

From: [REDACTED]
To: [Local Dev. Framework](#)
Cc: [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]
Subject: Craven Local Plan 2012-2020 (outside Yorkshire Dales National Park) - Bentham HB024
Date: 13 February 2018 15:37:45
Attachments: [Craven Local Plan - Publication Stage Representation Form.pdf](#)

Good afternoon

Please find attached the Publication Stage Representation Form duly completed in respect of Bentham site HB024.

I would be grateful if you could please acknowledge receipt.

Kind regards

[REDACTED]
PA to Directors

Edwardson Associates Ltd
Paddock House
10 Middle Street South
Driffield
YO25 6PT

Tel: [REDACTED]

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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 :	██████████ c/o Agent
First Name:	██████████
Last Name:	██████████
Job Title (where relevant):	Chartered Surveyor
Organisation (where relevant):	Edwardson Associates Ltd
Address 1:	Paddock House
Address 2:	10 Middle Street South
Address 3:	Driffield

Address 4:	
Postcode:	YO25 6PT
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:	██████████ - Edwardson Associates LTD
Address:	Paddock House 10 Middle Street South Driffield YO25 6PT
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:	
To which part of the Local Plan does this representation relate?	
Section and Paragraph	
Policy	Draft Policy SP7: Strategy for Bentham – Tier 2
Policies Map	Bentham – Inset Map 5

Section 4: Legal Compliance & Duty to Cooperate

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

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.

We support the allocation of this land for housing under HB024. The land is both deliverable and available for housing development.

It is confirmed that the development principles outline in the proposed policy is deliverable.

- Access for emergency vehicles to access the adjoining site HB052 can be made available and is subject to discussions with the landowner – however, in principle this is possible.
- The PROW through the site can be protected as suggested.
- Any development of the site can be carefully and sensitively designed to minimise visual impact on the character and appearance of the area.
- The design will take into account the Forest of Bowland AONB.

Please also see attached response submitted during the June-July 2017 consultation in relation to Policy H2 and this specific site.

Comments have also been submitted in relation to Table 6 – Settlement Hierarchy. Also attached.

(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.

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

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

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

Section 7: Participation at the Examination

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (please select one answer with a tick)	
Yes, I wish to participate at the oral examination	Yes
No, I do not wish to participate at the oral examination	
If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:	
We consider this is necessary to ensure the site is considered fully. The site also needs to be considered alongside Site HB052 and we consider these should be considered together if required.	

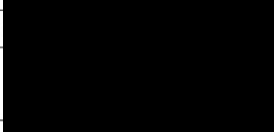
Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Section 8: Being Kept Informed

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

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

Section 9: Signature & Date of Representation

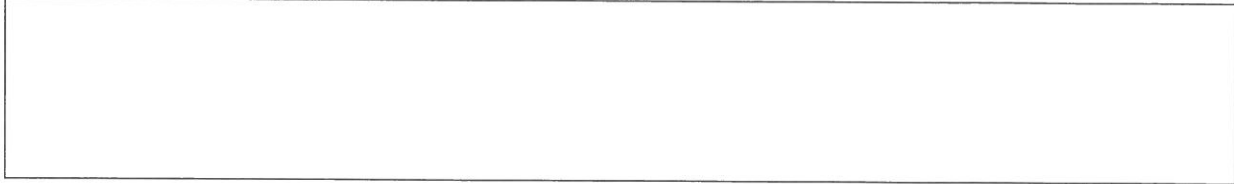
Please sign and date below:	
Signature	
Date	13.2.18

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.**

Craven Local Plan – third draft (19/6/17)

Informal consultation on draft local plan documents: Monday 19th June to Monday 31st July 2017



Comments Form

Craven District Council invites you to respond to the consultation in whichever format you find best. However, we would encourage you to use this comments form, which we have prepared, because it will help us to record, analyse and acknowledge everyone's comments more quickly and efficiently.

Name & address (email or postal):

Please return completed forms to localplan@cravencd.gov.uk or Planning Policy Team, Craven District Council, 1 Belle Vue Square, Skipton, BD23 1FJ, no later than 31/7/2017

Document name (draft local plan, policies map, infrastructure plan)	Subject of the comment (paragraph/policy/map/site reference number)	Nature of the comment (object, support, other)	Detail of the comment (concise and constructive criticism/support/information)									
Pre-Publication Draft Craven Local Plan Draft Policy SP4	4.47 The settlements included in the settlement hierarchy are presented in Table 6 below: <table border="1"> <thead> <tr> <th>Table 6 – Settlement Hierarchy</th> <th>Role and Function</th> <th>Settlement</th> </tr> </thead> <tbody> <tr> <td>Tier 1</td> <td>Principal Town Service Centre</td> <td>Skipton</td> </tr> <tr> <td>2</td> <td>Key Service Centres</td> <td>High and Low Bentham, Settle</td> </tr> </tbody> </table>	Table 6 – Settlement Hierarchy	Role and Function	Settlement	Tier 1	Principal Town Service Centre	Skipton	2	Key Service Centres	High and Low Bentham, Settle	Support Other	The inclusion of High and Low Bentham as a Key Service Centre is fully supported. It is acknowledged that Skipton is the largest Town and therefore a Tier 1 Principal Town. We do feel that a 50% distribution of housing to Skipton is too heavily weighted – when compared to a 10.5 % distribution to Settle and High and Low Bentham. This distribution should be spread more evenly with a higher distribution to both Settle and Bentham.
Table 6 – Settlement Hierarchy	Role and Function	Settlement										
Tier 1	Principal Town Service Centre	Skipton										
2	Key Service Centres	High and Low Bentham, Settle										

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	HB024 – Land North of Lakeber Drive, High Bentham	Support	<p>The allocation of this land for residential development is fully supported.</p> <p>It is confirmed that the land is deliverable and developable without any major constraints. There are no access or ownership constraints which could affect delivery of this site for housing.</p> <p>The land is accessed via Lakeber Drive and is located within an existing residential area and therefore considered a suitable area for further residential development.</p> <p>Although the site is crossed by a public footpath (the western boundary)– it is accepted that an appropriate design will successfully incorporate this within the development.</p> <p>It is also accepted that the allocation of this site will benefit adjoining proposed allocations HB052 and HB044 by providing a potential link.</p> <p>The site is very well screened currently – but it is accepted that further and careful consideration of design and layout will consider the character and appearance of the area. The site is screened from the East, South and West by existing residential development.</p> <p>This site forms a natural rounding off to an existing residential area.</p> <p>The site is located within Flood Zone 1.</p> <p>Development of this site for residential use will form a natural rounding off to the Lakeber Drive area and provide a natural infill area between Robin Lane and Lakeber Drive without sprawling into the open countryside unnecessarily.</p> <p>An existing pedestrian access onto Robin Lane is also retained so that the site is also well connected to this area.</p> <p>The site is sustainably well located and benefits from close connections to</p>

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			<p>existing services and facilities within High Bentham. It is well related to existing services.</p> <p>There are no known heritage assets within close proximity and no recorded Listed Buildings. There are no known Scheduled Ancient Monuments within the land.</p>
	<p>The local planning authority will seek to secure 40% of proposed new dwellings as affordable housing, unless the proposed development is for less than 11 dwellings and does not exceed 1000m2 combined gross floorspace. Where application of the normal 40% target generates a requirement for a whole number of affordable dwellings plus a fraction of an affordable dwelling, the local planning authority will seek on-site provision of the whole number plus a financial contribution for the fraction.</p> <p>d) In designated rural areas, the local planning authority will seek to secure a financial contribution, in lieu of 40% on-site affordable housing provision, from developments of 6 to 10 dwellings and from developments of less than 6 dwellings but more than 1000m2 combined gross</p>	<p>Object</p>	<p>We object to the blanket proposal of a 40% affordable housing across the Local Plan area.</p> <p>Other Local Planning authorities which have been through the Local Plan process have assessed the market and applied a percentage of affordable housing requirements dependent on house values in that particular area.</p> <p>This has been considered a more realistic approach to the delivery of affordable housing.</p> <p>It is evident that house prices vary significantly between different settlements with the Craven District area – and the Affordable housing policy should be tailored to accommodate this.</p> <p>In lower value areas, the affordable housing contributions should vary accordingly (and this has been done in other Local Authority Areas) to include 5%-30% affordable housing provision. This in itself is subject to viability.</p> <p>Many other Local Planning authorities have reduced a previous blanket 40% affordable contribution approach to between 5%-30% and this has successfully delivered affordable housing in areas where development was deemed unviable by a 40% contribution.</p> <p>We object to a 40% affordable housing requirement across the Craven District area to developments of more than 10 dwellings or 1000 sq m combined gross floor space. We request that this policy is adjusted to reflect</p>

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	floorspace.		<p>house values in each area and the 5% - 30% requirement is considered. Developers (and in particular regional and national house builders) will otherwise be attracted to alternative Local Authority areas where the requirement is considerably lower.</p> <p>Other local planning authorities have accepted that it is critical that they work and negotiate with housebuilders to achieve the maximum number of affordable dwellings that is reasonable and practicable for individual development sites.</p> <p>For example, an area where house prices are significantly lower a Local Planning Authority has a 5% requirement for affordable housing.</p> <p>In another area, which is the highest value area, a 25% contribution is required.</p> <p>We strongly urge Craven DC to review the proposal which will in turn attract developers to the area and provide realistic affordable housing delivery during the plan period.</p>

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