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To: [Local Dev. Framework](#)
Subject: Craven Local Plan - Publication Version Consultation
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[Publication Craven Local Plan - GDL Representations.pdf](#)
[Publication Reqs Form.pdf](#)

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Dear Sir/Madam,

Please see attached representations made by Gladman Developments in response to the ongoing consultation on the publication version of the Craven Local Plan.

Should you require any further information, do not hesitate to contact me.

I would appreciate confirmation of receipt of these representations by return.

Kind Regards,

[REDACTED]

[REDACTED] - Senior Policy Researcher | [REDACTED] | DDI: [REDACTED]

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Draft Craven Local Plan Consultation

2nd January – 13th February 2018



February 2018

CONTENTS

Executive Summary	2
1 Introduction	3
1.1 Introduction	3
1.2 Previous Submissions.....	3
1.3 National Policy	3
1.4 The White Paper	4
2 Duty To Cooperate	8
3 Vision And Objectives	9
3.1 Vision	9
3.2 Plan Period.....	9
4 Plan Policies	10
4.1 Draft Policy SD1: The Presumption In Favour Of Sustainable Development	10
4.2 Draft Policy SP1: Meeting Housing Need	10
4.3 Draft Policy SP3: Housing Mix and Density	10
4.4 Draft Policy SP4: Spatial Strategy and Housing Growth	11
4.5 Draft Policy ENV2: Heritage	12
4.6 Draft Policy ENV3: Good Design.....	12
4.7 Draft Policy ENV4: Biodiversity	12
4.8 Draft Policy ENV10: Local Green Space	13
4.9 Draft Policy H2: Affordable Housing.....	13
5 Conclusions	15
5.1 General Comments	15
5.2 Test of soundness	15

EXECUTIVE SUMMARY

- i. This representation provides Gladman Developments Ltd (GDL) written representations on the publication version of the Craven Local Plan currently out for public consultation.
 - ii. Gladman specialise in the promotion of strategic land for residential development with associated community infrastructure.
 - iii. These representations concern the following matters:
 - Evidence Base
 - Vision and Objectives
 - Strategic Policies and Spatial Strategy
 - Environment
 - Housing
 - Economy
 - Infrastructure, Services and Facilities
 - iv. Careful consideration needs to be given to the development strategy that forms the basis for the spatial distribution of growth across Craven. All sustainable settlements should be allowed to play their part in meeting their own housing and employment needs as well as contributing to the wider district's requirements. A flexible approach to delivering the development needs of the district will ensure the plan's ultimate deliverability and success.
 - v. Gladman have also made detailed comments regarding a range of development management policies including; countryside and landscape, heritage, good design, biodiversity and rural economy. Gladman believe a number of changes are required in order for these policies to conform with national policy and be capable of being found sound through the examination process.
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1 INTRODUCTION

1.1 Introduction

1.1.1 This representation is made by Gladman Developments Ltd (GDL) in response to the current consultation on the Publication version of the Craven Local Plan. GDL specialise in the promotion of strategic land for residential development with associated community infrastructure.

1.1.2 GDL has considerable experience in the development industry in a number of sectors including residential and employment development. From that experience, it understands the need for the planning system to provide local communities with the homes and jobs that they need to ensure that they have access to a decent home and employment opportunities.

1.1.3 GDL has considerable experience in contributing to the Development Plan preparation process, having made representations on numerous local planning documents throughout the UK and having participated in many local plan public examinations. It is on the basis of that experience that the comments are made in this representation.

1.2 Previous Submissions

1.2.1 GDL have made submissions in response to the following consultations in relation to the emerging Craven Local Plan;

- Craven Local Plan – first draft version (November 2014);
- Craven Local Plan – second draft version (May 2016);
- Craven Local Plan – pre-submission version (July 2017).

1.3 National Policy

1.3.1 The National Planning Policy Framework (the Framework) sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order to prepare a sound plan it is fundamental that it is:

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

1.4 The White Paper

- 1.4.1 The Government White Paper ('Fixing our Broken Housing Market') issued in February 2017 is a very clear statement from Government on the importance of the delivery of housing to the wider economy.
- 1.4.2 The Government are in no doubt that the housing market in Britain is broken which, according to the Prime Minister, is one of the greatest barriers to progress in the country today.
- 1.4.3 Average house costs are almost eight times average earnings which is an all-time record and soaring prices and rising rents caused by a shortage of the right homes in the right places has slammed the door of the housing market in the face of a whole generation
- 1.4.4 The reason for this crisis is that the Country is simply not building enough homes and has not done so for far too long. The consensus is that we need from 225,000 to 275,000 or more homes per year to keep up with population growth and to start to tackle years of under-supply.
- 1.4.5 Everyone involved in politics and the housing industry therefore has a moral duty to tackle this issue head on. The White Paper states quite unequivocally that 'the housing shortage isn't a looming crisis, a distant threat that will become a problem if we fail to act. We are already living in it.'
- 1.4.6 Tackling the housing shortage is not easy. It will inevitably require some tough decisions. But the alternative, according to the White Paper, is a divided nation, with an unbridgeable and ever-widening gap between the property haves and have-nots.
- 1.4.7 The challenge of increasing supply cannot be met by Government alone. It is vital to have local leadership and commitment from a wide range of stakeholders, including local authorities, private developers, housing associations, lenders and local communities.
- 1.4.8 The starting point is building more homes. This will slow the rise in housing costs so that more ordinary working families can afford to buy a home and it will also bring the cost of renting down. We need more land for homes where people want to live. All areas therefore need a plan to deal with the housing pressures they face.
- 1.4.9 Currently, over 40 per cent of local planning authorities do not have a plan that meets the projected growth in households in their area. All local authorities should therefore develop an up-to-date plan with their communities that meets their housing requirement based upon an honest assessment of the need for new homes.
- 1.4.10 Local planning authorities have a responsibility to do all that they can to meet their housing requirements, even though not every area may be able to do so in full. The identified housing
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requirement should be accommodated in the Local Plan, unless there are policies elsewhere in the National Planning Policy Framework that provide strong reasons for restricting development, or the adverse impacts of meeting this requirement would significantly and demonstrably outweigh the benefits. Where an authority has demonstrated that it is unable to meet all of its housing requirement, it must be able to work constructively with neighbouring authorities to ensure the remainder is met.

- 1.4.11 Plans should be reviewed regularly, and are likely to require updating in whole or in part at least every five years. An authority will also need to update their plan if their existing housing target can no longer be justified against their objectively assessed housing requirement.
- 1.4.12 Policies in Local Plans should also allow a good mix of sites to come forward for development, so that there is choice for consumers, places can grow in ways that are sustainable, and there are opportunities for a diverse construction sector including opportunities for SME housebuilders to deliver much needed housing.
- 1.4.13 In terms of rural areas, the Government expects local planning authorities to identify opportunities for villages to thrive, especially where this would support services and help meet the need to provide homes for local people who currently find it hard to live where they grew up. It is clear that improving the availability and affordability of homes in rural areas is vital for sustaining rural communities, alongside action to support jobs and services. There are opportunities to go further to support a good mix of sites and meet rural housing needs, especially where scope exists to expand settlements in a way which is sustainable and helps provide homes for local people. This is especially important in those rural areas where a high demand for homes makes the cost of housing a particular challenge for local people.
- 1.4.14 Finally, the Government have made it clear through the White Paper that local planning authorities are expected to have clear policies for addressing the housing requirements of groups with particular needs, such as older and disabled people.
- 1.4.15 The White Paper is the cornerstone of future Government policy on fixing the broken housing market. It provides the direction of travel the Government is intending to take and is a clear statement of intent that this Government is serious about the provision of the right number of houses in the right places. The Local Plan therefore needs to consider these policy intentions now in order to ensure that it fulfils the Government's agenda and provides the homes that its local communities need.
- 1.4.16 Following the election, Sajid Javid re-iterated the Government's intentions for boosting housing growth stating that he wants areas that have benefitted from soaring property prices to play their role in solving the housing crisis. Mr Javid pointed out that where property prices were particularly unaffordable, local leaders would need to take a long, hard and honest look to see if they are planning for the right number of homes.
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1.4.17 Consultation on the new proposed standardised methodology for calculating housing need took place in late 2017. The Council will therefore need to consider the implications of this consultation going forward.

1.4.18 More recently, in October 2017, the Prime Minister reaffirmed the Government's commitment to addressing the broken housing market by bringing forward measures to boost home ownership and housing supply, stating:

"I will dedicate my premiership to fixing this problem – to restoring hope. To renewing the British Dream for a new generation of people. And that means fixing our broken housing market."

"For 30 or 40 years we simply haven't built enough homes. As a result, prices have risen so much that the average home now costs almost 8 times average earnings. And that's been a disaster for young people in particular."

1.4.19 Furthermore, in a message to housebuilders, the Prime Minister indicated that:

"We, the government, will make sure the land is available. We'll make sure our young people have the skills you need. In return, you must do your duty to Britain and build the homes our country needs."

1.4.20 The Autumn Budget 2017 brought further details of the Government's commitment to building a Britain that is 'fit for the future'. A prominent feature of this is tackling the housing crisis, with housebuilding featuring prominently amongst the Chancellor's announcements, which included further confirmation that:

"The Government is determined to fix the broken housing market, and restore the dream of home ownership for a new generation."

1.4.21 The affordability of housing for young people is a key challenge for the Government, and whilst it is recognised that there is no 'single magic bullet' to solve the housing crisis, the Government is actively seeking to tackle obstacles standing in the way of first-time buyers. The Government sees a 'big step up' in new house building as an important element in its strategy to address the acute affordability problem and has set a goal to build 300,000 homes a year by the mid-2020s.

1.4.22 The vital importance of housing to the economic success of our cities and regions is also highlighted in the Government White Paper *"Industrial Strategy: building a Britain fit for the Future"*, which was published in November 2017. This includes reference to the introduction of planning reforms that will ensure more land is available for housing, and that better use is made of underused land in our cities and towns. It also sets out the challenge to raise housing supply to 300,000 per year before the end of the current Parliament. The Government wants to support places with ambitious and innovative plans to build additional homes where they are needed, and those which will support wider economic growth. Furthermore, the Government wants to support greater collaboration between councils, a more strategic approach to the planning of housing and infrastructure, more

innovation and high quality design in new homes and the creation of the right conditions for new private investment.

2 DUTY TO COOPERATE

- 2.1.1 The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act, 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. As demonstrated through the outcome of the 2012 Coventry Core Strategy Examination and the 2013 Mid Sussex Core Strategy Examination, if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non adoption of the Plan.
- 2.1.2 Whilst Gladman recognise that the Duty to Cooperate is a process of ongoing engagement and collaboration as set out in the PPG, it is clear that it is intended to produce effective policies on cross boundary strategic matters. In this regard, the Craven Local Plan must be able to demonstrate that it has engaged and worked with neighbouring authorities, especially South Lakeland, Richmondshire and the YDNP Authority, alongside their existing joint working arrangements, to satisfactorily address cross boundary strategic issues and the requirement to meet any unmet housing needs. This is not simply an issue of consultation but a question of effective cooperation.
- 2.1.3 Further, the PPG reflects on the public bodies which are subject to the duty to cooperate. It contains a list of the prescribed bodies. The PPG then goes on to state that:
- “These bodies play a key role in delivering local aspirations, and cooperation between them and local planning authorities is vital to make Local Plans as effective as possible on strategic cross boundary matters.”*
- 2.1.4 The Government proposes that all Councils will have a Statement of Common Ground (its draft form in place in six months) in place twelve months from the publication of the revised NPPF (anticipated in 2018). If any Statements of Common Ground are prepared, Gladman Developments may wish to submit further comments on the Council’s legal compliance with the Duty.
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3 VISION AND OBJECTIVES

3.1 Vision

3.1.1 The vision for Craven in 2032 is set out at section 3 of the publication version of the Local Plan. Gladman are pleased to note that the vision continues in a positive manner and seeks to provide for economic growth and housing to meet the full needs of the district.

3.2 Plan Period

3.2.1 Paragraphs 1.1 and 1.8 clearly set out that the plan period of the document is 2012 to 2032. Gladman have previously expressed concerns with this plan period, with a delay in preparation meaning that it is now impossible that a 15-year time horizon, post adoption can be achieved.

3.2.2 Paragraph 157 of the NPPF states that crucially, Local Plans should;

“be drawn up over an appropriate time scale, preferably 15-year time horizon, take account of longer term requirements, and be kept up to date.”

3.2.3 In line with this, Gladman suggest that the Council consider further, extending the plan period to conform with this guidance.

4 PLAN POLICIES

4.1 Draft Policy SD1: The Presumption In Favour Of Sustainable Development

4.1.1 Gladman are fully supportive of the inclusion of the policy on Sustainable Development. The ethos of sustainable development is key to assessing planning proposals, it is the golden thread running through the NPPF.

4.2 Draft Policy SP1: Meeting Housing Need

4.2.1 The submission version of the Craven Local Plan sets out a minimum provision of 4,600 additional dwellings between 2012 and 2032. The 2017 SHMA update increases the OAN to 242 dwellings per annum, with 206 dwellings attribute to the Craven Local Plan area, and 36 dwellings to the Yorkshire Dales National Park.

4.2.2 The Yorkshire Dales Local Plan was adopted in 2016, it looks to expand the supply of housing to meet a target of 55 new dwellings each year. Gladman note that the Yorkshire Dales Local Plan covers an area beyond the Craven District HMA. We therefore consider that it is not clear how much of the OAN from Craven will be provided for within the National Park, and note that this is not covered by the MoU or the Duty to Cooperate Statement provided in the evidence base. Therefore, it is not evident whether the OAN is being met in full or not.

4.2.3 Gladman are pleased that the proposed housing requirement is expressed as a 'minimum provision'.

4.2.4 Whilst it is noted that further to the pre-submission consultation, the updated SHMA has given consideration to alterations to headship rates, Gladman still consider that the OAN and housing requirement set out at draft Policy SP1 is too low. We continue to suggest that it is appropriate to apply a market signals uplift and that a figure closer to 280 dpa would be considered appropriate for the Craven Local Plan Area. Gladman consider that a higher housing figure would assist the Council in dealing with the increasing need for affordable housing in line with guidance.

4.2.5 This policy is therefore not considered to be sound, as it is not considered to be positively prepared, justified or consistent with national policy.

4.3 Draft Policy SP3: Housing Mix and Density

4.3.1 Draft Policy SP3 relates to housing mix and density and sets out two requirements that residential development proposals will normally be expected to adhere to. Whilst Gladman are pleased to note that in line with our previous recommendations, the policy has been amended to increase flexibility, we still consider that it details an overly prescriptive mix of house types.

- 4.3.2 Gladman continues to recommend a more flexible approach is taken regarding housing mix which, whilst taking account of the SHMA findings, is also mindful that needs and demand will vary from area to area and site to site and that the need to provide evidence for each and every variation to this very specific mix is likely to delay development and may reduce the deliverability of sites.
- 4.3.3 In respect of the indicative housing density that is set out, Gladman continue to believe that a further element of flexibility should be built into the policy. Gladman support an approach which does not set a rigid density requirement, but rather seeks to encourage higher densities in certain locations, such as Skipton. This will enable sites to be designed to a density which is appropriate and responds to any site specific features or reflects the densities within the locality. Such a flexible approach is supported as it allows for housing density to be considered on a site by site and settlement by settlement basis.
- 4.3.4 This policy is not considered to be sound, as it is not considered to be effective or justified.

4.4 Draft Policy SP4: Spatial Strategy and Housing Growth

- 4.4.1 Draft Policy SP4 sets out the housing strategy, specifically providing details regarding the spatial approach to the delivery of housing across the district. The largest proportion of the annual requirement (50%) goes to the principle town of Skipton. The Key Service Centres of Settle and Low/High Bentham are each allocated 10.9% of the growth target, with the remainder distributed to lower order settlements.
- 4.4.2 Gladman consider that it is appropriate that development is focussed upon the main settlements of Skipton, Settle and Low/High Bentham, as these represent the most sustainable locations for growth. The Council should recognise that directing further growth to Craven's Local Service Centres and Villages will result in a number of benefits for their ongoing vibrancy. Gladman are disappointed to note that from the pre-submission version to the submission version of the Craven Local Plan, the Council seeks to direct increased growth to the Key Service Centres of Settle and Low/High Bentham, and as such reduces the growth to the Local Service Centres and Villages.
- 4.4.3 Gladman are however supportive of amendments to this policy wording to clearly acknowledge that the growth figures are provided as a guide only. We again suggest that the policy wording ought to be further amended to make it clear that the distribution of housing to each settlement is represented as a figure. This will bring the policy in line with the wording of draft Policy SP1 and will ensure that any confusion and inconsistency between the two policies is avoided.
- 4.4.4 Further, if the proportions of development, that are set out within the policy, are rigidly applied, there is a very real chance that sustainable development opportunities, in accordance with draft Policy H1, might be prevented from coming forward.
- 4.4.5 Gladman therefore continue to recommend that the wording of the policy and the associated table is amended to reflect that the figures provided are only considered as guidelines.
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4.5 Draft Policy ENV2: Heritage

4.5.1 Gladman are pleased to note that further to our comments on the pre-submission version of the Craven Local Plan, the Council have sought to amend the policy to reflect the guidance set out in the Framework at paragraphs 126-141.

4.6 Draft Policy ENV3: Good Design

4.6.1 Draft Policy ENV3 sets out a list of objectives/principles and states that development proposals should be approved if they meet these. In this case these relate to designing a good quality place. Gladman are disappointed to note that our concerns expressed during the last round of consultation have not been resolved.

4.6.2 In relation to these design policies Gladman refer to paragraphs 59 and 60 of the Framework. Specifically, paragraph 59 which states:

“Design policies should avoid unnecessary prescription or detail and should concentrate on the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally.”

4.6.3 Whilst Gladman recognise the importance of high quality design, planning policies should not be overly prescriptive and need flexibility in order for schemes to respond to site specifics and the character of the local area. There will not be a ‘one size fits all’ solution in relation to design and sites should be considered on a site by site basis with consideration given to various design principles/objectives.

4.7 Draft Policy ENV4: Biodiversity

4.7.1 Draft Policy ENV4 sets out the Council’s proposed approach to achieving improvements in Biodiversity.

4.7.2 Paragraph 113 of the Framework refers to the need for criteria based policies in relation to proposals affecting protected wildlife or geodiversity sites or landscape areas, and that protection should be commensurate with their status which gives appropriate weight to their importance and contributions to wider networks. Whilst it is noted that statutory bodies, including Natural England have not expressed any concerns regarding the working of ENV4, as currently drafted, Gladman do not believe this policy aligns with the Framework. The policy fails to make a distinction and recognise that there are two separate balancing exercises which need to be undertaken for national and local designated sites and their settings. We therefore suggest that the policy is revisited to ensure that it is consistent with the approach set out within the Framework.

4.8 Draft Policy ENV10: Local Green Space

4.8.1 Draft Policy ENV10 seeks to designate 32 parcels of land as Local Green Space. Gladman are encouraged that the criteria for designating a Local Green Spaces generally accord with the guidance set out at Paragraph 76 and Paragraph 77 of the Framework.

4.8.2 Once again Gladman remind the Council that the Framework makes clear at Paragraph 76 that designation of land as LGS should be consistent with the local planning of sustainable development for the area. Paragraph 76 states that:

'Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances. Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period.'

4.8.3 Further guidance is provided at Paragraph 77 which sets out three tests that must be met for the designation of Local Green Spaces. Paragraph 77 states that:

'The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:

- Where the green space is in reasonably close proximity to the community it serves;*
- Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreation value (including as a playing field), tranquillity or richness of its wildlife; and*
- Where the green area concerned is local in character and is not an extensive tract of land.'*

4.9 Draft Policy H2: Affordable Housing

4.9.1 Draft Policy H2 sets out the affordable housing policy for the Craven District and proposes that on development sites of 11 or more homes, the Council will seek a minimum of 30% of homes for affordable housing.

4.9.2 Gladman acknowledges the amendment to the policy to reduce the affordable housing target from 40% to 30%. We are however concerned that the flexible approach taken in the previous version of the plan regarding viability and the delivery of affordable housing has to some extent been lost from the policy. We wish to express particular concerns in relation to the language used in the policy and specifically the reference to 'exceptional circumstances'. We consider that it would be more

appropriate to refer to the viability of development, as this is most likely to be the reason for the need to reduce the provision of affordable housing.

5 CONCLUSIONS

5.1 General Comments

5.1.1 Having considered the submission version of the Craven Local Plan, Gladman are concerned about a range of matters including the housing requirement as well as several of the detailed development. The plan must be positively prepared, effective, justified and consistent with national policy to be found sound at examination. In the first instance the Council must start with clearly defining and NPPF and PPG compliant OAN by developing an unconstrained requirement which properly follows the guidelines as set out at the national level.

5.1.2 Careful consideration also needs to be given to the spatial strategy that forms the basis of the spatial distribution of growth across the district. It is important that all sustainable settlements should be allowed to play their part in meeting their own housing and employment needs as well as contributing to the wider district requirement. A flexible approach to delivering the development needs of the district will ensure the plan's ultimate success.

5.2 Test of soundness

5.2.1 GDL reiterate the importance of the tests of soundness when progressing with the Craven Local Plan. The Framework sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order for the Craven Local Plan to be sound it is fundamental that it is:

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

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

Publication Stage Representation Form

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

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

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

Please return completed forms to:

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

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

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

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

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	████
First Name:	████
Last Name:	████
Job Title (where relevant):	Senior Policy Researcher
Organisation (where relevant):	Gladman Developments
Address 1:	Gladman House
Address 2:	Alexandria Way
Address 3:	Congleton

Address 4:	
Postcode:	CW12 1LB
Telephone:	██████████
Email:	████████████████████

Section 2: Agent Details

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

Agent name:	
Address:	
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:	Gladman Developments
To which part of the Local Plan does this representation relate?	
Section and Paragraph	See attached representation.
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		X
2. Sound		X
3. In Compliance with the Duty to Cooperate		X

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.

See attached representation.

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

Section 6: Proposed Modifications to the local plan

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

See attached representation

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

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

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

Section 7: Participation at the Examination

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (please select one answer with a tick)	
Yes, I wish to participate at the oral examination	X
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:	
See attached representation	


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	A
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	13/02/2018

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

