes in order to gain a planning permission, and then all too often state that the actual delivery is unviable, and the number of affordable homes required do not get delivered. This happens throughout the district, North Yorkshire and the country. CPRENY believe that by lowering the requirement at this stage will only lead to more substantial reductions at the time proposals are delivered. Whilst affordable housing is dealt with via Policy H2 – CPRENY believe that a cross-reference to this Policy within this policy would make it more robust.

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.

CPRENY believe that the previous housing requirement figure of 214 dpa should be used as a maximum figure, or preferably a lower figure which more accurately represent a viable delivery in line with past completion data. Consideration should also be given to the DCLG figures proposed in the Housing White Paper consultation.

CPRENY are of the opinion that a reference to policy H2 and the percentage requirement across developments should be included within policy SP1 to aid the Council require such a level to be delivered.

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	✓
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:

This is an important issue which needs to be discussed as part of the Examination as the outcome will inform the entire spatial strategy of the plan

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	✓
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	10th 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.cravenc.gov.uk

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



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

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:	CPRENY
To which part of the Local Plan does this representation relate?	
Section and Paragraph	Section 4 Paragraphs 4.19-4.28
Policy	SP2
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		✓
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.

This section of the Local Plan is entitled 'Economic Growth'.

As suggested in the July 2017 consultation response, CPRENY welcomes the transposition of the reference to North Yorkshire within the text of Policy SP2 for clarification purposes.

CPRENY are concerned that 32Ha of employment land has been allocated based on the need to update the ELR to reflect the revised housing requirement target. Given that CPRENY have objected to the higher proposed requirement, it follows that they must object to this figure also.

There is some confusion surrounding paragraph 4.26 of the draft Local Plan which states that *"evidence suggests that the realistic range of employment land requirement is relatively narrow (5ha) but it is considered appropriate to indicate a minimum level of provision to ensure that the*

Local Plan strategies for housing and economic growth are aligned and complementary to deliver a balanced pattern of growth in Craven [...] to achieve this, draft Policy SP2 proposes a minimum of 32ha of employment land for B Class Uses be provided in the plan area ...”

There is a huge difference (27ha) between what evidence suggests is required and what the plan proposes is required as a minimum amount of employment land. This could be for a variety of reasons, including the fact that the general population of residents of Craven district are retired or approaching retirement age, residents choose to live in the rural district of Craven and commute out of the area to work, or residents are engaged in agriculture or tourism-based industries and thus employment land is not needed in significant amounts. The settlements themselves are relatively small with larger businesses already operating on sites within the district.

Whilst it is important to allocate land to foster and support existing businesses to expand and new business opportunities to be realised, surely allocating 27ha of land over what evidence suggest is actually required is excessive? CPRENY believe that a lower allocation reflecting the actual need would be more realistic. Whilst the Framework encourages proactive planning for economic growth, paragraph 22 of the NPPF states that policies should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Therefore, CPRENY believe, it would seem sensible to not over-allocate in the first instance.

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.

CPRENY believe that a lower allocation would be more appropriate in line with actual requirements.

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	
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:

--


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	<input checked="" type="checkbox"/>
No, I don't want to be informed	<input type="checkbox"/>

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	10th 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:	

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



INVESTOR IN PEOPLE



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

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:	CPRENY
To which part of the Local Plan does this representation relate?	
Section and Paragraph	4
Policy	SP4
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	✓	
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.

CPRENY supports the revision of text in draft policy SP4 at point F as suggested in their July 2017 response. It is considered that this gives more protection for the countryside of Craven district and will enable development to support the spatial strategy.

However, this policy amalgamates SP4 and the previous draft policy H1 and this is now a very long and unwieldy policy. To be more 'user-friendly', CPRENY suggest that a separate policy is created which amalgamates the reference to the open countryside in point F and those points pertinent to development in the open countryside – currently detailed in Point K.

Alternatively, it is questioned whether the table highlighting the 'Guidelines for the distribution of new dwellings to deliver the spatial strategy' to the rear of the policy is actually required to be located within the same policy – this could be contained in a separate policy.

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.

CPRENY suggest that the following modification could be made to establish a new policy dealing with development in the open countryside:

‘and open countryside’ would be taken out of point F of policy SP4 - as would Point K.

A new Policy would replicate Point K in its entirety.

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

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:

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

✓

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	10th 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.cravenc.gov.uk

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



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

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:	CPRENY
To which part of the Local Plan does this representation relate?	
Section and Paragraph	4
Policy	SP6 – SG025, SG064 and INO10
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		✓
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.

CPRENY has recently responded to consultations by the Council's Development Management Team regarding both of these sites, objecting to the amount of development at each location.

SG025 relates to land south of Ingfield Lane, Settle. The site currently consists of 11.43 Ha of greenfield land outside of the existing settlement boundary and thus currently within open countryside. It is a much-used amenity space, valued by local residents who have objected vociferously to numerous planning applications for various uses on the site and highlighted surface water flooding to be a particular problem.

It is acknowledged that the Council are only allocating 3.91Ha of this land for residential use and are including a 7.52Ha site area of green infrastructure to be included within the site in order to minimise impacts on the adjacent YDNP and the Settle-Carlisle Railway Conservation Area and the

heritage assets of the Falcon Manor Hotel and Ingfield Lodge. However, CPRENY believe that the allocation of this valuable green space will undoubtedly impact upon these assets and designated landscapes as well as significantly alter the setting of Settle from viewpoints within the YDNP and from the railway. It is understood that the YDNPA expressed concern over the development of this site during a recent planning application consultation (62/2017/18067 and resubmission 62/2017/18067).

SG064 relates to land south of Runley Bridge Farm and west of the B6480. The site consists of 5.039Ha and a minimum of 2.6Ha has been allocated for B1, B2 and B8 usage – the rest presumably would be for residential use. The design brief sets out that this would be for 'employment led mixed use development' which would require an employment use to be permitted on the site before or at the same time juncture as any residential allocation could be permitted. Whilst the Plan does not set out the potential residential yield for this site, a recent application (62/2017/18064) proposed approximately 19 dwellings. This level of development would seem at odds with the settlement hierarchy set out in Policy SP4 at Tier 5 which directs only a "*low level of growth to support a sustainable, vibrant and healthy rural economy and communities*". The textual justification at paragraph 4.53 explains that support for housing proposals (in the open countryside) will be limited to the special circumstances identified in the NPPF and the criteria in Policy SP4 point K. Policy H2 allows rural exception sites to be delivered however sets out at Point F that these schemes would be "*in or adjoin any settlement in the plan area*" – this location clearly is not in nor does it adjoin the boundary of Settle, therefore should not be considered as a suitable exception site location.

Given the amount of employment land proposed within the draft Local Plan (SP2) and the fact that CPRENY have questioned the need to allocate 32Ha when the draft Local Plan states at paragraph 4.26 that the "*realistic range of employment land requirement is relatively narrow (5Ha)*", CPRENY must question the validity of allocating this greenfield site which is currently within a prominent open countryside location.

The site is in close proximity to the Anley Crag Plantation and the River Ribble runs to the north of the of the site. The River Ribble feeds into the Long Preston Deeps Site of Special Scientific Interest (SSSi). whilst the Council have stated a hydrological investigation and bird survey will be required as part of any application for planning permission, CPRENY would hope that a full HRA would be required.

CPRENY are of the opinion that both sites would impact on the surrounding designated landscapes, heritage assets and open countryside to their detriment and therefore should not be allocated for development as they are not consistent with national policy found in the Framework and cannot be justified.

Proposed site INO10 relates to an existing caravan park, north of the River Greta at Ingleton. The Council expect the site to deliver 11 dwellings on the 0.35Ha site. The development guidelines for this site do not set out whether or not this is to be considered a rural exception site for 100% affordable housing given the edge of settlement location.

This site was originally located to give visitors access to the nearby waterfalls. The site is immediately adjacent to the Ingleton Conservation Area to the north west of the settlement. The Conservation Area currently forms the edge of the built form of the village abutting a river which currently forms a natural boundary to the settlement. Should this site be included within the Local Plan, it would be introducing dwellings and buildings into an area of the countryside and essentially expanding the settlement to the eastern side of the river.

It is acknowledged that there is an existing employment site adjacent to the proposed residential allocation, however, CPRENY believe that by allocating this land for residential and ‘joining up’ the village with the employment site, would in effect open the door to future expansion opportunities and potential windfall applications to this western edge of the settlement and thereby are not complementary to the settlement’s form, character and appearance.

CPRENY are also aware that there have been a number of planning applications for caravan sites across North Yorkshire which have sought a Change of Use application to become residential development and are concerned that this allocation may set a dangerous precedent for Craven District. Whilst it is acknowledged that some of these sites may well go some way to demonstrating a 5-year housing land supply, these sites are often located within rural countryside locations (as is the case for INO10) and as such are sites where residential development would usually be considered unsustainable. The development of this site would not be consistent with Tier 5 of the spatial strategy (draft policy SP4) which sets out that ‘individual’ homes in the countryside will be limited to the special circumstances as identified by the NPPF and therefore cannot be considered consistent with national policy.

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.

--

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	✓
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:	
The appropriate allocation of sites is something that is important to CPRENY and its members, given the amount of constraints within CDS area, CPRENY believe it is vital that the Local Plan does not over allocate sites and chooses the most appropriate locations for development	

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	✓
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	[REDACTED]
Date	10th 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.cravenc.gov.uk

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



INVESTOR IN PEOPLE



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

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:	CPRENY
To which part of the Local Plan does this representation relate?	
Section and Paragraph	5 paragraph 5.4
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		✓
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.

Paragraph 5.4 sets out that currently the Craven Landscape Appraisal (2002) and the Forest of Bowland Landscape Character Assessment (2009) are the relevant landscape appraisals used in decision making – it goes on to state that appraisals may be updated, and successor documents will be used at that time. However, CPRENY note that the Council have published alongside the draft Local Plan its 'Landscape Visual Impact Assessment prepared as part of the Evidence Base for the Craven District Council Local Plan, 2012-2032' by the Planning Policy Team for Natural England in October 2017. This appears to assess the sites that have been allocated near 5 settlements within closest proximity to either the YDNP or the Forest of Bowland AONB. IS this to be treated as a successor document?

CPRENY are unsure as to the status of this document – which does not set out why it has been prepared for Natural England and for what purpose. CPRENY are also unsure as to the ability of

the Planning Policy Team to undertake this activity as no information has been provided about the authors in terms of qualification to undertake a full LVIA and thus question whether the draft Local Plan, if it is based on this evidence, is justified?

CPRENY are aware that developers will wish to utilise material published by the Local Planning Authority when assessing sites for potential planning applications and are concerned as to whether this document should be considered as appropriate evidence.

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.

--

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	
----------------------------------------------------	--

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:

--

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	✓
----------------------------	---

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	10th 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.cravenc.gov.uk

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



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

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:	CPRENY
To which part of the Local Plan does this representation relate?	
Section and Paragraph	5
Policy	ENV1
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	✓	
3. In Compliance with the Duty to Cooperate		

Please refer to the Council's representation guidance notes at

<http://www.cravendc.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.

CPRENY fully endorses draft Policy ENV1 and particularly welcomes reference to the need to wherever possible 'restore and enhance' the landscape character of the area. All too often throughout the district members have witnessed areas of open countryside degraded prior to the submission of a planning application which in some cases have been refused but the land has not been restored. It is hoped that this policy will enable the planning authority to enforce restoration of sites and areas of the countryside to protect its special character.

CPRENY also welcome the recognition that the protection and promotion of dark skies are valued.

It is considered that this policy would be further strengthened by reference to tranquillity which often goes hand in hand with the protection of the countryside and dark skies. This would be in conformity with paragraph 123 of the Framework.

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.

--

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	
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:

--

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	✓
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	10 th 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.cravenc.gov.uk

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



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

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:	CPRENY
To which part of the Local Plan does this representation relate?	
Section and Paragraph	5 paragraph 5.23
Policy	ENV2
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		✓
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.

CPRENY welcomes the amendments to paragraph 5.23 in line with their suggestion at the previous consultation stage (July 2017) that the setting of a heritage asset is also an important factor when considering the asset's significance.

However, CPRENY remain disappointed that the importance of the 'setting' of heritage assets has not been transposed through to Policy ENV2 and because of this fact, consider that the draft plan is not consistent with national policy.

Paragraphs 128 and 129 of the NPPF set out that in determining planning applications, local planning authorities should consider the potential harm to heritage assets as well as to their setting. This is confirmed in recent case law by the Court of Appeal case (*Barnwell Manor Wind Energy Ltd v (1) East Northamptonshire DC and Others [2014] EW Civ 137*) which prescribed that

the desirability of preserving the setting of listed buildings should not simply be given careful consideration but “*considerable importance and weight*” when carrying out the balancing exercise, which gives rise to a strong statutory presumption against granting planning permission for development which would cause harm to the setting of listed buildings. Even where the harm would be “less than substantial” the balancing exercise cannot ignore the overarching statutory duty imposed by Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. It is therefore important for the Council to recognise this.

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.

CPRENY propose that point B is reworded to read:

Ensuring that proposals affecting a designated heritage asset (or an archaeological site of national importance) conserve those elements, **including its setting**, which contribute to its significance....

CPRENY believe that the words ‘including its setting’ should also be added in the same way to section C regarding Conservation Areas; Section D regarding archaeological sites of less than national importance; and Section E regarding non-designated heritage assets.

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	✓
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:

CPRENY are concerned that heritage is often something that has been overlooked by development management teams at the Council, with Historic England often not being consulted where they should have been, therefore this is a matter of importance to members to ensure that the Council’s policies are correct to ensure that they can be utilised correctly and appropriately by other teams within the Council.

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	✓
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	[REDACTED]
Date	10th 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.cravenc.gov.uk

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



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

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:	CPRENY
To which part of the Local Plan does this representation relate?	
Section and Paragraph	5
Policy	ENV5
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		✓
3. In Compliance with the Duty to Cooperate		

Please refer to the Council's representation guidance notes at

<http://www.cravendc.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.

CPRENY welcomes the inclusion of a list of sites where green infrastructure is to be included within proposals on those allocations.

Whilst CPRENY have objected to the inclusion of site SG064, should the Local Plan include this site at adoption stage, CPRENY believe that this site should also be included within this list. This is primarily due to its prominent position within the open countryside and proximity to the Anley Crag plantation and the River Ribble. The development guidelines for the site as part of draft policy SP6 (page88 of the Publication draft Local Plan) states that *"new proposals will include a comprehensive landscaping scheme to filter views of the development from the east and west. Semi mature trees will be planted for immediate effect."* With this in mind CPRENY believe that this planting would ideally form a new section of green infrastructure and ensure that the Plan is justified and effective.

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.

CPRENY propose that site SG062 is also included within the list of allocated sites in policy ENV5

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

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:

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

✓

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	10 th 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.cravenc.gov.uk

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



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

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:	CPRENY
To which part of the Local Plan does this representation relate?	
Section and Paragraph	5
Policy	ENV10, ENV11, ENV12, ENV13
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	✓	
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.

CPRENY wishes to endorse and support the above policies which are all consistent with national policies regarding the protection of the countryside, gaps between settlements and promotion of sustainable access (by means other than the private vehicle) to the countryside.

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.

--

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	
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:

--

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	✓
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	10 th 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.cravenc.gov.uk

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



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

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:	CPRENY
To which part of the Local Plan does this representation relate?	
Section and Paragraph	6
Policy	H2
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		✓
3. In Compliance with the Duty to Cooperate		

Please refer to the Council's representation guidance notes at

<http://www.cravendc.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.

CPRENY reiterates its statement made in respect of draft policy SP2 that of concern to CPRENY is the Council's acknowledgement that the 40% affordable target figure has been lowered to 30%. This combined with the higher annual housing requirement figure means that the full objectively assessed need for affordable housing (FOANAH) will not be met as only 66% would be delivered – when combined with the provision in the NP. The Council appear to be relying on other initiatives to bridge the gap and lower the actual 'affordable need' for the District, however, CPRENY believe this is a risky strategy. Whilst in theory the schemes mentioned in the Addendum report and in the Local Plan (paras 4.15-4.17) may help reduce this need and may, for example, help return vacant properties into use (which CPRENY are fully supportive of), the reliance on them to deliver is such that should any scheme fail, or funding not be delivered, then the percentage of people in need of such homes within the district will increased.

Furthermore, it is well documented that developers agree to the delivery of such homes to gain a planning permission, and then all too often state that the actual delivery is unviable, and the number of affordable homes required do not get delivered. This happens throughout the district, North Yorkshire and the country. CPRENY believe that by lowering the requirement at this stage will only lead to more substantial reductions at the time proposals are delivered.

Paragraph 50 of the NPPF states that where local planning authorities have identified affordable housing is needed, local plans should contain policies for meeting this need. Paragraph 6.13 of the draft Local Plan sets out *“to address the issue of a shortfall in affordable homes across Craven, increasing the supply of new affordable homes is a priority for the local plan.”* It goes on to state at paragraph 6.16 that *“the scale of need revealed by the 2017 SHMA would justify the Council establishing a high target for the amount of affordable housing that will be required from new development sites.”* Setting a higher target of 40% was welcomed by CPRENY in their previous response to the third pre-publication draft Local Plan in July 2017.

CPRENY believe that a more appropriate approach would be to adopt a ‘variable’ percentage, where larger sites are required to deliver 40% affordable units, reducing in scale to 30% in order to ensure that a figure closer to the FOANAH is actually delivered. CPPRENY have found that affordable housing is of real concern to many members and resident across the district who are employed in more traditional and seasonal employment.

CPRENY are supportive of the requirement for sites offering between 5-10 dwellings to provide 30% affordable housing and those sites of under 5 units offering a cash contribution.

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.

CPRENY believe a variable scale for affordable housing should be required rather than a flat rate of ‘30%’ across all sites. This would ensure the plan has been positively prepared and is consistent with national planning policies in the delivery of affordable housing.

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	
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:	

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	✓
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	[REDACTED]
Date	10th 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.	
Please explain below, why you have made this request:	

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

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



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

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:	CPRENY
To which part of the Local Plan does this representation relate?	
Section and Paragraph	7 Paragraph 7.19
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		✓
3. In Compliance with the Duty to Cooperate		

Please refer to the Council's representation guidance notes at

<http://www.cravendc.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.

Paragraph 7.19 references the Tourism Development Commitment to the Land to the west of Hellifield which incorporates the Hellifield Flashes – a series of natural ponds which are recognised for their importance to migratory birds and other wildlife. The flashes both provide a direct link to the Long Preston Deeps SSSI and the Pan Beck Fen SSSI.

CPRENY acknowledge the complex planning history of this site. It is imperative that any application on this site respects the original planning permission and does not stray beyond the use class that it is permitted for. For example, a cinema or a park and ride facility at this location would not be suitable.

Because of the type of development proposed and the location of the site (which was recommended to be designated as a Site for Importance to Nature Conservation (SINC) and is

recognised for its importance for migratory birds and proximity to the 2 SSSI's), CPRENY believe that to be consistent with national planning policy, the Local Plan should, in addition to those policies already suggested, also state that any proposal for development on this site should be in accordance with additional local plan policies: ENV3 (Good Design; ENV6 (Flood Risk); ENV7 (Land and Air Quality); ENV8 Water Resources, Water Quality and Groundwater) and ENV9 (Renewable and Low Carbon Energy) – should any future eco-hotel be proposed for the site who wish to be self-sufficient etc.

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.

CPRENY propose that the final sentence be reworded to incorporate the above list of policies to read:

[...], in accordance with local plan policies ENV1, ENV2, ENV3, ENV4, ENV6, ENV7, ENV8, ENV9, ENV10 and ENV12.

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	✓
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:

The Tourism Development Commitment has a controversial planning history that CPRENY has been involved in and therefore would like to be able to contribute to any discussions surrounding this allocation.

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	✓
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	[REDACTED]
Date	10th 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.cravenc.gov.uk

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



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

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:	CPRENY
To which part of the Local Plan does this representation relate?	
Section and Paragraph	7
Policy	EC4
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		✓
3. In Compliance with the Duty to Cooperate		

Please refer to the Council's representation guidance notes at

<http://www.cravendc.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.

Policy EC4 sets out the Council's priorities for tourism.

It references the Tourism Development Commitment (to the Land to the west of Hellifield which incorporates the Hellifield Flashes) at point H. It is noted that the other key location for tourism development (Bolton Abbey) has its own policy EC4A and it is proposed by CPRENY that the Hellifield site also has its own, in the interests of clarity – thus would keep both sites separate from the Council's general tourism policy.

CPRENY do not understand where the reference to 'alternative tourism development' for the land designated as a Tourism Development Commitment has come from? This site was originally allocated in the Council's Local Plan (adopted 1999) in Policy EMP11 which is set out in italics in full below:

EMP11. TOURIST DEVELOPMENT OPPORTUNITY SITES

*The following development opportunity sites are acceptable in principle, for tourist related development (Class D1 uses)**

- *Hellifield Station site.*
- *Bolton Abbey Station site.*
- *Embsay Station site.*

Applications for planning permission will be assessed against other relevant policies in the plan and against the Development Briefs, to be provided for these sites.

** From the Town and Country Planning (Use Classes) Order 1987*

Use Class D1 is specifically mentioned within the policy (not any other Use class) and refers to public services including centres for education and exhibition space which is why the planning permission which was granted in outline form in 2000, renewed in 2003 and subject to Reserved Matters in 2005 were approved. There does not appear to be any evidence to support this change in use or commitment. It is the CPRENY opinion that as this commitment has been carried forward from the 1999 Local Plan, the original use class should also carry forward.

The new policy also seems to support the development of non-designated land (shown in white on diagram EC4) for the purposes of sustainable tourism providing that it adjoins the designated tourism development commitment. The land shown in white appears to adjoin the Local Green Space Commitment and not, as directed to by the policy, the Tourism Development Commitment shown in grey. An existing Public Right of Way exists across the site which segregates an area of white land to the north east of the site with a small area shaded in grey away from the main central committed area.

This area also forms part of a wider area which is included within the Long Preston Conservation Area and is within close proximity of two Grade II Listed Buildings which CPPRENY believe should also be given reference in the policy. It is unclear why this area of land, within the Conservation Area, outwith any settlements and adjacent to the Local Green Space Designation is needed for additional tourism related development. The reference in point J to sports, leisure, recreational and shops do not form part of use class D1 and therefore are also at odds with the original policy allocation.

It is therefore considered that parts of this policy are not justified.

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.

CPRENY believe an additional policy dealing with the Tourism Development Commitment would be beneficial for clarification purposes.

CPRENY believe there is no justification for the support for 'alternative' tourism uses within the policy and are of the opinion that the original use class that the site was previously allocated for should be maintained.

Point H)2) should include reference to the 2 Grade II Listed Buildings adjacent to the Conservation Area.

It is also considered development should not be supported for the development of non-designated land (shown as white land on diagram EC4) adjacent to the Local Green Space Designation, SSSI's and Conservation Area.

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	✓
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:

The Tourism Development Commitment has a controversial planning history that CPRENY has been involved in and therefore would like to be able to contribute to any discussions surrounding this allocation.

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	✓
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	10 th 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.	
-----------------------------------------------------------------------------------------------------------------------------	--

Please explain below, why you have made this request:

--

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

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



INVESTOR IN PEOPLE



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