

**From:** [Bentham Parish Council](#)  
**To:** [Local Dev. Framework](#)  
**Subject:** Representations on draft Local Plan  
**Date:** 12 February 2018 11:28:15  
**Attachments:** [pub-reps-form1\\_2018.docx](#)  
[pub-reps-form2\\_2018.docx](#)  
**Importance:** High

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Please find attached 2 representations on the draft local plan

Please acknowledge receipt of these.

Thank you,



Bentham Town Clerk

# 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 2<sup>nd</sup> January 2018 – Tuesday 13<sup>th</sup> February 2018.

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

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**Representations must be received no later than 5pm on Tuesday 13<sup>th</sup> 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](mailto: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

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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

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### Part A

#### Section 1: Personal Details

|                                |                    |
|--------------------------------|--------------------|
| Title :                        | █                  |
| First Name:                    | █                  |
| Last Name:                     | █                  |
| Job Title (where relevant):    | Town Clerk         |
| Organisation (where relevant): | Bentham Town Clerk |
| Address 1:                     | Bentham Town Hall  |
| Address 2:                     | Station Road       |
| Address 3:                     | Bentham            |
| Address 4:                     | Lancaster          |
| Postcode:                      | LA2 7LH            |

|            |  |
|------------|--|
|            |  |
| 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:   | Bentham Town Council                |
| <b>To which part of the Local Plan does this representation relate?</b> |                                     |
| Section and Paragraph   | Economic Activity & Business Growth |
| Policy  | SP2                                 |
| Policies Map  |                                     |

**Section 4: Legal Compliance & Duty to Cooperate**

|   |     |    |
|---|-----|----|
| <b>Do you consider the Local Plan is: (tick as appropriate)</b> |     |    |
|   | Yes | No |
| 1. Legally Compliant  |     |    |

|   |  |   |
|---|--|---|
| 2. Sound                                    |  | X |
| 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.**

Section 4.19 states 'The delivery of new housing in Craven will also need to be balanced with the approach to facilitating economic growth and providing employment opportunities for residents and entrepreneurs.'

Section 4.24 then shows that the available employment land is some 11-16ha short of the identified requirement.

Looking at the Key Settlement of Bentham, some 14.6ha of housing land is identified with absolutely no provision of employment land. This compares with 10ha housing land and 6.7ha of employment land in Settle and 3.2ha housing land and 2.94ha employment land in Ingleton.

Bearing in mind that employment land should be provided close to housing, then, if Bentham is expected to have 250 new homes during the life of the Local Plan, some employment land should be provided to service these new residents.

Earlier versions of the Local Plan did include employment land in the area but these have now been removed.

To be sustainable new housing needs employment opportunities close by. This Local Plan does not identify sufficient employment land for the housing requirement and fails to provide any employment land in one of its key settlements. Where are the new residents of Bentham expected to find employment when public transport and the road infra structure does not readily support working outside of the area.

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.**

The Local Plan needs to be modified to include the provision of more employment land, specifically to make provision for such within the key settlement of Bentham to support the new residents of the 250 proposed dwellings without them having to leave the area everyday, which is unsustainable

(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

|  |           |
|--|-----------|
| <b>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)</b> |           |
| Yes, I wish to participate at the oral examination   |           |
| No, I do not wish to participate at the oral examination   | <b>No</b> |
| <b>If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:</b>   |           |
|  |           |

**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

|  |            |
|--|------------|
| <b>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)</b> |            |
| Yes, I want to be informed   | <b>Yes</b> |
| 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

|                                    |  |
|------------------------------------|--|
| <b>Please sign and date below:</b> |  |
| Signature                          |  |
| Date                               |  |

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.

|   |                          |
|---|--------------------------|
| <b>If you wish your personal details to be treated in confidence and not published please tick the box below:</b>           |                          |
| I wish to request that the personal details submitted with this representation are treated in confidence and not published. | <input type="checkbox"/> |
| <b>Please explain below, why you have made this request:</b>  |                          |
|   |                          |

**Craven District Council** | 1 Belle Vue Square | Skipton | BD23 1FJ  
 | [www.cravenc.gov.uk](http://www.cravenc.gov.uk)

Planning Policy Team | 01756 706472 | [localplan@cravenc.gov.uk](mailto:localplan@cravenc.gov.uk)



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

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| Last Name:                     | █                  |
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| Organisation (where relevant): | Bentham Town Clerk |
| Address 1:                     | Bentham Town Hall  |
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| Address 4:                     | Lancaster          |
| Postcode:                      | LA2 7LH            |

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| Telephone: | ██████████                               |
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**Part B**

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**Section 3**

|   |                                  |
|---|----------------------------------|
| Name or Organisation:   | Bentham Town Council             |
| <b>To which part of the Local Plan does this representation relate?</b> |                                  |
| Section and Paragraph   | Affordable Housing Provision 6.8 |
| Policy  |                                  |
| Policies Map  |                                  |

**Section 4: Legal Compliance & Duty to Cooperate**

|   |     |    |
|---|-----|----|
| <b>Do you consider the Local Plan is: (tick as appropriate)</b> |     |    |
|   | Yes | No |
| 1. Legally Compliant  |     |    |



|   |  |   |
|---|--|---|
| 2. Sound                                    |  | X |
| 3. In Compliance with the Duty to Cooperate |  |   |

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Draft Policy SP3 on housing mix and density identifies that the suitable housing mix is 39% 1-2 bed properties, 44% 3-bed and 17% 4+ beds.

Paragraph 6.7 states that there is a mis-match between local incomes and the cost of renting or buying in the Local Plan area – meaning that more families are reliant upon some form of affordable housing.

Paragraph 6.8 then suggests that a suitable provision for this housing is 87.4% 1-2 bed and 12.6% 3+ bed properties.

This is unsound.

Bentham has been lucky in the provision of affordable housing in the recent past with the provision of over 40 properties. Unfortunately, the vast majority were built as 2-bed '4-person' houses with only a small percentage of 3 & 4-bed houses.

A 2-bed property is not a 4-person house if the family consists of 2 parents, a son and a daughter. The problem is that young families have a habit of growing! There are now several families in Bentham where the parents sleep on a pull-out sofa bed in the living room every night because their children have the 2 bedrooms. This is not a satisfactory way of living, and the Local Plan needs amending to ensure that more families do not end up in the same trap. Our grandparents grew up with large families living in cramped conditions, our children should not have to.

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)

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The Local Plan needs to be modified to include the provision of a larger proportion of 3+ bedroom affordable homes. The provision of too many small affordable homes traps families in situations that are difficult to escape due to inaffordability of larger private sector properties. The Plan needs to

address this

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|--|-----------|
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| <br><br><br>  |                          |

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