

From: [REDACTED]
To: [Local Dev. Framework](#); [Local Dev. Framework](#)
Subject: FW: Representation to Publication Local Plan.
Date: 26 January 2018 11:02:50
Attachments: [image001.png](#)
[image004.png](#)
[image005.jpg](#)
[Publication Local Plan representation - \[REDACTED\].pdf](#)

Hello Planning Policy,

Please find attached a representation to the plan sent on behalf of my client [REDACTED].

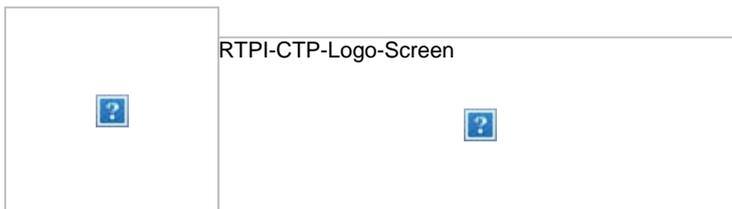
By the way the reply form to make representations states to email 'localplans@cravendc.gov.uk'.

That email address doesn't work! It just bounced back to me. I think it should state 'localplan' and not 'localplans'.

Thanks,

[REDACTED]

[REDACTED] MRTPI
Principal Planner
WBW Surveyors Ltd



WBW Surveyors Ltd
Skipton Auction Mart
Gargrave Road
Skipton
BD23 1UD

Tel: [REDACTED]
Fax: [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.

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: localplans@cravencd.gov.uk

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

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

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	■
First Name:	■■■■
Last Name:	■
Job Title (where relevant):	
Organisation (where relevant):	
Address 1:	■■■■■■■■■■
Address 2:	■■■■■
Address 3:	■■■■■■■■

Address 4:	
Postcode:	██████
Telephone:	
Email:	████████████████

Section 2: Agent Details

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

Agent name:	██████ Ba (Hons) BTP MRTPI
Address:	WBW Surveyors Skipton Auction Mart Gargrave Road Skipton North Yorkshire BD23 1UD
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	ENV10 – Specifically the inclusion of site ‘CA-LGS6 - North of Vicars Row, Carleton’ within that policy.
Policies Map	The inclusion of site CA-LGS6 on the 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		✓ Object
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.

The land identified as site CA-LGS6 on the proposals map and by policy ENV10 should not be designated as Local Green Space.

In December 2017, the Council published its Local Green Space Assessment. This document sets out the methodology that the Council has used to decide on whether to designate land as Local Green Space. Application of the Council’s own methodology would suggest that this site should not be designated as Local Green Space.

It is accepted that the site passes Test 1 and Test 2 of the Council’s methodology. Test 1 seeks to ensure a site is reasonably close to the community it serves (which it is), and Test 2 looks to ensure that the site is local in character and not an extensive tract of land (it is not).

Test 3 is not however passed. The test assesses the significance or value of the land to the local community. The outcome of the Council’s Assessment of the value of site CA-LGS6 (as assessed against Test 3) is quoted below: -

‘The submitted site provides some contribution towards the character and appearance of the area, as identified within the Conservation Area Appraisal.

Information obtained from the Ecological Data Centre indicates that this site is not significantly rich in wildlife. (below established species threshold).

It is considered that this site is valued for its beauty as it provides an area of openness in the centre of the settlement.

CPRE Tranquillity maps identify areas in red as having the lowest tranquillity scores and areas in green the highest. This site is identified as orange.'

The croft that comprises part of CA-LGS6 is enclosed on all sides by existing development, principally residential dwellings. Public views into and out of the site are essentially not available, or at best extremely limited. Furthermore, planning permission has recently been given for a new dwelling on the eastern side of the croft (Planning Ref. 2017/18190/FUL). This new dwelling will further obscure any public views that are available into the croft.

It is recognised that the occupants of dwellings that enclose the field currently enjoy uninterrupted views across the land owners well maintained croft. However, the purpose of the planning system is to protect public amenity and not the private views and vistas of individual interests. In terms of the public amenity benefits that the croft provides its contribution is extremely minimal.

The croft is identified in Carleton's Conservation Area Character Appraisal as an area of open space that makes 'some contribution' to the character and appearance of the area. The appraisal identifies the vast majority of all other open space in and around Carleton as making a more significant 'strong contribution' to the character and appearance of the area. Limited value is given to the croft in the Conservation Area Appraisal compared to the majority of other land in and around the village. This limited value is presumably due to the limited public views of the site, and therefore the limited contribution to public amenity that it provides.

The benefits of designating the site, as stated by the Council in terms of the contribution to the Conservation Area and the fact that it is valued for its natural beauty, are wrong. Due to its very limited visibility, the contribution that CA-LGS6 makes to the local community is very minimal.

Furthermore, the Council's Assessment of the value of site CA-LGS6 specifically states that there is no local support for the designation of this site as Local Green Space. The Council's statement that the site is valued for its beauty is not correct. The site is virtually invisible from public viewpoints and there is no evidence of support for its designation as Local Green Space.

Comments are also made in the Council's Assessment that 'the Ecological Data Centre indicates that this site is not significantly rich in wildlife', and that the land does not score highly on CPRE tranquillity maps. These findings are not disputed and are further reasons why the land should be designated as Local Green Space.

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.

The designated Local Green Space site CA-LGS6 should be deleted from the proposals map and the site left as unallocated 'white land'. Policy ENV10 should be amended to delete reference to 'CA-LGS6 North of Vicars Row, Carleton'.

For reasons explained above, this modification is considered necessary to ensure the proposed new Local Plan for Craven is sound / appropriate.

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	26/1/18

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.