

From: [REDACTED]
To: [Local Dev. Framework](#)
Subject: Publication Draft Craven Local Plan: Regulation 19 Draft Document for Consultation
Date: 13 February 2018 15:05:44
Attachments: [180212 Representation from Yorkshire WT SVR.pdf](#)

Attached is a brief comment from Yorkshire Wildlife Trust.

Do get in touch if you need any clarification.

[REDACTED]
Conservation Officer (Planning)

Yorkshire Wildlife Trust

Tel: [REDACTED]

Email: [REDACTED]

Website: www.ywt.org.uk

Volunteer With Us



Yorkshire Wildlife Trust is a company limited by guarantee, registered in England Number 409650.
Registered Charity Number 210807. Registered Office: 1 St George's Place, York, YO24 1GN.

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):	Conservation officer (planning)
Organisation (where relevant):	Yorkshire Wildlife Trust
Address 1:	1 St Georges Place
Address 2:	
Address 3:	York

Address 4:	
Postcode:	YO24 1GN
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:	Yorkshire Wildlife Trust
To which part of the Local Plan does this representation relate?	
Section and Paragraph	Habitat Regulations Assessment overall
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.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 Trust is happy with the contents of the Habitat Regulations Assessment (HRA) and the thorough approach.

The Trust would like to see within the HRA a table showing the development sites which could potentially have an impact on European sites and what avoidance, mitigation or compensation will be provided. The information is to a certain extent present in the text but would benefit from being focused on the individual sites.

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.

Inclusion of a table in the HRA showing allocated sites which may impact on European sites and how this can be avoided, mitigated or compensated for.

Part B

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Section 3

Name or Organisation:	Yorkshire Wildlife Trust
To which part of the Local Plan does this representation relate?	
Section and Paragraph	7.19
Policy	DRAFT POLICY EC4: TOURISM
Policies Map	Inset map number 13

Section 4: Legal Compliance & Duty to Cooperate

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

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The Trust is concerned that the inclusion of a Tourist Development Commitment on land west of Hellifield has potential to have serious impacts on biodiversity and on bird populations which are important for the nearby Long Preston Deeps SSSI. There are outstanding objections and concerns on wildlife and biodiversity grounds to the more recent application on the site 42/2016/17496 including an objection from the Yorkshire Wildlife Trust. It appears that without compensation habitat outside the Hellifield development site there will be impacts on biodiversity which will be contrary to national policy and also in particular Policy EC4 h) III) Conservation of biodiversity value. A Tourist Development Commitment on the land west of Hellifield without policy support for compensation being provided for impacts on biodiversity risks making the plan unsound.

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Revised wording for the inclusion of the Hellifield Tourist Development Commitment area to ensure that if the development should go ahead there will be sufficient compensation habitat provided so that there is no net loss of biodiversity.

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.

	Yes	No
1. Legally Compliant	x	
2. Sound	x	
3. In Compliance with the Duty to Cooperate	x	

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The Trust is pleased to see that policy ENV4 is very comprehensive. The only addition the Trust would like to see would be **an accurate assessment of habitat loss and habitat created in mitigation**. This could be achieved by ensuring that biodiversity offsetting calculations are provided for applications where there will be a loss of habitat. Natural England are consulting on updated recommendations for biodiversity offsetting so these metrics could be included either in the policy or in monitoring mechanisms.

Section 6: Proposed Modifications to the local plan

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Either in Policy ENV4 or in the monitoring plan there should be mention of the use of biodiversity offsetting to ensure that net gain or no net loss of biodiversity occurs.
An addition such as:

“For applications being submitted for more than 10 dwellings we will require an Ecological Constraints and Opportunities Plan (ECOP) and a Balance Sheet or table setting out habitats lost and gained as detailed in the British Standard (BS42020:2013). These ensure that the areas of habitat to be lost, retained or enhanced can be clearly seen on one plan, and can be clearly calculated in one table.

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	x
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 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



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