



Craven Local Plan Examination

Matter 21

Statement by Craven District Council

Matter 21 – Green Infrastructure, Local Green Space and Green Wedges (Policies ENV5, ENV10 and ENV13)

Hearing Day 10 – Thursday 25th October 2018 (Week 3)

September 2018

Issue 1 – Green Infrastructure – Policy ENV5

Q1. What is the justification for listing sites under Policy ENV5 and specifying on the Policies Map the extent of green infrastructure required?

Council's Response

1. Justification lies in the Vision for the local plan which plans for new homes “between extensive public open spaces, connecting people to the countryside and creating corridors for wildlife”, and in the Objectives of the local plan, specifically PO2 which aims to “conserve and enhance the high quality local environment including reinforcing the distinctive character of Craven’s towns, villages, green infrastructure, biodiversity, ecological networks and cultural heritage”. Paragraph 114 of the Framework also provides justification for identifying green infrastructure on sites as it states that local plan authorities should “set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure”. Sites listed under Policy ENV5 incorporate areas of green infrastructure and are identified as a way of linking specific site allocations with this strategic policy which aims to increase the green infrastructure network in the district. Green infrastructure has been identified on the policies map for allocated sites in order to create multifunctional areas for one or more uses such as biodiversity, access and linkages with the PROW network, but also to act as mitigation and provide buffer zones for flood risk, landscape, heritage or ecological impacts, and to reduce recreational impacts on the SPA and SAC. These specified areas of green infrastructure on allocated sites also give a greater element of certainty to would be developers, and provide better connections between green areas, specifically around the principal town of Skipton (i.e. the green infrastructure routes on site SK081, SK082, SK108 connect to wider green networks in the town such as Aireville Park to the south and the PROW to the north, which links on to the proposed Local Green Space designation behind Skipton Castle and Woods).

Q2. Does this provide sufficient flexibility to allow allocated sites to come forward at the detailed design stage?

Council's Response

1. Yes, allocated sites will have sufficient flexibility to come forward at the detailed design stage as the areas outside the green infrastructure are large, free from constraints and well connected to the road network. This allows for flexibility in site design and ensures that housing does not encroach on more sensitive areas of the site.

Q3. How were sites considered for inclusion in Policy ENV5? What process did the Council follow?

Council's Response

1. Sites listed under Policy ENV5 incorporate areas of green infrastructure and are identified as a way of linking specific site allocations with this strategic policy which aims to increase the green infrastructure network in the district. Sites were considered for inclusion in policy ENV5 based on whether green infrastructure could perform a multifunctional use and mitigate constraints. The Sustainability Appraisal process (SA004) looked for mitigations for site-specific constraints. Green infrastructure has been identified on allocated sites in order to create multifunctional areas for one or more uses such as biodiversity, access and linkages with the PROW network, but also to act as mitigation and provide buffer zones for flood risk, landscape, heritage or ecological impacts, and to reduce recreational impacts on the SPA and SAC.
2. The process that was followed to identify areas of green infrastructure was through the Sustainability Appraisal process (SA004) which looked for site-specific constraints (such as flood risk, nearby landscape, heritage or ecological assets, and PROWs), and the site policies aimed to mitigate these constraints by affording green infrastructure to these areas. A good example of how the particular characteristics of a site led to the identification of areas of green infrastructure being needed through the SA process is SG025, Land to the south of Ingfield Lane, Settle. This has green infrastructure identified in the western and central sections of the site to take account of nearby heritage assets (grade II listed Falcon Manor Hotel, the undesignated heritage asset of Ingfield Lodge, and the Settle-Carlisle Railway Conservation Area). In addition, a large swathe of green infrastructure to the south and east of the site is identified to take account of the approved 'water meadows' surface water management scheme which deals with surface water flood risk issues in the area; provides opportunities for a net gain in biodiversity, and mitigates impact on the setting of the Yorkshire Dales National Park.

Q4. How were areas of green infrastructure decided? What factors were taken into account in establishing the areas illustrated on the Policies Map?

Council's Response

1. Green infrastructure has been proposed on allocated sites and illustrated on the Policies Map where it could perform a multifunctional use such as achieving net gains in biodiversity and helping to access and link up with the existing PROW network. The Council also checked constraints via the Sustainability Appraisal process (SA004) on or near the site and afforded green infrastructure to these

areas accordingly to act as mitigation and provides buffer zones for flood risk, landscape, heritage or ecological impacts, and to reduce recreational impacts on the SPA and SAC.

Q5. In determining which sites to include in Policy ENV5 how was deliverability and viability considered, especially for sites where large areas of green infrastructure is required?

Council's Response

1. To deliver the housing on sites which are allocated for a combination of housing and green infrastructure, the land identified for green infrastructure will also need to form part of the planning application and be able to be the subject of planning conditions in any approval of planning permission. The identification of green infrastructure on the policies map and the guideline figure for each area of green infrastructure in the site's development principles, plus the contents of Policy ENV5 make it clear where and how much land cannot form part of the sites' net developable area.
2. Land values negotiated between the developer and the landowner should reflect this position for each site. In this respect the viability assessment allows for 75% net to gross costs on land acquisition. Thus where (say) a farmer is selling some land, he will not just sell the developable area but will require the developer to buy *all* of the relevant land parcel - the gross area. AspinallVerdi have applied EUV's to the gross area. AspinallVerdi has then applied a 75% net:gross assumption consider the net values. Thus where EUVs for agricultural land are £10,000 per acre gross in Skipton this equates to £13,333 per acre on the net area (assuming 25% of the land is not developable). Premiums to EUV have been applied in excess of 20x on the *net* EUV. Accordingly there is a buffer for Green Infrastructure.
3. As regards the actual costs of ensuring that the green infrastructure (GI) serves an appropriate purpose in accordance with Policy ENV5, this is very much dependent upon individual sites circumstances. Some of these costs e.g. for amenity open space, have been taken into account in the viability assessment as part of the potential costs in connection with Policy INF3, Sport, Open Space and Recreation. As stated in Appendix 4 to Ec005, £3,151 per unit developer contribution has been taken into account to meet Policy INF3 requirements for sites in Skipton. This has been explicitly included in the Aspinall Verdi appraisals. The majority of the larger GI allocations in the plan are in Skipton.
4. The GI might also seek woodland or tree- planting for screening and/or enhanced biodiversity, it might be appropriate for grazing or could provide for some footpath links and represent amenity open space for the site. Such costs will be small relative to the overall development costs and would be able to be met within the healthy 'buffer' included in the plan's viability assessment (Ec004

and EC005). The AspinallVerdi appraisals include costs such as external works, 'normal abnormalities', contingency etc. and it is anticipated that the costs of GI can be accommodated within these allowances

Q6. Are the sites included in Policy ENV5 justified, effective and consistent with national planning policy?

Council's Response

1. The sites identified in Policy ENV5 are justified, effective and consistent with national planning policy as they have all been subject to Sustainability Appraisal (SA004) and sites that were suitable were put through the residential site selection process (SA005). The policy is clear in its requirements as sites which are expected to deliver green infrastructure are clearly listed. These are then cross referenced in the specific site policies with a corresponding development principle setting out the function and reason for the green infrastructure on site. Sites included in Policy ENV5 are effective as they are all programmed to be delivered over the plan period as set out in the Housing Trajectory 2012 to 2032 (2018 Update for Submission) (SD004). Finally sites included in Policy ENV5 are consistent with national planning policy as paragraph 114 of the Framework states that local plan authorities should "set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure".

Q7. Policy SP6 (Site Ref SG064, Runley Bridge Farm) requires a comprehensive landscaping scheme to filter views of the development from the east and west. Taking this into account, why has no green infrastructure been identified for the site under Policy ENV5?

Council's Response

1. The seventh development principle for site SG064 under policy SP6 requires the inclusion of "a comprehensive landscaping scheme to filter views of the development from east and west. Semi-mature trees will be planted for immediate effect". It is acknowledged however that the provision of such landscaping will have the added benefit of providing a biodiversity function, thereby creating a multifunctional use to this area of the site. As such, the seventh development principle is proposed to be modified to include the need for an area of multifunctional green infrastructure along the eastern and western boundaries of the site which will include a comprehensive landscaping scheme. (Accompanying changes to the policies map, i.e. green infrastructure to accord with the landscaping scheme proposed in the current planning application, ref. 62/2017/18064).

Proposed Modification

Page 88 of the Submission Draft Local Plan: Policy SP6 Site Ref SG064: The seventh development principle of site SG064 to be amended as follows:

“As the site is in a prominent location, development proposals will be carefully and sensitively designed to minimise visual impact on the character and appearance of the area, and include measures to minimise impacts on air quality, noise and light pollution. New proposals will ~~include a~~ incorporate landscape mitigation(s) including areas of green infrastructure along the eastern and western boundaries of the site to provide a comprehensive landscaping scheme to filter views of the development from east and west, and achieve net gains in biodiversity. Semi mature trees will be planted for immediate effect.”

Q8. What is the justification for the extent of green infrastructure proposed at Site Ref SG079 (land north of Town Head Way) under Policy SP6?

Council’s Response

1. Justification for the extent of green infrastructure proposed at site SG079 under policy SP6 lies in the multifunctional uses for this area. It is acknowledged that at present the policy does not expressly set out these multifunctional uses therefore a main modification to the first development principle for site SG079 is proposed. The development principle should make clear that the multifunctional use of the green infrastructure is to provide a buffer to mitigate impacts on the YDNP to the east and the heritage asset of grade II listed Barrel Sykes Farm to the north, and to provide footpath links to railway tunnel footpath to north and the YDNP highway/footpath and PROW to east.

Proposed Modification

Page 84 of the Submission Draft Local Plan: Policy SP6 Site Ref SG079 - The first development principle for Policy SP6, site SG079 to be amended as follows:

“The site is a greenfield site in a prominent location on the edge of Settle. Development proposals for this site will incorporate landscape mitigation(s) including a green infrastructure corridor along the eastern and northern boundaries of the site to mitigate impact on the National Park and the adjacent grade II listed building, Barrel Sykes Farm, and to provide footpath links to railway tunnel footpath to north and the National Park highway/footpath and PROW to east. The layout of the site will be designed to leave gaps through the site from east to west to retain views from the National Park to the Barrel Sykes Farm and the undesignated heritage asset of

Watershed Mill chimney beyond. The layout of the site will also ensure that views from Town Head Way north towards Barrel Sykes Farm and the Watershed Mill chimney are retained.”

Issue 2 – Local Green Space - Policy ENV10

Q1. How were areas of Local Green Space identified on the Policies Map and what process was followed? What evidence-based documents were used to inform this process?

Council’s Response

1. The Council’s Local Green Space Assessment Dec 2017 (Lo002) provides detailed information on how sites were identified and assessed to establish if they were suitable for LGS designation. This is set out in detail in sections 3, 4 and 5 of document Lo002, however a summary is set out below.
2. Sites for consideration as Local Green Space (LGS) were identified for assessment via a ‘call for sites’ process held during 2015 and 2016. The community, including residents, interest groups and Parish Councils were invited to submit applications for sites to be considered for LGS designation and to identify the reasons why the site/s holds a particular importance for the local community. Sites have been assessed against a robust methodology (which was developed following consultation with stakeholders in July 2015) to determine their suitability for designation. In addition sites designated in the 1999 Craven Local Plan as important open space, existing recreation/amenity space and protected road approaches within settlements have been assessed. These sites were identified through consultation for the preparation of the 1999 Local Plan as being valued by local communities. The LGS process for the new Craven Local Plan has reassessed these sites in the same way as sites submitted through the ‘call for sites’ process to consider their suitability for LGS designation.
3. In assessing sites against the requirements of paragraphs 76 & 77 of the NPPF a number of evidence base documents and information were used. In terms of assessing whether sites are reasonably close to the community they serve the Accessible Natural Greenspace Standard ANGSt (Natural England 2010) was used to assess if sites meet this criterion. This standard recommends that everyone, wherever they live, should have an accessible natural greenspace no more than 300m (5 minutes walk). Where potential LGS sites are located more than 300m from the edge of a settlement the site did not meet this test.

4. In assessing sites to establish if they are demonstrably special to the local community and holds particular local significance the following evidence base documents/information were used:

- Historic significance: The assessment of site for LGS designation has been informed by the Council's 2008 and 2016 Conservation Appraisals to establish the contribution a site makes to the Conservation Area.
- Recreational value: The assessment of the site for LGS designation has been informed by the Council's Open Space Assessment, Playing Pitch and Built Facilities Strategies 2016. Advice was also sought from the Council's Sports Development Officer relating to the recreational value of sites.
- Tranquillity: The CPRE tranquillity maps have been used to support the assessment of sites, which classifies land as being in areas of high (coloured yellow to green), mid (coloured orange) or low (coloured red) levels of tranquillity. Sites that fall into an area of high tranquillity (coloured yellow to green on the maps) have been considered as tranquil.
- Richness of wildlife: Information was received from The North & East Yorkshire Ecological Data Centre relating to legally protected species/priority habitats and species/priority habitats identified in both the UK BAP and Craven BAP have been used to assess sites. From this information a threshold of seven species/priority habitats found within a 500m radius from the site was set. This threshold is supported by The North & East Yorkshire Ecological Data Centre. Where seven or more species/priority habitats exist either on or within 500m of the site, it is considered that the site is rich in wildlife.
- Evidence submitted as part of LGS applications received during the call for sites has been reviewed to determine local support for LGS designations.
- Consultation responses on draft policy ENV10: Local Green Spaces and proposed sites included in the April – May 2016 pre-publication draft local Plan has also informed the assessment of LGS sites. Responses were received from residents, town and parish councils, planning consultants, Yorkshire Wildlife Trust, North Yorkshire County Council, Natural England and Historic England.

Q2. Are the Local Green Spaces consistent with paragraphs 76-77 of the Framework which state that such designations 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, recreational 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.**

Council's Response

1. Yes. The council's Local Green Space Assessment Dec 2017 (Lo002) provides detailed information on how sites were assessed against paragraphs 76 & 77 of the Framework. This is set out in detail in section 4 and tables 1 & 2 of document Lo002.
2. In terms of assessing whether the green space is in reasonably close proximity to the community it serves, all sites designated as LGS met the Accessible Natural Greenspace Standard ANGSt (Natural England 2010), which recommends that everyone, wherever they live, should have an accessible natural greenspace no more than 300m (5 minutes walk).
3. Following assessment, which was informed by the evidence base set out in the answer to question 1 above, all sites designated as LGS are considered to be demonstrably special to the local community and hold particular local significance, for example because of its beauty, historic significance, recreational value, tranquillity or richness of wildlife. Sites are considered to be demonstrably special where one or more examples of such local significance exist on the site.
4. In terms of assessing whether the green space is local in character and is not an extensive tract of land the NPPF is clear that the Local Green Space designation should only be used where the land is not an extensive tract of land. National Planning Policy Guidance (NPPG) relating to the designation of LGS consider that extensive tracts of land on the edge of settlements and blanket designation of open countryside are not appropriate. However neither the NPPF nor the NPPG provide a specific definition of what constitutes an extensive tract of land, in terms of size. In line with the guidance that does exist within both the NPPF and the NPPG relating to the designation of LGS, the council consider that extensive tracts of land on the edge of settlements and blanket designation of open countryside are not appropriate. The council expects the size of the area to reasonably relate to the community that it serves and to have clearly defined edges. All sites designated as LGS within the local plan are considered to be local in character and are not extensive tracts of land.
5. Based on the detailed assessment of sites as summarised above and set out in full in section 4 and tables 1 & 2 of document Lo002 the council considers that the Local Green Spaces listed in Policy ENV10 and identified on the Policies Map are consistent with paragraphs 76-77 of the Framework.

Q3. What is the justification for designation EM-LGS11? How has the site area been defined and assessed in the Local Green Space Assessment (Lo002)?

Council's Response

1. Site EM-LGS11 forms part of a larger LGS site (EM-LGS8) submitted to the Council as a LGS application, which covered a larger area of land of 10.519ha in area. The initial assessment of site EM-LGS8 against tests 1 & 2 (set out in section 4 of Lo002) concluded that that site is considered to be an extensive tract of land, as no clear boundaries to the south east of the site, distinguishing the LGS from the surrounding open countryside, were defined. A smaller revised site boundary (site EM-LGS11) was put forward by the applicant to be considered by the Council's Craven Spatial Planning Sub Committee on 30th January 2017. Following assessment of this revised LGS site prior to the Sub - Committee meeting, Planning Policy Officers recommended that it is suitable for LGS designation in the Pre-Publication Craven Local Plan (June 2017). Members of the Sub-Committee approved this recommendation on 6th April 2017 (minute ref. CSP.135).
2. Site EM-LGS11: Fields adjacent to Kirk Lane, Embsay passed tests 1 & 2 (set out in section 4 of Lo002) as it is considered to be reasonably close to the community it serves and is considered to be local in character and not an extensive tract of land, as the site has clear boundaries defined by Kirk Lane to the west and north, the PROW and beck to the east and Low Lane to the south. The site would not be protected by Policy INF3 and has no relevant planning history.
3. In assessing the site area submitted with the LGS application against test 3 (set out in section 4 of Lo002) it was concluded that the site is demonstrably special to the local community as it has historic significance as the majority of the site provides a strong contribution to the character/appearance of the area, as identified within the Embsay Conservation Area Appraisal; it is rich in wildlife as information obtained from the Ecological Data Centres indicates that this site is significantly rich in wildlife (above established species/priority habitats threshold); it is valued for its beauty as it is considered to make a significant contribution to the visual attractiveness of the settlement and plays an important role in defining both the physical form of Eastby and Embsay; and it is valued for its recreational aspects as the site has a PROW running through it and is used by walkers.

Q4. What is the justification for designation HE-LGS5? What evidence is there to indicate that the site is rich in wildlife?

Council's Response

1. Site HE-LGS5: Field Adjacent St. Aiden's Church, Hellifield passed tests 1 & 2 (set out in section 4 of Lo002) as it is considered to be reasonably close to the community it serves and is considered to be local in character and not an extensive tract of land. The site would not be protected by Policy INF3 and has no relevant planning history.

2. In assessing the site area submitted with the LGS application against test 3 (set out in section 4 of Lo002) it was concluded that the site is demonstrably special to the local community as the site is valued in terms of beauty and that it is rich in wildlife. From information received from the North & East Yorkshire Ecological Data Centre relating to legally protected species/priority habitats and species/priority habitats identified in both the UK BAP and Craven BAP, a threshold of seven species/priority habitats found within a 500m radius from the site was set. Eleven species/priority habitats exist either on or within 500m of this site; therefore it is considered that the site is rich in wildlife.

Q5. What is the justification for designation HE-LGS1? Does the site relate to an extensive tract of land for the purposes of the Framework?

Council's Response

1. Site HE-LGS1: Land to the west of Hellifield (Hellifield Flashes), Hellifield passed test 1 as it is considered to be reasonably close to community it serves. The site originally submitted as a LGS application by the community was 41.74ha and comprised an area of land that benefits from planning permission for the construction of Hellifield Rural Environmental Education Centre (outline planning permission 42/2002/2763 and reserved matters approval 42/2005/5082). These planning approvals relate to the entire site (41.74ha); however the proposed built elements of these approvals are not compatible with LGS designation and are therefore excluded from the LGS site. The LGS site is not considered to be an extensive tract of land as it has clearly defined boundaries (A65 on the western boundary, Waterside Lane and the railway line on the northern boundary and Station Road on the eastern boundary). The site is a self-contained area of green space which has special qualities that relate to this defined area, is local in character and reasonably relates to the community of Hellifield. As such the site passed test 2.
2. In assessing the site area against test 3 (set out in section 4 of Lo002) it was concluded that the site is demonstrably special to the local community as the site has historic significance, as the Settle-Carlisle Conservation Area Appraisal 2016 identified the northern part of the site as making a strong contribution to the character and appearance of the Conservation Area. Detailed information submitted as part of the LGS application states that the site is recognised as a significant site for wildlife. Information obtained from the Ecological Data Centre also indicates that the site is rich in wildlife. It is considered by the council that the site is valued for its recreational value (PROW runs through the site) and that the site is tranquil. The LGS application suggests that the site is valued in terms of its beauty.

Q6. What is the justification for designation SG-LGS22? How has the site area been defined and assessed in the Local Green Space Assessment?

Council's Response

1. A LGS application was submitted to the Council by nine members of the community for site SG-LGS22: Glebe Field, Giggleswick. The site area has been defined in these submitted applications. The initial assessment of the site concluded that it is reasonably close to the community and is local in character and is not an extensive tract of land, therefore passing tests 1 & 2 (set out in section 4 of Lo002). The site would not be protected by Policy INF3 and has no relevant planning history.
2. In assessing the site area submitted with the LGS application against test 3 (set out in section 4 of Lo002) it was concluded that the site is demonstrably special to the local community as it has historic significance, as evidenced in the 2008 Giggleswick Conservation Area Appraisal and is rich in wildlife, as indicated from information obtained from the Ecological Data Centre.

Q7. What is the justification for designation CA-LGS6? How has the site area been defined and assessed in the Local Green Space Assessment?

Council's Response

1. Site CA-LGS6: North of Vicars Row, Carleton was designated in the 1999 Craven Local Plan as an Important Open Space under local plan policy BE1. Policy BE1 is not a saved local plan policy (1999), therefore this is why these sites have been reassessed to establish their suitability for LGS designation. Paragraph 3.3 of document Lo002 explains that 108 sites designated as important open space, amenity/recreation areas and protected road approaches in the 1999 adopted Local Plan were assessed to establish their suitability for LGS designation. The site area for CA-LGS6 as defined by the important open space designation in the 1999 Craven Local Plan was assessed. The initial assessment concluded that it is reasonably close to the community, is local in character and is not an extensive tract of land, therefore passing tests 1 & 2 (set out in section 4 of Lo002). The site would not be protected by Policy INF3 and has no relevant planning history.
2. In assessing the site area against test 3 (set out in section 4 of Lo002) it was concluded that the site is demonstrably special to the local community as it has historic significance, as the Carleton Conservation Area Appraisal 2016 (He003) concludes that it provides some contribution towards the character and appearance of the area. It is considered by the council that this site is valued for its beauty as it provides an area of openness in the centre of the settlement, which reinforces the agriculture nature of this part of the village.

Q8. What is the justification for designation SK-LGS64? Does the site relate to an extensive tract of land for the purposes of the Framework?

Council's Response

1. Site SK-LGS64 relates to Land to the north of Skipton (bounded to the north by Skipton Bypass, to the east by Embsay Road & The Bailey; and to the west by Grassington Road). This was not included in the LGS Assessment Jan 2017 and was suggested for LGS designation by the owners of Skipton Castle at the June 2017 pre-pub consultation. The Council agreed with the land owners that the site had potential for LGS designation due to its close proximity and historical linkages to Skipton Castle and Wood. As such the site was assessed against the LGS methodology prior to publication of the local plan.
2. The site passed test 1 as it is considered to be reasonably close to community it serves. Whilst the site, at 75.68ha is a large area of land, it is considered that it is not an extensive tract of land as it has clearly defined edges. It is naturally bordered by Grassington Road, The Bailey, Embsay Road and the A59 by-pass. The site is a Green Natural Gateway from the centre of Skipton to the countryside beyond and encompasses areas of historic significance including Skipton Castle, Skipton Woods (formerly known as the Old Park), Chapel Hill with Battery and the Old Show Field and the adjoining fields. It is also considered that the site as a whole is a unique space of historical importance and beauty. This area is the remnants of the Old Park/ Hunting Grounds dating back to the 1300's, which ran from Skipton Castle to Rylstone in the North and Bolton Abbey in the East. The Council concluded that the various areas of the site were well related therefore not an extensive tract of land for the purposes of LGS designation. As such the site passed test 2.
3. In assessing the site area against test 3 (set out in section 4 of Lo002) it was concluded that the site is demonstrably special to the local community as it has historic significance. The 2008 Skipton Conservation Area Appraisal specifically identified this site as one that enhances the environment and character of the conservation areas, providing key vistas and views over the town. The appraisal specifically identifies the view into the town and identifies this proposed LGS as an existing open and green space that enhances the environment and character of the conservation area. The 2008 appraisal specially mentions Skipton Woods, the grounds of Skipton Castle, and Park Hill with earthworks and Civil War battery. The site is locally significant in terms of its beauty, wildlife and recreation given the existing features on the site, including the SINC, existing designations of protected road approach, existing recreation/amenity space and the Skipton Conservation Area, the existence of PROWs running through the sites, providing links from the town centre, through a wooded area into the wider countryside. In terms of tranquillity, whilst parts of the site are within close

proximity to existing roads these parts cannot be classed as tranquil, however the majority of the site including the area of Skipton Woods provide a tranquil space adjoining the busy town of Skipton.

Q9. What is the justification for designation SK-LGS51 enclosing allocation Ref SK087 – land north of A6131 and south of A65?

Council's Response

1. The area of proposed LGS (SK-LGS51: Existing Road Approach between Harrogate Road & Overdale Grange – Part) together with the housing allocation site SK087 was assessed to establish if the site was suitable for LGS designation. The reason for this is due to the fact that all sites identified as protected road approaches to Skipton in the Craven Local Plan (adopted 1999) under saved local plan policy BE2: Protected Road Approaches to Skipton have been assessed to determine their suitability for LGS designation. The Council's Local Green Space Assessment (December 2017) (Lo002) concluded that part of this protected road approach to Skipton should be designated as LGS as it meets criteria relating to richness of wildlife. The rest of the site is identified as a draft housing allocation (SK087). The area of designated LGS falls outside the housing allocation boundary.
2. The initial LGS assessment concluded that it is reasonably close to the community, is local in character and is not an extensive tract of land, therefore passing tests 1&2 (set out in Section 4 of Lo002). The site would not be protected by Policy INF3 and has no relevant planning history. In assessing the site against test 3 (set out in section 4 of Lo002) it was concluded that the site is demonstrably special to the local community in terms of its wildlife value. The area proposed as LGS would maintain this existing important road approach into Skipton, whilst protecting what is demonstrably special about this site.

Q10. Is Policy ENV10 consistent with paragraph 78 of the Framework which states that local policy for managing development within a Local Green Space should be consistent with policy for Green Belts?

Council's Response

1. Yes. Paragraph 79 of the Framework states '*The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence*'. Policy ENV10 aims to protect sites designated as Local Green Space from incompatible development that would adversely impact on their open character and particular local significance placed on such green areas which make them valued by their local community. The policy states that incompatible development is harmful to areas designated as Local Green Space and should not be approved except in very special circumstances. This approach is

consistent to paragraph 87 of the Framework which states that '*inappropriate is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.*'

2. Policy ENV10 sets out at criteria a) to e), the exceptions to incompatible development within Local Green Spaces. This is consistent to paragraphs 89 and 90 of the Framework which sets out exceptions to construction of new buildings and other forms of development in Green Belt. It is considered therefore that Policy ENV10 is consistent with paragraph 78 of the Framework.

Issue 3 – Green Wedges – Policy ENV13

Q1. What is the justification for Green Wedges between High and Low Bentham, between Glusburn, Crosshills, Sutton-in-Craven, Farnhill and Kildwick and up to the plan boundary near Eastburn?

Council's Response

1. Broad justification is set out in the supporting text for Policy ENV13, at paragraphs 5.108 – 5.112 of the Local Plan. Paragraph 5.108 and Footnote 40 refer to document La010 – 'Review of Green Wedge Designations in Craven (June 2017)', which provides more detailed justification, including an assessment of existing green wedge policy and boundaries, and recommendations for future policy and boundaries.

Q2. How were the Green Wedges identified on the Policies Map and what process was followed? What evidence-based documents were used to inform this process?

Council's Response

2. How the Green Wedges were identified and the process that was followed is set out, firstly, in evidence-based document La010 – 'Review of Green Wedge Designations in Craven (June 2017)', which is referred to in the supporting text for Policy ENV13, at paragraph 5.108 and Footnote 40 of the Local plan. Secondly, the process of taking into account representations with respect to the Green Wedges is set out in document EL1.005c – 'Policy Response Paper to representations on third draft Local Plan (June 2017)'.

Q3. Are the Green Wedges justified, effective and consistent with national policy? Are there any significant factors that indicate that areas of land

should not have been designated?

Council's Response

3. The Green Wedges are justified and effective. Support for their justification and effectiveness is provided by documents La010 – 'Review of Green Wedge Designations in Craven (June 2017)' and EL1.005c – 'Policy Response Paper to representations on third draft Local Plan (June 2017)'. The Green Wedges are also consistent with national policy, as their fundamental objective to restrict coalescence and protect setting is consistent with the core planning principle, at paragraph 17 of the Framework, to recognise the role and character of different areas. This is confirmed by the Planning Inspector in Appeal Decision APP/C2708/W/17/3166843, paragraph 38. The issue of positive and negative factors in the designation of Green Wedges is addressed in the Sustainability Appraisal of Policy ENV13, which can be found in document PD007 – 'Final Sustainability Appraisal Report (March 2018)'. Two options for Policy ENV13 are appraised – one where the Green Wedges are designated and one where they are not. The appraisal indicates that the better option is to designate. The outcome of the Sustainability Appraisal, the process of designating Green Wedges (described in the answer to Q.2, above) and support expressed for the designation (including support in Representations 009 and 017) indicate that all of the designations are justified and sound.

Q4. Policy ENV13 states that development will be resisted where it would compromise the gap between settlements. Is this clear to decision-makers, developers and local communities? Is it consistent with the aims and objectives of the policy which states that Green Wedges will help settlements grow in ways that maintain and reinforce individual character?

Council's Response

4. The statement in Policy ENV13, that development will be resisted where it would compromise the gap between settlements, is also contained in the Council's current Green Wedge policy, which is Policy BE3 of the Craven District Local Plan (1999) (document Ot001). Document La010 – 'Review of Green Wedge Designations in Craven (June 2017)', concludes that Policy BE3 has been clear and effective, and should be taken forward in the replacement Craven Local Plan with only minor modification to bring it up to date. Therefore, the statement carried forward from Policy BE3 should continue to be clear and effective within Policy ENV13. The aim of Green Wedges is not to block the growth of settlements, but to help settlements grow in ways that maintain and reinforce their individual character and identity. Green Wedges serve this aim by directing growth away from locations where development would detract from individual character and identity, i.e.

locations where development would compromise the gap between settlements and promote the coalescence of separate built-up areas.

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

