

From: [REDACTED]
To: [Local Dev. Framework](#)
Subject: Representation to Publication Draft Craven Local Plan
Date: 12 February 2018 10:42:08
Attachments: [image001.png](#)
[Craven LP pub-reps-form - Skipton.pdf](#)
[Site Location Plan - Land north of Gargrave Road and south of A65.jpg](#)

Dear Sirs,

Please see attached representation to the Publication Draft Craven Local Plan (January 2018).

I would be grateful if you could please confirm receipt and keep us informed as the plan progresses to examination.









Yours faithfully,

[REDACTED] BA(hons) DipTP MRTPI
Senior Planning Consultant

YRPS


**Priestpopple, Hexham,
Northumberland, NE46 1PS**

DD: [REDACTED]
Mob: [REDACTED]
Mob: [REDACTED]

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):	
Organisation (where relevant):	TRCPR
Address 1:	c/o YoungsRPS
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:	██████████
Address:	YoungsRPS Priestpopple Hexham Northumberland NE46 1PS
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:	TRCPR
To which part of the Local Plan does this representation relate?	
Section and Paragraph	
Policy	SP5
Policies Map	Inset Map 1

Section 4: Legal Compliance & Duty to Cooperate

Do you consider the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant		
2. Sound		✓
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.

In defining the extent of housing allocation ref. SK081, SK082 & SK108 and the associated Green Infrastructure Provision, the Council has deviated from the recommendations of the background papers to the Publication Draft Craven Local Plan (as detailed below) without providing any justification. Representations submitted on behalf of our client to the Pre-Publication Draft Local Plan (June 2017) raising this issue have failed to be taken into account and there is no response from the Council to our comments in the 'Site Response Papers (January 2018)'.

With reference to the site edged red on the submitted site location plan (previously known as either SK080 or SK080a), a generously sized green infrastructure buffer is designated adjacent to the northern boundary of the east side of the site which evidently, the Council considers to be sufficient to provide biodiversity and landscape mitigation for the YDNP and SINC. Yet on the west side of the site the Council has extended this buffer across the entire field without any explanation as to why this is considered necessary in this particular area.

In the emerging Local Plan background paper titled 'Pool of Site Options with Potential for Residential or Mixed Use and Sustainability Appraisal (April 2016)', the Council states under site reference SK080 that *"The site performs well regarding any flood risk, and the southern portion of the site would seem to be suitable for development"*. The Council therefore acknowledges that the southern part of the site is appropriate for housing development.

In the 'Residential Site Selection Process (June 2017) background paper under site reference SK080a, the Council concludes that *"the northern edge of the site is not suitable for residential development due to the presence of the SINC and also the presence of the adjacent A-road (A65), which would have some noise and air quality impacts from passing traffic. In order to mitigate against the negative effects and pressure development may have on these areas there is an opportunity for the creation of a green infrastructure corridor running adjacent to the northern boundary of the site"*. The Council recognises that Green Infrastructure Provision is only required along the northern boundary of the site, not across the entire site.

In draft Policy SP5, site ref. SK081, SK082 & SK108 is stated as *“a greenfield site in a prominent position on the edge of Skipton, in relatively close proximity to the Yorkshire Dales National Park boundary and a SINC”*, yet the area of land designated as Green Infrastructure Provision on the north west side of the site is perhaps the least prominent area of the whole site.

Any glimpses of this area of land from distance views will be entirely back-clothed by the presence of the Gateway House office building to the south west of the site and therefore if the site was developed for housing there would be no impact on the Yorkshire Dales National Park.

As per our previous representations, we believe the buffer at the depth it is set along on the east side of the site should be continued for the full length of the northern boundary. This will achieve the objectives of providing biodiversity and landscape mitigation for the YDNP and SINC whilst maintaining at least 3 or 4 acres of developable land that could make a worthwhile contribution to the housing land supply in combination with the wider proposed allocation. This is consistent with the Council’s own conclusions when assessing the site as quote above.

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 Green Infrastructure Provision on the northern side of housing allocation Ref. SK081, SK082 & SK108 should be reduced to a buffer strip of a continuous depth along only the northern boundary of the site edged red on the submitted site location plan (previously known as SK080 or SK080a) to allow additional, much need housing to be built on part of this site.

This modification accords with the Council’s own recommendations in background papers to the Publication Draft Craven Local Plan (January 2018) titled ‘Pool of Site Options with Potential for Residential or Mixed Use and Sustainability Appraisal (April 2016)’ and ‘Residential Site Selection Process background paper (June 2017)’ which recognise that the southern part of this site is suitable for development and a green infrastructure corridor is only necessary *“running adjacent to the northern boundary of the site”*.

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	X
If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:	
Our concerns can be addressed through written submissions, unless the Inspector determines otherwise in which event we would wish to be invited to participate.	


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	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	12.02.2018

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"/>
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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.



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SKIPTON

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