

# Craven Local Plan (Draft 5/4/16) Consultation

# Policy Response Papers



The following tables provide a detailed summary of:

- Main issues raised in comments received
- The council's response on each issue
- Whether or not a change needs to be made to the draft plan
- Details of any changes made

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General comments

## Section 1: Introduction Response Paper

April – May 2016 Draft Local Plan

<b>Section 1: Introduction</b>			
<b>Aim of the Section: To explain the role and purpose of the Local Plan, and to introduce the vision, objectives, strategy, proposals, plan period, plan area, other planning documents, duty to cooperate, engagement, collaboration and evidence, sustainability appraisal, neighbourhood plans.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
The plan period (para 1.8) has been extended from 2030 in previous consultation to 2032. Presuming that the plan will be adopted in 2017, this would be a 15 year time horizon. This is consistent with para 157 of the NPPF and is considered appropriate and is supported. There is however a disparity between the plan period and the evidence base, particularly in relation to the OAN. This needs to be addressed prior to submission.	The plan period for the emerging Local Plan is a 20 year period from 2012 until 2032. The Council has commissioned an update to its demographic modelling (based on the most recent 2014 based population projections) and an update to the Strategic Housing Market Assessment (SHMA) for the plan period 2012 to 2032. The plan period and the evidence base period for calculating an up to date OAN will therefore be aligned for the published version of the Local Plan.	No	
Duty to Cooperate: para 1.11 is noted, however the plan is lacking a clear statement on the willingness to cooperate. Stroud Local Plan is given as a good example of how DtC is addressed.	Noted. The next draft of the Local Plan will be accompanied by a Duty to Cooperate statement.	Yes	Change paragraph 1.11 to include cross reference to Duty to Cooperate Statement.
Cross Boundary Housing Issues: It is unclear how the 34 dwellings per annum allocated to the YDNP has been derived. Their submission Local Plan suggests a total housing requirement of 55dpa (21 dwellings over the suggested need emanating from Craven). Given that the YDNP also includes parts of S Lakeland	Noted: This is an evolving Duty to Cooperate issue that will be further influenced by the update to the Council's SHMA, the outcome of the examination into the YDNP Local Plan and further engagement and cooperation with the National Park Authority. The next draft of the	Yes	Changes to section 4 of the Local Plan relating to cross boundary housing issues may be necessary following consideration of the outcome of the updated SHMA, the examination of the YDNP Local Plan and further ongoing cooperation and engagement

<p>and Richmondshire, an additional 21dpa is unlikely to be sufficient to meet the full needs of the national park. The YDNP has not sought to identify its housing requirement on the basis of apportionment as suggested in the consultation document. Likely that this issue will be discussed at the examination into the YDNP Local Plan. It is important that this issue is resolved as if left in its current situation one or both plans risk being found lacking in terms of Duty to Cooperate.</p>	<p>Local Plan will be accompanied by a background Housing Topic Paper which will provide greater clarity on this issue.</p>		<p>with the Yorkshire Dales National Park Authority</p>
<p>Neighbourhood Planning: The draft Local Plan does not seem to be supportive enough of neighbourhood planning. Stroud Local Plan is given as a good example of how Neighbourhood Planning is addressed.</p> <p>Only a few of the larger parishes with greater resources are in the process of developing neighbourhood plans. Is there an opportunity to promote Village Design Statements leading to adoption of SPD so that smaller parishes have some say in how their villages develop?</p>	<p>Following a review of the example of Stroud Local Plan in respect of its approach to Neighbourhood Planning, it is acknowledged that paragraphs 1.15 to 1.21 of the Introduction focus on the detail of the process and procedure of preparing neighbourhood plans and the plan could be improved by providing a simpler and more straightforward statement on the role of neighbourhood plans and their relationship with the Craven local plan.</p> <p>Yes, a Neighbourhood Plan can address whatever issues local communities consider to be important to them , so a Neighbourhood Plan can consist of design policies and guidance similar to a Village Design Statement , if that is what the community wants, which following successful examination, referendum and adoption will form part of the development plan for the area.</p>	<p>Yes</p> <p>No</p>	<p>Replace paragraphs 1.15 to 1.21 with a simpler and more straightforward statement on the role of neighbourhood plans.</p>

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## Section 2: Context Response Paper

April – May 2016 Draft Local Plan

<b>Section 2: Context</b>			
<b>Aim of the Section: To provide some context for Craven, its people and places in 2016 and identified the key issues and challenges facing the area.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
Kildwick is described as a village “with good and frequent public transport connections and are within walking distance of its wider range of services and employment opportunities”. This is not correct as bus services are infrequent, there is no rail station in the immediate area (would need to drive to Cononley or Steeton) and there are no specific cycling routes other than along the canal, which is recreational. Cycling along the main road is dangerous.	Paragraph 2.2 in the context section is providing a strategic overview of settlement patterns throughout the plan area, not a detailed description of individual settlements.	No	
This section should describe the existing infrastructure constraints i.e., highway, Airedale Trunk Sewer, schools, GP surgeries. A specific issue relating to healthcare in Settle has been raised. There should be some awareness of the deliverability of new infrastructure, including viability and likely timescales and what this means for the spatial growth strategy. This would tell the story about the challenges and opportunities	The infrastructure that is required to be delivered over the plan period will be set out in the Infrastructure Delivery Plan (IDP). Policies within the Local Plan aim to deliver the IDP, including specifically draft policy SP12.	Yes	Inclusion of draft policy SP12.

<p>faced today, which sustainable development achieved through the LP should help to address.</p>			
<p>Section 2 rightly highlights transport and communication as a key factor in bringing developments to fruition. Currently housing and business development is held back by poor transport facilities. Access to services is hampered by poor roads and sparse public transport services. The Skipton – Lancaster rail line has spare capacity to allow expansion of existing services. Costs would be modest and may even be covered by additional passenger traffic. This option would be more environmentally friendly than road expansion. Parking provision is already available at most stations except Bentham where a potential site needs to be added to the draft plan.</p> <p>Request that the expansion of rail services on this line be included in the draft Local Plan as a key transport requirement.</p> <p>We are aware that CDC have been in touch with the Community Rail Partnership and the operator Arriva to raise these issues and that extra trains have been promised but at present no concrete timetable for this has been set.</p>	<p>The rail operator Arriva have agreed increased train services between Skipton and Lancaster. This will therefore improve commuting between north western part of the plan area and Lancaster.</p> <p>These agreed improvements to rail services in this area together with the need to make improvements to existing railway stations along this route are identified within the Council’s IDP. The detail of the required improvements would need to be agreed in consultation with NYCC, Network Rail and Arriva.</p>	<p>Yes</p>	<p>The following will be included in para 2.15:  “Improvements to the train services between Skipton and Lancaster have recently been agreed and are included in the Council’s Infrastructure Delivery Plan (IDP) together with the need to make improvements to existing railway stations along this route. “</p>
<p>Para 2.24 could state whether the designations are local or national. NYCC are not aware of any local landscape designations despite what is said about high quality landscape in para 2.25, though there</p>	<p>This section (paras 2.24 – 2.31) provides a context for the local plan relating to the natural and built environment. Draft policies ENV1, ENV2, ENV4 &amp; ENV5 and supporting text provide more specific detail in terms of the</p>	<p>Yes</p>	<p>Amend para 2.24 to read:  “Craven has a unique and outstanding natural and built environment, which is reflected in local, national and international</p>

will be biodiversity ones.	types of local, national and international landscape, biodiversity and heritage designations.		landscape and biodiversity designations together with designated and non- designated heritage assets.”
<p>Para 2.20 – there is not a good public transport link between Bentham &amp; Ingleton.</p> <p>Paras 2.20-2.22 claim either good or frequent public transport connections. Rural bus services have been cut recently and remaining services are not secure. It is not until ENV9 that the limitations of public transport are acknowledged.</p>	<p>Paragraphs 2.18 to 2.22 set out a context for, and general overview of, settlements located in different parts of the plan area, so the description of public transport connections should be viewed in this context. Public transport services (bus and rail) in the rural north and mid areas of the Craven Plan area are comparatively good for more remote and sparsely populated rural areas (between 4-8 daily bus services to and from Settle and Bentham with outlying settlements and access to 2 main rail routes) and in the more densely populated south sub area, access to public transport connections, are not only good to excellent (particularly rail), but frequent. However, it is acknowledged in para 2.16 that in the more remote rural areas of the plan area, bus services face an uncertain future related to social change.</p>	No	
Support for the recognition in paragraph 2.40 that greenfield sites will be required for new development as a key issue to be addressed in the Local Plan.	Support noted	No	
Natural England are pleased to see the positive emphasis on biodiversity, landscape and heritage in paras 2.24 to 2.31	Support noted	No	

<p>Support for the recognition in para 2.40 that one of the key issues identified for the Local Plan relates to the falling resident workforce as a result of the existing housing stock increasingly occupied by 1 or 2 person older/retired households. The reference to the need for new housing to address this issue is also supported.</p>	<p>Support noted</p>	<p>No</p>	
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\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

**Section 3: Sustainable Development**  
**Response Paper to the April – May 2016 Draft Local Plan**

<b>Section 3: Sustainable Development</b>			
<b>Vision for Craven in 2032</b>			
<b>Plan Objectives</b>			
<b>Draft Policy SD1: The Presumption in Favour of Sustainable Development</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
<b>Vision for Craven in 2032</b>			
The vision and objectives are generally welcomed and considered fit for purpose. Paragraph 2 of the vision retains reference to previously developed land being utilised where it is possible and appropriate. Providing this is not interpreted as prioritisation, which would be contrary to paragraph 111 of the NPPF, the HBF raises no concerns.	Support for the Vision and Objectives are noted.  Draft policy ENV7: Land and Air Quality, which specifically addresses the development of brownfield land, has been amended to ensure that the Council’s approach is in line with the NPPF. As such it is considered that the Vision, which states “Most new homes are situated within and around market towns and villages (on previously development land where it has been possible and appropriate)...” is in line with draft policy ENV7.	Yes	With reference to criterion b) of draft policy ENV7, this has been amended to include the word “encouraged” rather than “preferred”.
Overall the Yorkshire Wildlife Trust supports the Vision. However as well as providing wildlife corridors the plan needs to enhance biodiversity within and around developments. A sentence should be added such as “Developments will have enhanced	Support for the Vision is noted.  The plan supports the concept of enhancing biodiversity through development with sensitive landscaping and well-designed SUDs and this is drawn out in draft policy ENV4:	No	



<p>biodiversity with sensitive landscaping and well-designed SUDS”.</p>	<p>Biodiversity criteria a) ii) which aims to avoid the loss of habitats and species by “incorporating beneficial biodiversity features in the design (i.e. through landscaping or SUDS”.</p> <p>It is considered that the purpose of the Vision is to provide an overall picture of Craven in 2032, and not to set out specific policy aims.</p>		
<p>Reference to “most new homes are situated within and around market towns and villages” is welcomed. However reference to this being “on previously developed land where it has been possible and appropriate” needs careful consideration, as this should be seen as encouraging the re-use of previously developed land rather than prioritising (in accordance with paragraph 111 of the NPPF). The vision should be reworded accordingly.</p>	<p>Support for the Vision is noted.</p> <p>It is considered that the following wording in the Vision: “on previously developed land where it has been possible and appropriate” is in line with the amended Draft policy ENV7: Land and Air Quality, which specifically addresses the development of brownfield land. Draft policy ENV7 has been amended to ensure that the Council’s approach is in line with the NPPF, by using the word “encourages” rather than “preferred” with reference to the development of brownfield land.</p> <p>As such it is considered that it is not necessary to reword the Vision as draft policy ENV7 appropriately sets out the Council’s policy approach to the development of brownfield land.</p>	No	<p>[With reference to criterion b) of draft policy ENV7, this has been amended to include the word “encouraged” rather than “preferred”.]</p>
<p>Support for the draft Plan’s Vision Statement for Craven in 2032. The Council acknowledges the importance of new, innovative and diversified employment development within high quality local</p>	<p>Support for the Vision is noted.</p>	Yes	<p>Amend para. 2 of South Area section of the Vision to include reference to Broughton Hall Estate in the list of heritage, cultural and environmental assets for the tourism economy .</p>

<p>environments at Skipton, Gargrave, Cononley and the established Broughton Hall Business Park and their contribution to the prosperity of the local area and the wider regional economic areas. This reference to Broughton Business Park is welcomed.</p> <p>Draft Policy EC4: Tourism, does make specific reference to the importance of Broughton Hall Estate as a key location for tourism development. It is suggested therefore that the South Area section of the Vision Statement also needs to reference Broughton Estate in its list of tourism economy sites.</p>			
<p>The Vision for Craven in 2032, set out on page 24, details that the Market Town of Low and High Bentham will be the focus for most new homes and jobs in the north area of the district. We support this vision.</p>	<p>Support for the Vision is noted.</p>	<p>No</p>	
<p>Natural England welcomes the positive strategy for the natural environment set out in the vision and objectives in line with para 114 of the NPPF which states that Local planning 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. We welcome the references to creating wildlife corridors, access to the countryside and the conservation and enjoyment of landscape and environmental</p>	<p>Support for the Vision is noted.</p>	<p>No</p>	

assets in the vision			
We welcome the reference in the Vision to Skipton being the main focus for growth: “As the largest settlement in the district, Skipton is the main focus for growth in Craven.”	Support for the Vision is noted.	No	
<b>Plan Objectives</b>			
PO2 – “Conserve and enhance the high quality local environment including reinforcing the distinctive character of Cravens towns and villages”. This is impossible to achieve as all developments in our villages remove green areas of open space. We do not need large houses for commuters being built on our village open spaces.	The overarching aim of the local plan is to achieve sustainable development. There are three dimensions to sustainable development : economic, social and environmental. Plan objective PO2 and the other plan objectives, collectively provide a framework for policies in the plan to achieve sustainable development.	No	
PO2 – Biodiversity needs to be mentioned as well as ecological networks. “green infrastructure, biodiversity, ecological networks and cultural heritage”	The inclusion of biodiversity in plan objective PO2 would clarify the connection between this objective and draft policy ENV4 on Biodiversity.	Yes	Amend PO2 to read “Conserve and enhance the high quality local environment including reinforcing the distinctive character of Craven’s towns, village, green infrastructure, <i>biodiversity</i> , ecological networks and cultural heritage.
PO2 – Natural England particularly welcomes the inclusion of green infrastructure and ecological networks in objective PO2.	Support for PO2 is noted.	No	
PO3 – Natural England particularly welcomes the reference to the setting and special qualities of the Forest of Bowland Area of Outstanding Natural Beauty (AONB) and Yorkshire Dales National Park in objective PO3.	Support for PO3 is noted.	No	
No objections to the 10 Plan Objectives and	Support for the Planning Objectives is noted.	No	

<p>particularly welcome PO4 and PO5.  PO4: Maintain a continuous supply of housing land to meet housing needs throughout the plan period.  PO5: Improve housing choice in terms of house type, size, tenure, price and location.</p>			
<p>HBF support for objectives PO4 and PO5.</p>	<p>Support for PO4 and PO5 is noted.</p>	<p>No</p>	
<p>PO8 – The Yorkshire Wildlife Trust suggests the addition of a phrase to consider reducing downstream flood risk as Craven is near the top of some catchments and slowing the flow at higher parts of catchments is very valuable downstream. E.g. water retention, wet woodland planting etc as has been done upstream of Skipton.</p>	<p>PO8 is an overarching objective on addressing and mitigating flood risk. It is intended to cover all aspects of flood risk mitigation, including reducing downstream flood risk through various water retention projects. This detailed level of flood risk mitigation is drawn out in draft policy ENV6 on Flood Risk, as noted in criterion d):  “Development will avoid areas with the potential to increase flood resilience, and seek to enhance as far as possible the natural capacity of soils, vegetation, river flood plains, wetland and upland habitats to reduce flood risk”.</p> <p>As such it is considered that it is not necessary to reword PO8 as draft policy ENV6 appropriately sets out the Council’s policy approach to the mitigation of flood risk.</p>	<p>No</p>	
<p><b>SD1: The Presumption in Favour of Sustainable Development</b></p>			
<p>The definition of sustainable development is not about sustainability as any normal person would define it but about development that can reach the target. It is impossible to exclude this statement from the plan and get it accepted nationally but it</p>	<p>The local plan is required to set out a policy framework that seeks to achieve sustainable development as defined in the NPPF.</p>	<p>No</p>	

<p>is directly contrary to local needs for real sustainability.</p>			
<p>Draft policy SD1 is not worded strongly enough in terms of there being a prerequisite for improved infrastructure and services to be planned holistically and put in place prior to or upon completion of the construction of new development. Without this stipulation sustainable development will not be achieved.</p>	<p>Draft policy SP12 sets out the local plan policy approach to the provision, timing and delivery of infrastructure to serve the growth proposals of the local plan, so it is not necessary to repeat these provisions within draft Policy SD1.</p>	<p>No</p>	
<p>Need clarity that the presumption in favour of sustainable development refers to all development, not just where land is allocated in the plan. Stroud’s LP is given as an example of being clear that development will be allowed even if not in the Plan, so long as it counts as sustainable under their policies and the NPPF. Rather woolly in Craven’s plan to say that the Council will “work with those wishing to carry out development “as it does not specify to what end they will work with them. Stroud makes it clear that the aim of such co-operative work is to find a solution that will end in approval of a sustainable development if one is possible.</p> <p>Suggestion to add "to find solutions to secure a sustainable development that meets relevant plan policies and can be approved, wherever possible" to the end of</p>	<p>The suggested additional wording to draft policy SD1 would provide useful clarity on the outcome the Council wishes to achieve by taking a proactive approach and working co-operatively with people and organisations wishing to carry out development .</p>	<p>Yes</p>	<p>Amend wording of 3<sup>rd</sup> paragraph of draft Policy SD1 to read:          “The Council will take a proactive approach and will work co-operatively with people and organisations wishing to carry out development and applying for planning permission, <i>to find solutions to secure sustainable development that meets relevant plan policies and can be approved, wherever possible.</i>”</p>

paragraph 3 in draft policy SD1.			
<p>Suggestion to add “sustainable” to paragraph 5 as follows:</p> <p>Where the local plan (or neighbourhood plan where applicable) is silent, or where relevant policies have become out of date, proposals for <i>sustainable</i> development will be approved unless there are sound planning reasons...."</p> <p>With reference to paragraph 5 of draft policy SD1, should "sound planning reasons" be "material considerations"? i.e. does “sound planning reasons” mean the same as “material considerations”?</p>	<p>The inclusion of “sustainable “ within paragraph 5 as suggested would improve the clarity of draft Policy SD1.</p> <p>The term “sound planning reasons” does mean the same thing as “material considerations”, a term which is used in the preceding paragraph of the policy.</p>	Yes	<p>Amend wording of 5<sup>th</sup> paragraph of draft Policy SD1 to read:</p> <p>“Where the local plan (or neighbourhood plan where applicable) is silent, or where relevant policies have become out of date, proposals for <i>sustainable</i> development will be approved unless there are sound planning reasons...."</p>
<p>The second Draft Local Plan and policy SD1: Presumption in Favour of Sustainable generally provides a framework through which viable and sustainable development can be achieved. The policy and plan, in its current draft form, to provide sufficient flexibility to respond to changeable circumstances and market conditions.</p>	Support for the draft policy SD1 is noted.	No	

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## Section 4: Policy SP1: Meeting Housing Need Policy Response Paper

April – May 2016 Draft Local Plan

<b>Policy SP1</b>			
<b>Aim of the Policy: To set a housing requirement target for the spatial strategy to address housing need in the plan area over the plan period 2012 to 2032</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
Whilst the proposed policy wording includes the word 'minimum', it is considered that it would be helpful if the policy wording highlighted the fact that the required number of homes proposed is a <i>minimum</i> .	This suggested change may be helpful in ensuring that this aspect of the policy is not overlooked when being read by third parties.	Yes	Amend the text of the first paragraph by putting the word "minimum" into italics.

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**Draft Policy SP2: Economic Activity and Business Growth Policy Response Paper to the April – May 2016 Draft Local Plan**

<b>Policy SP2</b>			
<b>Aim of the Policy: To support the local economy to grow, diversify and generate new employment and productivity opportunities.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
Given the existing connectivity between the north sub area and the eastern part of South Lakeland District (employment and retail in Kendal and Kirkby Lonsdale) and schools (Kirkby Lonsdale), then policy support in the emerging Craven Local Plan (Draft Policy SP2) for enhanced transport connectivity with south Lakeland (Cumbria) is welcomed.	Support for the policy is noted.	No	None.
There is a need to recognise the importance of new employment in the Local Service Centres particularly to diversify existing employment and allow growth in line with P07. We recommend the following is added to SP2 (c) (c).....as the principal town for Craven. Employment/ Mixed Use land be provided in Local Service Centres to diversify employment and allow for growth as appropriate.	Policy SP2 as drafted already allows for the identification of land in local service centres to support employment growth and enhance vitality. Land allocations are set out in policies SP5-SP12. Policy EC1 also provides a context for the consideration of individual proposals. As this is the case, the sought amendment is not necessary.	No.	None.
The NPA supports the identification of 28ha of employment land and measures to	Support for the policy is noted.	No	None.



<b>Policy SP2</b>			
<b>Aim of the Policy: To support the local economy to grow, diversify and generate new employment and productivity opportunities.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
improve connectivity to larger urban areas as set out in policy SP2 . This strategy will support the economic wellbeing of communities living in the National Park. The Yorkshire Dales Local Plan also identifies opportunity sites in the Park which may be complimentary to growth in the Craven Plan area.			
<p>Broughton The Council acknowledges the exceptional nature of the employment provision at Broughton Hall Business Park in making direct reference to it at draft Policy SP2. This policy approach is supported.</p> <p>What is not clear from the current Draft Local Plan is the extent of the 'employment cluster' at Broughton Hall Business Park. There are only two site areas in the plan titled "Broughton – Pool of site options with potential for employment. Identified existing employment areas", which accompanies the Draft Text, Policies and Policies Map document. It is essential that the following sites are also included in the employment cluster list:</p>	Support for the policy is noted. The individual sites put forward will be considered for identification as part of the publication plan.	No	None.

<b>Policy SP2</b>			
<b>Aim of the Policy: To support the local economy to grow, diversify and generate new employment and productivity opportunities.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
<ul style="list-style-type: none"> <li>•S kinnerground Farm site;</li> <li>•P asture House site;</li> <li>•M icklethorne Farm site.</li> </ul> <p>All of these sites are in existing employment use and all have potential for further growth. Once it is clear what the intention of the draft Policy is in defining clusters we can then assist the Council in qualifying the extent of boundaries to the clusters sites within Broughton Estate.</p>			
<p>Elslack</p> <p>Criterion (d) of Policy SP2 states “This includes capacity and congestion mitigation improvements, pedestrian and cycle links to enhanced public transport facilities and protection of the original double track route of the Skipton to Colne railway line for future transport use as identified on the policies map” and therefore seeks to place a ‘moratorium’ on any development proposals on land along the route of the former Skipton to Colne railway.</p> <p>The supporting justification to this Policy does not reference the former railway track bed at all – there is simply no justification offered for this part of the Policy and,</p>	<p>Disagree. The objector is incorrect.</p> <p>Page 89 of the North Yorkshire Local Transport Plan 3 states:</p> <p><i>“Around North Yorkshire there are many sections of former railway route and sidings which have the potential to be re-instated and re-opened for rail traffic or to serve other transport uses such as conversion to pedestrian / cycling / equestrian routes. A number of these were identified in LTP2 including sections of the Wensleydale Railway, <b>the Skipton to Colne Line [emphasis added]</b>, the Harrogate, Ripon, Northallerton Line and the Embsay railway near Skipton. <b>The County Council will continue its policy from LTP2 of recommending the planning authority protect former rail</b></i></p>	No.	None.

<b>Policy SP2</b>			
<b>Aim of the Policy: To support the local economy to grow, diversify and generate new employment and productivity opportunities.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
<p>importantly, no reference to any evidence base to indicate that there is a deliverable and programmed transport improvement involving the former track bed.</p> <p>Paragraph 41 of the NPPF states: “Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice.”</p> <p>The potential reinstatement of the Skipton to Colne track bed as a railway is not set out in any Transport Plan or Strategic Development Plan, and there is no robust ‘evidence available’ that indicates the delivery of this railway is ‘critical’ to widen transport choice. A central theme of the NPPF with regard to Plan Making is to ensure that proposed allocations of land are realistic, deliverable and viable. The NPPF at Paragraph 171 also indicates the importance of ensuring that any planned major infrastructure is deliverable during the plan period “It is equally important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion.”</p>	<p><b><i>infrastructure in their Local Development Frameworks for possible future transport use [emphasis added]. It must however be recognised that rail re-instatement and re-opening is generally expensive and therefore, whilst supporting railway re-opening in principle, it is highly unlikely that the County Council will be able to provide any financial support either for investigatory work or for actual re-opening schemes”</i></b></p> <p>The safeguarding of the former Skipton – Colne railway line is a continuation of this approach, as set out in the LTP2 and LTP3 and there is no reason to depart from this.</p> <p>Furthermore, policy ENV4 of the adopted Pendle Core strategy specifically supports reinstatement of the Skipton –Colne railway line and the route is protected in the adopted Pendle Local Plan. The safeguarding of the route in the Craven local plan is a continuation of that approach and there is no reason to depart from this.</p>		

<b>Policy SP2</b>			
<b>Aim of the Policy: To support the local economy to grow, diversify and generate new employment and productivity opportunities.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
The proposed Policy to protect the track-bed from any development proposals therefore fails all of the tests set out at NPPF paragraph 182			
Pendle Council supports the protection of the original double-track route of the Skipton to Colne railway line for future transport use in the draft plan. This echoes Policy ENV4 of the Pendle Core Strategy (2015), which is concerned with promoting sustainable travel. Pendle Council does not wish to comment on the calculation of the employment land requirement, but considers that the figure of 28 hectares of ADDITIONAL employment land is unlikely to have an adverse impact on the local economy in Pendle, provided that additional employment land, to meet projected needs in West Craven, can be allocated within the borough.	Support noted.	No	None.

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## Housing Mix Response Paper to the April – May 2016 Draft Local Plan

<b>Policy SP3: Housing Mix</b>			
<b>Aim of the Policy: To enhance the overall mix of housing types and sizes provided in the plan area so that it reflects and responds to the demographic profile of the resident population, is attractive to households of working age and families, and is accessible to newly forming households, or those wishing to downsize in later life.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
The plan correctly identifies the central importance of a much higher proportion of small properties - but it then goes on to fail to reflect this fully in the identification of the number and the size of sites which are required.	This will be reflected better in the next draft of the local plan, which will bring together housing need, mix, density and site allocations in a more comprehensive way.	Yes	See new policy SP3: Housing Mix and Density, which unifies previously separate policies SP3 (mix) and H4 (density). Site allocations have been made using the density figure of 32 dwellings per hectare.
The needs analysis states strong need for one bedroom but the housing mix fails to specify this - it needs to include numbers & proportions	The mix policy will be improved in this respect in the next draft of the local plan.	Yes	See new policy SP3, which is more specific about the proportions needed in the housing mix.
The policy states that the housing mix should be attractive to families. We can find no reference to additional provision for school places either at primary or secondary level. There appears to be no policy in place to impose a contribution towards education when a site is developed. The old plan showed provision for a new school but the proposed plan has none shown.	Evidence gathering and policy formulation continue to progress and these aspects will be improved in the next draft of the local plan.	Yes	See new/revised policies SP5, which includes the provision of land for a new primary school in Skipton, and INF6: Education Provision.
We also disagree with the Strategic Housing Market Assessment which has been recently prepared by Arc on behalf of the Council. Paragraph 4.16 indicates that the Council will prescribe a specific mix of market housing on	Evidence gathering and policy formulation continue to progress and these aspects will be improved in the next draft of the local plan.	Yes	See new policy SP3: Housing Mix and Density, which refers to the most up-to-date evidence from the 2016 SHMA.

<p>sites that are identified as housing allocations; and goes on to suggest that the Council will seek a higher proportion of 1 and 2-bedroom market homes in such schemes.</p> <p>This approach is unsound because the Council’s actual evidence base sets out the District requires a range of open market dwellings to be developed to reflect the ‘aspirations of households’. Refer to paragraph paragraphs 5.83 and 6.16 of the Craven 2015 SHMAA which states:</p> <p>“A range of open market dwellings needs to be developed to reflect the aspirations of households. Market aspirations would suggest a particular focus on the delivery of bungalows and three bedroom houses; along with requirements for smaller houses, houses with four or more bedrooms and flats.”</p> <p>Our criticisms of Policy SP3 are fully set out in the separate representations by Addison Planning.</p>			
<p>It is difficult to comment on this policy given its reference to aligning with site specific policies SP5 – SP11, which are currently without detail given the lack of preference of sites within this consultation document.</p> <p>We do not object to this Policy which doesn’t set any prescriptive mix of dwellings, and we reserve the right to comment later in relation to any specific mix detailed in more site specific policies in later iterations of the document.</p>	<p>Formulation of draft policies SP5-11 (site allocations) continues to progress and will be completed for the next draft of the local plan. A prescriptive mix is not intended.</p>	<p>Yes</p>	<p>See new/ revised policies SP5-11 and SP3: Housing Mix and Density, which plan for a mix of dwellings to reflect local needs, as evidenced by the 2016 SHMA, but without being prescriptive.</p>
<p>We recommend that Draft Policy SP3 is amended as follows:</p>	<p>In broad terms, the suggested approach is likely to be reflected in the next draft of the</p>	<p>Yes</p>	<p>New policy SP3 unifies previously separate policies on mix (SP3) and</p>

<p>The Council will work to enhance the overall mix of housing types, tenures and sizes provided in the plan area so that it reflects and responds to the demographic profile of the resident population, is attractive to households of working age and families, and is accessible to newly forming households, or those wishing to downsize later in life. Proposals will be supported where they meet these policy objectives and, in respect of individual allocated sites, meet the provisions for housing mix within Policies SP5, SP6, SP7, SP8, SP9, SP10 and SP11.</p>	<p>policy.</p>		<p>density (H4). Revised policies SP5-11 reflect new policy SP3. Together they plan for a mix and density that will help to deliver the housing needed in the local area, as evidenced by the 2016 SHMA.</p>
<p>Having divided the area into 3 to achieve balanced growth, this will not be reflected in whether an area or individual settlements have achieved the required growth unless the overall figure of 256 (plus add-ons) has been reached. Towns and especially villages that have more than satisfied their modest targets will not be protected nor free from allocation of yet more large sites. Phasing will not protect since I quote “it will not be possible to refuse sites coming forward where they are sustainable on the grounds of prematurity unless this jeopardises delivery of the strategy overall.” Surely overdevelopment in any one area or settlement is unsustainable and must jeopardise delivery of the spatial strategy.</p>	<p>These points are likely to be addressed as the gathering of evidence and the formulation of housing growth policies (particularly SP1, SP4 and SP5-11) continue to progress. This will include continued accounting of dwelling completions and planning permissions for housing development in towns and villages, plus updates to the SHMA where necessary.</p>	<p>Yes</p>	<p>See revised policies SP1, SP4 and SP5-11. Note that some settlements no longer require any residual housing allocation (see Table 7).</p>

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## Section 4: Policy SP4 Spatial Strategy and Housing Growth Policy Response Paper

April – May 2016 Draft Local Plan

<b>Policy SP4</b>			
<b>Aim of the Policy: To deliver the spatial strategy and underpin sustainable growth within the plan area over the plan period 2012 to 2032</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
<p>Why has Bentham been placed in Tier 2 with Settle and identified as a Key Service Centre? High Bentham is a small market town with a useful but limited range of services and retail opportunities. In Craven's retail hierarchy Bentham is placed in tier 3, alongside Crosshills, whereas Settle is in tier 2. (pg 117) Para 4.19 (pg 39) identify Bentham as serving a wide rural hinterland in mid and north Craven and this elevates their role and functions in the settlement hierarchy to tier 2 service centres.</p> <p>In what specific way does Bentham serve a rural hinterland which makes it radically different from Crosshills and why does this alleged service "elevate" Bentham to a 2 tier settlement when its facilities and resources are clearly defined in the draft plan as placing it in Tier 3?</p> <p>Misleading to call Bentham a market town as the "market" comprises one veg stall once a</p>	<p>The settlement hierarchy underpinning the Local Plan's overarching Spatial Strategy takes account of the wider role and function of settlements within the plan area ( rather than solely the narrow consideration of convenience and comparison shopping), and in the geographical context of where they are located in the plan area. In this context, Bentham is a (livestock)market town located in a sparsely populated rural area and so forms a key service centre in the north sub area of the District. Settle's role and function in the context of the rural mid sub area of Craven is very similar to Bentham, which is why they are both identified as Tier 2 settlements in the Spatial Strategy as key service centres. The geographical context for Crosshills in the south sub area is as a large village in a more densely populated part of the District and located in relatively close proximity to the principal town of Skipton. Crosshills's wider role and function in this context is as a</p>	No	



<p>week. Useful but very different to Settle. Strongly advise that Bentham should be re-categorised and placed in Tier 3.</p>	<p>local service centre and very different to Bentham's and Settle's and so is identified within the Spatial Strategy as a Tier 3 settlement.</p>		
<p>A major flaw of the draft plan is that it lumps High and Low Bentham together. They are two separate settlements, High Bentham is a small town and Low Bentham is a small village with very few facilities (fewer than Burton In Lonsdale, which is categorised as 4a). Low Bentham should be re-categorised into Tier 4a or even Tier 5 as it has fewer facilities than the Tier 4a settlements.</p>	<p>The idea of considering High and Low Bentham together within the Spatial Strategy stemmed not only from their obvious close functional and physical relationship, but also from residents and businesses in the area during early engagement on the emerging local plan, as a means of promoting greater social cohesion and achieving housing and economic opportunities for the whole Bentham community.</p>	No	
<p>Support for the potential for housing and economic growth the draft Local Plan has unearthed in the western part of Craven. If carried out this could lead to a considerable increase in the prosperity of the area</p>	<p>Support noted</p>	No	
<p>The two villages of Farnhill and Kildwick have been combined for the purposes of this plan. Kildwick has some 45 houses within its boundaries yet the plan allocates 73 out of the total 100 dwellings to Kildwick. This is patently unfair, will have major negative impacts on the Kildwick community and will more than double the size of the village. The size of the proposed change is contrary to the stated Plan Objectives:</p> <ul style="list-style-type: none"> <li>• PO1 - "Nurture high quality environments and community life".</li> </ul>	<p>Whilst Farnhill and Kildwick are within different parishes, spatially, they are co-joined settlements, where some services are shared. There is therefore no rational basis for considering Farnhill and Kildwick separately for spatial planning purposes.</p>	No	

<ul style="list-style-type: none"> <li>PO2 – “Conserve and enhance the high quality local environment including reinforcing the distinctive character of Craven’s towns, villages ...”</li> </ul> <p>The villages of Farnhill and Kildwick are separate. This should be recognised in the local plan with proposed development sites allocated accordingly.</p>			
<p>Ingleton has the 6<sup>th</sup> highest allocation of housing in the Local Plan and Settle &amp; Giggleswick has the second highest. It is an important location for both biodiversity and landscape. Natural England is not challenging the strategy, however ask that the sustainability of allocations in this area are carefully considered and backed up by evidence.</p>	<p>The identification of preferred site allocations from the pool of site options is informed by a detailed residential site selection process, including SA of sites to ensure that the sustainability of sites is considered and minor adjustments to the level of growth for individual settlements within each tier can be considered .</p>	<p>Yes</p>	<p>In Policy SP4, minor adjustments are made to the levels of growth in the following individual settlements, but these do not result in any significant change to the overall spatial strategy in terms of the growth directed to Tiers 1 to 5.</p> <p>Tier 1 Skipton – no change (50%)</p> <p>Tier 2- Low and High Bentham – change from 10.2% to 10.5% Overall change to growth directed to Tier 2 settlements + 0.3%</p> <p>Tier 3 – Glusburn /Crosshills – change from 5.1% to 3.5% Ingleton - change from 3.1% to 3.5% Gargrave – change from 2% to 3.5% Overall change to growth directed to Tier 3 settlements +0.3%</p> <p>Tier 4 (a &amp; b)– Burton in Lonsdale – change from 1.2% to 0.4% Cononley- change from 1.2% to 2.5%</p>

			<p>Farnhill and Kildwick – change from 0.8% to 0.4%</p> <p>Sutton in Craven – change from 2% to 1.2%</p> <p>Embsay – change from 1.2% to 2%</p> <p>Overall change to growth directed to Tier 4a and 4b settlements +0.1%</p> <p>Tier 5 – other villages/open countryside/small sites allowance – change from 6.7% to 6%.</p> <p>Overall change to growth directed to Tier 5 settlements/open countryside -0.7%</p>
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\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## Spatial Strategy and Housing Growth Response Paper to the April – May 2016 Draft Local Plan

<b>Policy SP5: Strategy for Skipton – Tier 1</b>			
<b>Aim of the Policy: To provide development areas to meet the housing, commercial and employment needs of the town as the primary focus for growth in the plan area. Note: The council is consulting on a pool of site options, so at this stage the policy does not show any specific sites for development.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
Fairhurst support the allocation of sites outlined in the policy SP5, specifically land to Land to the East of Overdale Caravan Park. Please refer to accompany letter for further detail.	Draft policy SP5 does not, at this stage, show any specific sites to meet the employment and housing requirements set out in draft policies SP2 and SP4. Preferred sites will be selected from the pool and added to the policy for inclusion in the next draft of the local plan.	Yes	See revised policy SP5, which now provides full details of specific development areas and development principles.
The Town Council notes, generally, that the pool of site options is largely for residential development only and is concerned at the lack of mixed use residential/employment land, which may impact on policy EC1.	Evidence gathering and policy formulation are on-going, but sufficient employment sites will be selected from the pool and added to the policy for inclusion in the next draft of the local plan.	Yes	See revised policy SP5, which now provides full details of specific employment sites and principles for their development.
We strongly recommend that Site SK013 – East of Aldersley Avenue and south of Moorview Way is a preferred site within Skipton. This site is deliverable, it being available now, in a suitable for location on the edge of the Principal Town and achievable. Persimmon, a national housebuilder is clearly keen to develop the site and it is highly realistic that dwellings will be delivered on the site within 5 years. A planning application is being prepared for the development of 96 dwellings, which will	Draft policy SP5 does not, at this stage, show any specific sites to meet the housing requirements set out in draft policy SP4. Preferred sites will be selected from the pool and added to the policy for inclusion in the next draft of the local plan.	Yes	See revised policy SP5, which now provides full details of specific development areas and development principles, including site SK013.

be submitted shortly. This takes into consideration the recommendations made in the sustainability appraisal of the Pool of Sites, in as much as development is proposed along the northern area of the site with the west being left for open green space.			
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\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## Spatial Strategy and Housing Growth Response Paper to the April – May 2016 Draft Local Plan

<b>Policy SP6: Strategy for Settle – Tier 2</b>			
<b>Aim of the Policy: To provide development areas to meet the housing and employment needs of the town as a secondary location for growth in the plan area. Note: The council is consulting on a pool of site options, so at this stage the policy does not show any specific sites for development.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
<p>Settle's main asset and industry is tourism. 'Serviced Employment Land' that impoverishes the townscape is to kill the golden goose. Tourism is not mentioned as a key spatial strategy factor. Settle and North Craven need to be building on the #1 sector of the economy.</p> <p>From an employment point of view, talking about Settle as 'rail connected' fails to consider the indifferent rail service we actually have, and the problems of the A65. This is not a place to develop industry or services, save as far as they support tourism.</p>	<p>Draft policy SP6 does not, at this stage, show any specific sites to meet the employment requirements set out in draft policy SP2. Preferred sites will be selected from the pool and added to the policy for inclusion in the next draft of the local plan. The level of employment land to be provided will be appropriate for the town and will reflect evidence gathered in the Employment Land Review.</p>	Yes	<p>See revised policy SP6, which includes one 5ha site for new employment-led mixed-use development and one existing employment site for regeneration.</p>
<p>The Draft policy states that housing will provide for local needs and refers to economic development to provide opportunities for entrepreneurs and businesses to expand and locate. The development of housing on the sites referred to above will lead to the influx of people from outside the area as it far exceeds local needs. Housing development should be linked to the increase in the provision of employment opportunities in Settle about which the local plan is deficient. Otherwise the risk is that Settle will become a retirement town for people from outside the area.</p>	<p>Draft policy SP6 does not, at this stage, show any specific sites to meet the employment and housing requirements set out in draft policies SP2 and SP4. Preferred sites will be selected from the pool and added to the policy for inclusion in the next draft of the local plan. The level of employment and housing land</p>	Yes	<p>See revised policy SP6, which now provides full details of specific development areas and development principles.</p>

<p>There is a disproportionate amount of housing being proposed in Settle as compared with Giggleswick. Large developments on the outskirts of the small market town will significantly alter its character.</p> <p>New economic development and existing industrial and commercial businesses e.g Sowarth industrial estate, should be re-located to an out-of-the town site, alleviating the need for heavy freight and commercial traffic to access industrial units via residential areas and freeing significant sections of land close to the town centre for residential development. Such a shift would allow both for economic development through appropriate commercial growth and stimulate the visitor economy by creating a more pedestrian-friendly town centre environment.</p>	<p>to be provided will be appropriate for the town and will reflect evidence gathered in the Employment Land Review and Strategic Housing Market Assessment.</p>		
<p>Firstly the Local Plan contains no business vision or strategy for Settle. The Chamber of Trade have developed a vision and strategy which if adopted by the Council will provide a sensible and properly considered basis for the production of a logical and workable local area plan for Settle and district.</p> <p>Our vision is:-          “Settle &amp; District will become a well-connected hub for the Yorkshire Dales that will have a flourishing concentration of shops, hospitality businesses, services, cultural facilities, creative businesses, farming businesses and industry.”          and there is a detailed strategy and implementation plan to achieve it.</p> <p>The Craven District Council draft policy states that housing in and around Settle will provide for local needs and refers to economic development to provide opportunities for entrepreneurs and businesses to expand and locate.</p> <p>The Chamber of Trade would like to see more clarity given to the split between housing and employment. The Chamber would like to see employment land separately identified and</p>	<p>Draft policy SP6 does not, at this stage, show any specific sites to meet the employment and housing requirements set out in draft policies SP2 and SP4. Preferred sites will be selected from the pool and added to the policy for inclusion in the next draft of the local plan. The level of employment and housing land to be provided will be appropriate for the town and will reflect evidence gathered in the Employment Land Review and Strategic Housing Market Assessment.</p>	<p>Yes</p>	<p>See revised policy SP6, which now provides full details of specific development areas and development principles.</p>

<p>not mixed in with housing in the Local Plan. Areas shown on the pool of options map as housing and employment will be likely to become 100% housing areas owing to the land values. Employment zones should be separately indicated and should not be mixed.</p> <p>The Chamber proposes that housing development should be linked to the increase in the provision of employment opportunities in Settle about which the local plan is deficient despite the policy referring to economic development to provide opportunities for entrepreneurs and business to expand. Without development for employment the risk is that Settle will become a retirement town for people from outside the area. Employment provisions should come first followed by housing constructed to provide for those employed and working in Settle. The draft plan appears to put housing development first, before economic development. There is no current local demand for the amount of housing proposed. The development of housing on the sites shown on the pool of sites will lead to an influx of people from outside the area as it far exceeds current local needs. This contradicts the policy statement that housing is to provide for local needs.</p> <p>The Chamber feels that further consideration should be given to locating new development for employment on sites on the outskirts of the town, alleviating the need for heavy freight and commercial traffic to access industrial units via residential areas. This would retain (or even free) sections of land for residential development closer to the town centre rather than creating ribbon developments along the B6480. Such a shift would allow both for economic development through appropriate commercial growth and stimulate the visitor economy by creating a more pedestrian friendly town centre environment. It will also lead to fewer private vehicle</p>			
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<p>movements as householders will be able to walk into town. In that respect would the Council consider residential development in the fields immediately to the south of Station Road, Giggleswick immediately to the west of the River Ribble opposite Sandholme Close? That is a large level site, the development of which would match the Chamber's suggestion for housing closer to the town centre.</p> <p>Given the Council's proposals for increases in employment, housing, visitors and taking account of the proposed changes to the parking regime in the Market Place, especially as a result of the expected positive effect on trade and business as a result of the recent Tour de Yorkshire, the Chamber cannot support building development on the Lower Greenfoot car park SG032. The Chamber cannot see any logic in that site remaining in the pool of sites.</p> <p>Wherever and whatever development takes place in Settle and district the Chamber will expect Craven Council to ensure that all income derived as a result of development gain such as Section 106 agreements will be allocated for spending locally on infrastructure improvements and additional essential services including schools, doctors surgeries and dental services provisions. The Chamber will be looking for guaranteed assurances on this from Craven Council.</p> <p>We would like the Council to take due consideration to our comments above and together we can achieve our vision and strategy for Settle, improve the active and creative community life of Settle and district, whilst preserving the attraction of the town as an historical and desirable place to live, work and visit.</p>			
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\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## Spatial Strategy and Housing Growth Response Paper to the April – May 2016 Draft Local Plan

<b>Policy SP7: Strategy for Bentham – Tier 2</b>			
<b>Aim of the Policy: To provide development areas to meet the housing and employment needs of the town as a secondary location for growth in the plan area. Note: The council is consulting on a pool of site options, so at this stage the policy does not show any specific sites for development.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
<p>We think it is very important to ensure that green spaces penetrate built up areas and that they are maintained and valued. In any urban environment greenspaces of all sizes are important for community health and wildlife habitat but it is vital that these green spaces are given generous enough treatment. It is counterproductive if they area marginalised by being meanly provided for.</p> <p>Fields with Footpaths</p> <p>The point that easy access to real green spaces should be made a planning requirement on urban development. The creation of unattractive and narrow footpaths round the edge of new housing (see Barghs Meadows) or the provision of bland hard-wearing turf are no recompense for the loss of old meadows or wild land.</p> <p>Development should be required to maintain genuine tongues of green land penetrating urban areas providing habitat corridors as well as allowing the benefits of access not only to the fittest but also those in the community who are less able such as young children or the elderly. The planning assumption often made that infill is always preferable to the use of greenbelt should be questioned. The small town of Bentham has strong relationships with its rural hinterland and should be very wary of allowing infill development to sever its traditional contact with agricultural</p>	<p>Draft policy SP7 does not, at this stage, show any specific sites to meet the employment and housing requirements set out in draft policies SP2 and SP4. The comments are noted and preferred sites will be selected from the pool and added to the policy for inclusion in the next draft of the local plan.</p>	<p>Yes</p>	<p>See revised policy SP7, which now provides full details of specific development areas and development principles, including the treatment of footpaths and the provision of green spaces. New draft policy ENV12 may also be of interest.</p>

<p>land. The concept whereby the fields provide the lungs and footpath the arteries ably fulfils the criteria accepted by planners for the maintenance of health. Wildlife is encouraged, birds come into the town, the beauty of views can be retained and most importantly all sorts of people can access green space from their homes.</p>			
<p>It was not made clear at the event [consultation meeting at Bentham Town Hall 4th May] that the plan being put forward is one of several possible choices. It would seem that this plan (~5 I believe) [Option E] is the one that Craven DC prefers. However it would appear that this places an inappropriate weight on Bentham to supply an excessive number of the new houses required by Craven DC over the next 20 years. Proper consideration does not seem to have been given to the employment of the occupants of these new houses. There is little employment in the Bentham at present. New residents would need to travel to Lancaster, South Craven or to Bradford. Since Lancaster is building houses at a prodigious rate building more housing for this market does not seem appropriate. To provide for people working in South Craven or Bradford it would be more sustainable to build their residences closer to their work, thereby reducing journey times, road traffic and fuel use. A further drawback to providing housing for workers in Lancashire is the state of transport from Bentham to that city. The road from Bentham to Caton is poor and really quite dangerous. Some of the blame can be placed on poor standards of driving along the route. But to add to the large amount of rush hour traffic would not be wise. The bus service is poor and getting poorer as well as slow and the train service is not suitable as connections at the Lancaster end for people wishing to go to their place of employment would be difficult. It would therefore see, to make more sense to concentrate such</p>	<p>Draft policy SP7 does not, at this stage, show any specific sites to meet the employment and housing requirements set out in draft policies SP2 and SP4. Preferred sites will be selected from the pool and added to the policy for inclusion in the next draft of the local plan. The level of employment and housing land to be provided will be appropriate for the town and will reflect evidence gathered in the Employment Land Review and Strategic Housing Market Assessment.</p>	<p>Yes</p>	<p>See revised policy SP7, which now provides full details of specific development areas and development principles.</p>

<p>new housing development as may be really needed closer to where that need exists which is in the south of the Craven area.</p>			
<p>This policy is supported but the wording should also reflect the - .... support the existing tourism economy and the further tourism potential of the Forest of Bowland AONB...”</p>	<p>The draft local plan does make it clear that the tourism economy exists throughout the plan area and is to be supported. The wording of draft policy SP7 is intended to highlight the potential of the AONB for Bentham in particular.</p>	<p>No</p>	

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## Spatial Strategy and Housing Growth Response Paper to the April – May 2016 Draft Local Plan

<b>Policy SP8: Strategy for Glusburn / Cross Hills – Tier 3</b>			
<b>Aim of the Policy: To provide development areas for growth that take account of the settlement's role, recognise constraints and account for opportunities. Note: The council is consulting on a pool of site options, so at this stage the policy does not show any specific sites for development.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
Although this is a 'Local Plan', decisions need to be made with a holistic approach. Extra housing produces extra pupils, extra cars, extra patients, increased flood risks, increased sewage etc etc which involve other agencies than just the local council. Glusburn & Cross Hills are already under pressure and too much housing will destroy the village nature of the area.	The local plan process is evidenced based and involves consultation and co-operation with relevant agencies. Whilst draft policy SP8 does not, at this stage, show any specific sites to meet the housing requirements set out in draft policy SP4, an appropriate level of housing growth will be allocated to the settlement, which will reflect evidence and take account of physical and infrastructure constraints.	Yes	See revised policy SP8, which now provides full details of specific development areas and development principles.
Any development at the western end of Glusburn and Crosshills would increase traffic flow through the village as people commute to the A629 for access to Skipton, Keighley & the Airedale train stations.	Draft policy SP8 does not, at this stage, show any specific sites to meet the employment and housing requirements set out in draft policies SP2 and SP4. Preferred sites will be selected from the pool and added to the policy for inclusion in the next draft of the local plan.	Yes	See revised policy SP8, which now provides full details of specific development areas and development principles.

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## Spatial Strategy and Housing Growth Response Paper to the April – May 2016 Draft Local Plan

<b>Policy SP9: Strategy for Ingleton – Tier 3</b>			
<b>Aim of the Policy: To provide sites for a proportionate level of growth to bolster the settlement’s role and function as a service centre and the vitality of the village centre. Note: The council is consulting on a pool of site options, so at this stage the policy does not show any specific sites for development.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
No comments received	Not applicable	No	

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## Spatial Strategy and Housing Growth Response Paper to the April – May 2016 Draft Local Plan

<b>Policy SP10: Strategy for Gargrave – Tier 3</b>			
<b>Aim of the Policy: To provide sites for a proportionate level of growth that underpins and bolsters the settlement's role and function as a local service centre. Note: The council is consulting on a pool of site options, so at this stage the policy does not show any specific sites for development.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
<p>Having made extensive enquiries as to where to build and what type of properties etc. is required in Gargrave; enquiries amongst both visitors and the general population, the answer is "do not even start to think about it!" Both groups are completely against government targets.</p> <p>Visitors treat Gargrave as the gateway to The Dales a little gem is referred to, too many people, too many vehicles the whole village is unsuitable for extension of any kind. Leave it as it is or it will destroy itself.</p> <p>Most visitors are outdoor enthusiasts hiking groups campers cyclists fell walkers they enjoy visiting Gargrave at every opportunity they do not want to know about hidden politics.</p> <p>Established Local Residents</p> <p>Everybody is annoyed at even a suggestion of further building is upsetting; the village is full, the main street and narrow roads feeding in and out are particularly seized up, the narrow lanes out of Gargrave are out of the question and dangerous ie. Large tractors and farm vehicles take pride of place!!</p> <p>There simply is not room for any more any additional building of any sort will immediately make the</p>	<p>The local plan process is evidenced based and involves consultation and co-operation with relevant agencies. By this process, an appropriate level of growth will be allocated to the village, taking account of evidence and any physical, infrastructure or other constraints. Whilst draft policy SP10 does not, at this stage, show any specific sites to meet the employment and housing requirements set out in draft policies SP2 and SP4, preferred sites will be selected from the pool and added to the policy for inclusion in the next draft of the local plan.</p>	<p>Yes</p>	<p>See revised policy SP10, which now provides full details of specific development areas and development principles.</p>

<p>situation worse. The local residents are not in the mood to let this happen Walkers Pedestrians are not catered for and find themselves walking in the road throughout Gargrave, pavements are narrow and built for one person only. What about the bridge? Weight restriction sign on it? Traffic lights will not solve that problem. Personally speaking after compiling the letter my conclusion is NIGHTMARE SITUATION.</p>			
<p>I cannot accept the proposed number of houses that have to be built in Gargrave as anything more than scare tactics. Anyone with even limited knowledge of the area must realise that the A65 through Gargrave Main Street is one of the busiest in England. The weight, size and frequency of the traffic through the village is horrendous: Fumes and noise pollution makes life here for many on a daily basis a misery. First and foremost I object to any large scale development in Gargrave. The difference in the dynamics of the village since we moved here 25 years ago was unimaginable then. The planners have far too narrow an overview of the situation. Obviously the easiest and most appropriate sites for development are the ones on the west side of the village GA028, GA029 etc. Apart from the fact that these sites do not detract from the heart of the village they tend to lead directly onto the A65 Settle-Skipton Routes. The alternative sites GA031, GA023, GA005 Ga017 all feed onto Church Street. Apart from the Main Street this is the busiest and most congested area. Marton Road has no pedestrian pavements. The</p>	<p>The local plan process is evidenced based and involves consultation and co-operation with relevant agencies. By this process, an appropriate level of growth will be allocated to the village, taking account of evidence and any physical, infrastructure or other constraints. Whilst draft policy SP10 does not, at this stage, show any specific sites to meet the employment and housing requirements set out in draft policies SP2 and SP4, preferred sites will be selected from the pool and added to the policy for inclusion in the next draft of the local plan.</p>	<p>Yes</p>	<p>See revised policy SP10, which now provides full details of specific development areas and development principles.</p>



<p>fields on one side of the Road look very attractive to a developer but there are already caravan parks, a new holiday chalet park, a nursing home existing houses with roadside parking. There is just one road access to the village, the pub and the Church. It is a bottle neck.</p> <p>We desperately need local intelligence and in depth survey of the traffic situation surrounding the bridge at Church Street access.</p> <p>The weight restriction is constantly ignored with the plant hire and the farm vehicles getting even heavier. Further housing will increase the traffic to a level hard to estimate.</p> <p>I appeal to you to question the need to develop Gargrave on such a scale. It will destroy the character and status of the village.</p>			
<p>I agree with all the proposals that Gargrave Parish Council have made.</p>	<p>Whilst the district and parish councils are consulting and cooperating with each other in the local and neighbourhood planning processes, draft policy SP10 does not, at this stage, show any specific sites to meet the employment and housing requirements set out in draft policies SP2 and SP4. However, preferred sites will be selected from the pool and added to the policy for inclusion in the next draft of the local plan.</p>	<p>Yes</p>	<p>See revised policy SP10, which now provides full details of specific development areas and development principles.</p>
<p>We would like to comment on the fact that Gargrave Parish Council has consulted fully with the residents of Gargrave about development and has come up with a plan which provides for the required new housing quota and therefore do not see why Craven District Council should try to force more development on our village. Probably most people in</p>	<p>The district and parish councils are consulting and cooperating with each other in the local/neighbourhood planning process and preferred sites will be selected from the pool and added to the policy for inclusion in the next draft of the local plan.</p>	<p>Yes</p>	<p>See revised policy SP10, which now provides full details of specific development areas and development principles.</p>

<p>the village realise that some development is inevitable and necessary but this attempt to extend it by so many extra dwellings only causes distress and anger so we hope that Craven District Council can take this on board and not force more development upon us.</p>			
<p>This is the third time I have responded. We would reiterate comments already made. It seems that not enough weight has been given to the work undertaken by Gargrave Parish Council and the results of their consultations with local residents. GPC Neighbourhood Plan has the required number of houses adequately covered without building to the north of the village.</p>	<p>The district and parish councils are consulting and cooperating with each other in the local and neighbourhood planning processes. Draft policy SP10 does not, at this stage, show any specific sites for housing, but preferred sites will be selected from the pool and added to the policy for inclusion in the next draft of the local plan.</p>	<p>Yes</p>	<p>See revised policy SP10, which now provides full details of specific development areas and development principles.</p>

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## Spatial Strategy and Housing Growth Response Paper to the April – May 2016 Draft Local Plan

<b>Policy SP11: Strategy for Tier 4a and 4b Villages with Basic Services and Bisected Villages with Basic Services</b>			
<b>Aim of the Policy: To provide development sites for a limited amount of growth that underpins the role and function of villages and ensures ongoing sustainability. Note: The council is consulting on a pool of site options, so at this stage the policy does not show any specific sites for development.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
<p>There seems to be a marked imbalance in predicted housing requirement between Settle (population 3659) and Giggleswick (population 1410). The suggested housing requirement for Settle (16 per annum) is 8 times that of Giggleswick (2 per annum) whereas the population of Settle is only 2.6 times that of Giggleswick. Surely it would be more sensible to consider the two communities together (as they are geographically) as they largely share the same services.</p> <p>If both Settle and Giggleswick are considered together a long term solution would be to develop an industrial estate adjacent to the Settle bypass and encourage industry and business to relocate there. As it would be more prominent it may encourage fresh light industry to move into the area providing much needed work for local people. The vacant land on Sowarth could then be used for new housing which would be well placed for amenities in the town centre. This would also help relieve the already problematic congestion in the centre of Settle.</p>	<p>Draft policy SP11 does not, at this stage, show any specific sites to meet the employment and housing requirements set out in draft policies SP2 and SP4. Preferred sites will be selected from the pool and added to the policy for inclusion in the next draft of the local plan. The level of employment and housing land to be provided will be appropriate to the location and will reflect evidence gathered in the Employment Land Review and Strategic Housing Market Assessment.</p>	Yes	See revised policy SP11, which now provides full details of specific development areas and development principles.
<p>Part of the site within the Representors ownership is available, suitable and deliverable as a sustainable housing site. The whole site was originally included in the Council's SHLAA 2012 as an available, suitable and deliverable as a sustainable housing site (given site reference EM002).</p> <p>The site was then assessed in the published document 'Craven</p>	<p>Draft policy SP11 does not, at this stage, show any specific sites to meet the housing requirements set out in draft policy SP4. Preferred sites will be selected from the pool and added to the policy for</p>	Yes	See revised policy SP11, which now provides full details of specific development areas and development principles.

<p>Local Plan Draft 22/9/14 - Sites Preferred and Not Preferred for Consultation' as Site Reference EM002: and assessed as a site not preferred for consultation but one which would have 'potential significant positive impacts' under the Preliminary Sustainability Check. It is notable that the document selects site EM016 as a preferred site for consultation despite the Preliminary Sustainability Check identifying that EM016 (Shire Lane) would have 'potential minor positive impacts'.</p> <p>The suitability and deliverability of part of Site EM002 for housing development should therefore be re-assessed and considered for inclusion in the Plan. An indicative layout is included with this Representation which illustrates just one potential scheme within the western part of the site with an approximate capacity of 20 dwellings. The proposed site is contiguous with the extent of the western field and measures approximately 0.5 hectares. The Representor will make further representations in due course to provide evidence on the deliverability of the site.</p>	<p>inclusion in the next draft of the local plan.</p>		
<p>We support the inclusion of SHLAA sites EM010 and EM012 within the pool of potential residential development sites. However we agree with the Council's initial conclusion that EM012 is a large site and that it is inappropriate to consider the full development of this land area. We generally agree with the council that there are issues of biodiversity, landscape and green infrastructure to be addressed. The project team commissioned by KCS Development Ltd have examined these issues and other potential impacts in some detail. As a result two discrete net residential development cells have been identified at the southern and northern ends of the EM012 land holding. The southern cell constitutes a logical extension to the settlement form of Embsay and is assessed as having a development capacity of circa 25 dwellings. The northern cell fits within the subsidiary SHLAA site EM010 and is assessed as having a development capacity of circa 15 dwellings. Development of the cell will be in an essentially linear format reflecting the</p>	<p>Draft policy SP11 does not, at this stage, show any specific sites to meet the housing requirements set out in draft policy SP4. Preferred sites will be selected from the pool and added to the policy for inclusion in the next draft of the local plan.</p>	<p>Yes</p>	<p>See revised policy SP11, which now provides full details of specific development areas and development principles.</p>

<p>pattern of existing housing to the north of Kirk Lane and in the smaller village of Eastby to the east of the cell.</p> <p>These sites are deliverable, currently available and in suitable locations relative to the existing settlement pattern of Embsay and Eastby.</p> <p>Pool of Site Options with potential for residential or mixed use and sustainability appraisal:</p> <p>Based on our detailed work to date, as summarised in paragraph 2.20 above, we support the inclusion of two discrete residential allocations as outlined on the plan at Appendix 1. These proposed allocations represent developments which are deliverable, sustainable and appropriate in scale and have a good fit with the existing settlement form. Detailed assessment has been undertaken of the impacts of this level of development on heritage assets, landscape character and visual amenity.</p> <p>The Council has assessed the full land coverage of SHLAA site EM012 and EM010 in their Sustainability Assessment. The Council’s summary of issues and recommendations for site EM012 states:</p> <p>“A potential site for residential development, but it is a very large site which may be inappropriate for full development given the relatively low housing requirements for Embsay. Some issues of medium to high risk of surface water flooding areas scattered throughout the site. A listed building is close to the site to the west. A gas pipeline runs through the site. The national border is adjacent.”</p> <p>The Sustainability Appraisal also provides recommends on avoidance, mitigation and opportunity measures for each site. Sites EM010 and EM012 highlight the following recommendations:</p> <ul style="list-style-type: none"> <li>☑ Flood Risk Assessment;</li> </ul> <p>Consider impact on Conservation Area and Heritage Assets;</p> <ul style="list-style-type: none"> <li>☑ Ground work assessment to investigate archaeological significance; and,</li> </ul>			
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<p>☑ Prominent location – visual character in relation to housing density, building heights and dwelling design to be considered. KCS Development has continued to engage a team of technical consultants including flood risk, landscape, highways, design, heritage and archaeological expertise. Further technical work is currently underway and we reserve the right to provide future technical updates to the Council when appropriate.</p> <p>Conclusion In summary therefore the development team employed by KCS Development Ltd have undertaken a significant amount of technical work to refine the development proposals within the wider land holding, as defined in SHLAA site EM012. The smaller development cells now put forward as residential allocations will make a significant contribution to the enhanced housing requirement for this fourth tier settlement. These proposals are the result of considering all relevant constraints and opportunities and they achieve a planning balance and macro design solution which will constitute a positive outcome.</p> <p>We welcome the opportunity to comment on this informal consultation of the Craven Local Plan Second Draft and look forward to being kept informed of future consultation exercises and the publication of further evidence base documents and draft SPD's.</p>			
<p>Limited support. Remember brownfield sites may all have been used already in settlements needs taking into account when calculating allocations, further development anti ENV5.</p>	<p>The limited support is noted. Whilst draft policy SP11 does not, at this stage, show any specific sites for development, preferred sites will be selected from the pool and added to the policy for inclusion in the next draft of the local plan.</p>	<p>Yes</p>	<p>See revised policy SP11, which now provides full details of specific development areas and development principles.</p>
<p>We support the inclusion of SHLAA site SC043 West of Holme Lane and south of Holme Beck within the pool of potential residential development sites.</p>	<p>Draft policy SP11 does not, at this stage, show any specific sites to meet the housing requirements set</p>	<p>Yes</p>	<p>See revised policy SP11, which now provides full details of specific</p>

<p>2.20 This site is deliverable, currently available and in a suitable location relative to the existing settlement pattern of Sutton in Craven. The Inspector in his Appeal Decision relating to the refusal of outline planning permission for 53 dwellings, whilst dismissing the appeal did refer to the proposed development not affecting the setting of the Conservation Area. He also stated that “there is no substantive evidence that local services and facilities would be unable to accommodate the additional population. The Inspector commented that subject to appropriate conditions the proposed development would not adversely affect highway or pedestrian safety, nor would the proposed development have an adverse effect in terms of flood risk, drainage and sewerage.</p>	<p>out in draft policy SP4. Preferred sites will be selected from the pool and added to the policy for inclusion in the next draft of the local plan.</p>		<p>development areas and development principles.</p>
<p>The site (an expanded CW011) is available, suitable and deliverable as a sustainable housing site. The site was originally included in the Council’s SHLAA 2013 as an available, suitable and deliverable as a sustainable housing site (given site reference CW011). The site was then assessed in the published document ‘Craven Local Plan Draft 22/9/14 - Sites Preferred and Not Preferred for Consultation’ as Site Reference CW011: and assessed as a site preferred for consultation and one which would have ‘potential significant positive impacts’ under the Preliminary Sustainability Check. That document summarised the checklist findings: “The site is well related to existing services and recreational opportunities and has no flood risk or known highway safety issues. Issues relating to the proximity of SPA and SAC to be investigated further.”</p> <p>The Representor supports the allocation of this site under Policy SP11 and will make further representations in due course to provide evidence on the deliverability of the site.</p>	<p>Draft policy SP11 does not, at this stage, show any specific sites to meet the housing requirements set out in draft policy SP4. Preferred sites will be selected from the pool and added to the policy for inclusion in the next draft of the local plan.</p>	<p>Yes</p>	<p>See revised policy SP11, which now provides full details of specific development areas and development principles.</p>

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## Draft Policy SP12: Infrastructure, Strategy &amp; Development Delivery Response Paper

April – May 2016 Draft Local Plan

<b>Policy SP 12</b>			
<b>Aim of the Policy: To set out the overall approach to infrastructure provision and requirements arising from development and strategy delivery.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
<p>Support, but in need of strengthening. This section is in need of strengthening by referring to the cumulative effect/ impact of several housing/economic development site options within one settlement.</p> <p>Infrastructure developments should not be dealt with piecemeal on a site by site basis, they need to be considered as a whole e.g. the case for a new rail station at Crosshills, highway infrastructure or new sewer will require this holistic approach.</p>	<p>An infrastructure delivery plan (IDP), which will accompany the local plan considers infrastructure requirements as a whole and is in preparation. A holistic view on infrastructure will be taken on this matter through the IDP. This point could be usefully clarified by including a reference to the IDP in the policy SP12 and supporting text.</p>	Yes	<p>Insert reference to IDP at the end of the 1<sup>st</sup> paragraph of draft policy SP12 to read <i>“This is set out in the Infrastructure Delivery Plan (IDP) which accompanies the local plan. The IDP will be updated regularly”</i></p> <p>Include the following text in the supporting justification to draft policy SP12 .</p> <p><i>“Planning for infrastructure provision has been, and continues to be, an ongoing process through the development of an Infrastructure Delivery Plan (IDP), which accompanies this plan. The IDP has been produced in collaboration with infrastructure providers and examines provision of the following broad types of infrastructure:</i></p> <ul style="list-style-type: none"> <li>• <i>Physical: transport, energy, water and drainage, waste</i></li> </ul>



			<ul style="list-style-type: none"> <li>• <i>Social: education, health care, leisure and recreation, community and social and emergency services</i></li> <li>• <i>Green: open space</i></li> </ul> <p><i>The IDP is a living document and will be updated regularly, providing an overview of the infrastructure required to support new development. It also provides an overview of who is responsible for delivery, and a broad indication of costs and funding mechanisms. Moreover, the IDP will act as a focus for delivery, but should not be seen as a detailed investment programme. “</i></p>
Natural England welcomes the consideration of environmental sustainability in relation to the delivery of infrastructure alongside social and economic concerns in draft policy SP12.	Supporting comment noted.	No	
Limited support. Mitigation must also be effective not merely 'adequate'.	Support noted. The use of the word 'adequate' is intended to reflect requirements arising from development. By definition, infrastructure provided would need to be effective in order to be adequate for the offsetting of effects arising from development. However, it may improve interpretation of the policy if the word "adequate" was removed.	Yes	Delete the word "adequate" from the first sentence of the 2 <sup>nd</sup> paragraph of policy SP12 , so that it reads " <i>The Council will work to mitigate.....</i> "

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

**Countryside and Landscape Policy Response Paper to the April – May 2016 Draft Local Plan**

<b>Policy ENV1 Countryside and Landscape</b>			
<b>Aim of the Policy:</b> To ensure that the quality of Craven’s countryside and landscape is conserved for future generations to enjoy; and that opportunities to restore and enhance the landscape are taken wherever possible.			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
Should be some recognition of need to balance need for green space in built up areas with need to try and encourage greater density of existing settlements within existing boundaries. Latter approach will support viability of new services and more sustainable travel patterns.	This point is addressed in the vision, objectives and spatial strategy of the local plan and it is not considered that a change is required to Policy ENV1.	No	
Policy does not adequately address problem of light pollution outside the National Park. Majority of proposed development sites are green field and will adversely affect lighting pollution unless there are some controls stated within the policy.	It is recognised that the policy and supporting text focuses on the potential impacts on designated landscapes at present and perhaps should give more recognition to remote dark areas in open countryside that are not in specific designated areas, but where nevertheless it is important to retain intrinsically dark skies.	Yes	Insert additional paragraph after paragraph 5.13 to read: <i>“However, it is also important outside these designated areas, where there are significant areas of remote open countryside that also have intrinsically dark skies, that these locations are not adversely affected by lighting arising from new development proposals. Therefore other non-designated areas of remote open countryside, and areas identified as being sensitive to light pollution within the relevant landscape character appraisal in the local plan area are categorised as</i>

			<p><i>being within Environmental Zone E1 under the ILP Guidance (guidance Notes for the Reduction of Obtrusive Lighting) and shall be subject to the requirements for light levels in that document (or successor documents) unless otherwise agreed with the Local Authority.'</i></p> <p>Insert new criterion at e) in Policy ENV1 to read:  <i>"The impacts of obtrusive lighting will be minimised within proposals for new development. All new proposals where external lighting is to be incorporated within a development scheme shall be subject to guidance set out in the Institute of Lighting Professionals Guidance Notes for the Reduction of Obtrusive Lighting GN01:2011. For the purposes of clarity, areas of remote open countryside and those which are identified as being sensitive to light pollution within the relevant Landscape Character Appraisal will be categorised as falling within zone E1."</i></p> <p>Change criterion e) to criterion f)</p>
<p>Local Plan objective PO3 and Policy ENV1 are supported. Particularly welcome reference to setting of the National Park. Welcome</p>	<p>Support Noted</p>	<p>No</p>	

reference to National Park Management Plan which is now a material planning consideration in national planning guidance.			
Policy ENV1 welcomed in particular for emphasis on utilising relevant landscape appraisals, and the weight afforded to dark skies.	Support Noted.	No	
The North Yorkshire and York Landscape Characterisation Project also contains useful information on sensitivity to change and managing landscape change, both in Craven and in adjacent districts that may be affected by developments that occur within Craven.	The supporting text to Policy ENV1 does refer to the North Yorkshire and York Landscape Characterisation Project, however, there is no reference within the policy. The inclusion of a reference within the policy to the above study may provide greater clarity to applicants on sources of information on considerations to take into account in preparing development proposals .	Yes	Amend criterion a) in policy ENV1 to read:  “a) Expect new development proposals in those areas not subject to national landscape designations to respect, safeguard, and wherever possible, restore or enhance the landscape character of the area. Proposals should have regard to the relevant Landscape Character Appraisal, and specifically to the different landscape character types that are present in the plan area. <i>Regard should also be had to the relevant Natural England Character Area Profile and the York and North Yorkshire Landscape Characterisation Project (or its successor document).</i> All proposals for new development should show how they respond to the particular character type they are located within.”

<p>National Character Area profiles include analysis of landscape change, statements of environmental opportunity and information on ecosystem services. There are strong links between policy ENV1 and a number of other policies including ENV3 and ENV5.</p>	<p>The supporting text to Policy ENV1 does refer to the National Character Area profiles, however, there is no reference within the policy. The inclusion of a reference within the policy to the above profiles may provide greater clarity to applicants on sources of information on considerations to take into account in preparing development proposals .</p>	<p>Yes</p>	<p>Amend criterion a) in policy ENV1 to read:</p> <p>“a) Expect new development proposals in those areas not subject to national landscape designations to respect, safeguard, and wherever possible, restore or enhance the landscape character of the area. Proposals should have regard to the relevant Landscape Character Appraisal, and specifically to the different landscape character types that are present in the plan area. <i>Regard should also be had to the relevant Natural England Character Area Profile and the York and North Yorkshire Landscape Characterisation Project (or its successor document).</i> All proposals for new development should show how they respond to the particular character type they are located within.”</p>
<p>Welcome section concerning ‘designated landscapes.’ Includes commitment to work with Yorkshire Dales National Park Authority and Forest of Bowland AONB.</p> <p>Natural England welcome positive emphasis of ENV1. Welcome reference to respecting, safeguarding and wherever possible,</p>	<p>Support Noted</p> <p>Support Noted</p>	<p>No</p>	

<p>restoring or enhancing landscape character of the area as well as a) and b). Welcome weight given to setting and special qualities of the Yorkshire Dales National Park and Forest of Bowland AONB in line with paragraph 115 of the NPPF in d) and the reference to relevant protected landscape Management Plan objectives. (Natural England).</p>			
<p>Natural England welcomes recognition of light pollution on sensitive landscape and biodiversity receptors (5.12-5.15).</p> <p>Advise make reference to use of landscape character assessment to identify sensitive landscape receptors as well as to the particular sensitivity of nocturnal protected species such as bats and owls to lighting in addition to the other feeding and migratory birds, as already noted in para 5.12.</p>	<p>Support noted</p> <p>The inclusion of a reference that Landscape Character Assessments will be used to identify sensitive landscape receptors is a useful addition to the policy and aids clarity.</p> <p>Reference will also be made to nocturnal species including bats and owls.</p>	<p>Yes</p>	<p>Insert new criterion at e) in Policy ENV1 to read:  <i>“The impacts of obtrusive lighting will be minimised within proposals for new development. All new proposals where external lighting is to be incorporated within a development scheme shall be subject to guidance set out in the Institute of Lighting Professionals Guidance Notes for the Reduction of Obtrusive Lighting GN01:2011. For the purposes of clarity, areas of remote open countryside and those which are identified as being sensitive to light pollution within the relevant Landscape Character Appraisal will be categorised as falling within zone E1.”</i></p> <p>Change criterion e) to criterion f)</p> <p>Add to paragraph 5.12 ‘the</p>

			migration and feeding behaviour of bird and other animal species <i>including in particular nocturnal species such as owls and bats</i> , and the opportunity to view constellations. “
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\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## Heritage Response Paper to the April – May 2016 Draft Local Plan

<b>Policy ENV2: Heritage</b>			
<b>Aim of the Policy: To help ensure that Craven's historic environment, including designated and non-designated heritage assets, is conserved and enhanced and its potential to contribute towards economic regeneration, tourism and education is fully exploited.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
Generally supportive, but a more detailed explanation/definition of how and when development will be permitted if the benefits outweigh the costs if required.	This may be difficult to do in detail, as decisions will need to be based on informed, balanced judgements and the merits of each case.	Yes	See revised paragraph 5.23, which refers to informed, balanced judgements and the merits of each case.
As it stands this statement focuses on the Post-medieval heritage assets. In addition to those listed, the 'District's distinctive character and sense of place' should include its historic places of worship and monastic heritage. Bolton Abbey is considered special in its own right however it cannot be viewed in isolation as there are many sites / heritage assets that are associated with it. This statement should also recognise that the list is not exhaustive.	This comment has been discussed with Historic England. It is considered that Craven's historic places of worship and monastic heritage are not particularly notable as defining elements of its historic environment (NB. monastic ruins at Bolton Abbey are outside the plan area) and that the draft policy as worded serves the intended purpose of identifying those elements of the historic environment which make Craven distinctive.	No	
Support a), in particular the nature of historic barns iv and v.	Noted. Part a) iv and v are to be retained within the policy.	No	
A number of heritage assets such as canal bridges and canal and river side buildings and barns are very important for protected species such barn owls, bats, swallows swifts and house martins. An addition to the	Inclusion of this point about the biodiversity value of historic structures would be an improvement. The supporting text and policy should be	Yes	See paragraph 5.21 and part g) of the revised policy, which have been added.



<p>policy such as there will be support for enhancing structures for biodiversity would be useful. This will further support the use of the canal and river corridors as Green Infrastructure. For example a phrase such as “heritage buildings, barns and bridges can be very important nesting and roosting sites for endangered species such as swallows, bats and barn owls. Enhancement of such structures for biodiversity is important and will be supported by the authority”</p>	<p>amended as suggested.</p>		
<p>Policy ENV2: Heritage is also a welcome feature of the plan, with its focus on designated and undesignated archaeology. The North Yorkshire and Lower Tees Valley Historic Landscape Characterisation <a href="http://www.northyorks.gov.uk/article/25492/Historic-landscape-characterisation-guide">http://www.northyorks.gov.uk/article/25492/Historic-landscape-characterisation-guide</a> contains descriptions of historic landscape types in Craven, including designed landscapes. Further information on the latter may be available from the Yorkshire Gardens Trust or from the UK Parks and Gardens database <a href="http://www.parksandgardens.org/">http://www.parksandgardens.org/</a>. The Historic Environment Record (HER) retains information on non-designated historic sites and monuments, and can also provide designated data. In terms of the policy, in cases where archaeological significance is not fully understood it is worth stressing that developers should provide an archaeological field evaluation to assess this significance and the impact of the proposal upon it prior to a planning decision being made. To this end, some suggested text for the policy could be “In cases where this significance is not fully understood, or where archaeological potential has been identified, developers will be required to provide supporting information in the form of an archaeological field evaluation”.</p>	<p>The suggested amendment would provide greater clarity and guidance within the supporting text, which would be helpful to developers and promote more effective conservation of heritage assets.</p>	<p>Yes</p>	<p>See revised paragraph 5.20.</p>

<ul style="list-style-type: none"> <li>• We are supportive in general of the Heritage section of the plan (pages 53-56). We agree with the importance of identifying and conserving Craven’s non-designated heritage assets. NCHT/NCBPT would be happy to play a role in helping identify such assets in the North Craven Area and are equipped with the necessary skills and experience to do so. In this regard it would be helpful for the Plan to list (as an appendix) the non-designated assets that “are known about and already identified”. We also agree with the importance of making a record of designated and non-designated heritage assets before changes to them are made. We suggest that this requirement is made explicit in paragraphs b) and e) of the draft policy. Paragraph f) of the draft policy describes those heritage assets “identified as being of greatest risk or decay”. We suggest that these identified assets are listed in the Plan documentation.</li> </ul>	<p>Non-designated heritage assets are mainly identified in the Historic Environment Record maintained by the county council. Others may be identified in the district council’s conservation area appraisals, of which there are 22, including 3 of potential conservation areas. A record of assets at risk is maintained by Historic England. Drawing on this information, within the local plan, is a good idea. However, rather than attempting to reproduce the information in an appendix, it may be more helpful and accurate to refer to the original sources. This would also have the advantage of avoiding information becoming out of date when the county council, district council and Historic England update their records. The policy wording reflects, but does not repeat the regulatory requirements for recording heritage assets and this is considered to be the correct approach.</p>	<p>Yes</p>	<p>See new footnotes added to pages 55 and 56 , which explain where information is kept about non-designated assets and assets at risk.</p>
<p>Good policy supported by reasonable language</p>	<p>Support Noted</p>	<p>No</p>	
<p>We welcome that Policy ENV2 acknowledges the heritage value of the Leeds &amp; Liverpool canal which will be conserved and, where appropriate, enhanced and its potential to contribute towards the economic regeneration, tourism and education of the area fully exploited. In particular, specific reference is made to conserving the buildings, bridges, locks and other and structures associated with the Leeds &amp; Liverpool Canal and Thanet Canal. Such an approach would be consistent</p>	<p>Noted. These aspects of the draft policy are to be retained.</p>	<p>No</p>	

with section 12 'Conserving and enhancing the historic environment' of the National Planning Policy Framework.			
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\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## Good Design Response Paper to the April – May 2016 Draft Local Plan

<b>Policy ENV3 Good Design</b>			
<b>Aim of the Policy:</b> To promote good design in new development within Craven including in relation to accessibility, layout, use of materials etc.			
<b>Main issues from consultation</b>	<b>Response</b>	<b>Change required to the local plan (yes/no)</b>	<b>Changes made to the plan (ideas relating to change/site identified or not as a preferred site)</b>
Welcomes reference to designing out crime. No further comments (North Yorkshire Police)	Supporting Comment Noted	No	
Easy access to green space should be a planning requirement of new development. Development should be required to maintain genuine tongues of green land penetrating urban areas providing habitat corridors and allowing access for those less mobile including children or the elderly. Infill not always best solution. Bentham has strong relationship with rural hinterland and should be wary of infill severing contact with agricultural land.	In consideration of proposals for new development, the Local Plan will be taken as a whole and therefore all relevant policies will apply. This includes the Landscape Policy ENV1, which at point e) states 'Important considerations will include creating connections between built-up areas and the countryside, allowing the countryside to permeate built-up areas, and maintaining gaps between settlements in order to preserve their separate identities.' Therefore it is considered that this point has been covered within the plan and inclusion in the design policy would represent unnecessary duplication.	No	
Too much use of 'should,' allows scope for people to find ways not to comply. Replace 'should' with 'must.'	To include the word "must" within any policy, the policy has to be clear that whatever is required is specific and essential and the requirements are set out in detail, so developers know exactly what is required. Policy ENV3 relates in the most part to general principles for good design and to use	No	

	the word 'must' in this context would be both unreasonable and unfair.		
Good Design policy encouraging as seeks to reduce energy, water use and carbon emissions. BREEAM recognises importance of designing for resilience to a changing climate.	Reference to BREEAM standards for non-residential development within the policy would strengthen the sustainability aspects of the policy in relation to climate change adaptation.	Yes	Insert reference to BREEAM for non-residential development within policy at point q)
While pleasing to see water use referred to, there are a number of aspects of climate adaptation that would be missed by the policy such as issues of materials, resilience to fading and rotting, thermal comfort issues and hazard resilience. Point k could be rephrased to 'sustainability should be designed in, so that development takes the opportunity to reduce energy use and water use, minimise waste and ensure future resilience to a changing climate.' Met Office UKCP09 data shows mid-range estimate of summer temperature change under medium emission scenario for Yorkshire and Humber likely to be between 1.7 degrees and 5.4 degrees warmer by 2080. Could have health impacts. NHS heatwave plan calls for 'long term multi-agency planning to adapt to and reduce the impact of climate change including greening the built environment and building design.' New development should be planned to avoid increased vulnerability to the range of impacts from climate change.' This policy on good design, if it takes on consideration of climate adaptation could make a not insignificant	Suggested revised wording to point k) would be an improvement to the policy.	Yes	Point k) to be revised as suggested (Now shown as point r) in policy ENV3)

contribution to a more climate resilient built environment. (North Yorkshire County Council)			
Lack of reference to Neighbourhood Plan design policies. Stroud Local Plan has direct reference.	The justification to the policy as existing includes reference to neighbourhood plans and reads, 'Communities also have the option of setting out their own policies, in support of good design, within a Neighbourhood Plan.'	No	
Object to omission of bicycle storage and non-recyclable waste. The NPPF aims to promote sustainable travel through the planning system including walking and cycling. The Leeds and Liverpool Canal towpath is being upgraded specifically to encourage cycling to work and several allocations of land lie along it. Sites elsewhere should also promote cycling. If people are going to cycle then storage space important.	The suggestion for inclusion of references to both cycle storage and non-recyclable waste would be an improvement to the policy.	Yes	Incorporate wording re non-recyclable waste and cycle storage within policy (see points f) and k) in draft policy ENV3.
Opportunity to expand on tranquillity, light and dark.	It is unclear how the respondent considers that reference to tranquillity, light and dark should be expanded.	No	
Consideration should be given to a separate policy solely relating to canals given their importance of the natural and built environment. Policy should seek to address issues associated with canalside development. Canalside locations are unique and new development needs to fully reflect their settings in terms of heritage, environmental and infrastructure impacts. Good example policy A6 of Hyndburn Borough Council Adopted Core Strategy and	Noted, a new policy will be inserted into the Local Plan which seeks to ensure that new development adjacent to or within the vicinity of the Leeds and Liverpool Canal is of high design quality and environmental quality, together with criteria to ensure good amenity.	Yes	New policy ENV11 to be included in Local plan on Leeds –Liverpool Canal.

policy SP34 of Rotherham Council Sites and Policies DPD.			
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## Draft Policy ENV4: Biodiversity Policy Response Paper

April – May 2016 Draft Local Plan

<b>Policy ENV4</b>			
<b>Aim of the Policy: Help to safeguard and improve biodiversity in Craven through new growth.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
Potential to include SC034 and SC070 in the list of sites at the end of the policy due to the presence of swallows, bats, curlews, variety of grasses and wildflowers.	This comment is based on a mis-understanding of the purpose of the list of sites at the end of draft policy ENV4 (section 'e'). The sites listed will comprise those proposed allocated housing sites where the Council envisages that opportunities for potentially significant contributions to a net gain in biodiversity could be made.	No	
The Environment Agency is pleased to see that the majority of the comments they made on the previous consultation have been taken into account within this revised draft. In particular they note the positive changes to the biodiversity policy.	Support for draft policy ENV4 is noted and welcomed.	No	
Paragraph a) v) states "Ensure there is no deterioration in the ecological status of surface or ground waterbodies". The Environment Agency recommends that it is changed to read "Ensure that there is no deterioration in the Water Framework Directive ecological status of surface or	The Water Framework is the Directive through which ecological status of surface or groundwater bodies is assessed, therefore this suggested amendment should be incorporated.	Yes	Amend criterion a) v) of draft policy ENV4 (renumbered a) vi)) to read: "Ensure that there is no deterioration in the <i>Water Framework Directive</i> ecological status of surface or groundwater bodies as a result of the



<p>groundwater bodies as a result of the development” in order to clarify how the Water Framework Directive is referred to.</p>			<p>development.”</p>
<p>The Yorkshire Wildlife Trust is very supportive of this policy overall, however the use of the phrases “if possible” and “wherever possible” should be assessed as many are not necessary and provide developers with a reason for not looking at potential enhancements. The onus needs to be on developers to show why something is not possible.</p>	<p>Paragraph 109 of the NPPF sets out that planning policies should minimise impacts on biodiversity and provide net gains in biodiversity <u>where possible</u>, and draft policy ENV4 has been worded to accord with the NPPF.</p>	<p>No</p>	
<p>NYCC Business and Environmental Services states that draft policy ENV4: Biodiversity looks broadly fine, and the reference to ecological networks and integrating biodiversity into developments are particularly welcome. Query to point a) i), which states “Ensure that there is no adverse impact on any locally, nationally or internationally designated sites, unless the benefit of the development clearly outweighs the impact on the designation.” NYCC advises that for international designations there is a very specific test as to whether a development can proceed in the event of adverse effects on SACs and SPAs that must be demonstrated through the Habitats Regulations Assessment process. To pass this test it much be demonstrated that:</p> <ul style="list-style-type: none"> <li>• Mitigation measures have been explored and that residual effects</li> </ul>	<p>It is acknowledged that there is a specific IROPI test (Imperative Reasons of Overriding Public Interest) under Article 6 (4) of the EU Directive on the Conservation of Natural Habitats and of Wild Flora and Fauna (The Habitats Directive)where development may adversely affect international designations. It would therefore improve the plan if this was explicitly stated in both the supporting text and within Policy ENV4 at point a) i)</p>	<p>Yes</p>	<p>Insert new paragraph at 5.45 into supporting text for Policy ENV4 to read: <i>“Development proposals which are likely to adversely affect international designations would be subject to a specific IROPI test under (Article 6 (4) of the EU Directive on the Conservation of Habitats and of Wild Flora and Fauna (The Habitats Directive). To pass the IROPI test development proposals must demonstrate that mitigation measures have been explored and that residual effects remain and that when mitigation measures have been exhausted ,alternative solutions have been be sought. If , and only after, alternative solutions are shown not to be possible, then the development must be able to</i></p>

<p>remain;</p> <ul style="list-style-type: none"> <li>Once mitigation measures have been exhausted alternative solutions should be sought;</li> <li>Only after alternative solutions are shown not to be possible then the development must be able to demonstrate 'imperative reasons of overriding public interest' to proceed. This is more than simply a measure of 'outweighing' the impact, and for sites which host a priority natural habitat type or species there must be imperative reasons relating to human health, public safety or beneficial consequences of primary importance to the environment, or other reasons to the opinions of the European Commission.</li> <li>If the IROPI test is passed, compensatory measures must still be provided, for instance the recreation of a comparable habitat.</li> </ul> <p>Advice from Natural England should be sought as to whether the policy's wording appropriately reflects the requirements of the Habitats Regulations.</p>			<p><i>demonstrate 'imperative reasons of overriding public interest' (relating for example to human health, public safety or beneficial consequences of primary importance to the environment) to proceed. In the event that a development proposal passes the IROPI test, compensatory measures must still be provided, for instance the recreation of a comparable habitat."</i></p> <p>Amend point a) i) of Policy ENV4 to read:  <i>"Ensure that there is no adverse impact on any international designated site, unless the IROPI test under Article 6(4) of the EU Directive on the Conservation of Natural Habitats and of Wild Flora and Fauna (The Habitats Directive) has been passed and compensatory measures provided"</i></p>
<p>Objection to lack of emphasis on green roofs. Modern fabric and materials make green roofs much easier to build and maintain. It should be possible to require developments to put them in.</p>	<p>Whilst the plan will not require new development to incorporate green walls, roofs and soft borders it will support them as one of many methods of improving biodiversity in the plan area. It is acknowledged that these</p>	<p>No</p>	

	<p>features provide additional green space in an area, thereby assisting biodiversity connectivity, however this is also true of many other methods, i.e. the provision of open space.</p> <p>Green walls and roofs and soft border are also advocated through the sustainable building standards set out by Government.</p>		
Strengthen language	Comment noted. It is considered that draft policy ENV4, following suggested amendments by key statutory bodies will be sufficiently robust to safeguard and improve the biodiversity of the plan area.	No	
Natural England supports draft policy ENV4 and welcomes the recognition (para. 5.38) of the role of biodiversity in achieving sustainable development in compliance with para. 9 of the NPPF.	Support for draft policy ENV4 is noted and welcomed.	No	
Natural England supports draft policy ENV4 and welcomes the recognition of the sensitivity of Craven's biodiversity (para. 5.39) and that the protection of designated sites alone is insufficient to protect biodiversity (para. 5.40). Para. 5 40 should also include a reference to the impact of climate change on the biodiversity in this context.	Support for draft policy ENV4 is noted and welcomed. It is considered that paragraph 5.40 is amended to incorporate a reference to the impact of climate change on biodiversity, to ensure that the draft policy is in line with para. 99 of the NPPF.	Yes	Amend paragraph 5.40 (renumbered 5.42) to read: “...we need to make the best of all opportunities, wherever they arise, to safeguard native habitats and species and to help their recovery, expansion, <i>adaptation to climate change</i> and movement across the plan area”
Natural England notes that para. 5.40 refers to the mapping of designated sites, which is in compliance with para. 117 of the NPPF. The plan should also include wider mapping of the components of the ecological	Planned green infrastructure areas and routes as part of proposed development sites that can form wildlife corridors and stepping stones to connect with wider ecological networks will be mapped	Yes	Green infrastructure areas and routes proposed as part of development sites are shown on the Policies Map.

networks including wildlife corridors and stepping stones as specified in NPPF para. 117. This will be key for the effective delivery and monitoring of policy ENV4, it will be difficult for applicants and decision makers without access to the necessary information.			
Natural England notes that criterion a) ii) of ENV4 refers to the potential for update of the Local Biodiversity Action Plan, in line with para 165 of the NPPF and encourages working with local groups, particularly the North and East Yorkshire Local Biological Records Centre, with regards to ecological data collection.	Comment noted. The Council has subscribed to the North and East Yorkshire Local Biological Records Centre to ensure that up to date information is available on priority habitats and species in the plan area.	No	
Natural England supports draft policy ENV4 and welcomes the reference to the National Character Areas in para. 5.41. The character area profiles include useful references to ecosystem services and landscape and biodiversity opportunities which could be helpful in supporting the delivery of ENV4.	Support for draft policy ENV4 is noted and welcomed.	No	
Natural England supports draft policy ENV4 and particularly welcomes the emphasis on delivering the plan's positive strategy for the natural environment through development in policy ENV4 and para. 5.42 of the supporting text. This is in line with para. 118 of the NPPF which makes it clear that opportunities to incorporate biodiversity in and around development should be encouraged. In particular we note and welcome criterion b) of the policy.	Support for draft policy ENV4 is noted and welcomed.	No	

<p>Natural England supports draft policy ENV4 and welcomes the intention in criterion e) to include guiding development principles to identify how allocations can make significant contributions to achieving a net gain in biodiversity, and encourages working with the Local Records Centre and Local Nature Partnerships on this.</p>	<p>Support for draft policy ENV4 is noted and welcomed.</p>	<p>No</p>	
<p>CPRE note that there is no mention of the Local Nature Partnerships (LNPs) in the supportive text for draft policy ENV4 and feel this is a section which could be made stronger before submission.</p>	<p>Commented noted. It is considered that in their assessments of the likely effect of their proposals on biodiversity within the site, on wider ecological networks and on biodiversity beyond the site, developers should seek advice from Local Nature Partnerships to establish if and where they could link in with existing biodiversity improvement projects in the locality.</p>	<p>Yes</p>	<p>Amend paragraph 5.42 (renumbered 5.44) to include the following wording: <i>“Local Nature Partnerships can provide developers with useful advice and access to local organisations, businesses and people who are working towards improving the local natural environment, as a way of linking development proposals in with existing biodiversity improvement projects in the locality”</i>.</p>
<p>CPRE suggested that the first criterion of bullet point a) could be made stronger by the inclusion of the following words to read: <i>“Ensure that there is no adverse impact on any locally, nationally or internationally designated sites and their settings, unless the benefit of the development clearly outweighs the impact on the designation. The benefit of and underlying need of this development would need to be proved to the satisfaction of the Local Authority prior to the approval of any proposal.”</i></p>	<p>Comment noted. It is considered that an additional criterion a) ii) should be included within draft policy ENV4 to reflect the significance of developing on or near designated national or local biodiversity sites, by emphasizing that the onus would be on developers to demonstrate that the need and benefits of the proposal would outweigh the adverse impacts on the designated site.</p>	<p>Yes</p>	<p>Amend criterion a) i) and renumber as criterion a) ii) to read: <i>“Ensure that there is no adverse impact on any national or local designated sites and their settings, unless it has been demonstrated to the satisfaction of the local planning authority that the benefit of, and need for the development clearly outweighs the impact on the importance of the designation. “</i>  Remaining sub sections of criterion</p>

			a) to be renumbered.
CPRE welcomes the clarity given in bullet points c) and d) of this policy which infer that impractical schemes and those which result in loss/harm to biodiversity will be resisted.	Support for draft policy ENV4 is noted and welcomed.	No	
Disappointing that the list of allocated sites has not been included in draft policy ENV4, however, CPRE would welcome the opportunity to comment on this during a future consultation event.	Comment noted.	Yes	Include list of preferred housing allocation sites at end of draft policy ENV4 where it is envisioned that the plan area's biodiversity can be improved as part of the development.
Any approach should be taken in line with that set out in the NPPF. In particular when formulating policies on biodiversity and geodiversity 'Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make. (Gladmans)	Comment noted. Proposed changes to criterion a)i) and a) ii) and supporting text in response to other comments will also address this particular point about the hierarchy of designated sites.	Yes	See proposed changes for criterion a) i) and ii)

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## Draft Policy ENV5: Green Infrastructure

April – May 2016 Draft Local Plan

<b>Policy ENV5</b>			
<b>Aim of the Policy: Help to create an improved and expanded green infrastructure network in Craven through new growth.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
Support for draft policy ENV5.	Support for draft policy ENV5 is noted and welcomed.	No	
NYCC Business and Environmental Services states that it is encouraging to see draft policy ENV5: Green Infrastructure, which seeks to avoid loss of and enhance green infrastructure. They state that it will be important to effectively map green infrastructure (ideally on the Policies map and on sites maps) so that the policy can be fulfilled.	Comment noted. Green infrastructure areas and networks will be identified on the policies map, and within the Development principles and site maps for preferred site allocations where relevant.	Yes	Green infrastructure networks to be shown on policies map and preferred site allocation maps where relevant.
Strengthen language. No list of allocated sites in policy.	Comment noted. It is considered that draft policy ENV5, following suggested amendments by key statutory bodies will be sufficiently robust to help improve and expand the green infrastructure network in the plan area. The next draft of the local plan will identify preferred housing allocations, and sites where it is envisioned that the plan area's green infrastructure network can be improved as part of the development will be highlighted in draft	Yes	Include list of preferred housing allocation sites at end of draft policy ENV5 where it is envisioned that the plan area's green infrastructure network can be improved as part of the development

	policy ENV5.		
The Canal and Rivers Trust notes that within the supporting text of draft ENV5 (para. 5.49) that the Leeds & Liverpool Canal is recognised as green infrastructure and that specific reference is made to the canal towpath improvement scheme which seeks to improve access and enjoyment of the canal environment. Support is expressed for the policy which seeks to improve the green infrastructure network by enhancing and seeking maintenance for existing green infrastructure especially from new developments that may impact on it, for example, a new residential development that increases the usage of a nearby towpath and increases the maintenance liability of the towpath.	Support for draft policy ENV5 is noted and welcomed.	No	
Natural England notes and welcomes the definition and explanation of green infrastructure (GI) in paras. 5.44 and 5.45 and the recognition of the social and economic benefit of GI networks in para. 5.46 in addition to the value of GI for biodiversity.	Support for draft policy ENV5 is noted and welcomed.	No	
Natural England welcomes the reference to the Yorkshire and Humber Green Infrastructure mapping project in para. 5.48 and support for GI links beyond that plan area in para. 5.47.	Support for draft policy ENV5 is noted and welcomed.	No	
Natural England welcomes the commitment to supporting projects associated with Leeds City Region Green Infrastructure Strategy	Comment noted	No	



<p>and note that the strategy is currently under review. Opportunities should be sought through the review process to engage with elements of the strategy within the plan area. Particular regard should be given to considering opportunities for delivering natural flood management through green infrastructure in the upper reaches of the River Aire.</p>			
<p>Natural England welcomes policy ENV5, particularly the emphasis on delivery through development and reference to habitat corridors, linages and stepping stones, in line with paras. 114 and 117 of the NPPF and the 2011 Natural environment White paper. However, in order to aid developers and decision makers in delivering and complying with this policy, Natural England advise that the local plan should include mapping of the component and corridors of the GI network with the plan.</p>	<p>Comment noted. Green infrastructure areas and networks will be identified on the policies map, and within the Development principles and site maps for preferred site allocations where relevant.</p>	<p>Yes</p>	<p>Green infrastructure networks to be shown on policies map and preferred site allocation maps where relevant.</p>
<p>Natural England welcomes criterion e) and the intent to include guiding principles for specific allocations to help deliver the policy. Natural England encourages the Local Planning Authority to work with local biodiversity groups, the local records centre and Local Nature Partnership on this.</p>	<p>Comment noted. [NB. Draft policy ENV5 does not include a criterion e), however it is clear from the nature of Natural England's comment that they are in fact referring to criterion d) of the draft policy.</p>	<p>No</p>	
<p>Support for draft policy ENV5 in relation to draft site SK013, Aldersley Avenue, Skipton. SK013 has the opportunity to contribute to the district's green infrastructure which would accord with this draft policy, in</p>	<p>Comment noted.</p>	<p>No</p>	

<p>particular part a) ii) and iii) of the policy:</p> <p>a) ii) Enhance existing or create new green infrastructure and secure its long-term management and maintenance, and</p> <p>a) iii) enhance existing or create new links in the green infrastructure network, including habitat corridors that help wildlife to move more freely through the local environment.</p>			
<p>The draft Local Green Space map for Skipton identifies two sites to be assessed for LGS, which are both existing playgrounds within the vicinity of draft site SK013. The development of SK013 would be well linked to these proposed designated LGS sites in accordance with mitigation measure 4 in the Council's Sustainability Appraisal mitigations and recommendations for SK013 (i.e. opportunity to incorporate social infrastructure related to community parks and other green infrastructure).</p>	<p>Comment noted</p>	<p>No</p>	
<p>CPRE welcomes paragraph 5.46 relating to green infrastructure networks, in particular they support the reference to "<i>preserving and enhancing existing assets, creating new assets and strengthening connections between assets</i>" – this is crucial to helping to maintain the rural character of the District at a time when growth is being promoted.</p>	<p>Support for draft policy ENV5 is noted and welcomed.</p>	<p>No</p>	
<p>The detail of paragraphs 5.48-5.49 need to be incorporated into a Duty to Cooperate matrix to prove legal compliance prior to</p>	<p>Commented noted. The Council is working closely with the appropriate statutory bodies, neighbouring authorities and local</p>	<p>No</p>	

submission.	organisations to ensure that the plan is legally sound and complies with the Duty to Cooperate test of soundness. This will be set out in the Duty to Cooperate document that will accompany the submission of the plan.		
Draft policy ENV5 sets out the requirements for Green Infrastructure provision in the Local Plan. The opening sentence to the policy is repetitive (the word growth) and does not read well.	Comment noted. The opening sentence to draft ENV5 will be amended so that it does not repeat the word 'growth'.	Yes	Amend first sentence of draft policy ENV5 to read: <i>"Growth in housing, business and other land uses will be accompanied by an improved and expanded green infrastructure network."</i>
CPRE believe that draft policy ENV5 will allow developers to promote sites that do not enhance or expand the networks due to the phrasing " <i>wherever possible</i> " in bullet point a). This could be strengthened by rewording to read: " <i>Development proposals will:</i> "	Comment noted, however, it is not considered that the suggested change to draft policy ENV 5 would improve the policy as it could prevent otherwise sustainable development, such as the conversion or change of use of existing buildings from coming forward.	No	
CPRE suggests that bullet point b) could be strengthened by the alteration of the text to read: " <i>...Where improvements are viable these should be achieved on site, however, if to the satisfaction of the Local Authority this is not achievable and the development still considered necessary at this location, contributions for off-site enhancements should be made...</i> "	Comment noted, however, it is not considered that the suggested change to point b) would be an improvement, as the term "necessary at this location" is ambiguous in the context of this policy.	No	
CPRE would welcome the opportunity to comment further on this policy during the next public consultation stage when the	Comment noted. Further comments on future drafts of the plan are encouraged and welcomed.	No	

list of allocated sites has been included.			
<p>Historic England expresses support for draft policy ENV5 which should help to safeguard the Green Infrastructure of the District. Several elements of Craven’s Green Infrastructure network are either designated heritage assets in their own right or contribute to the setting of its historic buildings and structures. The protection and effective management of this resource will not only help to safeguard many elements which contribute to the distinctive character of the area but also to deliver the plan’s Objectives for the historic environment.</p>	<p>Support for draft policy ENV5 is noted and welcomed.</p>	<p>No</p>	

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## Draft Policy ENV6: Flood Risk – Policy Response Paper

April – May 2016 Draft Local Plan

<b>Policy ENV6</b>			
<b>Aim of the Policy: Help to avoid and alleviate flood risk in Craven through a flood risk based sequential approach to new growth.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
Draft policy ENV6 needs strengthening. Developers should make contributions to the cost of upstream flood management schemes to reduce flooding on sites downstream (i.e. maintenance of moors, tree planting).	Comment noted. It is considered that criteria d) and f) of draft policy ENV6 address this issue by avoiding the development of upstream areas where there land provides a natural capacity to reduce flood risk and by “maximising opportunities to help reduce the causes and impacts of flooding by ensuring adequate sufficient attenuation and long term storage is provided to accommodate storm water on site without risk to people or property and without overflowing into a watercourse”.	No	
General support for draft policy ENV6 but need to acknowledge the recent evidence in relation to fluvial and pluvial flooding events and their geographical/spatial/topographic implications for proposed development.	Support for draft policy ENV6 is noted and welcomed. The draft local plan in setting out preferred sites for allocation has utilised up to date information from the Strategic Flood Risk Assessment.	No	
The Local Plan states that building will be in areas of low flood risk wherever possible but flooding events have occurred recently in areas close to or on potential housing allocations (where planning applications	Comment noted. Draft policy ENV6 promotes a sequential approach to development on areas at risk of flooding. The selection of preferred sites for allocation will also follow the sequential approach based on the most up to	No	

<p>have been granted refusals in the past on the grounds of flood risk and where sewage systems are already at capacity).</p>	<p>date information in the Strategic Flood Risk Assessment. Criterion a) states that “development will take place in areas of low flood risk wherever possible and always in areas with the lowest acceptable flood risk, by taking into account the development’s vulnerability to flooding and by applying any necessary sequential and exception test.” Where there have been instances of surface water and localised flooding on preferred sites for allocation, guiding development principles for the site will require SUDS and other features within the development to mitigate these risks. In addition, the Council’s Infrastructure Delivery Plan and corresponding draft Infrastructure policies in the plan will ensure that where necessary, development coincides with adequate upgrades to existing sewage infrastructure.</p>		
<p>The Environment Agency recommends that the plan utilises and refers to North Yorkshire County Council’s SUDS design guidance, as NYCC are now the statutory consultee regarding surface water drainage on major development. The Environment Agency recommends consultation with NYCC if not already done so.</p>	<p>Comment noted. North Yorkshire County Council has been consulted at all stages of plan preparation. Although responses have been received from them on various aspects of the plan, they have not commented on draft policy ENV6. Nevertheless, the suggestion that the local plan refers to NYCC’s SuDs design guidance would improve the plan.</p>	<p>Yes</p>	<p>Include reference to NYCC SuDs Design Guidance in paragraph 5.53 (now renumbered 5.57) of the supporting text to Policy ENV6</p>
<p>Natural England welcomes the inclusion of Sustainable Drainage Systems (SUDS) in policy ENV6 and the recognition in the supporting text of the value of SUDS for people and wildlife.</p>	<p>Support for draft policy ENV6 is noted and welcomed.</p>	<p>No</p>	
<p>Do not negate the work done on River Ribble</p>	<p>Comment noted. Draft policy ENV6 promotes</p>	<p>No</p>	

<p>downstream from Gildersleets, re-aligning river banks, water storage ditches, extensive tree planting etc. to slow the flow of water downstream, by building on greenfield sites in areas that have flooded in the past.</p>	<p>a sequential approach to development on areas at risk of flooding. The selection of preferred sites for allocation will also follow the sequential approach based on the most up to date information in the Strategic Flood Risk Assessment. Criterion a) states that “development will take place in areas of low flood risk wherever possible and always in areas with the lowest acceptable flood risk, by taking into account the development’s vulnerability to flooding and by applying any necessary sequential and exception test.” Where there have been instances of surface water and localised flooding on preferred sites for allocation, guiding development principles for the site will require SUDS and other features within the development to mitigate these risks. Additionally, criterion f) of draft policy ENV6 addresses this issue by “ensuring adequate sufficient attenuation and long term storage is provided to accommodate storm water on site without risk to people or property and without overflowing into a watercourse”. In addition, where there have been instances of surface water and localised flooding on draft housing allocations, guiding development principles for the site will require SUDS and other features within the development to mitigate these risks. infrastructure to absorb the effects of any new development.</p>		
<p>CPRE states that draft policy ENV6 needs strengthening in order to avoid development occurring in inappropriate locations. Bullet</p>	<p>Comment noted. However, it is considered that the suggested change to criterion a) would not be in accordance with paragraph 100 of</p>	<p>No</p>	

<p>point a) does not need the caveat '<i>where possible</i>' and should place greater emphasis on the sequential and exceptions test.</p>	<p>the NPPF.</p>		
<p>CPRE states that a bullet point could be included in draft policy ENV6 to reference the importance of reducing flood risk by maintaining and restoring upland areas and wooded valley slopes in line with the supporting text in paragraph 5.54.</p>	<p>Comment noted. It is considered that the existing criterion d) of draft policy ENV6 addresses this issue:          "Development will avoid areas with the potential to increase flood resilience, and seek to enhance as far as possible the natural capacity of soils, vegetation, river floodplains, wetlands and upland habitats to reduce flood risk."</p>	<p>No</p>	

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.



## Draft Policy ENV7: Land and Air Quality

April – May 2016 Draft Local Plan

<b>Policy ENV7</b>			
<b>Aim of the Policy: Help to safeguard and improve land and air quality in Craven through new growth.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
<p>Support for draft policy ENV7. Criterion (b) effectively prioritises the development of PDL, however given the limited nature of this in Craven and NPPF para 111 the following amendment to this criteria is recommended: <i>The re use of PDL (brownfield) of low environmental value will be <u>encouraged</u> and supported.</i></p> <p>The government is already seeking such encouragement through the introduction of brownfield registers and permission in principle. The Council may wish to consider how it can provide further encouragement.</p>	<p>Support for draft policy ENV7 is noted and welcomed. This point is noted and it is considered that the suggested amendment to criterion (b) is incorporated to ensure that the draft policy is in line with the Core planning principles and para 111 of the NPPF.</p>	Yes	<p>Amend criterion b) of draft Policy ENV7 to read “ The re-use of previously developed (brownfield) land of low environmental value will be <i>encouraged</i> and supported.”</p>
<p>Part D requires development to avoid the creation or worsening of traffic congestion. Para 32 of the NPPF sets out that “Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe”, not simply where they add to or create congestion. The policy should be</p>	<p>Comment noted. Criterion d) should be amended to accord with paragraph 32 of the NPPF.</p>	Yes	<p>Amend criterion d) of draft policy ENV7 to read: “Development will avoid <i>severe residual cumulative impacts of</i> traffic congestion and, wherever possible.....”</p>

reworded to ensure it is in line with requirements of the NPPF.			
Some local roads are narrow, congested and have narrow pavements, for example Sutton Lane, Sutton. Further development would increase traffic and accident risk. Bus services are infrequent and encouragement of walking and cycling on congested roads and narrow inadequate footpaths would be dangerous. Many people require the use of a car to access shops, doctors etc.	Comment noted. Whilst it is recognised that reliance on the private car is relatively high, given the rural nature of the district, draft policy ENV7 aims to ensure that new development should be accessible by walking, cycling public transport, and the layout and design of buildings should be modified to reduce emissions and their cumulative impact on air quality into the future.	No	
The Coal Authority is pleased to see that reference has now been made in the supporting text of the policy to the significant coal mining legacy in the Craven area. Although still not explicit in the title of the policy the Coal Authority is pleased to see that consideration of unstable land has now been included within the main body of the policy text.	Support for draft policy ENV7 and previous amendments made is noted and welcomed.	No	
Natural England broadly welcomes the consideration of soils and agricultural land in policy ENV7 and supporting text. This is in line with NPPF para 109, which refers to the protection and enhancement of soils and para 112 which makes it clear that LPAs should take account of the benefits of best and most versatile agricultural land and seek to use poorer quality land in preference to higher quality. NE advise that strategic scale provisional data should not be used to confirm ALC	Support for draft policy ENV7 is noted and welcomed. The suggested amendment to paragraph 5.56 of the supporting text provides useful clarification on best and most versatile agricultural land in the Craven context.	Yes	Amend first sentence of paragraph 5.56 (now renumbered 5.60) to read:  <i>“Craven’s agricultural land is considered not to be best and most versatile (BMV) for the majority of the plan area, but there is potential for areas of BMV agricultural land in several parishes.”</i>

<p>grades at the field level and can only be used as a guide. Recommended that the Local Plan refer to the best and most versatile (BMV) agricultural land more generally along the lines of the following at para 5.56: “Craven’s agricultural land is considered not to be best and most versatile (BMV) for the majority of the plan area, but there is potential for areas of BMV agricultural land in several parishes.”</p> <p>It should be noted that the best BMV agricultural land is considered grades 1 to 3a, while 3b and higher are considered not BMV. Some strategic level mapping is not able to distinguish between grades 3a and 3b.</p>			
<p>Concern expressed in relation to the supporting text to draft policy ENV7 as it does not recognise the value of lower grade agricultural land in Craven. It is suggested that the land classification table is included and explained in the supporting text as the table is primarily focused on arable production. Lower grade land is perfect for the production of beef, lamb, wool and dairy products. A significant amount is generated from “poor quality” agricultural land, generating a significant income to Craven. Suggest the inclusion of a fourth bullet point to include reference to the need to protect vital grazing land for agricultural uses on land classified as grade 3b, 4 &amp; 5.</p>	<p>Para 112 of the NPPF states that “where significant development of agriculture land is demonstrated to be necessary, LPAs should seek to use areas of poorer quality land in preference to that of higher quality.” The majority of agricultural land in Craven is not considered to be the best and most versatile. It is not considered necessary to include the land classification table and explanation in Local Plan policy or supporting text. It is recognised that lower grade agricultural land is valuable in terms of food production, however by avoiding development on the best agricultural land (i.e., in Craven that is grade 3) land quality will be safeguarded and improved. A consultation response has been received from Natural England, which has suggested revised policy</p>	<p>No</p>	

	wording in relation to BMV agricultural land (see above) Amendments will be made to para 5.56 in this respect to ensure that the draft policy is in line with paragraphs 109 and 112 of the NPPF.		
Suggestion that the bullet point list (a-c) should be re ordered to enable a brownfield first policy.	Bullet points a-c are not placed in any priority order. They are all equally important in safeguarding and improving land quality.	No	
The part of the policy relating to air quality is supported by the brief text at para 5.59. There seems to have been an amalgamation of policies as the majority of points within the air quality section is attributed to vehicle congestion and the reduction of car use. There appears to be no policy or supporting text that reflects the requirement of sustainable modes of transport or any policy relating to transport in general, which would be reflective of NPPF para 29-38.	The requirement for new development to be linked to sustainable modes of transport is set out within a range of policies, for example ENV3: Good Design and EC4: Tourism, together with the development principles for preferred site allocations. This is a thread which runs throughout the entire draft Local Plan and is an integral part of the overall spatial strategy.	No	

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## Draft Policy ENV8: Water Resources, Water Quality and Groundwater Policy Response Paper

April – May 2016 Draft Local Plan

<b>Policy ENV8</b>			
<b>Aim of the Policy: Help to safeguard and improve water resources in Craven through new growth.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
This policy needs to be more balanced by providing a policy context in fracking and fossil fuel exploration by including a statement that fracking is not appropriate on the edge of the Yorkshire Dales and within the Forest of Bowland AONB.	The potential for fracking is dependent on the underlying geology of the area. Any application for fracking would be considered and determined by North Yorkshire County Council as this is a county matter.	No	
Existing sewers are overloaded and in time of heavy rainfall causes overflow (as seen in Dec 2015, for example in Sutton)	During preparation of the Local Plan, ongoing consultation takes place with key infrastructure providers, including sewerage providers to ensure that the management and delivery plans of those providers are in line with the extent and type of development proposed in the Local Plan.	No	
This policy is welcomed, which makes reference to the Water Framework Directive and steers development to achieving “good status”.	Support for draft policy ENV8 is noted and welcomed.	No	
Natural England welcomes the consideration of ecological receptors in relation to Water Resources, Quality and Groundwater in the supporting text to draft policy ENV8.	Support for draft policy ENV8 is noted and welcomed.	No	

<p>Para 5.61 states “development in close proximity to water bodies in the plan area should safeguard these important water resources...” The Environment Agency recommend it is changed to read:  “Any development should safeguard these important water resources.”  As any land which drains into a river catchment or stream is considered part of the waterbody.</p>	<p>Given the advice from the EA that any land which drains into a river catchment or stream is considered part of the waterbody, this suggested amendment should be incorporated.</p>	<p>Yes</p>	<p>Replace first part of third sentence in para 5.61( now renumbered 5.65) with:  “<i>Any development</i> should safeguard these important water resources...”,</p>
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\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## Policy ENV9: Renewable and Low Carbon Energy Response Paper

April – May 2016 Draft Local Plan

<b>Policy ENV9</b>			
<b>Aim of the Policy:</b> To promote the sustainable growth of renewable and low carbon energy technologies within Craven taking account of impacts including biodiversity, historic environment, landscape and amenity.			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
Turbines need to be sited where bat roosts and bat hibernation sites will not be affected.	Comment noted and it is considered that reference in the supporting text of the need to consider effects on bats, including direct effects such as collision and barotrauma will add clarity to the policy.	Yes	Amend paragraph 5.71 (now renumbered 5.75) to read:  “Potential effects on biodiversity may be indirect, such as the effect of rotating turbine blades on the migration pattern of birds and bat species. However, effects can also be direct and can include collision of blades with birds and bats species and barotrauma affecting bat species. Therefore, whilst Policy ENV9 promotes the sustainable growth of renewable and low-carbon energy, proposals will need to consider carefully ecological effects and accord with other local plan policies in achieving sustainable development overall.”
Biomass technology is not always carbon neutral and burning biomass can be as	Comment noted . The supporting text to Policy ENV9 at paragraph 5.64 ( now	No	

damaging as burning coal.	renumbered ???) refers to information contained within the Low Carbon and Renewable Energy Capacity in Yorkshire and Humber Final Report March 2011 (AECOM), and confirms that there is limited potential for biomass technology within Craven.		
An Inspector may require compliance with the ministerial statement and the identification on the Policies Map of areas of Craven with capacity for wind turbines (where these require planning permission)	Paragraphs 5.75 to 5.78 of the explanation to draft policy ENV9 refers to the written Ministerial Statement released on 18 <sup>th</sup> June 2015 and the implications this has for Craven in terms of wind energy development.	No	
May be useful to consider Landscape Capacity Study for Wind Energy Developments in the South Pennines 2010, though doesn't specifically refer to Craven. Also guidance on turbines under 60m in height.	Whilst guidance within this study is noted, given the lack of reference to Craven, it is not considered directly relevant and therefore should not be referenced within the Local Plan.	No	
Object to use of 'and' rather than 'or' between i) and ii) ii) only applies if there is no Neighbourhood Plan because if a Neighbourhood Plan had a specified wind turbine site and it met a) to k) then the local community would already have agreed to back a site and so ii) would be unnecessary. ii) is only necessary if there is no neighbourhood plan, recognised in the following section which uses OR between iii) and iv)	Noted. The policy replicates guidance within the National Planning Practice Guidance and to change this would be contrary to national guidance, and therefore not considered appropriate. Criteria iv) allows for commercial small scale turbines identified in areas considered appropriate within individual neighbourhood plans.	No	
Natural England welcomes recognition of potential negative and unsustainable environmental impacts from renewable energy and low carbon energy development on the landscape, heritage, biodiversity and	Support Noted	No	



people's homes and recognition of sensitivities of Yorkshire Dales National Park and Forest of Bowland AONB in 5.7. Welcome criteria b) and c) of policy ENV9, particularly references to setting of these nationally protected landscapes.			
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\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## Draft Policy ENV10: Local Green Space Response Paper

April – May 2016 Draft Local Plan

<b>Policy ENV10</b>			
<b>Aim of the Policy: To designate and protect designated Local Green Space.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
Draft policy ENV10 gives poor protection of important greenspaces. The Stroud Plan appears to give better protection to unlisted green spaces than the Craven draft plan and has a clearer statement on this (lists an extract from the Stroud policy)	It is acknowledged that Draft policy ENV10 as it appears in the April 2016 draft local plan is a reflection of the early stage of the Local Green Space designation process. It is therefore expected that the policy will change significantly from this early version following the consideration of comments made on the early draft and further evidence on potential sites.	Yes	Draft policy ENV10 and supporting text has been replaced with a new draft policy and supporting text to reflect comments received on the early draft version and the consideration of further evidence on sites.
Many sites that are distinctive in form, character and setting, that provide settings to important buildings/ancient monuments or that provide green corridors are not on the LGS maps.	It is acknowledged that Draft policy ENV10 as it appears in the April 2016 draft local plan is a reflection of the early stage of the Local Green Space designation process. It is therefore expected that the policy will change significantly from this early version following the consideration of comments made on the early draft and further evidence on potential sites.	Yes	Draft policy ENV10 and supporting text has been replaced with a new draft policy and supporting text to reflect comments received on the early draft version and the consideration of further evidence on sites.
A broad range of areas are identified as LGS designation, however a significant omission	It is acknowledged that Draft policy ENV10 as it appears in the April 2016 draft local plan is a	Yes	Draft policy ENV10 and supporting text has been replaced with a new

<p>is the inclusion of Park Hill bounded by Grassington Rd and Skipton woods. It includes the Dales High Way route, was an hunting park for the castle and the area at the top is a Civil War battery site. This area is complementary to the woods, is an accessible area of pasture within easy walking distance of much of the local population and provides significant amenity. It is prominent from Park St and Primrose Hill. Small area near the roundabout has been designated as LGS and includes Short Hill Lane. The LGS site should be much larger.</p> <p>This site was put forward for LGS designation by the Civic Society. It appears to meet criteria a-f, however it may be considered too extensive. Is not clear why it is not included as a proposed LGS designation.</p>	<p>reflection of the early stage of the Local Green Space designation process. It is therefore expected that the policy will change significantly from this early version following the consideration of comments made on the early draft and further evidence on potential sites.</p>		<p>draft policy and supporting text to reflect comments received on the early draft version and the consideration of further evidence on sites.</p>
<p>Support for the policy and designation of green spaces with biodiversity value, however can see problems with designating so many small and varied pieces of land. There is greater need for monitoring and updating the SINCs, which are more important for conserving biodiversity.</p>	<p>It is acknowledged that Draft policy ENV10 as it appears in the April 2016 draft local plan is a reflection of the early stage of the Local Green Space designation process. It is therefore expected that the policy will change significantly from this early version following the consideration of comments made on the early draft and further evidence on potential sites.</p>	<p>Yes</p>	<p>Draft policy ENV10 and supporting text has been replaced with a new draft policy and supporting text to reflect comments received on the early draft version and the consideration of further evidence on sites.</p>
<p>Site 50 – this should be extended further down Grassington Rd to the starting point for existing housing.</p>	<p>It is acknowledged that Draft policy ENV10 as it appears in the April 2016 draft local plan is a reflection of the early stage of the Local Green Space designation process. It is therefore expected that the policy will change</p>	<p>Yes</p>	<p>Draft policy ENV10 and supporting text has been replaced with a new draft policy and supporting text to reflect comments received on the early draft version and the</p>

	significantly from this early version following the consideration of comments made on the early draft and further evidence on potential sites.		consideration of further evidence on sites.
Skipton site 21 – whole area to the south of the by pass should be designated. Could the green corridor along both sides of Otley Rd (after railway bridge) be protected as this is an attractive entrance to Skipton?	It is acknowledged that Draft policy ENV10 as it appears in the April 2016 draft local plan is a reflection of the early stage of the Local Green Space designation process. It is therefore expected that the policy will change significantly from this early version following the consideration of comments made on the early draft and further evidence on potential sites.	Yes	Draft policy ENV10 and supporting text has been replaced with a new draft policy and supporting text to reflect comments received on the early draft version and the consideration of further evidence on sites.
Proposed LGS sites are within the CA and all contribute to the character, tranquillity and beauty of the village. There are opportunities to enhance further as LGS and as an owner of a site I see no value in developing other than for personal financial gain. Development of these proposed sites would be a significant cost to the village character.	It is acknowledged that Draft policy ENV10 as it appears in the April 2016 draft local plan is a reflection of the early stage of the Local Green Space designation process. It is therefore expected that the policy will change significantly from this early version following the consideration of comments made on the early draft and further evidence on potential sites.	Yes	Draft policy ENV10 and supporting text has been replaced with a new draft policy and supporting text to reflect comments received on the early draft version and the consideration of further evidence on sites.
Welcome draft policies ENV10 & INF3 in relation to open space. If there are any private allotments not designated as LGS they would be worth considering as there is currently no protection for them under existing legislation, unlike council owned sites.	Note and welcome support for draft policies ENV10 & INF3. Allotment sites (both privately and publically owned) have been assessed within the 2016 Open Space Assessment and would therefore be protected under draft policy INF3.	No	
Object to the following statement included in the SA: “LGS does not directly contribute to the	Comment noted and accepted that LGS and other areas of open space provide opportunities for educational purposes and the	Yes	Take account of contribution LGS can make to education in SA of this policy against this specific SA

<p>achievement of a good standard of education for Craven's population. Other policies in the draft plan seek to achieve this objective". This is false as a good standard of education includes learning in greenspace with school groups. A great deal of child and adult education takes place in or relies on LGS.</p>	<p>SA for Policy ENV10 should reflect this.</p>		<p>objective.</p>
<p>The draft LP states that fields that provide a green wedge between villages are important both spatially and visually. The Sutton Lane site and Thompson Fields are such wedges. Sutton has been a village for hundreds of years and should be allowed to remain a village through protection of these existing green wedges.</p>	<p>Adopted Local Plan policy (1999) relating to green wedges is saved Local Plan policy BE3. It is not intended to replace policy BE3 with draft policy ENV10.</p>	<p>No</p>	
<p>Footpaths around Bentham need protection despite new development. The enclosure of the footpath by Bargh's Meadow is an example of what should not happen – gravel paths and high fences do not create interesting walks.</p>	<p>Comment Noted, and acknowledged , however, this point is addressed through other policies in the Local Plan primarily through draft Policy ENV5 : Green Infrastructure which requires development proposals to enhance existing or create new green infrastructure networks wherever possible and secure its long term management and maintenance. In addition, development principles for the provision of green infrastructure will be developed for individual proposed preferred sites for allocation.</p>	<p>No</p>	
<p>Surprise that only 2 spaces have been identified in Bradley and one being a sports field.</p>	<p>Bradley PC currently preparing a Neighbourhood Plan, which will assess and identify LGS designations. The sites identified</p>	<p>No</p>	

	on the LGS map for Bradley are those that would be protected under draft policy INF3 of the Craven Local Plan .		
Sites EM012 & EM013 should not be included in pool of sites for housing, instead they should be designated as LGS.	It is acknowledged that Draft policy ENV10 as it appears in the April 2016 draft local plan is a reflection of the early stage of the Local Green Space designation process. It is therefore expected that the policy will change significantly from this early version following the consideration of comments made on the early draft and further evidence on potential sites.	Yes	Draft policy ENV10 and supporting text has been replaced with a new draft policy and supporting text to reflect comments received on the early draft version and the consideration of further evidence on sites.
<p>NPPF is very clear that LGS will not be appropriate for most green areas or open space. Where sites are designated as LGS evidence is needed as to what is demonstrably special about the site. The draft LP takes an unbalanced, un-evidenced approach because:</p> <ul style="list-style-type: none"> <li>• There is a significant volume of sites on the draft LP map as potential LGS designations following only a partial assessment against four basic criteria.</li> <li>• There are no parameters provided within policy ENV10 criteria to undertake an objective assessment of the role and function of the LGS site.</li> <li>• The criteria is unclear. What is meant by “local character” and how is “reasonably close” defined?</li> <li>• Draft policy fails to define what the</li> </ul>	<p>The Council’s LGS methodology has been finalised following public consultation, including with specific interest groups and is in line with the relevant sections of the NPPF and the NPPG. The NPPF and NPPG is also clear that sites designated as LGS do not require public access.</p> <p>However, it is acknowledged that Draft policy ENV10 as it appears in the April 2016 draft local plan is a reflection of the early stage of the Local Green Space designation process. It is therefore expected that the policy will change significantly from this early version following the consideration of comments made on the early draft and further evidence on potential sites.</p>	Yes	Draft policy ENV10 and supporting text has been replaced with a new draft policy and supporting text to reflect comments received on the early draft version and the consideration of further evidence on sites.

<p>essential characteristics of the LGS should be. Large number of sites identified that have been put forward by individuals/community groups without publishing for consultation the detailed evidence base to quantify the exceptional value of those sites, and without consulting landowners. This approach has provided a NIMBY's tool to stifle the development potential of sites within settlements which may provide opportunities for sustainable growth. Sites have been included which have no public access. The LP therefore needs to accurately define what a LGS should be, clearly set out the exceptional circumstances when LGS will be designated and publish for consultation the evidence which justifies the identification of each proposed LGS designation.</p> <ul style="list-style-type: none"><li>• Part two of the policy sets out the exceptional circumstances when development may be approved on LGS designated sites, however they are extremely limited and do not reflect the intention of para 78 of the NPPF. Draft policy ENV10 is more restrictive than Green Belt policy by creating a "planning status" as the most restrictive planning</li></ul>			
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<p>policy designation in the English planning system. It prevents any development on a LGS designation, which does not conform with para 78 of the NPPF, making the policy unsound.</p>			
<p>Landowner is not supportive of the designation of this site on the following grounds [EMBSAY SITE- NEED SITE ID]:</p> <ul style="list-style-type: none"> <li>• Site is an extensive tract of land.</li> <li>• Is not publically accessible</li> <li>• Provides no formal recreation function, informal amenity open space or special ecological habitat.</li> <li>• Site is not demonstrably special.</li> <li>• Part of site is available, suitable and deliverable as a housing site, therefore designation of LGS would conflict with other objectives of the LP to provide sustainable development in sustainable locations.</li> </ul>	<p>The Council's LGS methodology has been finalised following public consultation, including with specific interest groups and is in line with the relevant sections of the NPPF and the NPPG. The NPPF and NPPG is also clear that sites designated as LGS do not require public access.</p> <p>However, it is acknowledged that Draft policy ENV10 as it appears in the April 2016 draft local plan is a reflection of the early stage of the Local Green Space designation process. It is therefore expected that the policy will change significantly from this early version following the consideration of comments made on the early draft and further evidence on potential sites.</p>	Yes	Draft policy ENV10 and supporting text has been replaced with a new draft policy and supporting text to reflect comments received on the early draft version and the consideration of further evidence on sites.
<p>Support for proposed LGS designations as they would conserve the character of the village. Considered that sites GA014, GA023, GA028 AND GA029 should also be designated as LGS.</p>	<p>Gargrave PC are currently preparing a Neighbourhood Plan, which will assess and identify LGS designations.</p>	No	
<p>Support. Of the SA objectives, SO2, SO5 &amp; SO8 can be said to play a role in contributing to ENV10 objectives. SO5 &amp; SO8 would require land being made accessible to the public.</p>	<p>Comment noted , however commentator may be mis-understanding SA process. SA objectives are used to measure the sustainability of policies, not the other way round.</p>	No	



<p>Support for the criteria for designating LGS in line with para 77 of the NPPF and PPG. Para 77 makes it clear that LGS should only be used in certain circumstances, reasonably close to community, demonstrably special to the community because of its beauty, historic significance, recreational value, tranquillity or richness of wildlife and is local in character and not an extensive tract of land.</p>	<p>Support for policy is noted , however It is acknowledged that Draft policy ENV10 as it appears in the April 2016 draft local plan is a reflection of the early stage of the Local Green Space designation process. It is therefore expected that the policy will change significantly from this early version following the consideration of comments made on the early draft and further evidence on potential sites. .</p>	<p>Yes</p>	<p>Draft policy ENV10 and supporting text has been replaced with a new draft policy and supporting text to reflect comments received on the early draft version and the consideration of further evidence on sites.</p>
<p>Support for the inclusion of this policy by Historic England to protect LGS and endorse the proposed criteria for identifying such areas. Many of the areas which are identified in the Policies Map contribute to the special architectural or historic interest of the District’s conservation areas, the landscape setting of its settlements or are an important element in the setting of its heritage assets. The safeguarding of these areas will therefore assist in ensuring that the distinctive character if Craven’s villages is retained and that its objectives for the historic environment are realised.</p>	<p>Support for policy is noted , however It is acknowledged that Draft policy ENV10 as it appears in the April 2016 draft local plan is a reflection of the early stage of the Local Green Space designation process. It is therefore expected that the policy will change significantly from this early version following the consideration of comments made on the early draft and further evidence on potential sites.</p>	<p>Yes</p>	<p>Draft policy ENV10 and supporting text has been replaced with a new draft policy and supporting text to reflect comments received on the early draft version and the consideration of further evidence on sites.</p>
<p>Fields adjacent to Kirk Lane, Emsay (not identified as a potential LGS designation on the April – May 2016 LGS maps): These fields make an important contribution to the landscape setting of and provide views towards the eastern edge of the Emsay Conservation Area. The identification of this area as a Local</p>	<p>It is acknowledged that Draft policy ENV10 as it appears in the April 2016 draft local plan is a reflection of the early stage of the Local Green Space designation process. It is therefore expected that the policy will change significantly from this early version following the consideration of comments made on the early draft and further evidence on potential</p>	<p>Yes</p>	<p>Draft policy ENV10 and supporting text has been replaced with a new draft policy and supporting text to reflect comments received on the early draft version and the consideration of further evidence on sites.</p>

<p>Green Space, therefore, would be likely to safeguard an element which contributes to the significance of the Conservation Area. Consequently, Historic England would support this site being identified in the Local Plan as a Local Green Space.</p>	<p>sites.</p>		
<p>Field South of The Bailey, Skipton. LGS site 11 on Skipton LGS map: This site lies within the Skipton Conservation Area. It is identified in the 2008 Conservation Area Appraisal as being an important open space within the Conservation Area. The identification of this area as a Local Green Space, therefore, would be likely to safeguard an element which has been identified as contributing to the significance of the Conservation Area. Consequently, Historic England would support this site being identified in the Local Plan as a Local Green Space.</p>	<p>Supporting comment is noted , however it is acknowledged that Draft policy ENV10 as it appears in the April 2016 draft local plan is a reflection of the early stage of the Local Green Space designation process. It is therefore expected that the policy will change significantly from this early version following the consideration of comments made on the early draft and further evidence on potential sites.</p>	<p>Yes</p>	<p>Draft policy ENV10 and supporting text has been replaced with a new draft policy and supporting text to reflect comments received on the early draft version and the consideration of further evidence on sites.</p>
<p>Bowling Green, north of the Rope Walk, Skipton LGS site 28 on Skipton LGS map: This site lies within the Skipton Conservation Area and is identified in the 2008 Conservation Area Appraisal as being an important open area within the Conservation Area. The identification of this area as a Local Green Space, therefore, would be likely to safeguard an element which has been identified as contributing to the significance of the Conservation Area. Consequently, Historic England would support this site</p>	<p>Supporting comment is noted , however it is acknowledged that Draft policy ENV10 as it appears in the April 2016 draft local plan is a reflection of the early stage of the Local Green Space designation process. It is therefore expected that the policy will change significantly from this early version following the consideration of comments made on the early draft and further evidence on potential sites.</p>	<p>Yes</p>	<p>Draft policy ENV10 and supporting text has been replaced with a new draft policy and supporting text to reflect comments received on the early draft version and the consideration of further evidence on sites.</p>

being identified in the Local Plan as a Local Green Space			
<p>Glebe Field, Giggleswick, LGS site ? on Settle/Giggleswick LGS map: This site lies within the Giggleswick Conservation Area. The open green spaces of Harrisons Playing Fields are identified in the 2008 Conservation Area Appraisal as being integral to the character of the central part of the Conservation Area. The identification of this area as a Local Green Space, therefore, would be likely to safeguard an element which has been identified as contributing to the significance of the Conservation Area. Consequently, Historic England would support this site being identified in the Local Plan as a Local Green Space</p>	<p>Supporting comment is noted , however it is acknowledged that Draft policy ENV10 as it appears in the April 2016 draft local plan is a reflection of the early stage of the Local Green Space designation process. It is therefore expected that the policy will change significantly from this early version following the consideration of comments made on the early draft and further evidence on potential sites.</p>	Yes	<p>Draft policy ENV10 and supporting text has been replaced with a new draft policy and supporting text to reflect comments received on the early draft version and the consideration of further evidence on sites.</p>
<p>Harrison Playing Fields, Giggleswick, site 8 on the Settle/Giggleswick LGS map. This site lies within the Giggleswick Conservation Area. The open green spaces of Harrisons Playing Fields are identified in the 2008 Conservation Area Appraisal as being integral to the character of the central part of the Conservation Area. The identification of this area as a Local Green Space, therefore, would be likely to safeguard an element which has been identified as contributing to the significance of the Conservation Area. Consequently, Historic England would support this site being identified in the Local Plan as a Local</p>	<p>Supporting comment is noted , however it is acknowledged that Draft policy ENV10 as it appears in the April 2016 draft local plan is a reflection of the early stage of the Local Green Space designation process. It is therefore expected that the policy will change significantly from this early version following the consideration of comments made on the early draft and further evidence on potential sites.</p>	Yes	<p>Draft policy ENV10 and supporting text has been replaced with a new draft policy and supporting text to reflect comments received on the early draft version and the consideration of further evidence on sites.</p>

Green Space			
<p>Sutton Park, Sutton-in Craven, site 5 on the Sutton LGS map: This is an important open space within the Sutton-in Craven Conservation Area which makes an important contribution to the character of the northern part of the Conservation Area. The identification of this area as a Local Green Space, therefore, would be likely to safeguard an element which contributes to the significance of the Conservation Area. Consequently, Historic England would support this site being identified in the Local Plan as a Local Green Space</p>	<p>Supporting comment is noted , however it is acknowledged that Draft policy ENV10 as it appears in the April 2016 draft local plan is a reflection of the early stage of the Local Green Space designation process. It is therefore expected that the policy will change significantly from this early version following the consideration of comments made on the early draft and further evidence on potential sites.</p>	Yes	<p>Draft policy ENV10 and supporting text has been replaced with a new draft policy and supporting text to reflect comments received on the early draft version and the consideration of further evidence on sites.</p>
<p>Closed Burial Ground, Raikes Road, Skipton, site 39 on the Skipton LGS map: The Old Cemetery on Raikes Road is identified in the 2008 Conservation Area Appraisal as being an important open area within the Conservation Area Consequently, Historic England would support it being identified as a Local Green Space</p>	<p>Supporting comment is noted , however it is acknowledged that Draft policy ENV10 as it appears in the April 2016 draft local plan is a reflection of the early stage of the Local Green Space designation process. It is therefore expected that the policy will change significantly from this early version following the consideration of comments made on the early draft and further evidence on potential sites.</p>	Yes	<p>Draft policy ENV10 and supporting text has been replaced with a new draft policy and supporting text to reflect comments received on the early draft version and the consideration of further evidence on sites.</p>
<p>The Brow, Ingleton, site 4 on the Ingleton LGS map: This is an important within the Ingleton Conservation Area which makes an important contribution to the character of the southern part of the Conservation Area The identification of this area as a Local Green Space, therefore, would be likely to</p>	<p>Supporting comment is noted , however it is acknowledged that Draft policy ENV10 as it appears in the April 2016 draft local plan is a reflection of the early stage of the Local Green Space designation process. It is therefore expected that the policy will change significantly from this early version following the consideration of comments made on the</p>	Yes	<p>Draft policy ENV10 and supporting text has been replaced with a new draft policy and supporting text to reflect comments received on the early draft version and the consideration of further evidence on sites.</p>

safeguard an element which has been identified as contributing to the significance of the Conservation Area. Consequently, Historic England would support this site being identified in the Local Plan as a Local Green Space	early draft and further evidence on potential sites.		
<p>Hellifield Flashes, Hellifield, site 1 on the Hellifield LGS map: The northern part of this area lies within the Long Preston Conservation Area. Presumably, when this Conservation Area was designated in 1989, this open area was considered to make an important contribution to its character. The identification of this area as a Local Green Space, therefore, would be likely to safeguard an element which contributes to its significance. Therefore, Historic England would support the northern part of this site being identified in the Local Plan as a Local Green Space</p>	Supporting comment is noted , however it is acknowledged that Draft policy ENV10 as it appears in the April 2016 draft local plan is a reflection of the early stage of the Local Green Space designation process. It is therefore expected that the policy will change significantly from this early version following the consideration of comments made on the early draft and further evidence on potential sites.	Yes	Draft policy ENV10 and supporting text has been replaced with a new draft policy and supporting text to reflect comments received on the early draft version and the consideration of further evidence on sites.
<p>Field adjacent to St Aidan’s Church, Hellifield, site 5 on Hellifield LGS map: This field contributes to the setting of the Grade II Listed St Aidan’s Church. The identification of this area as a Local Green Space, therefore, would be likely to safeguard an element which contributes to the significance of the adjacent to Listed Building. Therefore, Historic England would support this site being identified in the Local Plan as a Local Green Space</p>	Supporting comment is noted , however it is acknowledged that Draft policy ENV10 as it appears in the April 2016 draft local plan is a reflection of the early stage of the Local Green Space designation process. It is therefore expected that the policy will change significantly from this early version following the consideration of comments made on the early draft and further evidence on potential sites.	Yes	Draft policy ENV10 and supporting text has been replaced with a new draft policy and supporting text to reflect comments received on the early draft version and the consideration of further evidence on sites.
Kildwick LGS Site 1:	Supporting comment is noted , however it is	Yes	Draft policy ENV10 and supporting

<p>This area lies within the Kildwick Conservation Area. Presumably, when this Conservation Area was designated in 1989, this open area was considered to make an important contribution to its character. The site also contribute to the setting of the Grade I and Scheduled Kildwick Bridge. The identification of this area as a Local Green Space, therefore, would be likely to safeguard an element which contributes to the significance of these designated heritage assets. Therefore, Historic England would support this site being identified in the Local Plan as a Local Green Space</p>	<p>acknowledged that Draft policy ENV10 as it appears in the April 2016 draft local plan is a reflection of the early stage of the Local Green Space designation process. It is therefore expected that the policy will change significantly from this early version following the consideration of comments made on the early draft and further evidence on potential sites.</p>		<p>text has been replaced with a new draft policy and supporting text to reflect comments received on the early draft version and the consideration of further evidence on sites.</p>
<p>Gawflat Conservation Meadow, site 33 on Skipton LGS map: This area was added to the Skipton Conservation Area in the 2008 review. The Conservation Area Appraisal identified a key view of the town across this site and stated:- “The extensive public park at Aireville, dating from the 1830s when it was the grounds of a private house and adopted as a public park in the 1950s by Skipton Town Council, is of great importance. It is easily accessible from all conservation areas, with a canal-side walk from the centre of the town, but is not part of them. It has a large open grassed area with mature trees (the site of fairgrounds and public events), a conservation meadow, golf course, swimming pool and fitness centre”. The identification of this area as a Local</p>	<p>Supporting comment is noted , however it is acknowledged that Draft policy ENV10 as it appears in the April 2016 draft local plan is a reflection of the early stage of the Local Green Space designation process. It is therefore expected that the policy will change significantly from this early version following the consideration of comments made on the early draft and further evidence on potential sites.</p>	<p>Yes</p>	<p>Draft policy ENV10 and supporting text has been replaced with a new draft policy and supporting text to reflect comments received on the early draft version and the consideration of further evidence on sites.</p>

<p>Green Space, therefore, would be likely to safeguard an element which has been identified as contributing to the significance of the Conservation Area. Consequently, Historic England would support this site being identified in the Local Plan as a Local Green Space</p>			
<p>Park Hill, Skipton, site 50? on Skipton LGS map: This site lies in the Skipton Conservation Area. Park Hill, with earthworks of a Civil War battery and fine views over the town is identified in the 2008 Conservation Area Appraisal as being an important open area within the Conservation Area. It also contributes to the setting of the Scheduled Monument at Park Hill</p> <p>The identification of this area as a Local Green Space, therefore, would be likely to safeguard an element which has been identified as contributing to the significance of the Conservation Area. Consequently, Historic England would support this site being identified in the Local Plan as a Local Green Space</p>	<p>Supporting comment is noted , however it is acknowledged that Draft policy ENV10 as it appears in the April 2016 draft local plan is a reflection of the early stage of the Local Green Space designation process. It is therefore expected that the policy will change significantly from this early version following the consideration of comments made on the early draft and further evidence on potential sites.</p>	<p>Yes</p>	<p>Draft policy ENV10 and supporting text has been replaced with a new draft policy and supporting text to reflect comments received on the early draft version and the consideration of further evidence on sites.</p>
<p>Aireville Park, Skipton, site 33 on Skipton LGS map: This area was added to the Skipton Conservation Area in the 2008 review. The Conservation Area Appraisal identified a key view of the town across this site and stated:- "The extensive public park at Aireville, dating from the 1830s when it was the grounds of a</p>	<p>Supporting comment is noted , however it is acknowledged that Draft policy ENV10 as it appears in the April 2016 draft local plan is a reflection of the early stage of the Local Green Space designation process. It is therefore expected that the policy will change significantly from this early version following the consideration of comments made on the</p>	<p>Yes</p>	<p>Draft policy ENV10 and supporting text has been replaced with a new draft policy and supporting text to reflect comments received on the early draft version and the consideration of further evidence on sites.</p>

<p>private house and adopted as a public park in the 1950s by Skipton Town Council, is of great importance. It is easily accessible from all conservation areas, with a canal-side walk from the centre of the town, but is not part of them. It has a large open grassed area with mature trees (the site of fairgrounds and public events), a conservation meadow, golf course, swimming pool and fitness centre”.</p> <p>The identification of this area as a Local Green Space, therefore, would be likely to safeguard an element which has been identified as contributing to the significance of the Conservation Area. Consequently, Historic England would support this site being identified in the Local Plan as a Local Green Space</p>	<p>early draft and further evidence on potential sites.</p>		
<p>Bentham Local Green Space Area 1 on map: Support this site as LGS, as this area has been purchased by Town Council for development as Play Area.</p>	<p>Supporting comment is noted , however it is acknowledged that Draft policy ENV10 as it appears in the April 2016 draft local plan is a reflection of the early stage of the Local Green Space designation process. It is therefore expected that the policy will change significantly from this early version following the consideration of comments made on the early draft and further evidence on potential sites.</p>	<p>Yes</p>	<p>Draft policy ENV10 and supporting text has been replaced with a new draft policy and supporting text to reflect comments received on the early draft version and the consideration of further evidence on sites.</p>
<p>Bentham Local Green Space Area 2 on map: Object to this site as LGS as the field unsuitable as Play Area (see Bruce Dinsmore’s recent report) and been closed</p>	<p>It is acknowledged that Draft policy ENV10 as it appears in the April 2016 draft local plan is a reflection of the early stage of the Local Green Space designation process. It is therefore expected that the policy will change</p>	<p>Yes</p>	<p>Draft policy ENV10 and supporting text has been replaced with a new draft policy and supporting text to reflect comments received on the early draft version and the</p>



for several years. Bounded by Main Road without pavements for safe access & fast flowing beck, on steep slope. Now subject of planning application.	significantly from this early version following the consideration of comments made on the early draft and further evidence on potential sites.		consideration of further evidence on sites.
Bentham Local Green Space Area 3 on map: Wrongly identified as Bentham Grammar Playing Fields. Actually owned by Craven & leased by Bentham Auction Mart Should be protected as Green Space & developed as a park for residents & visitors	It is acknowledged that Draft policy ENV10 as it appears in the April 2016 draft local plan is a reflection of the early stage of the Local Green Space designation process. It is therefore expected that the policy will change significantly from this early version following the consideration of comments made on the early draft and further evidence on potential sites.	Yes	Draft policy ENV10 and supporting text has been replaced with a new draft policy and supporting text to reflect comments received on the early draft version and the consideration of further evidence on sites.
Bentham Local Green Space Area 4 on map: Support for this site as LGS. Goodenber Play Area, recently refurbished to high standard. Run by local association and supported by the Town Council	Supporting comment is noted , however it is acknowledged that Draft policy ENV10 as it appears in the April 2016 draft local plan is a reflection of the early stage of the Local Green Space designation process. It is therefore expected that the policy will change significantly from this early version following the consideration of comments made on the early draft and further evidence on potential sites.	Yes	Draft policy ENV10 and supporting text has been replaced with a new draft policy and supporting text to reflect comments received on the early draft version and the consideration of further evidence on sites.
Bentham Local Green Space Area 5: Object. Ring fenced by NYCC for much needed Extra Care development	It is acknowledged that Draft policy ENV10 as it appears in the April 2016 draft local plan is a reflection of the early stage of the Local Green Space designation process. It is therefore expected that the policy will change significantly from this early version following the consideration of comments made on the early draft and further evidence on potential sites.	Yes	Draft policy ENV10 and supporting text has been replaced with a new draft policy and supporting text to reflect comments received on the early draft version and the consideration of further evidence on sites.
Bentham Local Green Space	Supporting comment is noted , however it is	Yes	Draft policy ENV10 and supporting

Area 6: Support. Existing amenity area	acknowledged that Draft policy ENV10 as it appears in the April 2016 draft local plan is a reflection of the early stage of the Local Green Space designation process. It is therefore expected that the policy will change significantly from this early version following the consideration of comments made on the early draft and further evidence on potential sites.		text has been replaced with a new draft policy and supporting text to reflect comments received on the early draft version and the consideration of further evidence on sites.
Bentham Local Green Space Area 7: Support. Existing bowling green.	Supporting comment is noted , however it is acknowledged that Draft policy ENV10 as it appears in the April 2016 draft local plan is a reflection of the early stage of the Local Green Space designation process. It is therefore expected that the policy will change significantly from this early version following the consideration of comments made on the early draft and further evidence on potential sites.	Yes	Draft policy ENV10 and supporting text has been replaced with a new draft policy and supporting text to reflect comments received on the early draft version and the consideration of further evidence on sites.
Bentham Local Green Space Area 8: Support. Sports Ground Owned by Angus Fire – requires protection in case of future change of ownership	Supporting comment is noted , however it is acknowledged that Draft policy ENV10 as it appears in the April 2016 draft local plan is a reflection of the early stage of the Local Green Space designation process. It is therefore expected that the policy will change significantly from this early version following the consideration of comments made on the early draft and further evidence on potential sites.	Yes	Draft policy ENV10 and supporting text has been replaced with a new draft policy and supporting text to reflect comments received on the early draft version and the consideration of further evidence on sites.
Bentham Local Green Space Area 9: Support. Village Green, not Memorial Garden	Supporting comment is noted , however it is acknowledged that Draft policy ENV10 as it appears in the April 2016 draft local plan is a reflection of the early stage of the Local Green	Yes	Draft policy ENV10 and supporting text has been replaced with a new draft policy and supporting text to reflect comments received on the

	Space designation process. It is therefore expected that the policy will change significantly from this early version following the consideration of comments made on the early draft and further evidence on potential sites.		early draft version and the consideration of further evidence on sites.
Bentham Local Green Space Area 10: Support. Rose Garden Owned by Craven – needs substantial remedial work	Supporting comment is noted , however it is acknowledged that Draft policy ENV10 as it appears in the April 2016 draft local plan is a reflection of the early stage of the Local Green Space designation process. It is therefore expected that the policy will change significantly from this early version following the consideration of comments made on the early draft and further evidence on potential sites.	Yes	Draft policy ENV10 and supporting text has been replaced with a new draft policy and supporting text to reflect comments received on the early draft version and the consideration of further evidence on sites.
Bentham Local Green Space Area 11/12: Support. Private grazing land	Supporting comment is noted , however it is acknowledged that Draft policy ENV10 as it appears in the April 2016 draft local plan is a reflection of the early stage of the Local Green Space designation process. It is therefore expected that the policy will change significantly from this early version following the consideration of comments made on the early draft and further evidence on potential sites.	Yes	Draft policy ENV10 and supporting text has been replaced with a new draft policy and supporting text to reflect comments received on the early draft version and the consideration of further evidence on sites.
Bentham Local Green Space Area 13: Correction. Not green space Gravelled parking area for properties in Police Yard	Police yard was identified and assessed as a civic space in the 2016 Open Space Assessment.  It is acknowledged that Draft policy ENV10 as it appears in the April 2016 draft local plan is a reflection of the early stage of the Local Green Space designation process. It is therefore	Yes	Draft policy ENV10 and supporting text has been replaced with a new draft policy and supporting text to reflect comments received on the early draft version and the consideration of further evidence on sites.

	<p>expected that the policy will change significantly from this early version following the consideration of comments made on the early draft and further evidence on potential sites..</p>		
<p>Bentham Local Green Space Area 14: Correction. Not owned by Sedbergh Junior School, but Cedar House Private land not available for local use Right hand end now Church carpark.</p>	<p>Comment is noted , however it is acknowledged that Draft policy ENV10 as it appears in the April 2016 draft local plan is a reflection of the early stage of the Local Green Space designation process. It is therefore expected that the policy will change significantly from this early version following the consideration of comments made on the early draft and further evidence on potential sites.</p>	<p>Yes</p>	<p>Draft policy ENV10 and supporting text has been replaced with a new draft policy and supporting text to reflect comments received on the early draft version and the consideration of further evidence on sites.</p>

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## Draft Policy H1: New Homes on Unallocated Sites Response Paper

April – May 2016 Draft Local Plan

<b>Policy H1</b>			
<b>Aim of the Policy: To provide a context for where residential development proposals on sites that are not identified within the plan can come forward for development.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
Object to specifying where windfall should be. No-one can specify where windfall housing will occur. Remove designation of windfall into different areas. It should be clearer whether any additional sites allocated by village/towns in their neighbourhood plans would count as windfall.	The policy does not specify where windfall should be. Rather it sets a context for assessing windfall development proposals which by their nature are unpredictable.	No	
This proposed policy as currently drafted is too loose and open to interpretation. This may be acceptable in the case of developments of five dwellings or less, but should be much more specific for larger developments.	The policy provides clear guidance on the consideration of all development proposals.	No	
Place limits on development in open countryside	It is policy SP4 that sets out the approach to development across Craven including open countryside locations, where limited growth is directed.	No	
Vacant, available and deliverable previously developed sites can exist which fall outside	It is possible that brownfield land may exist in locations that fall outside of the settlement hierarchy.	No	

<p>of this defined settlement hierarchy. Policy SP4 effectively restricts brownfield land located outside of this hierarchy from being developed for housing irrespective of the potential benefits of housing development in such locations and presents limited flexibility. It should be amended to make it clear that Tier 5 settlements or the open countryside can make a positive contribution to housing supply in the District on previously developed sites. Small scale housing schemes, and particularly those promoting home working and small scale linked business development, will be actively encouraged and supported as part of the housing strategy. Policy H1 should also be amended to reflect the same flexibility.</p>	<p>The policy framework allows for this by setting the presumption in favour of sustainable development under policy SD1. There is also no ceiling on sustainable development, and this is reflected in the policy framework and provides the flexibility sought in the comment.</p>		
<p>Object to this draft policy allowing extension beyond settlement limits, especially in villages. Concerned that extension to settlements without being rounded off could result in ribbon development. Objection to the fact that the new Local Plan does not identify settlement development limits.</p>	<p>The new Local Plan does not identify settlement development limits as they are clearly incompatible with the concept of sustainable development. Instead draft policy H3 supports proposals for sustainable residential development on unallocated sites, which include infilling, rounding off or extension of settlements providing the proposal accords with the policy criteria, and all other relevant policies of the local plan.</p>	<p>No</p>	

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## Housing Response Paper to Issues/Comments on the April – May 2016 Draft Local Plan

<b>Policy H2: Affordable Housing</b>			
<b>Aim of the Policy: To meet the plan area's objectively assessed need for affordable housing by requiring developers to provide affordable units on new housing sites, by requiring financial contributions for off-site provision and by enabling development of rural exception sites, whilst taking into account the economic viability of development.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
Needs greater sophistication. Document fails to address the need for a different form of affordable property. The needs analysis says one bedroom is central. The local population needs market price one bedroom properties to be over 50% of the increase in supply to ensure these remain affordable by young people in work and retired people. This need emphasising here - the section only addresses social housing not affordable.	The issues raised are acknowledged. However, there is a specific requirement for draft policy H2, which addresses the objectively assessed need for affordable housing as defined in the NPPF. The overall mix of housing is a strategic matter and is therefore dealt with in draft policy SP3: Housing Mix, which highlights the need for one-bedroom market housing that is accessible to young people in work and retired people.	No	
The HBF supports the provision of affordable housing and indeed notes that the 2015 SHMA indicates an imbalance of 114 affordable units per annum. It is, however important that when considering affordable housing policies local authorities ensure that the thresholds and targets identified do not place undue burdens upon development (NPPF, paragraph 173). In the case of this policy the HBF has concerns over the 40% target, these were expressed within our previous comments upon the earlier draft of the plan.	The draft viability study provides evidence to support a 40% affordable housing target and includes potential CIL charges in its cost calculations. However, the viability evidence and policy are both draft and both will be subject to further updates and revisions. Updated viability evidence is being commissioned and this will be used to inform the next draft of the policy.	Yes	<i>[The policy will need to be revised in line with updated viability evidence, once that becomes available.]</i>

<p>Part c of the policy imposes a 40% affordable housing target upon developments of 5 or more units, under this threshold the requirement is made by way of a financial contribution. The 40% requirement is based upon outdated evidence contained within the draft 2013 Affordable Housing and Community Infrastructure Viability Study. It is noted that the Council intends to update this study prior to submission (draft plan footnote 35) at which time the final affordable housing requirement will be finalised. The HBF wish to retain our position until this important part of the evidence base is finalised. In preparing the viability work it is strongly recommended that the Council engage with the development industry to ensure that robust and realistic assumptions are utilised.</p> <p>It is worth re-iterating, from our previous comments, that the 40% target is not currently justified. The draft Affordable Housing and Community Infrastructure Viability Study advises a lower target of 35% (paragraph 5.2.5). In making this recommendation it is noted that the study does not take account of the likely development costs associated with strategic infrastructure or public transport (paragraph 3.2.2) or possible section 106 contributions (paragraph 3.2.3). It is therefore likely that a lower requirement than 35% will be viable once these additional costs are considered.</p>			
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<p>Given this recommendation and the omissions from the viability study it is clear that the current 40% target is unjustified and therefore unsound.</p> <p>It is noted that the policy identifies that the Council will negotiate the actual level of contributions sought. Whilst this is welcomed such an approach should not be used to support an unsustainable policy aspiration.</p>			
Support	Noted	No	
<p>There is no evidence base to support the proposed Policy of 40% of new dwellings as affordable housing on-site as part of developments of 5 dwellings or 0.2 ha or more; or to seek a financial contribution from site under 5 dwellings. The Council has not undertaken any evidence to ascertain the impact on viability of schemes or assessed the impact of the policy on the deliverability of small sites. The Policy is therefore unsound. The Policy also conflicts with the Government's Policy of not seeking affordable housing on sites under 10 dwellings as set out in the NPPG.</p>	<p>Evidence to support the draft policy requirements is contained within the council's draft viability study – refer to paragraph 6.12 of the policy's supporting text. Updated viability evidence is being commissioned and this will be used to inform the next draft of the policy. The next draft will also provide an opportunity to incorporate the government's reinstated policy and guidance on contributions from small developers.</p>	Yes	<p><i>[The policy will need to be revised in line with updated viability evidence, once that becomes available.]</i></p> <p>The policy and supporting text have been revised in line with the government's reinstated policy on contributions from small developers.</p>
<p>The retention of a 40% requirement is, in our view, not justified and is certainly not remotely supported by the Council's own evidence. The PBA Draft Report commissioned by the Council in August 2013 makes it clear at paragraph 13.1.2 that the appropriate level is 35% in order to achieve viable schemes. We do not accept that this</p>	<p>Evidence within the council's draft viability study is considered to support the draft policy requirements (refer to paragraph 6.12 of the policy's supporting text) and, more crucially, updated viability evidence is being commissioned. The next draft of the policy will be informed by the updated evidence and will incorporate the government's reinstated policy</p>	Yes	<p><i>[The policy will need to be revised in line with updated viability evidence, once that becomes available.]</i></p> <p>The policy and supporting text have been revised in line with the government's reinstated policy on contributions from small developers.</p>

<p>is the correct figure but even this figure does not support the requirement of 40% in the Consultation Draft Plan.</p> <p>The Council will be very well aware of the guidance contained within the NPPF (paragraphs 173 and 174) and the PPG which stresses that Local Planning Authorities need to show that the Local Plan is capable of being delivered whilst ensuring that the requirements of the plan as a whole will not prejudice the viability of development.</p> <p>Paragraph 018 of the PPG provides that the evidence which accompanies an emerging plan should show how the policies have been tested for their impact on the viability of development.</p> <p>The lack of such information at this pre-publication draft stage is of considerable concern because the Council is failing therefore to properly engage (again, as required by all the National Guidance) with the local stakeholders. The whole of the system is predicated on pre-engagement and front loading with interested parties.</p> <p>Paragraph 017 of the PPG specifically notes that local planning authorities will need to identify and engage at an early stage at all those that maybe interested in development or content of the Plan. The Local Planning Authority must take into account any representation made and will need to set out how the main issues raised have been</p>	<p>on contributions from small developers. Once the draft plan is sufficiently close to being finalised, its viability and deliverability as a whole will also be tested. Pre-engagement and frontloading is being carried out on the basis of draft and emerging evidence and policy proposals. Representations received in response are being taken into account and the plan is changing as a result. This policy response paper is part of that process.</p>		
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<p>taken into account. The recent Court of Appeal decision (Secretary of State for Communities and Local Government v West Berkshire District Council &amp; Anor [2016]) upheld the Government's policy exempting small development sites (10 units or 1000 sqm or less) from affordable housing levies and tariff based contributions. The Council will therefore need to review this as part of the affordable housing policy in accordance with the Court of Appeal decision.</p>			
<p>It is important that the Council is able to justify the 40% target as being both needed and deliverable within the context of the wider infrastructure funding requirements associated with delivery of the plan.</p>	<p>Noted. An infrastructure delivery plan is being formulated, updates to the SHMA and viability study are being commissioned and the next draft of the plan will be subjected to viability and deliverability testing.</p>	<p>Yes</p>	<p><i>[The policy will need to be revised in line with updated viability evidence, once it becomes available.]</i></p> <p>The policy and supporting text have been revised in line with the updated 2016 SHMA.</p>
<p>We recommend the following policy updates to Draft Policy H2 to recognise the importance of rent to buy as a model that can make a valuable contribution in the District:</p> <p>a) Local affordable homes that are needed in the plan area which comprise of affordable rented, intermediate and affordable rent to buy housing will be delivered by:</p> <p>i. Pro-active and pragmatic negotiation Negotiating with developers and landowners to secure a proportion of new housing development to be provided as affordable units;</p>	<p>The point about pro-active and pragmatic negotiations with developers and landowners is noted. However, because this applies broadly and generally across the whole local plan, it has been covered in a separate overarching policy (draft policy SD1).</p> <p>The policy's supporting text should be revised to better describe the variety of models and range of providers in the affordable housing sector and could mention rent to buy and other providers specifically. However, highlighting these within the policy itself is not necessary or appropriate. The vast majority of evidenced</p>	<p>Yes</p>	<p>The policy's supporting text has been revised and now refers to rent to buy and other affordable housing providers.</p> <p>The policy has been revised with respect to rural exception sites and now allows flexibility in taking need from a wider area into account.</p> <p>The policy has been revised and now acknowledges that affordable housing subsidy may be recycled instead of units being retained in</p>

<p>ii. Supporting registered and other affordable housing providers in bringing forward wholly affordable schemes within Craven’s market towns and villages; Affordable housing from developer contributions</p> <p>f) The size, type and tenure of affordable units will be expected to reflect the affordable housing needs and aspirations in the locality. Affordable housing contributions should comprise both social and affordable rent tenures as well as intermediate tenure types including affordable rent to buy. Point H of Draft Policy H2 seeks the retention of affordable housing units in perpetuity, however it is a long standing principle that affordable housing need not be retained in perpetuity as permanence is not a realistic planning objective. When considering the delivery of traditional affordable housing Planning Inspectors have deemed a period of twenty years to be more suitable even where a housing association is promoting a site. The NPPF only requires in perpetuity in relation to affordable housing delivered on rural exception sites. Furthermore, one of the Government’s recent proposed changes to the NPPF suggests removing the condition that affordable housing be retained in perpetuity or have any subsidy recycled for alternative affordable housing provision. The reference to affordable housing being retained in</p>	<p>need is for social or affordable rent, which necessitates the involvement of registered providers. Proposals for only intermediate tenure by other providers would be contrary to the evidence, would not meet the identified need and could not therefore be supported under this particular policy.</p> <p>The point about rural exception sites and need in neighbouring settlements is noted. The policy should be revised to allow greater flexibility in this regard, so that need from a wider area may be taken into account.</p> <p>The point about in perpetuity is noted and this should be revised to acknowledge that subsidy may be recycled instead (as per the NPPF).</p> <p>The addition of ‘aspiration’ is unnecessary and unlikely to be helpful. It may suggest that aspiration is equivalent to need in the affordable housing policy and may introduce some uncertainty of meaning, which would undermine the policy’s clarity and evidence-based approach.</p>		<p>perpetuity.</p>
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<p>perpetuity should be removed from this section of the policy to bring the policy in line with the NPPF, and only be a requirement as part of the section on Rural Exception Sites.</p> <p>The section on Rural Exception Sites is unduly restrictive, and should be amended to more fully reflect the aims of the NPPF, as below:</p> <p>i) A scheme will help to meet but not exceed proven local need and those of neighbouring settlements; ...</p> <p>The proposed amendment to point i) seeks to maximise affordable housing provision; even where immediate need is met through a scheme, it may be appropriate to seek to provide housing for neighbouring areas which may have less capacity to meet that need. The Council should be proactive in seeking to meet its housing need, and not unnecessarily constrain providers from developing socially beneficial housing. We also recommend the following amendment to better reflect the intentions of the NPPF in enabling affordable housing delivery from a range of providers, and to deliver homes to meet needs and aspirations, as sought by the Government.</p> <p>j) A limited number of market homes will be allowed as part of rural exception sites where it can be demonstrated that:</p> <ol style="list-style-type: none"> <li>1. These are essential to enable the delivery of the affordable homes by a registered or</li> </ol>			
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<p>other affordable housing provider and the delivery of an appropriate mix of affordable house types and tenures to reflect need and aspiration in the locality; The above points would contribute towards boosting the Council’s affordable housing provision, as well as supporting the Government’s ambition to extend opportunities for affordable home ownership. Should the Council consider it useful, a meeting between relevant officers and Rentplus would assist in discussing the practical implications of delivering Rentplus homes, and the use of a Memorandum of Understanding in Craven District.</p>			
<p>b) and h) very good. Will developers be held to 40% affordable undertaking?</p>	<p>The final percentage target will be confirmed following viability testing. Affordable housing will then be sought from developments above the relevant threshold, either on-site or as a financial contribution, subject to vacant building credit and scheme viability.</p>	<p>Yes</p>	<p><i>[The policy will need to be revised in line with updated viability evidence, once that becomes available.]</i></p> <p>The policy and supporting text have been revised in line with the government’s reinstated policy on contributions from small developers.</p>
<p>Fairhurst note the need for local authorities to provide housing for all residents, however, point C of this policy should be removed entirely. The policy states “Where the on-site contribution does not equate precisely to whole numbers of units, equivalent financial contributions will be sought’, it can be argued that this policy does not provide a logical methodology for</p>	<p>The gathering of financial contributions – even contributions that may be regarded as small – is acceptable in principle and exists within the government’s reinstated policy and guidance on contributions from small developers. Therefore, part c) of the draft policy does not need to be removed, as suggested, but the methodology could be explained more clearly.</p>	<p>Yes</p>	<p>The policy and supporting text (within the financial and off-site contributions section) have been revised to provide a clearer explanation of how financial contributions will be gathered. Further practical guidance will also be provided in a subsequent SPD.</p>

<p>the provision of affordable housing in Craven. Fairhurst question this methodology of attaining financial contributions equivalent to the cost of an affordable unit is the most appropriate for the policy aims. It is questionable if this ad hoc approach to attain small contributions would produce sufficient funding to provide affordable housing.</p>			
<p>We object to the very high proportion of affordable housing sought through Policy H2 of the DTP. In particular, providing 40% on sites of five or more is too low a threshold given the need for 40% to be affordable, as this will no doubt make smaller sites undeliverable due to the restrictions of the policy. The recent Housing and Planning Act will also need to be factored into the affordable housing policy, and we wish to comment further in due course.</p>	<p>Evidence within the council's draft viability study is considered to support the draft policy requirements (refer to paragraph 6.12 of the policy's supporting text). However, updated viability evidence is being commissioned and this will inform the next draft of the policy. The next draft will also incorporate the government's reinstated policy on contributions from small developers and will be subjected to further consultation.</p>	<p>Yes</p>	<p><i>[The policy will need to be revised in line with updated viability evidence, once that becomes available.]</i></p> <p>The policy and supporting text have been revised in line with the government's reinstated policy on contributions from small developers.</p>
<p>The overall mix of sizes (based on the 2015 SHMA) is 25% one-bedroom, 60% two-bedroom and 15% three or more bedroom dwellings. The mix of tenure suggested is 25% intermediate and 75% affordable rented. We welcome the flexibility of enabling negotiation of the precise mix of tenures and sizes of affordable accommodation to reflect the needs of the locality. Likewise, we welcome reference to being realistic and ensuring that the affordable housing target is realistic and will not render schemes unviable.</p>	<p>Noted. Whilst the 40% target is draft and is based on draft evidence, it has proved to be realistic in practice. Nevertheless, the next draft of the policy will be informed by updated viability evidence, which is being commissioned, and will incorporate reinstated government policy on contributions from small developers. 'Open-book' is intended to refer to the developer's approach to negotiations with the council, which is likely to require the submission of sensitive financial information. However, such information will be treated as confidential and will not be made public.</p>	<p>Yes</p>	<p><i>[The policy will need to be revised in line with updated viability evidence, once that becomes available.]</i></p> <p>The policy and supporting text have been revised in line with the government's reinstated policy on contributions from small developers.</p> <p>See new/revised supporting text, which states how the council will treat sensitive financial information and clarifies the meaning of 'open-</p>

<p>Whilst we welcome the first part of the policy which refers to negotiation with developers and landowners to secure a proportion affordable units on new housing development (part a), we consider that part c of the policy, making specific reference to seeking 40% provision is too high. This is based on the August 2013 Affordable Housing and Community Infrastructure Viability Study, which is currently being updated by new viability evidence yet to be finalised. It therefore seems inappropriate to include a percentage provision at this stage, despite the Council currently using the 'Interim Approach to Negotiating Affordable Housing (2012) which requires a 40% provision on sites of 5 dwellings or more. We have concerns with regard to part e of the draft policy which states:</p> <p>"In negotiating schemes the local planning authority will look to maximise provision to achieve these targets, having regard to the circumstances of individual sites and scheme viability. Developers will be expected to conduct negotiations on an 'open book' basis."</p> <p>We welcome the Council's statement that it will take full account of the viability of schemes as part of the negotiating process and our client is happy to undertake full viability appraisals of schemes where necessary, our client does however have concerns with an 'open book' strategy. It is</p>	<p>'Open-book' is not intended to mean 'publicly available' and the draft policy should be revised to make this clearer.</p>		<p>book'.</p>
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<p>considered that the information contained within viability appraisals should remain private and confidential and we therefore request reference to 'open book' is removed from the policy. This also applies to Policy INF1 part g which refers to applications being expected to make adequate viability evidence available and to adopt a transparent and open-book approach to negotiations.</p>			
<p>Criterion b) There is no grant/loan funding for affordable homes through private landlords. Instead CDC Empty Homes Reserve or HCA grant may be payable for RPs to acquire/convert properties on the open market.</p> <p>Criterion c) Does this mean that whole dwellings will be sought plus whatever fraction brings the contribution up to the 40% target? That's fine, but may need to be a bit clearer.</p> <p>Revised thresholds in NPPG. Can we reconsider the target following introduction of Starter Homes?</p> <p>Criterion d) Delete – no longer permissible</p> <p>Criterion f) The type etc. of affordable homes reflects the district wide need (as per SHMA 2015).</p> <p>Delete 'management arrangements' Off site provision is acceptable exceptionally and only where it better meets Planning/Housing objectives.</p> <p>Criterion g) – Site sub-division does not have</p>	<p>Noted – 'landlords' should be replaced with 'registered providers' in part b) of the policy.</p> <p>Noted – the means of seeking contributions for less than whole dwellings should be made clearer and more precise within part c) of the policy.</p> <p>Noted - parts c) and d) of the policy need to be amended in order to reflect the government's reinstated policy and guidance on contributions from small developers.</p> <p>Starter Homes may provide a greater return for developers compared to affordable housing (within the current definition) and the resulting boost may ease viability restrictions on affordable housing targets. This would be taken into account in updated viability evidence.</p> <p>Noted – part f) should refer to the district's objectively assessed need, as identified in the commissioned update to the 2015 SHMA.</p> <p>'Management arrangements' should be removed and reference should be made to planning and housing objectives.</p> <p>Noted – part g) of the policy should not be</p>	<p>Yes</p>	<p>'Landlords' has been replaced with 'registered providers'.</p> <p>Financial contributions for less than whole dwellings have been clarified in the revised policy and supporting text.</p> <p>The policy and supporting text have been revised to reflect the government's reinstated policy on contributions from small developers.</p> <p><i>[The impact of starter homes should be taken into account in updated viability evidence and the resulting affordable housing target.]</i></p> <p>The revised policy now refers to 'affordable housing needs identified in the Council's latest Strategic Housing Market Assessment'.</p> <p>'Management arrangements' has been removed from the revised policy and 'housing and planning</p>

<p>to be deliberate for a refusal. . Affordable housing policy applies to the holistic site. Criterion h) ..'or subsidy recycled...' (need to amend this criterion as per the affordable housing definition in NPPF, which allows for the subsidy to be recycled). Also, sometimes the affordable housing is secured by s106, not by condition. My understanding though is that the NPPF definition will be changed to include Starter Homes, where there is no recycling of subsidy. Criterion l)iii or 'subsidy recycled...'. Criterion j) 2. 'In the absence of 'any' public subsidy'</p>	<p>based on the assumption of deliberate subdivision or avoidance and should be expressed more positively. Noted – part h) of the policy should refer to the recycling of subsidy and section 106 agreements, as suggested. The government has consulted on proposed changes to national planning policy, including the NPPF definition of affordable housing, but changes have yet to be confirmed. Noted – part l) iii) should refer to the recycling of subsidy. Noted – the typing error will be corrected.</p>		<p>objectives' has been added. The revised policy now refers more positively to contributions from 'the total combined or holistic development'. The revised policy now refers to the recycling of subsidy and section 106 agreements. <i>[Starter Homes?]</i></p> <p>The typing error has been corrected.</p>
<p>Affordable Housing from Developer Contributions (c): We object to this policy proposal and suggest that the threshold is amended to include National Policy as recently challenged by the Government. A threshold of 10 dwellings or 1000sq m floor space would be appropriate and in line with up to date Policy. It is considered that there should be no contribution below this threshold and it should not be pro-rated. We also strongly object to a 40% provision and consider that this rate of contribution will make many developments economically unviable. It is suggested that Craven DC apply a similar approach to other rural Local Authorities and assess the % of contribution due to that</p>	<p>Thresholds within the draft policy will be revised in order to reflect the government's reinstated policy and guidance on contributions from small developers. Any percentage target(s) for affordable housing provision will need to reflect evidence contained in an updated SHMA and viability study, which are being commissioned. Furthermore, the next draft of the local plan will be subjected to viability and deliverability testing, as a whole.</p>	<p>Yes</p>	<p><i>[The policy will need to be revised in line with updated viability evidence, once that becomes available.]</i></p> <p>The policy and supporting text have been revised in line with the updated 2016 SHMA and the government's reinstated policy on contributions from small developers.</p>

<p>area. In other Local Planning Authorities, settlements have been graded due to their economy (including house prices) and a maximum contribution of 25% is applied. It is considered that the affordable housing contribution has a significant impact on deliverability and availability of developments.</p> <p>Another predominantly rural local authority have applied contributions varying between 15% (and lower in some areas) to 25% accordingly. The Local Plan specifically categorises settlements within this criteria and it provides an economic awareness which should help to deliver housing in all settlements within the hierarchy.</p> <p>This approach would be welcomed in Craven and is considered a more sound approach.</p>			
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\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## Draft Policy H3: Gypsies, Travellers, Showmen &amp; Roma Response Paper

April – May 2016 Draft Local Plan

<b>Policy H3</b>			
<b>Aim of the Policy: To meet the housing requirements of Gypsies, Travellers, Showmen &amp; Roma by maintaining an adequate supply of private sites to occupy, in line with current evidence of existing and future need.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
<p>Bentham Parish has had evidence of requirement for many years with temporary planning permission allowed at Clay Barn for a gypsy family due to lack of provision for traveller sites.</p> <p>Clay Barn has recently received planning permission for a permanent site for 2 caravans. Support of extension to this site should not be presumed as stated in H3.</p>	<p>Draft policy H3 does not detail the location or planning status of the supply of privately owned G&amp;T sites that exist throughout Craven, therefore the presumption that the commentator assumes is made in Policy H3 does not in fact exist.</p> <p>The 2013 Traveller Needs Survey concludes that there is no evidence of a requirement for a public site in Craven and found no evidence of any deficiencies in service provision for any the of G&amp;T families within Craven. Therefore it is not proposed that the Local Plan allocate land for a public G&amp;T site in Craven. Draft policy H3 provides a criteria based approach to deal with any unforeseen private need arising during the plan period.</p>	No	
<p>There is no mention of parking standards, which are essential particularly in high density development.</p>	<p>Draft policy H3 and criterion D requires new or extensions to existing G&amp;T sites to have adequate space within the site for the parking and the turning of vehicles. Any proposals for G&amp;T sites (new or extensions to existing sites) will also have to accord with all other relevant Local Policies, including INF4:</p>	No	

	Parking Provision.		
Request that the issue of safety and hazard sites be added to the provisions detailed at criterion g) which relates to environment risks.	<p>Criterion g) relates to the compatibility of the proposal and existing land uses. Criterion h) relates to unacceptable environmental conditions e.g., flood risk and criterion i) relates to mitigating against any potential impacts on the environment. It is not clear, therefore which criterion the comments relates to.</p> <p>The existing draft criteria g, h &amp; i would ensure that potential residents of new or extended G&amp;T sites and residents of the existing settled community would be safeguarded from risks relating to safety and hazard.</p>	No	
<p>CDC has been informed that the owners of one of the existing privately owned G&amp;T sites in Craven are considering giving up/selling their site. The owner is not considering selling it as a going concern unless CDC wishes to purchase it. Their preferred option seems to be to sell to a developer who intends to vacate the site and make an application for housing. The owner is no longer in favour of the site being included as part of the Council's designated site for meeting GRTS need.</p>	<p>Whilst the Council has been informed of the intention of the owner of one of the privately owned G&amp;T sites which currently helps to meet the housing needs of the G&amp;T community, it is not clear if and when the site will be sold. As a result the Council considers this site still contributes to meeting the need of the G&amp;T community in Craven and so while this site forms part of this supply no deficiencies exist in service provision. The Council also considers that draft policy H3 provides a robust policy framework to address GRTS needs should the situation in respect of the existing supply change during the plan period. The Council does not have any plans to purchase this site and the GTAA 2013 identified that there was no appetite from the community to live on a <i>public</i> site.</p>	No	

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## Draft Policy H4: Housing Density Response Paper to the April – May 2016 Draft Local Plan

<b>Policy H4</b>			
<b>Aim of the Policy: To set out the plan approach to overall development density both on identified sites and elsewhere, whilst setting out circumstances where densities below the indicative density would be acceptable.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
Inconsistency. If 40 per acre is the requirement then how many acres are required? Does this calculation match up with the need for one bedroom properties and the land identified for development? It looks as if there is a contradiction between stated policy and amount of land allocated. Too much land is allocated because the plan appears to assume one bedroom homes will not be built and 40 per acre won't be achieved.	The representor is incorrect. The starting point is that the indicative density is 40 dwellings to the <u>hectare</u> and not the acre, which is a smaller unit of measurement. It is assumed that this is an oversight. An aim of the plan is to increase the range and mix of dwellings overall, including smaller properties. Policy SP3 refers. However, further work has been carried out to establish the most appropriate indicative net housing density for future housing development that will support the delivery of the right mix of housing to address objectively assessed housing need. The outcome of this work suggests that the indicative net housing density should be revised to 32 dwellings to the hectare with flexibility built in to address site specific circumstances and the link between site density and housing mix to be more clearly expressed. The work has also indicated that Policy H4 and Policy SP3 should be integrated to provide clearer guidance on this issue.	Yes	Revise and rename Policy SP3 Housing Mix and Density to read: <i>“To meet the housing needs of Craven, new housing development proposals will be expected to meet the following:- a) an indicative net housing density target of 32 dwellings per hectare; b) an indicative housing mix of 39.4% one and two-bedroom dwellings, 44% three- bedroom dwellings and 16.6% four (or more) bedroom dwellings. Variations (upwards or downwards) to the indicative targets for density and mix may be allowed where this can be properly justified on planning grounds. The definition of ‘net housing density’ includes land for dwellings, garages, gardens, parking spaces and on-site Public Open Space, plus a nominal allowance for access roads.”</i>

<b>Policy H4</b>			
<b>Aim of the Policy: To set out the plan approach to overall development density both on identified sites and elsewhere, whilst setting out circumstances where densities below the indicative density would be acceptable.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
			Delete Policy H4
Whilst it is recognised that the density requirement is indicative, 40dph is considered high. Nationally across all types of sites densities average around 32dph, with previously developed land being higher and greenfield sites lower (on average). A requirement for 40dph across all sites is therefore on the high side. A lower indicative overall density requirement be considered, unless contrary evidence can be provided. The final paragraph identifies the circumstances which would warrant a departure from the stated density requirement. The HBF supports the inclusion of this paragraph but recommends that other issues including local needs, demand and viability considerations also be included within the policy.	Comment noted. Further work has been carried out to establish the most appropriate indicative net housing density for future housing development that will support the delivery of the right mix of housing to address objectively assessed housing need. The outcome of this work suggests that the indicative net housing density should be revised to 32 dwellings to the hectare with flexibility built in to address site specific circumstances and the link between site density and housing mix to be more clearly expressed. The work has also indicated that Policy H4 and Policy SP3 should be integrated to provide clearer guidance on this issue.	Yes	Revise and rename Policy SP3 Housing Mix and Density to read: <i>“To meet the housing needs of Craven, new housing development proposals will be expected to meet the following:-</i> <i>a) an indicative net housing density target of 32 dwellings per hectare;</i> <i>b) an indicative housing mix of 39.4% one and two-bedroom dwellings, 44% three- bedroom dwellings and 16.6% four (or more) bedroom dwellings.</i> <i>Variations (upwards or downwards) to the indicative targets for density and mix may be allowed where this can be properly justified on planning grounds.</i> <i>The definition of ‘net housing density’ includes land for dwellings, garages, gardens, parking spaces and on-site Public Open Space, plus a nominal allowance for access roads.”</i> Delete Policy H4
Confusion over density, 40 per hectare in	Comment noted. Further work has been carried	Yes	Revise and rename Policy SP3

<b>Policy H4</b>			
<b>Aim of the Policy: To set out the plan approach to overall development density both on identified sites and elsewhere, whilst setting out circumstances where densities below the indicative density would be acceptable.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
text, 30 on settlement maps	out to establish the most appropriate indicative net housing density for future housing development that will support the delivery of the right mix of housing to address objectively assessed housing need. The outcome of this work suggests that the indicative net housing density should be revised to 32 dwellings to the hectare with flexibility built in to address site specific circumstances and the link between site density and housing mix to be more clearly expressed. The work has also indicated that Policy H4 and Policy SP3 should be integrated to provide clearer guidance on this issue.		Housing Mix and Density to read: <i>“To meet the housing needs of Craven, new housing development proposals will be expected to meet the following:-</i> <i>a) an indicative net housing density target of 32 dwellings per hectare;</i> <i>b) an indicative housing mix of 39.4% one and two-bedroom dwellings, 44% three- bedroom dwellings and 16.6% four (or more) bedroom dwellings.</i> <i>Variations (upwards or downwards) to the indicative targets for density and mix may be allowed where this can be properly justified on planning grounds.</i> <i>The definition of ‘net housing density’ includes land for dwellings, garages, gardens, parking spaces and on-site Public Open Space, plus a nominal allowance for access roads.”</i> Delete Policy H4
In terms of potential densities of new development, there are some discrepancies between the 30 dwellings per hectare used	Comment noted. Further work has been carried out to establish the most appropriate indicative net housing density for future	Yes	Revise and rename Policy SP3 Housing Mix and Density to read: <i>“To meet the housing needs of</i>



<b>Policy H4</b>			
<b>Aim of the Policy: To set out the plan approach to overall development density both on identified sites and elsewhere, whilst setting out circumstances where densities below the indicative density would be acceptable.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
<p>in POSO and the indicative dwelling density of 40 dwellings per hectare in Policy H4 of the DTP. We only raise this as a particularly issue to seek clarification rather than object to the principle of prescribed densities. The policy, in whatever form it takes, should however provide flexibility for lower or higher densities where these can be justified. It would appear to do this in its current form.</p>	<p>housing development that will support the delivery of the right mix of housing to address objectively assessed housing need. The outcome of this work suggests that the indicative net housing density should be revised to 32 dwellings to the hectare with flexibility built in to address site specific circumstances and the link between site density and housing mix to be more clearly expressed. The work has also indicated that Policy H4 and Policy SP3 should be integrated to provide clearer guidance on this issue.</p>		<p><i>Craven, new housing development proposals will be expected to meet the following:-</i></p> <p><i>a) an indicative net housing density target of 32 dwellings per hectare;</i></p> <p><i>b) an indicative housing mix of 39.4% one and two-bedroom dwellings, 44% three- bedroom dwellings and 16.6% four (or more) bedroom dwellings.</i></p> <p><i>Variations (upwards or downwards) to the indicative targets for density and mix may be allowed where this can be properly justified on planning grounds.</i></p> <p><i>The definition of ‘net housing density’ includes land for dwellings, garages, gardens, parking spaces and on-site Public Open Space, plus a nominal allowance for access roads.”</i></p> <p>Delete Policy H4.</p>
<p>The Plan also talks about sites of .1 hectare as being suitable for 5 dwelling. If the indicative density is 40 dph then for consistency and clarity, the .1 hectare measure should be 4 dwellings. 5 is not</p>	<p>Comment noted. Further work has been carried out to establish the most appropriate indicative net housing density for future housing development that will support the delivery of the right mix of housing to address</p>	Yes	<p>Revise and rename Policy SP3 Housing Mix and Density to read:  <i>“To meet the housing needs of Craven, new housing development proposals will be expected to meet</i></p>

<b>Policy H4</b>			
<b>Aim of the Policy: To set out the plan approach to overall development density both on identified sites and elsewhere, whilst setting out circumstances where densities below the indicative density would be acceptable.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
national guidance. 40dph may be suitable in some settings, but the Town and Country Planning Association recommend 35 dph. Above this it is difficult to provide enough on-site greenspace and gardens to replace the greenspace that wildlife enjoyed previously, unless there are green roofs and walls.	objectively assessed housing need. The outcome of this work suggests that the indicative net housing density should be revised to 32 dwellings to the hectare with flexibility built in to address site specific circumstances and the link between site density and housing mix to be more clearly expressed. The work has also indicated that Policy H4 and Policy SP3 should be integrated to provide clearer guidance on this issue.		<p><i>the following:-</i></p> <p><i>a) an indicative net housing density target of 32 dwellings per hectare;</i></p> <p><i>b) an indicative housing mix of 39.4% one and two-bedroom dwellings, 44% three- bedroom dwellings and 16.6% four (or more) bedroom dwellings.</i></p> <p><i>Variations (upwards or downwards) to the indicative targets for density and mix may be allowed where this can be properly justified on planning grounds.</i></p> <p><i>The definition of ‘net housing density’ includes land for dwellings, garages, gardens, parking spaces and on-site Public Open Space, plus a nominal allowance for access roads.”</i></p> <p>Delete Policy H4.</p>
We consider this blanket density across the district is not appropriate and consider there should be a range of indicative densities depending on matters such as the scale of the settlement, the topography of the site, and the density of adjacent property. An alternative approach would be to set a	Comment noted. Further work has been carried out to establish the most appropriate indicative net housing density for future housing development that will support the delivery of the right mix of housing to address objectively assessed housing need. The outcome of this work suggests that the	Yes	<p>Revise and rename Policy SP3 Housing Mix and Density to read:</p> <p><i>“To meet the housing needs of Craven, new housing development proposals will be expected to meet the following:-</i></p> <p><i>a) an indicative net housing density</i></p>

<b>Policy H4</b>			
<b>Aim of the Policy: To set out the plan approach to overall development density both on identified sites and elsewhere, whilst setting out circumstances where densities below the indicative density would be acceptable.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
target of 'not less than 30 dph', with higher densities suggested where appropriate.	indicative net housing density should be revised to 32 dwellings to the hectare with flexibility built in to address site specific circumstances and the link between site density and housing mix to be more clearly expressed. The work has also indicated that Policy H4 and Policy SP3 should be integrated to provide clearer guidance on this issue		<p><i>target of 32 dwellings per hectare;</i></p> <p><i>b) an indicative housing mix of 39.4% one and two-bedroom dwellings, 44% three- bedroom dwellings and 16.6% four (or more) bedroom dwellings.</i></p> <p><i>Variations (upwards or downwards) to the indicative targets for density and mix may be allowed where this can be properly justified on planning grounds.</i></p> <p><i>The definition of 'net housing density' includes land for dwellings, garages, gardens, parking spaces and on-site Public Open Space, plus a nominal allowance for access roads."</i></p> <p>Delete Policy H4.</p>

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## Draft Policy EC1: Employment &amp; Economic Development Response Paper

April – May 2016 Draft Local Plan

<b>Policy EC1</b>			
<b>Aim of the Policy: To set a context for facilitating economic and employment development subject to compliance with a number of criteria.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
The policy for the development of new mixed housing / employment use is not clear on the mix and needs clarification. Developers could get planning permission for the mixed use and then argue to push up the proportion of housing at the expense of employment use.	On mixed use sites, the actual mix and balance of uses will be specified in commentaries contained at policies SP5 - SP11, and proposals will be expected to accord with these provisions. Proposals or amendments to approvals that do not accord with the mix and balance of uses required will be resisted.	No	
There is no mention of criteria for assessing impacts on habitats and species important for biodiversity	Comment noted. Policy ENV4 addresses biodiversity and sets criteria for the consideration of proposals for all types of development, so do not need to be repeated in Policy EC1 in detail. However, cross reference to Policy ENV4 and other environmental policies within Policy EC1 may add useful clarification that proposals for economic/employment development also need to satisfy the provisions of other relevant policies in the local plan.	Yes	Revise criterion c to read: <i>“The proposal not adversely affecting the significance of natural environmental assets, designated heritage assets and open space provision and accords with the provisions of Policies ENV1, ENV2, ENV4, ENV5, ENV6, ENV7, ENV8, ENV10 and ENV11. ”</i> Add new criterion after criterion e to read: <i>“the proposal accords with any other relevant policies in the local plan”</i> Renumber remaining criteria and

<p>Employment and Economic Development We note criteria c) and e) of policy EC1 and advise that reference is also made to natural environmental assets and cross reference made to policy ENV4</p>	<p>Comment noted. Policy ENV4 addresses biodiversity and sets criteria for the consideration of proposals for all types of development, so do not need to be repeated in Policy EC1 in detail. However, cross reference to Policy ENV4 and other environmental policies within Policy EC1 may add useful clarification that proposals for economic/employment development also need to satisfy the provisions of other relevant policies in the local plan.</p>	<p>Yes</p>	<p>update references. Revise criterion c) to read: “The proposal not adversely affecting the significance of <i>natural environmental assets</i>, designated heritage assets and open space provision <i>and accords with the provisions of Policies ENV1, ENV2, ENV4, ENV5, ENV6, ENV7, ENV8, ENV10 and ENV11.</i> ” Add new criterion after criterion e) to read: “<i>the proposal accords with any other relevant policies in the local plan</i>” Renumber remaining criteria and update references.</p>
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\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## Draft Policy EC2: Safeguarding Existing Employment Uses Response Paper

April – May 2016 Draft Local Plan

<b>Policy EC2</b>			
<b>Aim of the Policy: To ensure that there is an adequate supply of employment locations in Craven for “B” class uses by setting out a presumption that these locations will be retained in employment generating uses.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
This policy is very important to maintain employment land and prevent changes of use to more lucrative housing. However, I note that the Council already appear to have gone against this policy by allowing new housing on the Station Yard industrial site at Settle. Having allowed this it might be difficult to prevent other employment land here being lost to residential use.	Note support for this policy approach. At this stage in the local plan preparation process draft policy EC2 holds little weight in the determination of planning applications	No	
The Council has rightly acknowledged both the employment and tourism development uses within Broughton Hall Business Park and estate in qualifying the safeguarding of such uses. This is supported.	Support for this policy is noted and welcomed.	No	
Policy is supported, however concern that Broughton Business Park is mentioned but not Snaygill.	Draft policy EC2 would apply in several locations where B Class Uses exist, including Snaygill and these locations will be identified on the policies map. Broughton Hall is specifically mentioned within this draft policy	Yes	Safeguarded areas for employment use to be shown on the Policies map

	<p>as it provides opportunities for both B Class employment and tourism development . Existing B Class uses at Broughton Hall will be safeguarded in draft policy EC3 and proposals for tourism development will be supported, in principle, in accordance with draft policy EC4: Tourism.</p>		
<p>It is suggested that the supporting text to this policy will have to acknowledge the flexibilities of use afforded by new and established permitted development rights.</p>	<p>The NPPF is very clear that local plan policy should not repeat national planning policy or legislation. Permitted development rights and any changes to them are set out in The Town and Country Planning (General Permitted Development) (England) Order 2015 and are applicable to development proposals where appropriate. Local Plan policy is not required to set out or repeat this legislation.</p>	<p>No</p>	

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## Draft Policy EC3: Rural Economy Response Paper

April – May 2016 Draft Local Plan

<b>Policy EC3</b>			
<b>Aim of the Policy: To support Craven's rural economy so that it may grow and diversify in a sustainable way to provide long term economic, environmental and social benefits for local communities.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
What about barns in north Craven?	Point e) of the draft policy acknowledges the potential social, economic and environmental benefits of reusing existing buildings by supporting the conversion of barns for residential and/or employment within sustainable rural locations. This applies to all rural areas throughout Craven, including the north.	No	
Support is shown for this policy as there is no aspiration to stifle improvement and growth of the rural economy, however those with commercial interests are keen to see these interests protected and wish to see some safeguards added to the policy to reflect the need to protect commercial sites from inappropriate development.	Comment noted, however, these considerations are addressed in Policy ENV3: Good Design.	No	
This policy is considered sound. Although there is a separate policy relating to tourism, it is considered that draft policy EC3 should	The term rural businesses, included within this draft policy and specifically at point c) includes tourism related rural businesses. There is an	Yes	Amend draft policy EC3, point c) to read "Helping <i>all existing and new</i> rural businesses, <i>including tourism</i>



<p>also include a reference to the tourism sector as it forms a key component of the rural economy in Craven. The following amended wording has been suggested to point c):          “Helping all existing and new rural businesses including new and existing tourism businesses to succeed, grow and expand....”</p>	<p>obvious overlap between this draft policy and EC4: Tourism, therefore draft policy EC3 could be slightly amended to reflect the fact that tourism related businesses form a significant part of Craven’s rural economy.</p>		<p><i>related businesses to succeed...”</i></p>
<p>The plan should be ambitious in seeking to achieve high levels of economic growth and that any possible risks of planning for a corresponding level of housing are vastly outweighed by the potential benefit. The draft plan should ensure its housing policies fully support the requirement set out in para 18 of the NPPF by planning for the higher rate of economic growth. Para 28 of the NPPF, relevant sections of PPG and the Government’s 10 point plan for boosting productivity in rural areas wants to make it easier for people to live and work in rural areas and any policies on the rural economy should support its aims and objectives.</p>	<p>The draft Local Plan aims to align housing and employment growth so that overall sustainable development is achieved. This draft policy is in line with the NPPF and PPG. It also aims to protect existing live work units and also acknowledges the potential benefits of reusing existing buildings by supporting proposals for the conversion of rural buildings for residential and/or employment uses.</p>	<p>No</p>	

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## Draft Policy EC4: Tourism Response Paper to the April – May 2016 Draft Local Plan

<b>Policy EC4: Tourism</b>			
<b>Aim of the Policy: To help secure a thriving economy, vibrant town centres, cultural experiences, active recreation, rich biodiversity, beautiful landscapes and well-preserved historic places, which will benefit visitors and local communities, by supporting sustainable growth in tourism.</b>			
<b>Main issues from consultation*</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
I would request that the Embsay & Bolton Abbey Steam Railways intention to extended its operations to Skipton Railway Station are included under transport and tourism and the former Platforms 5 & 6 at Skipton Railway Station be protected for this development.	The policy and/or supporting text should support these aspirations, but seeking to impose restrictions on operational railway land at Skipton is likely to be inappropriate.	Yes	A dedicated sub-section has been added to the policy's supporting text, in order to provide greater clarity and support for proposals at the Embsay key location.
Hellifield Flashes are put forward as green area. Reference the meeting that was held with officers at the beginning of May.	Noted. Further evidence of the nature and extent of the flashes' biodiversity value is being obtained from the Ecological Data Centre.	Yes	<i>[Policy and inset map will need to be refined in-line with ecological evidence]</i>
The Trust would like to see a specific point supporting Nature Tourism see <a href="http://www.yorkshirenaturetriangle.org.uk/">http://www.yorkshirenaturetriangle.org.uk/</a> for more information.	This would be a good addition to the policy and/or supporting text.	Yes	A specific point supporting nature tourism has been added in paragraph 7.34.
Hellifield Flash does appear to be in an area of high wildlife value of wet grassland. An overarching plan for the site is needed so that opportunities can be taken to ensure that there are no impacts on wildlife and enhancements are put in place.	Noted. Further evidence of the nature and extent of the flashes' biodiversity value is being obtained from the Ecological Data Centre.	Yes	<i>[Policy and inset map will need to be refined in-line with ecological evidence]</i>
The NPA support the positive approach to tourism and the recognition that farming and other rural enterprises have capacity for diversification. Tourism and diversification in Craven outside the Park, will broaden the appeal of the area by improving the year round	These points of support and observations about cross-boundary benefits are welcomed and noted.	No	

quality of facilities and improving the resilience of the local economy. Development of a scale or kind that would not be compatible with National Park purposes, may be facilitated in Craven outside the Park, to the mutual benefit of the wider area.			
I assume there is no precise allocation for EC4 at Bolton abbey, beyond the general location indicated on the Policies Map?	That is right. However, more details are now available regarding aspirations for the Bolton Abbey key location and these will allow the policy and supporting text to be refined.	Yes	See expanded supporting text, new/revised policy EC4A and additional inset map, in the publication draft local plan.
The Trustees welcome this positively framed policy supporting proposals for tourism development and for achieving synergies of co-location at locations for tourism development identified on the policies map. The specific reference at draft Policy EC4 to Broughton Hall Estate is supported.	These comments are welcomed and noted. The draft policy could be improved further by including a dedicated sub-section on each key location, within the supporting text.	Yes	A dedicated sub-section has been added to the policy's supporting text, in order to provide greater clarity and support for proposals at the Broughton Hall Estate key location.
Pendle Council is pleased to note that the draft plan offers support for tourism development by providing easy access to the network of public transport services, footpaths and cycle routes (including canal towpaths) in the area and, wherever possible, secures the improvement and expansion of that network.	These comments are welcomed and noted.	No	
We welcome that the policy seeks to ensure that tourism development provides easy access to the canal towpaths in the area and seeks to secure the improvement and expansion of that network. This aim is connected to policy ENV5 and will help promote increased usage of the towpath for leisure and recreation which helps stimulate health and wellbeing benefits. We also note the principle of supporting tourism development in the Gargrave and Skipton canal areas.	These comments are welcomed and noted. At present, the council has no details about any particular proposals for the Gargrave and Skipton key locations. However, greater clarity and encouragement could be provided by adding a dedicated sub-section on each key location, within the supporting text. The council is always open to meeting requests and	Yes	Dedicated sub-sections have been added to the policy's supporting text, in order to provide greater clarity and support for proposals at the Gargrave and Skipton key locations.

<p>We support this approach in principle; however, we would wish to understand if the Council have particular proposals in mind and would welcome the opportunity to meet and discuss these matters with the Council.</p>	<p>would welcome any positive and constructive dialogue about the local plan.</p>		
<p>g) The Council supports Policy EC4 and the highlighting of the canal and railway station areas – but would not wish to see tourism development restricted to these areas. K) &amp; l) The Council welcomes the references to Neighbourhood Planning and sees matters relating to the Town Centre, Tourism and Parking Provision as being key focal points for any future Neighbourhood Plan.</p>	<p>Noted. Whilst the draft policy’s support for tourism is not restricted to key locations, a further statement to that effect could be added to paragraph 7.18.</p>	<p>Yes</p>	<p>See revised paragraph 7.18, of the publication draft local plan, which includes the relevant statement.</p>
<p>2.13 Access and Rights of way Natural England advises that para 75 of the NPPF states that Planning policies should protect and enhance Public Rights of Way and access and that Local authorities should seek opportunities to provide better facilities for users. We note the positive commitment towards implementing the Craven Rights of Way Improvement Plan and working with Local Access Forums in para 5.11; the reference to public rights of way, footpaths and cycle-paths in relation to components of green infrastructure in para 5.44; and the proposal to ensure tourism development provides easy access to public transport, footpaths and cycle routes and secure improvement and expansion to the network in criterion e) of policy EC4. However, considering the importance of recreation and the rights of way network and the location of both the Pennine Way and Pennine Bridleway National Trails within the plan area we advise that you consider including a single policy addressing access, recreation and public rights of</p>	<p>Noted. An access, recreation and rights of way policy will be considered, as suggested.</p>	<p>?</p>	<p><i>[Create a new policy on access, recreation and rights of way]</i></p>

way.			
<p>Draft Policy EC3: Rural Economy is noted. Our clients would not wish to stifle the improvement and growth of the rural economy and in many ways will therefore be supportive of the principles laid out within draft policy EC3. However, given the location of my clients site on the edge of Settle they will be keen to protect their commercial interests and would wish to see some safeguards added to the policy to reflect the need to protect their site from inappropriate encroachment. It should be noted that the same concerns are being raised in relation to draft policy EC4 – Tourism and we trust these matters will be addressed by the local authority as part of the next phase of the new Local Plan.</p>	<p>This comment appears to relate to the consideration of hazard sites, public safety and compatibility with existing uses, which may be relevant to many forms of development in addition to tourism. Rather than adding a repetitive criterion to several policies, including EC4, it may be preferable to deal with this issue in a single dedicated local plan policy.</p>	<p>Yes</p>	<p><i>[Revise an existing environmental policy, such as ENV7, or create a new policy to deal specifically with this issue]</i></p>
<p>A policy reference to be provided as a footnote in policy 'EC4: Tourism indicating: "Sensitive mixed use development will be delivered at Bolton Abbey, to include new tourism and leisure facilities on the allocated village-centre site, through a Masterplan process, which supports the village's complimentary role as a tourism destination and service village."</p>	<p>More details are now available regarding aspirations for the Bolton Abbey key location and these will allow the policy and supporting text to be refined.</p>	<p>Yes</p>	<p>See expanded supporting text, new/revised policy EC4A and additional inset map, in the publication draft local plan.</p>
<p>It is considered that Policy EC4: Tourism should include a more specific policy to support the growth and expansion of existing tourism businesses. It is considered that section (g) provides specific areas for growth which in effect omits other keys areas where existing tourism businesses provide a key contribution the local economy (through visitor spend, local jobs etc). We therefore consider that a new additional policy / paragraph should be added as follows:</p>	<p>Noted. Whilst the draft policy's support for tourism is not restricted to key locations, a specific reference to supporting existing tourism businesses would be helpful. Furthermore, a reference to accommodation – in addition to destinations and activities – would also be helpful. However, providing a special mention for a particular type</p>	<p>Yes</p>	<p>See revised paragraph 7.16, which now includes specific support for existing businesses and visitor accommodation, and parts a) and b) of revised policy EC4, which now refer to established and up-and-coming businesses as well as destinations.</p>

<p>“(h) Supporting the growth, enhancement and provision of both new and existing tourism attractions including holiday accommodation such as caravan and camping sites in appropriate locations as it is recognised that this provides a key contribution the local economy”.</p>	<p>of business/accommodation would be unnecessary and inequitable.</p>		
<p>Land to the west of Hellifield is designated as a Tourist Development Opportunity Site under policy EMP11 of the current (1999) local plan. Outline planning permission for a proposed Hellifield Rural Environmental Centre was granted on 10<sup>th</sup> February 2003 (decision no. 42/2002/2763), reserved matters were approved in September 2005 (decision no. 42/2005/5082) and works to implement the permission have been carried out. Criteria (a) and (b) of draft policy ENV10 (Local Green Space) are satisfied where the site does not already have planning permission for an incompatible alternative use. Tourism figures show the increasing demand for overnight accommodation in the Yorkshire Dales National Park. The ideal location of the site adjacent to the national park boundary and railway station gives potential for the expansion of the extant permission to meet the increasing needs of the tourism industry. In order for the site to facilitate the increasing tourism demand, the whole of the site would be required as previously allocated which is incompatible with the Local Green Space policy. The site is an ‘extensive tract of land’ and therefore inappropriate for Local Green Space. The evidence does not support the designation of the archaeological area. No reasons are identified for the provision of the footpaths which will require compulsory purchase.</p>	<p>Policy EMP11 states that the site is acceptable in principle for tourism development and applications will be assessed against other policies and a development brief. An outline application (5/42/149/C) was submitted and approved before a development brief was produced. The proposals were amended and conditions imposed to address other policies, to resolve specific issues and to mitigate effects on biodiversity, archaeology and other interests. The application process substituted for a development brief, providing a detailed context for the general support of policy EMP11. The approved plan shows northern and eastern areas of the site as open space and an archaeological study (Sep. 1999) identifies features in those areas that warrant further field work. The known biodiversity value of the main ‘flash’, in the western part of the site, is safeguarded by an approved management plan. Information on the biodiversity value of other flashes, in the northern and</p>	<p>Yes</p>	<p><i>[The policy, supporting text and inset map need to be refined. References to any supporting evidence should be included. Local Green Space assessments need to be completed and the results taken on-board.]</i></p>

	<p>eastern parts of the site, is now being sought from the Ecological Data Centre. New public rights of way would be in line with paragraph 7.21 and criterion e) of draft policy EC4. The creation of a right of way does not require compulsory purchase of land across which the right exists. The need for sustainable growth in tourism is not disputed. However, allocation of the whole site and expansion of the extant permission to meet the increasing needs of the tourism industry may have adverse impacts on local archaeology, biodiversity and other interests, the importance of which has already been acknowledged in the site's planning history. More recently (Aug. 2016), an appraisal of the Settle-Carlisle Conservation Area identified the northern and north-eastern parts of the site as providing a strong contribution to character/appearance.</p>		
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\*These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## Draft Policy EC5: Town, District &amp; Local Centres Response Paper

April – May 2016 Draft Local Plan

<b>Policy EC5</b>			
<b>Aim of the Policy: To provide a context and approach to retail development , and retailing overall within Craven’s settlements and town centres.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
Pendle Council supports the overall objective of Policy EC5. Pendle Council is pleased to note that the draft plan proposes thresholds for town centre uses in out-of-centre locations, and that these follow the advice set in the Retail & Leisure Study (February 2016). Pendle Council also notes that the proposal for any out-of-centre proposals extending across a number of centres in the retail hierarchy should meet the lowest relevant impact threshold has not been translated into policy, but consider that this may have been useful in locations where cross-boundary impacts could be a consideration.	Comments noted.	No	
Suggested amendments to Primary Shopping Area Map. Given the protection it provides to the primary retail function of these areas, the Council believes that the area should be extended to include the following: <ul style="list-style-type: none"> <li>• Coach Street</li> </ul>	The request to amend both the primary shopping area and town centre boundaries in Skipton is noted.  However, the town centre boundaries (TCB) and Primary Shopping Areas (PSA) that are shown on the maps reflect the findings of the	No	



<b>Policy EC5</b>			
<b>Aim of the Policy: To provide a context and approach to retail development , and retailing overall within Craven’s settlements and town centres.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
<ul style="list-style-type: none"> <li>• The Part of the High Street extending from the Black Horse Pub to Mill Bridge</li> <li>• The Albion Place Development to the rear of Skipton Town Hall.</li> <li>• Town Centre Boundary Map The Town Centre Boundary should be extended to include:               <ul style="list-style-type: none"> <li>i) The Canal Basin area (on both sides of the canal)</li> <li>ii) The bus station and associated car park</li> </ul> </li> </ul> <p>Also, the Council asks whether it would be more appropriate to align the Town Centre Boundary with the Spring’s Branch Canal, rather than the rear outline of existing retail units on the High Street.</p>	<p>retail study, which identifies areas where planning policy approaches to support town centres including Skipton should apply. A key aspect of the approach to town centres is to support the primary retail and commercial function of the centre of Skipton, whilst also setting out a planning policy approach that facilitates a range complementary uses that supports Skipton town centre as an economic engine for Craven and a centre of commerce, recreation, enterprise and leisure.</p> <p>With regard to the extent of the TCB and PSA, The retail and leisure study which is part of the evidence base that underpins the plan, has considered these matters. It states:</p> <p><i>“The TCB should include the PSA and areas predominantly occupied by main town centre uses within or adjacent to the PSA. The PSA is a defined area where retail development is concentrated and generally comprises the primary frontages and those secondary frontages which are adjoining and closely related to the primary shopping frontage.”</i></p> <p>The study continues:</p> <p><i>“Primary frontages include a high proportion of</i></p>		

<b>Policy EC5</b>			
<b>Aim of the Policy: To provide a context and approach to retail development , and retailing overall within Craven’s settlements and town centres.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
	<p><i>retail uses which may include food, drinks, clothing and household goods. Secondary frontages provide greater opportunities for a diversity of uses such as restaurants, cinemas and businesses.”</i></p> <p>The study continues by setting out that the PSA is defined where:</p> <p><i>“retail development, (including the primary frontages), is concentrated and is clearly separated from the TCB.”</i></p> <p>In setting the TCB and PSA, the study has also considered areas to exclude. It states that the following areas should be excluded from the PSA:</p> <p><i>...“uses around Coach Street and Albert Terrace, as this area includes some dwellings and secondary frontages which aren’t closely related to the primary frontages.”</i></p> <p>In considering the TCB, the study continues to state:</p> <p><i>“We have also included a proposed TCB which extends across the wider town centre area and includes the PSA and other main town centres uses adjacent to the PSA. In particular, the TCB</i></p>		

<b>Policy EC5</b>			
<b>Aim of the Policy: To provide a context and approach to retail development , and retailing overall within Craven’s settlements and town centres.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
	<p><i>includes the area to the north along Mill Bridge, the area to the east along Newmarket Street, the area to the south along Keighley Road and the Coach Street / Albert Terrace area to the west.”</i></p> <p>The setting of the PSA and TCB boundaries have been set in a robust and consistent evidence based approach, informed and underpinned by the retail study. The study has considered and identified both town centre and primary retail areas. However, for the avoidance of doubt, the plan does not seek to define the extent of the town centre per se, but planning policy approaches that underpin and support the roles and functions of Skipton town centre, which is based in evidence.</p> <p>As such, altering the TCB and PSA in line with the requests is not reflected in the underpinning evidence, which is referenced above. To do so would undermine the robustness of the plan as a sound evidence based document that sets the approach accordingly.</p>		

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## Draft Policy EC5A: Residential Use in Town and Village Centres Response Paper

April – May 2016 Draft Local Plan

<b>Policy EC5a</b>			
<b>Aim of the Policy: To provides a context for, and identify circumstances where residential uses would be permitted in settlement centres.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
No responses received	There was no response to the policy	No	None

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## Infrastructure, Services and Facilities Response Paper to the April – May 2016 Draft Local Plan

<b>Policy INF1: Planning Obligations</b>			
<b>Aim of the Policy: To secure planning obligations that help to mitigate the impact of Craven's growth, support the provision of local infrastructure, secure community benefits and achieve sustainable development.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
This section is weak and lacks teeth. It needs to be significantly strengthened. Costs to schools, costs of flood mitigation, costs of off-site sewage don't seem to be included but most of all expected contributions to overall housing need and to community are not stated strongly and clearly enough. There must be something that empowers councillors to insist on levels of contribution to the community which reflect very high potential profits from some sites. Specific mention of greater contribution from greenfield sites needs including.	The draft policy relates to planning obligations rather than infrastructure requirements. Consultation, evidence gathering and assessment of infrastructure requirements are on-going, but ultimately the new local plan will be supported by an Infrastructure Delivery Plan, which will provide detail of future infrastructure requirements and provision. National law and policy on the appropriate use of planning obligations is explained in the supporting text.	Yes	See the draft Infrastructure Delivery Plan and related revisions to draft policies INF1 and SP12.
Support but in need of strengthening Generally supportive but paragraph g) on p122 should require applicants to work with the Council, other agencies and developers to understand the cumulative impact of developments on settlements, their environs, infrastructure and services, so that the requisite new infrastructure and services can be planned, -developed and implemented holistically.	Joint working, evidence gathering and assessment of infrastructure requirements are on-going and will feed into an Infrastructure Delivery Plan, which will support the new local plan and provide detail of future infrastructure requirements and provision.	Yes	See the draft Infrastructure Delivery Plan and related revisions to draft policies INF1 and SP12.
With the exception of parking provision there is little reference to car usage. This is an unrealistic	The draft policy relates to planning obligations rather than transport	Yes	See the draft Infrastructure Delivery Plan and related revisions to draft

<p>approach. People depend heavily on their cars in Craven and with poor and worsening public transport links to the rural areas the situation is unlikely to improve. There is no reference to any traffic modelling.</p>	<p>infrastructure. Traffic modelling and the assessment of transport infrastructure requirements are on-going and will feed into an Infrastructure Delivery Plan, which will support the new local plan and provide detail of future infrastructure requirements and provision.</p>		<p>policies INF1 and SP12.</p>
<p>Copies of the developer contribution policies of Selby DC and Scarborough BC are available for information online and we recommend that Craven DC adopts a similar policy. Our experience of Community Infrastructure Levy in other planning areas has been that it can be very difficult to secure education contributions through this mechanism and we recommend that education contributions are included in the matters which will continue to be secured through Section 106 Obligations.</p>	<p>Evidence gathering and assessment of requirements for education provision are on-going and will enable progress to be made on this area of policy. However, draft policy INF1 relates to planning obligations rather than education, so the option of having a separate education policy will be considered.</p>	<p>Yes</p>	<p>See new draft policy INF6: Education Provision.</p>
<p>We support this approach which aims to mitigate the impact of Craven's growth, support the provision of local infrastructure, secure community benefits and achieve sustainable development. We have highlighted in our response to ENV5 the need for new development to fully take account of the impacts of a development on existing green infrastructure. The Leeds &amp; Liverpool Canal is a key component of green infrastructure and the draft policy will help ensure that the impacts on the canal are mitigated.</p>	<p>The support for draft policy INF1 is noted. The aim of mitigating the impact of Craven's growth, supporting the provision of local infrastructure, securing community benefits and achieving sustainable development will be carried forward.</p>	<p>No</p>	

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## Draft Policy INF2: Community Facilities and Social Spaces Response Paper

April – May 2016 Draft Local Plan

<b>Policy INF2</b>			
<b>Aim of the Policy: To allow opportunities for existing community facilities to be improved, and new ones created, to meet the needs of the local community as it grows and changes over time.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
<p>Parish/Town Councils are the key providers of allotments, recreation grounds and play areas. Concern that sufficient account is taken account of the longer term costs of such provision. Although a 10 year maintenance provision is factored into calculations, should it be made clearer how such funding is to be held and, in each case, who will be responsible for the ongoing maintenance. Town and Parish Council's are also concerned who will meet the maintenance costs after the 10 year period has ended, particularly for new provision.</p>	<p>Appendix A to this draft policy states that developers will be expected to make provision for the management and maintenance of sport, open spaces and built facilities by a local organisation, club or residents group and will be in perpetuity and for a minimum of 10 years. Any on site provision is agreed via a S106 agreement.</p> <p>In addition, the Council will be looking into the feasibility of introducing the Community Infrastructure Levy (CIL). CIL is a charge that can be applied to new development to help pay for the infrastructure needed to support it. It is a different form of planning gain than Section 106 agreements and is applied per sqm of development. It is a non-negotiable charge and the infrastructure funded through CIL does not require to be directly related to a development unlike a S106 agreement and is far more flexible in how it can be spent.</p>	No	



	<p>CIL requires that a minimum of 15 percent of CIL funds are passed to a Parish/Town Council where development has taken place and can be spent on any form of infrastructure the Parish/Town Council sees fit which includes the maintenance of allotments, recreation grounds and play areas.</p>		
<p>This policy should ensure that funding for improvements to existing community facilities, including village and town halls, together with public art/civic space/public realm improvements is secured through new housing developments.</p>	<p>This policy supports proposals for the improvements of community facilities and social spaces, including town and village halls and public/civic space improvements and recognises the role they play to enhance the quality of life for residents, help to economically sustain facilities and settlements.</p> <p>Future evidence regarding Town/Village Halls would provide evidence to assess any proposals against criterion d-g, however at present it is not possible to adopt an approach requiring contributions to be made to improve or provide new Town/Village Halls. CDC currently do not have the evidence to justify such a policy approach.</p> <p>It is considered however that a range of policies in the Local Plan, including this one, can be amended to further support opportunities to create new or improve existing community facilities and spaces i.e., policies relating to design, town centres and planning obligations. In addition the Council's aspiration for new and improvements to community facilities and spaces can be included within the Council's</p>	<p>Yes</p>	<p>A stronger emphasis on arts and culture could be placed throughout a range of policies including INF3, ENV3: Good Design, EC5: Town, District and Local Centres, INF1: Planning Obligations. Reference will also be made within the explanatory text to the policy, at para 8.11, to existing and future town/village action and improvement plans, which will be used to inform the implementation of policy INF2.</p> <p>Development principles have also been amended to place a stronger emphasis on arts and culture.</p> <p>In addition the aim of improving the existing cultural and social spaces together with the provision of new ones can be incorporated in the Council's IDP and, if appropriate fed through to the CIL.</p>

	Infrastructure Delivery Plan (IDP), which would then link to CIL regulation 123 list (if the Council decides to adopt CIL in the future)		
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\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## Draft Policy INF3: Sport, Open Space and Recreation Facilities Response Paper

April – May 2016 Draft Local Plan

<b>Policy INF3</b>			
<b>Aim of the Policy: To promote health, well being and equality by safeguarding and improving sport, open space and built sports facilities through planned growth for Craven.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
<p>It is important to ensure that green spaces penetrate built areas and that they are maintained and valued. In any urban environment green spaces of all sizes are important for community health and wildlife habitat.</p> <p>Development should be required to maintain genuine tongues of green land penetrating urban areas providing habitat corridors as well as allowing access to all members of the community (including the young and elderly). The creation of unattractive and narrow footpaths on the edge of new development (Bargh's Meadow) is no recompense for loss of meadows.</p> <p>There is often an assumption that the development of infill sites is preferable over development of green fields on the edge of a settlement. Bentham has strong</p>	<p>Draft policy INF3 point d) aims to safeguard existing open space from loss and sets out the limited situations where this may be supported.</p> <p>Draft policy ENV5 aims to avoid the loss of existing green infrastructure networks, enhance existing networks and create new green infrastructure networks where appropriate.</p> <p>Development principles established for some allocated housing sites set out where areas of green infrastructure is required as part of any scheme, or where existing features should be retained. The list of allocated sites together with development principles are set out in draft policies SP5-SP11.</p> <p>Draft policy ENV10: Local Green Space sets out</p>	No	

<p>relationships with the rural hinterland and the Local Plan should recognise that these infill sites provide traditional and important links between the town and surrounding agricultural land.</p> <p>Green fields provide the lungs and footpaths provide the arteries that link settlements to the wider rural area.</p>	<p>sites designated as Local Green Space throughout the plan area and aims to protect such sites.</p>		
<p>Sport England objects to criterion D3. This criterion would allow the partial loss of any playing field and sports facilities in return for improvements to the remaining playing field and sports facilities. It is essentially an enabling policy. Sport England is a statutory consultee on planning applications affecting playing field land. Planning applications are assessed against the following 5 exceptions set out in SE Playing Fields Policy:</p> <ol style="list-style-type: none"> <li>1) A carefully quantified and documented assessment of current and future needs has demonstrated to SE that there is an excess if playing field provision in the catchment and the site has no special significance in the interests of sport.</li> <li>2) The proposed development is ancillary to the principle use of the site as a playing field(s) and does not affect the quantity or quality of pitches or adversely affect their use.</li> <li>3) The proposed development affects only land incapable of forming a</li> </ol>	<p>As criterion D3 is not in line with SEs Playing Field Policy and para 74 of the NPPF it will be amended to reflect the comments made by SE.</p>	<p>Yes</p>	<p>Criterion D3 will be amended to read:</p> <p>“If specific sites are identified in an up to date Playing Pitch Strategy, Built Sports Facilities Strategy or Open Space Assessment as being partially surplus, and therefore can be developed in return for improvements, the partial loss of a site may be justified where evidence is provided and where a proposal is supported by the relevant National Governing Bodies for Sport.”</p>

<p>playing pitch (or part) and does not result in the loss of or inability to make use of any playing pitch, a reduction in the size of the playing area of any pitch or the loss of any other sporting/ancillary facilities on the site.</p> <p>4) The playing fields to be lost as a result of proposed development would be replaced with playing fields of equivalent or better quality and equivalent or greater quantity, in a suitable location and subject to equivalent or better management arrangements, prior to the commencement of development.</p> <p>5) The proposed development is for an indoor or outdoor facility, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss of the playing field.</p> <p>These exceptions reflect para 74 of the NPPF and do not support the partial loss of a playing field (unless it can be demonstrated to meet points 1 or 3 above). There is nothing in para 74 of the NPPF that allows for the partial loss of sports facilities in return for improvements.</p> <p>Criterion D3 is therefore contrary to the NPPF and has the potential to encourage planning applications which SE would have</p>			
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<p>to object to. SE would remove its objection if criterion D3 was omitted. Alternatively if specific sites are identified in the PPS as being partially surplus and therefore can be redeveloped for improvements, and this has the support of the relevant National Governing Bodies for Sport, Criterion D3 should be amended to make this clear by reference to the PPS that provides the evidence that the site can be partially lost.</p>			
<p>The policy mentions shortage of pool space, but former Malsis pool and sports hall “surplus”.</p>	<p>The 2016 Built Sports Facilities Strategy states that at the time of the assessment of existing pools in Craven, the pool at Malsis School is rarely used. The 2016 Built Sports Facilities Strategy concludes that if no new pools are opened and the existing pools remain open there is a need for an additional 200sq meter pool in Craven by 2032. Sub area assessment of current and future provision shows there to be adequate provision in south craven, despite the recent closure of Malsis School &amp; pool, and a deficiency of pool provision in the mid/north craven area.</p>	<p>Yes</p>	<p>The last sentence of para 8.22 will be deleted to reflect the fact that Malsis School has now closed.</p>
<p>Note that the supporting text to this draft policy recognises the Leeds Liverpool Canal as open space and seeks improvement of the canal corridor through implementation of the Leeds Liverpool Canal Towpath Access Development Plan, part of which has already been implemented between Skipton and Bradley. This policy will help to ensure that</p>	<p>Support for this element of the policy is noted.</p>	<p>Yes</p>	<p>The next draft of the Local Plan will include draft policy ENV11: The Leeds Liverpool Canal, which sets out policy requirements relating to development proposals adjacent or adjoining the canal.</p>

<p>canal and towpath are improved and maintained so that access and enjoyment of the canal is promoted.</p>			
<p>Parish/Town Councils are the key providers of allotments, recreation grounds and play areas. Concern that sufficient account is taken account of the longer term costs of such provision. Although a 10 year maintenance provision is factored into calculations, should it be made clearer how such funding is to be held and, in each case, who will be responsible for the on-going maintenance? Town and Parish Councils are also concerned who will meet the maintenance costs after the 10 year period has ended, particularly for new provision.</p>	<p>Appendix A to this draft policy states that developers will be expected to make provision for the management and maintenance of sport, open spaces and built facilities by a local organisation, club or residents group and will be in perpetuity and for a minimum of 10 years. Town and Parish Councils have the option of ring fencing a proportion of planning gain, secured through A106 agreements to be used specifically to fund long term maintenance of a new facility or the improvement of existing facilities.</p> <p>In addition, the Council will be looking into the feasibility of introducing the Community Infrastructure Levy (CIL) once the new local plan is adopted. CIL is a charge that can be applied to new development to help pay for the infrastructure needed to support it. It is a different form of planning gain than Section 106 agreements and is applied per sqm of development. It is a non-negotiable charge and the infrastructure funded through CIL does not require to be directly related to a development unlike a S106 agreement and is far more flexible in how it can be spent.</p> <p>CIL requires that a minimum of 15 percent of CIL funds are passed to a Parish/Town Council where development has taken place and can be spent on any form of infrastructure the</p>	<p>No</p>	

	Parish/Town Council sees fit which includes the maintenance of allotments, recreation grounds and play areas.		
The draft policy sets out requirements for proposals above 5 dwellings and above 50 dwellings to either provide facilities/space on site or to pay a contribution. A flexible approach should be adopted by the Council in requiring facilities to be provided on site because this may not be appropriate in all circumstances. Para 173 of the NPPF states that “sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.	Draft policy INF3 and Appendix A is based on the 2016 assessment of open space, built facilities and Playing Pitch Strategy, in line with requirements of the NPPF and Sport England. Whether provision is required on or off site will be informed by the deficits or surpluses that exist in a type of open space/facilities or pitch, as set out by the 2016 assessment. In order to meet the requirements of the NPPF the plan will be subject to viability testing prior to submission. This work will ensure that the policy requirements set out in the plan are viable.	No	
A number of the District’s open spaces, such as parks and gardens, amenity greenspaces, cemeteries and civic spaces make a positive contribution to the character of the Craven’s Conservation Areas or the setting of its other heritage assets. Therefore, we support this policy which will assist in helping to ensure that those open areas which contribute to the distinctive character of the plan area are safeguarded.	Note the support from English Heritage for this draft policy.	No	

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.



## Policy INF4 Parking Provision Response Paper to the April – May 2016 Draft Local Plan

Main issues from consultation	Response	Change required to the local plan (yes/no)	Changes made to the plan ( <i>ideas relating to change/site identified or not as a preferred site</i> )
No policy on transport. Merely acceptance that private car will be a major part of the transport mix in Craven. Can the authority provide more support for sustainable travel, increasing use of existing public transport network, and ways in which cycling can be made more popular for short local trips.	<p>The Good Design policy (ENV3) point h) includes the need for the consideration of making development permeable and getting around easier —especially for pedestrians, cyclists and people with disabilities— by improving existing routes, adding new ones and creating connections to enhance the local network.’ It is therefore considered that consideration has been made within the plan to promote sustainable transport.</p> <p>It should also be noted that North Yorkshire’s interim guidance (Interim Guidance on Transport Issues including Parking Standards And Advice on Transport Assessments and Travel Plans) refers to requirements for cycle parking as well as car parking. These will be applicable to applications for new development under policy INF4.</p>	No	
Policy should include an adequate percentage increase over likely immediate demand to allow for comfortable accommodation of growth over plan period.	Where proposed extensions in commercial/non-domestic floorspace are proposed consideration is given to available parking and the need for additional requirements per m2 of floorspace.	No	
Consideration should be given to applying policy to other types of development as			

policy fails to deal with impact on parking where properties are extended, converted etc. Other Councils incorporate a policy for requiring increased parking with extensions.			
Para 8.34 notes issues of anti-social parking exists in some villages. This should be extended to recognise issues of on street parking in towns including Skipton.	The policy will be amended to include reference to anti-social parking issues in towns and villages across Craven.	Yes	Amend first line of paragraph 8.34 to read to read "Previous consultations with residents have identified a number of <u>towns and</u> villages where existing problems of anti-social parking exist"
Although acknowledged on street parking is responsibility of NYCC, INF4 should recognise interaction between off street public parking and issues relating to on street parking and NYCC and CDC should work together to manage situation better.	Comment noted, however policy INF4 already addresses the interaction between on and off street parking by reference to the respective strategies for NYCC and CDC, so no change to the plan is considered necessary.	No	

**Communications Infrastructure Response Paper to the April – May 2016 Draft Local Plan**

<b>Policy INF5: Communications Infrastructure</b>			
<b>Aim of the Policy: To promote broadband provision within Craven including in new developments particularly within more sparsely populated rural areas where existing provision is limited.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
<ul style="list-style-type: none"> <li>The importance of fast broadband for the rural economy is ignored. People working from home and the development of small businesses in rural areas could be vital in ensuring that the villages in our region thrive. Broadband is becoming increasingly important in accessing vital services such as health.</li> </ul>	<p>The policy is intended to provide support for rural broadband as a whole this includes both commercial enterprises and domestic properties. It is agreed that broadband is vital for accessing new services. However, there are areas of Craven that are remote which are not currently served by Next Generation Access Broadband and therefore it is considered that policy requirements should be incorporated within the Local Plan to promote service provision across the plan area, hence the inclusion of Local Plan policy INF5.</p>	No	N/A
<ul style="list-style-type: none"> <li>Support expansion using existing infrastructure (masts etc.) only support new if inadequate.</li> </ul>	<p>Where existing infrastructure can be utilised the policy seeks to ensure that this approach is taken unless proven to be unfeasible. Whilst it is recognised that feasibility may be different to adequacy, the cost or location etc. may require new provision.</p>	No	N/A

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

## CRAVEN LOCAL PLAN (DRAFT 05/04/2016)

### COMMENTS - SECTION 8: INFRASTRUCTURE, SERVICES AND FACILITIES

1. The division of facility types between Policy INF 2: Community Facilities and Social Spaces, and Policy INF 3: Sport, Open Space and Recreation Facilities are blurred; there are areas of duplication with a number of facility types falling into both Policy areas. I would suggest that we look to divide the facilities by in-door and out-door facilities. For example:

Community Facilities – extend the current definition to include indoor sport facilities – many of our community facilities double-up as sport/leisure centres so it makes sense to recognise this in the Plan. It also supports the proposition of leisure centres, swimming pools, etc. being assets of community value.

Open Space – to include the types in the Open Space Assessment (listed in paragraph 8.16) and outdoor sport facilities (instead of using the wording playing pitches).

Catherine J also raised this issue. We feel that draft policies INF2 & INF3 sit well together and fit with the existing evidence base, which has assessed Playing pitches, Built Facilities and Open Spaces separately. By adopting a policy approach that divides facilities by in door and out door, it would be difficult to develop local plan policies that are based clearly on the assessments and strategies prepared based on pitches, built facilities and open spaces. This policy approach is consistent with other LPs e.g., Harrogate BC Local Plan.

2. Paragraph 8.18 seems to stray into being a Service Action Plan – focusing on projects rather than focussing on the key planning issues. I would suggest that it would be more meaningful to start by identifying the issues that the Local Plan seeks to tackle, and as identified in the Assessment for Open Space, such as:

- Need for improvements to open spaces to make them more welcoming, and to interpret the diverse history and heritage of the District in order to increase residents' "sense of place"
- Lack of provision of multi-purpose parks and civic space in Mid and North Craven, especially in the key settlements of Bentham, Ingleton and Settle
- Green corridors such as the Leeds and Liverpool Canal should be upgraded or created to link settlements, encourage biodiversity and increase green transportation
- The provision for children and young people needs upgrading, in particular the provision of safer surfaces, installation of challenging and exciting pieces of equipment
- And others as identified on page 67 of the Assessment – Tackling Planning Issues.

Para 8.18 has been amended in line with the comment above.

3. Paragraph 8.19 talks about only using the Open Space Assessment to identify and prioritise the type of open space to be provided or improved. Considering the narrowly defined consultation that the 2016 assessment is based on, I would suggest that this is widened to include other appropriate strategies and assessments, such as the Town Centre Healthchecks and Town/Village Centre Action Plans. These are documents that have been informed by and developed in consultation with the

community; are based on addressing an identified need; are closely aligned with the vision and objectives of the Local Plan and also directly contribute to achieving the Council's priority for an Enterprising Craven. The following are examples of where the aforementioned documents have identified the need for improvement of open/civic space:

EC5 deals with Town, District & Local Centres and sets out the results/recommendations of the Town Centre Health Checks.

Para 8.11 of INF2 justification recognises the importance civic spaces and cultural venues are for both residents and visitors. Policy INF2 supports proposals for the improvement of such spaces, including public realm improvements. This para has been amended to include the following:

*"A range of town/village action and improvement plans exist throughout the plan area, which identify the need for improvement of open/civic space. These are documents that have been informed by and developed in consultation with the community; are based on addressing an identified need; are closely aligned with the vision and objectives of the Local Plan and also directly contribute to achieving the Council's priority for an Enterprising Craven. These existing plans and any prepared in the future will be used to inform the implementation of policy INF3."*

This paragraph has also been added to para 8.17 of the justification to draft policy INF3.

The IDP will also play a role in delivering the specific actions/recommendations of existing and future town/village action and improvement plans. (AMY TO ADD)

### 3.1 Ingleton Village Centre Action Plan

The Action Plan (approved by Policy Committee in June 2015), was developed in response to concerns of local businesses regarding the quality of the trading environment; in particular the impact of declining visitor numbers on the vitality of the core village centre – the lack of footfall is supported by the Ingleton Village Centre Healthcheck prepared by Nathaniel Lichfield & Partners as part of the Craven Retail and Leisure Study (2016)). The Plan was prepared in partnership with Ingleton Parish Council, Ingleton Rural Community Association and the local Business Group, and was informed by issues raised during consultation with a cross-section of the local community. The Plan contains a number of measures aimed at improving the quality of the open/civic space, such as development of Riverside Park (the area referenced as the Playground off Thacking Lane on the map in the draft Local Plan for local green space designation) and refurbishment of the Market Square.

The Council has commissioned the preparation of a masterplan for the development of Riverside Park as an attractive, welcoming and wildlife-rich environment for people from the local area and wider region to visit and enjoy. The masterplan will make a significant contribution to addressing the planning need identified by the Assessment of Open Space; however as the policy is currently drafted, its delivery would not be seen as a priority; likewise, refurbishment of the Market Square.

### 3.2 Cross Hills Village Centre Improvement Plan

The Improvement Plan (approved by Policy Committee in July 2015) was developed to address a number of key issues identified in consultation with local businesses and the Parish Council. The issues are:

- poorly maintained and cluttered pavements that create a low quality and unsafe environment.
- streetscape in disrepair with uneven pavements, redundant and poor quality street furniture.
- low quality shop fronts.
- Poorly maintained heritage features.

The Council is currently working on the delivery of a number of actions designed to address these issues and to make the retail area a more attractive place to socialise, shop, eat and live. Using the Open Space Assessment as the only evidence base by which to identify and prioritise improvements to open space would mean that these issues, which have been identified by the local community as having a material impact on the vitality of the settlement would be overlooked.

### 3.3 High Bentham Town Centre

In 2012, the Council commissioned a Spaceshaper Community Consultation event to gauge local perceptions of the town centre and to stimulate the development of plans to regenerate the town. From the consultation there was a consensus that the design and appearance of the town centre was very poor; it was felt that the Main Street did not meet their individual needs or those of other people coming into High Bentham. The way of addressing this was by developing a focal point for the town centre (an area where people are able to congregate); providing resting places along Main Street; adding colour, interest and greening of the environment. The findings from the Community Consultation were also reflected in the Bentham Market Town Benchmarking Report (2012) conducted by Action for Market Towns (AMT).

The Council is working with representatives from the Town Council and business community to deliver activity that tackles the issues identified by the community.

Again, by only using the Open Space Assessment as the evidence base to identify and prioritise improvements to open space would mean that these issues identified by the local community as having a material impact on the vitality of the settlement would be overlooked.

- 3.4 The work that the Council has been leading on to improve the economic vitality of its market towns has established that the quality of the civic space/public realm, such as within Ingleton, Cross Hills and Bentham is not of an appropriate standard. There seems to be a difference between how local stakeholders rate their own area and the importance given to this category of open space when compared to the Assessment. When appraising the quality of their civic space, local stakeholders have used wider criteria than is listed in the adopted standards in draft Policy INF3 – Appendix A, page 5. Local stakeholders took into account the design and appearance of the area and how well it functioned. In only using the Assessment of Open Space to prioritise and identify the type of open space to be provided or improved there is a risk that the importance of civic space is discounted and the extent of the works needed is downplayed. The Council's work to-date has identified that the magnitude of the work needed to raise the quality of the District's civic space to functional standards is broader than indicated in the Assessment – the ambition of the Local Plan should be wider than just the encouragement of more events and benches.
- 3.5 The need for civic space in respect of quality and quantitative issues seems to be lower in the Assessment of Open Space compared to the opinion of local stakeholders. This may be a result of the limited involvement of Parish Councils in

the mid and north of the District in the preparation of the Assessment. There does not seem to be any input from those Parish/Town Councils where schemes are being developed to tackle issues concerning the civic space such as the Market Square in Ingleton. There are numerous studies by Government and guidance from organisations, such as the Association of Town and City Management (ATCM) and Future High Streets Forum which highlight the importance of creating an environment where people want to spend time to supporting the social and economic well-being of retail spaces. These, and the Healthchecks commissioned by this Council all agree that the longer someone stays within a place, the more they are likely to spend. The quality, character and feel of the civic spaces are seen as crucial to ensuring that the town is able to reflect its distinctive character and to make the right impression.

### 3.6 Annex D – Open Space Quality Assessment

I have observed that there does not seem to be any mention of the Market Square in Ingleton in the Assessment, would it be possible that it has been overlooked? Also for accuracy, you may wish to check the appropriateness of categorising Police Yard in High Bentham as civic space. It is the general belief of the local organisations that the area is private and falls within the boundary of the residential properties; an area which they use for parking. You may also wish to check the designation of Cleveland Square in High Bentham, the category of civic space in the Assessment does not mirror current mapping of the town which labels the area as a car park.

The Market Square in Ingleton has not been included in the OS Assessment as a Civic Space.

The Police Yard has been removed from the OS Assessment following feedback that the site is used for car parking.

Cleveland Square was included in the OS Assessment as a civic space as it is used as the market place every Wednesday in Bentham. It was assessed as being very good.

The rationale for including a number of the entries seems to be unclear; there seems to be inconsistencies with locations serving similar purposes being excluded such as Bolton Abbey Estate and Coniston Hall – as with Broughton Hall Estate they provide open space for the benefit of their customers and for hosting organised events, and are located outside of existing settlements. These areas do not fall into the types of OS covered by the 2016 assessment. Broughton Hall Estate is identified as a potential tourism opportunity in draft policy EC4, which supports tourism proposals. New policy EC4a has been included in the Publication draft, which specifically relates to tourism led development at Bolton Abbey. This policy has been developed with Bolton Abbey Estate to meet their future aspirations within the estate. Again, Settle College has been excluded, as with Ermysted's School there is amenity greenspace next to the main building(s) which is additional to their main sports ground/playing field. School playing fields without community access were not been assessed as part of the PPS/OS Assessment. Advice from Sport England, however is clear that Paragraph 74 NPPF definition is very broad and covers all indoor and outdoor sport facilities and that sport facilities and playing fields should be protected unless it can be demonstrated (by a developer) that they are surplus or replaced. These sites would therefore be offered protected under draft policy INF3. Being a paid for attraction with restricted access to the lawns and garden areas, the inclusion of Skipton Castle (as well as Broughton Hall Estate and Ermysted's School) seems to be at odds with the definition for amenity green spaces – function as informal recreation areas, and are usually publicly accessible and serve the immediate local community providing a space for children's informal play, jogging and dog walking. Skipton Castle is a paid attraction, however the amenity areas have been assessed in recognizing the historic importance of these open spaces.

Two sites at Broughton have been included (amenity greenspace in the village of Broughton and Utopia and gardens, which are publically accessible).  
The area of amenity greenspace at Ermysted's School is also publically accessible.

If the purpose of preparing the Assessment was to provide an evidence base to determine future need and inform priorities for investment it is important that the findings and recommendations are based on accurate baseline data which can stand up to rigorous challenge. There is a possibility that the narrow response from Parish Councils (\*), together with discrepancies in respect of the space included in the assessment will invite questions, especially from those expected to support and contribute to its delivery, concerning the soundness of the recommendations.  
The Open Space, PPS and Built Facilities Assessment 2016 was prepared in consultation with T&PCs (although the response rate was low), sports clubs and organisations. The assessment was also managed by a steering group, which included representatives of CDC, NYCC (officers and District Councillors), key stakeholders from national governing bodies for sport, Strategic Leisure consultants and Sport England. All 3 assessments were done in line with SE methodologies and PPG17 Companion Guide for assessment open space. The planning policy team are therefore confident that this approach has resulted in evidence that will stand up to scrutiny during the Local Plan examination and that the draft LP policies based on this evidence will be found sound.

(\*) 12 parishes from 43 parishes outside the National Park boundary responded to the questionnaire; all but one response came from parishes in the south area.  
T&PCs were contacted numerous times by Strategic Leisure and CDC pLanning Policy Officers and asked to respond.

#### 4. **Planning Obligations**

From observing the use of planning obligations by other Local Authorities, it is possible that Craven District has missed an opportunity to ease the impact of major retail developments on the vitality of its town centres. For example, the agreement between Pendle Borough Council and Boundary Mills included the provision of £150,000 towards precinct improvements within the centre of Colne; the agreement with Sainburys to build a supermarket in Colne required that a proportion of the £390,000 planning obligation was for public realm improvements. It is suggested that the Council extends its proposed policy in respect of planning obligations to also apply to major retail developments (in the centre and outside of town centres) of more than 1,000 square metres.

[AMY TO ADD INFO RE CIL AND IDP]



## General Comments Response Paper to the April – May 2016 Draft Local Plan

<b>General Comments</b>			
<b>The aim of the Local Plan is to set out a spatial strategy and policies for change, development and conservation in Craven for the period 2012 to 2032, including how to decide planning applications; how land is to be used for housing, business, recreation and conservation; how the right development is to be achieved in the right location at the right time; and how sustainable development can be achieved overall.</b>			
<b>Main issues from consultation *</b>	<b>Response</b>	<b>Change required to the local plan (Yes/No)</b>	<b>Changes made to the plan [ideas relating to change]</b>
Please accept this email as a formal representation to the pre-publication draft of the Craven Local Plan consultation. Having considered the consultation document, Ribble Valley do not wish to make any specific representations on the consultation document. Many thanks for consulting us on the document.	Noted	No	
For several decades I have strived to be a conscientious citizen by submitting my contributions to the planning applications and plans as they arise. Now I'm keen to continue this record by responding to your invitation to comment on the draft Local Plan which the Craven Herald says is available for public consultation. When I went to Embsay library to do this this week I got a terrible shock - the draft format is presented in two enormous volumes/files, one of finally detailed maps, the other a hugely (many inches) thick text. I can't escape the conclusion that this format must be totally impractical for study by anyone except those with excellent eyesight, lots of free time and a great deal of patient perseverance. For me, at age 82 and with impaired sight it is a quite impossible prospect. Surely, the least that should be available is a competent summary text presenting a clear account of the salient aspects; for me I regret that enlarged print would be necessary (some of the draft print is quite tiny).	Large print versions can/have been/will be provided on request.	No	

<p>In fact is not such provision a legal requirement? I hope you can provide me with a reasonable, satisfying response to this letter urgently, in good time for me to submit comments within the time limit due on the 17th May.</p>			
<p>Could you please inform me of what is happening about the LOCAL PLANNING for South Craven? A few years ago at a meeting in Sutton about Thompsons Field it was mentioned that Craven DC hadn't got a local plan and without it builders can keep putting plans forward again and again and costing the Council and ratepayers money as without a plan we are in the dark about the future of our area.</p> <p>Perhaps you could provide answers to the following questions:</p> <ol style="list-style-type: none"> <li>1. Is there a time limit on producing a local plan?</li> <li>2. If a time limit is involved what happens next?</li> <li>3. If no local plan is produced what can be the end result i.e. endless enquiries over greenfield sites and brownfield sites ignored?</li> <li>4. I believe that an application has gone in again for houses in Sutton Lane. This site for housing has already been thrown out after an enquiry but it keeps coming back in a modified form. Would a Local Plan sort this problem out or not? Local people are in the dark.</li> </ol>	<p>A timetable for production of the new local plan (also known as a local development scheme or LDS) is available on our website. The draft local plan does not, at this stage, show any specific sites to meet the housing requirements set out in draft policy SP4. Preferred sites will be selected from the pool and added to the policy for inclusion in the next draft of the local plan.</p>	<p>Yes</p>	<p>No draft local plan housing allocations are proposed for Sutton – see revised policies SP4 (Table 7) and SP11. Land at Sutton Lane is included in the draft Green Wedge designation – see new policy ENV13.</p>
<p>The MMO will review your document and respond to you directly should a bespoke response be required. If you do not receive a bespoke response from us within your deadline, please consider the following information as the MMO's formal response.</p> <p>Response to your consultation</p> <p>The Marine Management Organisation (MMO) is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area</p>	<p>Standing advice is on record and noted.</p>	<p>No</p>	

<p>management, marine emergencies, fisheries management and issuing European grants.</p> <p><b>Marine Licensing</b>          Activities taking place below the mean high water mark may require a marine licence in accordance with the Marine and Coastal Access Act (MCAA) 2009. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in England and parts of Wales. The MMO is also the authority responsible for processing and determining harbour orders in England, and for some ports in Wales, and for granting consent under various local Acts and orders regarding harbours. A wildlife licence is also required for activities that that would affect a UK or European protected marine species.</p> <p><b>Marine Planning</b>          As the marine planning authority for England the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas. On 2 April 2014 the East Inshore and Offshore marine plans were published, becoming a material consideration for public authorities with decision making functions. The East Inshore and East Offshore Marine Plans cover the coast and seas from Flamborough Head to Felixstowe. For further information</p>			
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<p>on how to apply the East Inshore and Offshore Plans please visit our Marine Information System. The MMO is currently in the process of developing marine plans for the South Inshore and Offshore Plan Areas and has a requirement to develop plans for the remaining 7 marine plan areas by 2021.</p> <p>Planning documents for areas with a coastal influence may wish to make reference to the MMO’s licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. For marine and coastal areas where a marine plan is not currently in place, we advise local authorities to refer to the Marine Policy Statement for guidance on any planning activity that includes a section of coastline or tidal river. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act and the UK Marine Policy Statement unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our online guidance and the Planning Advisory Service soundness self-assessment checklist.</p> <p>Minerals and waste plans and local aggregate assessments If you are consulting on a mineral/waste plan or local aggregate assessment, the MMO recommend reference to marine aggregates is included and reference to be made to the documents below:</p> <ul style="list-style-type: none"> <li>• The Marine Policy Statement (MPS), section 3.5 which highlights the importance of marine aggregates and its supply to England’s (and the UK) construction industry.</li> <li>• The National Planning Policy Framework (NPPF) which sets out policies for national (England) construction minerals supply.</li> <li>• The Managed Aggregate Supply System (MASS) which includes specific references to the role of marine aggregates in the wider portfolio of supply.</li> <li>• The National and regional guidelines for aggregates provision</li> </ul>			
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<p>in England 2005-2020 predict likely aggregate demand over this period including marine supply.</p> <p>The NPPF informed MASS guidance requires local mineral planning authorities to prepare Local Aggregate Assessments, these assessments have to consider the opportunities and constraints of all mineral supplies into their planning regions – including marine. This means that even land-locked counties, may have to consider the role that marine sourced supplies (delivered by rail or river) play – particularly where land based resources are becoming increasingly constrained.</p>			
<p>I applaud the efforts of the team involved, to produce a meaningful Local Plan within the time and resources available to you and the constraints imposed by Government policy. Your Vision for Craven in 2032 is encouraging as it contains your plan to ensure that ‘Most new homes are situated within and around market towns and villages (on previously developed land where it has been possible and appropriate), between extensive public open spaces, connecting people to the countryside and creating corridors for wildlife.</p> <p>I particularly commend your intentions to ensure that ‘Craven’s high quality landscape and treasured environmental assets are conserved and are enjoyed by everyone’.</p> <p>I am submitting these comments in this format, as I previously completed the online form for Local Green Spaces (twice) on 1.12.15 and was recently informed it did not arrive with you and hence was not considered. Although advised to resubmit my comments on the online form, I can no longer find it on the Council website. I am also concerned that others may have made Local Green Space applications which were not received due to problems with your website at the time.</p> <p>Finally, I would like to thank you for the time taken to read and consider these comments and for the time I was afforded and clarifications offered by Ruth Parker and David Feeney at the</p>	<p>Noted. Draft local green space designations will be included in the next consultation draft of the new local plan.</p>	<p>Yes</p>	<p>See new/revise policy ENV10 and the new/revise policies map.</p>

recent Local Plan Surgery. It's a long and complicated document, but one worth getting right for the current and future residents of Craven.			
<p>We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.</p> <p>Further Advice</p> <p>National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure.</p>	National Grid's continuing co-operation is noted and welcomed.	No	
I strongly object to any kind of new housing in Gargrave.	It is difficult to provide a meaningful response to such an absolute, unreasoned and unexplained statement.	No	
We support the development of new homes in Gargrave but strongly believe that this could and should be achieved by small developments of homes which do not destroy the look and feel of this fine village. Developers will, we would imagine, argue for high density large scale housing which give the maximum profit from sites. This is what all villagers we have spoken with fear the most. Please do not allow infill development which would change the feel of the village for ever. In general terms we support the Gargrave Neighbourhood Plan.	Noted. The district and parish councils are consulting and cooperating with each other in the local and neighbourhood planning processes.	Yes	See new/revised policies SP3, SP10, ENV3 and H1 (which deal with housing mix, density, allocations, design and unallocated sites).
Firstly, CDC has not put its own piece of land situated behind Victoria Hall in Settle into the plan. This is ideally situated in the	The council has consulted on a pool of site options. Therefore, at this	Yes	See revised policies SP5 to SP11, which now provide full

<p>centre of the town is a brownfield site.</p> <p>Secondly, North Yorkshire Highways has not put in its site by Kings Mill, which has been waste ground for many years. This is also a brownfield site that I would think has excellent potential for development.</p> <p>Thirdly, and most critically, Airedale NHS Trust has put the whole site of Castleberg Hospital in for possible development. This is a vital resource for the North Craven area and one that we have fought hard to keep it open.</p> <p>So, two pieces of publicly-owned waste ground are not put into the plan and one of the most needed public services in the area is allocated for possible housing.</p> <p>Can any of the elected representatives on these bodies explain their actions?</p> <p>What is this 'additional period of consultation on preferred sites for residential or mixed use site allocation during summer 2016'?</p> <p>Will there be dates and times when this consultation occurs?</p> <p>Let's hope there is much more advertising and, people get to know what is happening, as this has a huge effect on the community we live in.</p>	<p>stage, the draft local plan does not show any specific sites for development to meet the employment and housing requirements set out in draft policies SP2 and SP4. However, preferred sites will be selected and added to the next consultation draft of the local plan.</p>		<p>details of specific development areas and development principles.</p>
<p>I fully support Gargrave Parish Council's Neighbourhood Plan, (May 2016)</p> <p>I want this plan to be adopted into Craven District Council's Local Plan and their current pool of Gargrave sites (in the 2nd draft Local Plan currently in consultation) to be discarded. Although two sites (GA031 &amp; GA004) are included in both Plans</p> <p>My reasons for supporting GPC's NP can be summarised as follows:</p> <p>Gargrave Parish Council has worked with a committee formed from its residents to follow a planning arrangement that is process-led, evidence-based, inclusive &amp; fair to all.</p> <p>Their reasoning is fully documented. It considers sustainability and applies a simple scoring system. Sites, other than those</p>	<p>Noted. The district and parish councils are consulting and co-operating with each other in the local and neighbourhood planning processes. As the district council has consulted on a pool of site options, the draft local plan does not, at this stage, show any specific sites for development to meet the employment and housing requirements set out in draft policies SP2 and SP4. However, preferred sites will be selected and</p>	<p>Yes</p>	<p>See revised policy SP10, which now provides full details of specific development areas and development principles.</p>

<p>selected by CDC, have also been proposed which meet the criteria. GPC's NP has been in development for 3 years. Thus illustrating its depth of study. This plan meets the target for 100 local dwellings for the period 2012 to 2032</p>	<p>added to the next consultation draft of the local plan.</p>		
<p>This consultation response has been written by Johnson Mowat (formally Johnson Brook) on behalf of KCS Development Ltd in relation to their land interests in the Craven District, in particular sites EM010 and EM012, Land off Kirk Lane, Embsay. The total area of EM012 as demarcated by the Council is approximately 12 hectares and that of site EM010, which sits within the larger site, is approximately 1 hectare. This response provides comments and observations on the collective documents forming the Craven Local Plan Second Draft (Pre-publication) informal consultation, including the following:</p> <ul style="list-style-type: none"> <li>☑ Draft Text, Policies and Policies Map</li> <li>☑ Alternative Spatial Strategy Options; and,</li> <li>☑ Pool of Sites Options &amp; Sustainability Appraisal.</li> </ul> <p>1.2 We have previously made submissions to the Council including the submission of a concept statement and plan to inform the preferred sites taken forward in the Local Plan and through representations to the first pre-publication draft public consultation which was undertaken in September to November 2014.</p> <p>1.3 Johnson Mowat have also engaged with Craven Development Control Officers through a pre-application meeting and subsequent planning application. Whilst the planning application was withdrawn the consultee comments and feedback have informed the approach to the level and disposition of development within SHLAA site EM012.</p>	<p>The council has consulted on a pool of site options. Therefore, at this stage, the draft local plan does not show any specific sites for development to meet the employment and housing requirements set out in draft policies SP2 and SP4. However, preferred sites will be selected and added to the next consultation draft of the local plan.</p>	<p>Yes</p>	<p>See revised policy SP11, which now provides full details of specific development areas and development principles.</p>
<p>Consultation Document – P15 para 2.15 1. Reinstatement of the Colne to Skipton railway line and passenger + freight services on</p>	<p><i>Unclear - a request to add reference to freight?</i></p>	<p>?</p>	<p><i>[Refer to freight?]</i></p>



it. 2. Development of 7 day freight + passenger services Manchester Clitheroe – Hellifield.			
<p><b>IMPORTANT POINT</b></p> <p>If more houses are built there must be traffic control in Cross Hills top of Holme Lane as now it requires the Pelican to allow traffic to get out of Holme Lane.</p>	<p>The local plan process is evidenced based and involves consultation and co-operation with relevant agencies, including the local highway authority. Whilst the draft local plan does not, at this stage, show any specific sites to meet the housing requirements set out in draft policy SP4, preferred sites will be selected for inclusion in the next consultation draft.</p>	<p>Yes</p>	<p>See revised policy SP8, which now provides full details of specific development areas and development principles.</p>
<p>The sites identified on the Gargrave Parish Council Plan I consider would be suitable for development The Old Saw Mill, GA031 Marton Road, Neville Road GA004 Plot at the rear of Skipton Road, plot rear of the High Street</p>	<p>The district and parish councils are consulting and co-operating with each other in the local and neighbourhood planning processes. The next consultation draft of the local plan will include preferred sites.</p>	<p>Yes</p>	<p>See revised policy SP10, which now provides full details of specific development areas and development principles.</p>
<p>This is not at all easy to fill in due to the back to back plans. Pool Site – plan maps of village difficult to read.</p>	<p>Noted. Unfortunately, paper copies of the draft local plan maps have their limitations. However, online/PDF copies can be zoomed and are easier to read.</p>	<p>Yes</p>	<p>See new/revised policies map and inset maps.</p>
<p>Policy/Sites – Follow discussion at the meeting in Skipton town hall on 26th May, I was asked to submit these observations: Accepting that it is government policy to build a large number of houses, Skipton itself has such a large proportion of these that the character of the town will be significantly changed. I am assured that the central preservation area will continue, but there seems no indication as to where the necessary new schools will be built. Present town primary schools are over-full</p>	<p>Evidence gathering and assessment of requirements for education provision are on-going and will enable progress to be made on this area of policy.</p>	<p>Yes</p>	<p>See new/revised draft policy SP5: Strategy for Skipton (Site Ref. SK081, SK082 &amp; SK108, in particular) and INF6: Education Provision.</p>

<p>and there is no room to expand. When sites are allocated for new housing, there seem to be no sites designated for new schools.</p>			
<p>Plan Period Whilst we do not object to the plan period of 2012 – 2032 (an extension of two years from the previous consultation), we note that the evidence base, particularly in relation to the OAN, does not align with this plan period. The SHMA (2015), Craven Demographic Analysis and Forecasts (January 2015), and the Addendum to January 2015 Craven Demographic Analysis and Forecasts (March 2015) all use the period 2015 – 2030. There should be some justification within the Policy document to account for these differing timescales.</p>	<p>This will be addressed as further progress is made on evidence gathering and policy formulation.</p>	<p>Yes</p>	<p>The plan period and evidence base are now fully aligned – see paragraph 4.5 of the revised plan, for example.</p>
<p>Economic/Housing Development – Rail Services Issues The Committee of the Lancaster &amp; Skipton Rail User Group (LASRUG) is impressed by the potential for housing and economic growth your draft local plan has unearthed in the Western part of the Craven District. If carried out this could lead to a considerable increase in the prosperity of the area. The preamble to the report rightly highlights transport and communication as a key factor in bringing these developments into fruition. Currently housing and business development in the area is held back by poor transport facilities. For most of the villages north west of Skipton access to work, education, shopping and social facilities is hampered by poor roads – even the main A65 is inadequate and often congested – heavy congestion and difficulty in providing parking facilities in Lancaster, Skipton, Keighley, Bradford and Leeds. The main road between Bentham and Lancaster has been blocked for 5 months since the December storms. Public transport is no better. Bus services are sparse and the current rail service west of Giggleswick consists of 5 trains a day at irregular intervals none of which allow commutability to either</p>	<p>Support will be provided for improved rail services and other infrastructure.</p>	<p>Yes</p>	<p>See draft policies SP2 and SP12 of the revised draft local plan and Appendix C, which contains a draft Infrastructure Delivery Plan.</p>

<p>Lancaster or Leeds. The last weekday train leaves Leeds for Lancaster and Morecambe at 16.46.</p> <p>If growth in local economy activity, housing and tourism is to be achieved improved communications will be needed.</p> <p>Development of the road infrastructure would be difficult and costly. The Skipton – Lancaster rail line however is double track throughout and has spare capacity to allow a considerable expansion of the existing service. Costs would be modest and may even be covered by additional passenger traffic, and provide a more environmentally friendly solution to transport issues than road expansion. Parking provision is already available at most stations, except Bentham where we would ask that a potential site is added to the draft plan.</p> <p>LASRUG writes to ask that the expansion of rail services on this line be included in the report as a key transport requirement. At least commutability to and from Lancaster, Leeds and Bradford is needed in addition to that already available to Skipton and Keighley, and a more frequent service during the day would greatly assist other travel needs including tourism.</p> <p>We appreciate that, although you are not the transport authority, you have already been in touch with the Community Rail Partnership and the new operator Arriva to raise these issues. We understand some extra trains have been promised over the next few years but at present no specific timetable has appeared. Your help in ensuring that an improved service as outlined in the above paragraph is included in Craven District Council’s Local Plan would be greatly appreciated.</p>			
<p>Introduction</p> <p>Thank you for the Craven local plan setting out your proposed development sites relating to the Parish of Bradleys Both.</p> <p>As you are aware the Parish Council through its Neighbourhood Planning Group has now concluded the formal six weeks consultation of the pre submission Draft, a copy of which should</p>	<p>Noted. The draft local plan does not, at this stage, show any specific sites to meet the housing requirements set out in draft policy SP4. Preferred sites will be selected from the pool and added to the</p>	<p>Yes</p>	<p>See revised policy SP11, which now specifies one housing site on the north side of Bradley. See also draft policy INF4: Parking Provision.</p>

<p>be in your possession. To avoid unnecessary duplication it may be useful to refer to the Draft Plan for any additional information.</p> <p>All available sites in the Parish of Bradley have been the subject of sustainability studies through the use of recognised methodologies and visits by the Neighbourhood Plan Working Group members.</p> <p>Principals against which the C.D.C proposed sites were tested. Among complaints received from the Community many related to the problems created by the increasing volumes of vehicular traffic parking on the streets and the congestion in the centre of the Village. Significant traffic flows were created by traffic leaving and entering the village to join the A629 either via Ings Lane or Skipton Road. To attempt to reduce the flow of traffic crossing the centre of the village to get to their homes or to the A629 any new developments should contribute to the reduction of the traffic congestion within the Low Bradley Area.</p> <p>It was considered that:-</p> <ol style="list-style-type: none"> <li>1) sites which lay to the West or North of the village offered some advantages to vehicles heading to the major trunk roads</li> <li>2) Access or exit from the site itself was not dangerous or presented a danger to other road users</li> <li>3) Sufficient space was allocated to each plot with in the site for car parking to prevent any increase in off street parking.</li> <li>4) Increasing traffic flows along the A629 are leading to increasing numbers of accidents causing blockage of the A 629 with the consequential effect of traffic taking diversions through the Village</li> </ol> <p>Creating periods of total grid lock with in the village</p> <ol style="list-style-type: none"> <li>5) Pedestrian safety is of paramount concern.</li> </ol>	<p>policy for inclusion in the next draft of the local plan.</p>		
<p>PLAN PERIOD</p> <p>4. The plan period is clearly set out at paragraph 1.8 of the consultation document. It is noted that the end date has been</p>	<p>This will be addressed as further progress is made on evidence gathering and policy formulation.</p>	<p>Yes</p>	<p>The plan period and evidence base are now fully aligned – see paragraph 4.5 of the</p>

<p>extended from 2030 in the previous consultation to 2032. Presuming that the plan will be adopted in 2017, this should allow a 15 year time horizon. This is consistent with paragraph 157 of the NPPF and accords with our previous comments, as such it is considered appropriate and is supported.</p> <p>5. It is, however, noted that there is a disparity between the plan period and the evidence base, particularly in relation to the objectively assessed need for housing (OAN). This needs to be addressed prior to submission of the plan for examination</p>			revised plan, for example.
<p><b>DUTY TO CO-OPERATE</b></p> <p>6. We previously highlighted the need to provide clear evidence upon how the Council has discharged its obligations under the 'Duty to Co-operate'. Whilst the statement at paragraph 1.11 is noted the HBF is unaware of any further evidence in this regard. It is recommended that the Council rectify this prior to submission.</p> <p>7. A key area of concern for the HBF are cross-boundary housing issues. In this regard it is unclear how the 34 dwellings per annum (dpa) allocated to the Yorkshire Dales National Park, as described at paragraph 4.9 of the draft plan, has been derived. It is notable that the National Park recently submitted their Local Plan for examination. This document suggests a total housing requirement of just 55dpa, just 21 dwellings over the suggested need emanating from Craven. Given that the Park also includes parts of South Lakeland and Richmondshire, an additional 21dpa is unlikely to be sufficient to meet the full needs of the National Park. It is also notable that the National Park has not sought to identify its housing requirement on the basis of apportionment as suggested within the consultation document.</p> <p>8. This issue is likely to be discussed in detail at the forthcoming examination of the Yorkshire Dales Local Plan. It is therefore important, for both Craven and the National Park, that this issue is adequately resolved. If left in its current situation it risks one</p>	This will be addressed as further progress is made on evidence gathering, policy formulation and co-operation with the YDNP authority.	Yes	See paragraph 4.8 and policy SP1 of the revised draft local plan, plus the background document "Memorandum of Understanding - CDC and YDNPA (June 2017)".

<p>or both plans being found lacking in terms of the Duty to Co-operate.</p>			
<p>I have compared the Draft Plan to that of Stroud, in order to see how the plan for another area differs. I am not an expert on planning but was involved with local plans in Leeds as a councillor there, and in the UDP inquiry process as an objector.</p> <p>I compared it to Stroud's just because I happen to have been to Stroud fairly recently and quite liked it and they seem to have a plan that is further forward than ours.</p> <p>In general I found the draft Craven Plan seems to provide less protection for public benefits (countryside, wildlife, heritage, landscape, sense of place etc.) compared to Stroud's, emphasises sustainability less, concentrates less on providing for the elderly and seems to interact less well with existing or prospective neighbourhood plans.</p> <p>I struggled to find anything where the Craven Plan was better than Stroud's, although no doubt there will be some cases where it is.</p> <p>Craven's not having stuff about co-operating with neighbouring authorities to provide housing to meet their needs rather than just local ones is probably a significant improvement on Stroud's, they simply temper this with a constraint that housing must consider local needs first, which is not a constraint on overall numbers.</p>	<p>Although they are prepared in accordance with common national legislation, policy and guidance, local plans do tend to be shaped by local circumstances, as has been observed.</p>	<p>No</p>	
<p>The Plan has no bedspace policy, as there is in Stroud's plan, and yet Stroud has a lower proportion of elderly than Craven does. The Local Plan for Stroud identifies specifically a target for additional bedspaces in Class C2 care homes to meet the needs of elderly people, as well as a target for individual dwellings. Given the high numbers of elderly people in Craven, shouldn't Craven do the same?</p>	<p>Further progress is being made on evidence gathering and policy formulation. It should also be noted that North Yorkshire County Council's elderly extra care housing model falls within use class C3 (dwellings) rather than C2 (institutions).</p>	<p>Yes</p>	<p>See new/revised policy SP3 for dwelling sizes /bedroom numbers. See new/revised policies SP7 (site ref. HB011), SP9 (site ref. IN049), SP10 (site ref. GA009), SP12 (including Appendix C) and INF2 for extra care housing.</p>
<p>The obvious way to free up existing 4- and 3- bed homes for</p>			

<p>families in Craven is to provide more, suitable, 1- and 2- bed homes for elderly people to downsize to. The Craven Needs assessment specifically says that more 1 and 2 bed homes are needed, for this reason. But the Plan will not discourage 3- and 4- bed provision or favour 1- and 2- bed provision.</p> <p>At present many people end up in 3- or 4- bed homes that are too big for them or else in 1- and 2- bed Park Homes because there is nothing else suitable that is smaller. But the Draft Plan does not provide what the Needs Assessment says is needed: 1- or 2- bed homes.</p> <p>It does not even offer a new Park Home site.</p> <p>Craven's elderly population is forecast to be in the ratio of 7 retired:3 younger in the near future. Of those 7 it is likely that quite a few will need some level of care, much of it provided in their own home, but the Plan does not seem to address the needs of this ageing population.</p> <p>It is also the case that the increasingly elderly population tend to employ people within their homes rather than on B1-B8 use class sites. Health services and residential care are also employment providers and are increasingly needed.</p> <p>The Stroud plan spells out the importance of employment in the care sector, the Craven one does not. Instead it bemoans the fact that so many workers in Craven are low paid. In a district where most people are elderly and care workers are low paid, then this is bound to be the case.</p> <p>Care jobs are no worse than other low-paid jobs and as they are so vital to Craven the care/healthcare industry needs promoting here not denigrating.</p> <p>I propose that:</p> <p>The Plan encourages provision of bedspaces in care homes, as Stroud does, to meet both housing and employment needs.</p> <p>The Plan encourages provision of "granny flats" and sub-division of housing, plus provision of new housing suitable for the</p>			
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<p>elderly, in order to free up more 3- and 4- bed homes for families and to provide better for an ageing population.</p>			
<p>Object to weak language which makes it more difficult for applicants, local residents and council to know where they stand. 'Should' is a request; will or shall are requirements. Can the Craven Plan please be 'toughened up' from 'should' to shall? Stroud Plan in its policies including its Design Policy uses 'shall' and 'will' rather than 'should'. So other authorities are more definite that Craven. Stroud has e.g. "The policy will apply to all new development and it is recommended that proposals should take account of principles, guidance and design tools published by the Design Council (and its predecessor (CABE))." "All development proposals shall accord with the Mini-Visions and shall have regard to the Guiding Principles for that locality, as set out in this Plan and shall be informed by other relevant documents, such as any design statements adopted as Supplementary Planning Documents." "Proposals will be expected to: 1. Integrate into the neighbourhood (taking account of connectivity...."</p>	<p>Wording will be improved wherever possible as work on the draft local plan progresses with a view to using clear, reasonable and appropriate language throughout. <i>Should</i> is used to describe what is expected or recommended, rather than being a request, and may be used appropriately. In the draft design policy (ENV3), <i>should</i> is used to convey design principles, as a "principle" is a general law to guide action.</p>	<p>No</p>	
<p>Lack of self build policy. Self-build has a footnote in the subsidiary text, rather than an actual policy. In the previous consultation I notice that a comment was made about omission of self build and a footnote still seems to be an inadequate way of including it. "Footnote 33. Self-build projects may be provided for on allocated sites owned by the council (refer to Policies SP 5 to SP 11) and may come forward in planning applications for unallocated sites." This seems rather non-committal, as of course they may come forward for unallocated sites, so it is hardly necessary to say so. In policies SP5 to SP11 I could not find what % of council owned sites were to be for self build. Stroud Plan specifically allocates space in its policies for self-</p>	<p>This comment refers to the supporting text for draft policy H1. As no allocations are being made for sites below 5 dwellings, any small self-build projects would be considered under this policy. The evidence-base on the demand for self-build plots needs to be strengthened in order to inform policy formulation. Reference to council land reflects government intentions (i.e. the 'right to a plot'). The council will establish a self-</p>	<p>No</p>	<p><i>[Establish a self-build register and monitor SHMA updates for evidence to support policy]</i></p>



<p>build on strategic sites and does not limit this to council owned sites. "At strategic sites allocated within this Local Plan a minimum of 2% of the dwellings shall be to meet Government aspirations to increase self build developments, subject to appropriate demand being identified. In determining the nature and scale of any provision, the Council will have regard to viability considerations and site-specific circumstances...The Council will maintain a local register of self-builders who wish to acquire a suitable plot of land to build their own home, to evidence demand.</p> <p>Rather oddly, to deter self-builders Stroud also insists that self-build houses must be innovative, rather than only allowing them to be innovative, for which I can see no justification at all. The point is to allow someone to provide themselves with affordable housing, not to insist on innovation.</p> <p>But perhaps Craven should have self-build in an actual policy not just in a footnote? Self-build is a good way of people on low incomes providing their own houses, it is basically how building societies started, but when large scale developers snap up all the sites it is hard to find land to build on. And I do not see why in Craven self-build should only be supported on sites owned by the council.</p>	<p>build register and monitor evidence from future SHMA updates.</p>		
<p>Please could you place us on the mailing list for the ongoing consultation in relation to the New Local Plan?</p>	<p>Done</p>	<p>No</p>	
<p>I have looked at the Craven Local Plan documentation and I'd like to raise a few concerns regarding the lack of firm parking proposals for High Bentham ... unless I've missed them. If I can use, as a discussion point, the following extract from the 'Craven District Local Plan ADOPTED 2 JULY 1999' ...</p> <p>3.5.1 The evolution of the layout, design and construction of much of the building stock of the settlements within the plan area occurred before the arrival of the motor car, and hence made no provision for its accommodation.</p>	<p>Draft policy INF4: Parking Provision is intended to apply generally across the plan area, including High Bentham. On-street and off-street parking issues are also covered in the policy's supporting text.</p>	<p>No</p>	<p>NB. Reference to towns has been added to revised paragraph 8.36.</p>

<p>Yes, I agree and I'm pleased to see that the problem has been recognised to some extent. Here in High Bentham much of the 'building stock' was built well before the era of the motor car and as such there was no provision for parking of vehicles. Point 3.5.1 then goes on to say ...</p> <p>With steady increases in car use and ownership continuing unabated, excess demand for on-street car parking is jeopardising safety and detracting from environmental quality in many places. To ensure that this situation is not exacerbated further, new development should generally be required to meet defined parking standards.</p> <p>Now, that's fine for 'new development' assuming that is that you mean adequate off-road parking/garaging per new household. However, I can assure you that, regardless of any new housing development, the parking situation for the pre-car building stock has become increasingly exacerbated and will continue to do so.</p> <p>This is mainly due to the changing demographics of the village i.e. earlier generations of householders worked locally and had no need of a car. As each generation 'moved on' each subsequent generation became more dependent on the use of car transport due to less local employment and people having to travel considerable distances from the village to gain employment.</p> <p>The alternative of using public transport simply doesn't work for Bentham – the bus service has been quite poor and, with recent local authority cuts, using a bus to/from work is now laughable. There are NO buses in Bentham on a Sunday – that's pretty grim for anyone who has to do weekend work on a regular basis. The recent decline in Angus Fire (once the main employer in the village) will only make the situation worse still.</p> <p>Most working families in Bentham have at least two cars and, as the younger generations grow up, you will increasingly find some</p>			
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<p>households with three or more vehicles and no proper parking. OK, there is the 'main' Grasmere Drive car park but who would want to park there! The main access route consists of a convoluted succession of streets already crammed with parked vehicles and presents a considerable frustration to anyone trying to park there. Laughingly, a lot of visitors to the village don't even know that particular car park exists! As a result most residents and visitors will park on the streets ... if they can manage to find a parking space.</p> <p>I've lost count of the number of times that, on busy days, I've vacated an on-street parking space in Robin lane only to return a couple of hours later to find no street parking available and, after negotiating the ridiculous route to the Grasmere Drive car park, finding no parking available there either!</p> <p>The situation did improve for a while when the Primary School on Robin Lane moved to its new location on the outskirts of the village; however, once word got around that street parking had improved then the situation became as bad as ever.</p> <p>Another significant factor putting pressure on street parking is Bentham Auction Mart – this thriving business is going from strength to strength and although I wish them every success I think it's time that consideration was given to finding a site on the outskirts of the village; this would relieve pressure on parking and help prevent some of those days when Bentham is grid-locked with Landrovers and cattle trailers and also reduce the noise of heavy goods vehicles accessing the Mart 24/7 during busy auction periods. Surely this site (HB031) could be put to better use for housing and parking?</p> <p>Also, the site of the old Primary School (HB011) is flagged up for housing and local green space. I can't help thinking that it would be far better to turn this into a proper car-park for residents and visitors and use the non-functional Grasmere Drive car park for said housing development?</p>			
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<p>I seem to remember, several years ago now, that there was a 'housing needs' questionnaire sent to all Bentham residents. Have we ever had a 'parking needs' questionnaire? Well, that's got that off my chest before we set off for holiday to bonny Scotland – heaven knows where we'll be able to park when we return</p>			
<p>It is clear from the sites maps that the majority of any additional housing in Skipton is likely to be on greenfield sites on the outer edges of Skipton. This poses a significant risk to the transport infrastructure in the town. Sites to the north east of the town (off Harrogate Road or Otley Road) to those to the west (off Gargrave Road) are all likely to generate significant numbers of trips using the local road network in the centre of the town. For example access to both major supermarkets or the rail station require access via the High Street (or alternatively the use of rat runs along residential streets). As the road network in the centre of Skipton is essentially medieval it funnels all traffic through the High Street, this already creates significant congestion, for which little mitigation is available and which the addition of further development will only worsen. There is little or no evidence presented on how transport issues would be dealt with in the local plan, with only an assumption that more people would cycle. Given that existing on road facilities are either poor or non-existent it would seem unlikely that cycling is likely to resolve all transport issues. 2011 census data shows that cycle rates for commute trips wholly within Skipton are in the region of 1% to 2%, hardly a majority mode. In areas outside of Skipton much is made within policies of the potential to support rural services and local public transport through development. However the existing weighting of development is not likely to be sufficient to meet this objective. If more development were located, for example, in locations with rail stations, such as Gargrave, Bentham, Hellifield and</p>	<p>Evidence is being gathered on the draft local plan's potential impact on traffic in Skipton. This evidence is being gathered in the form of traffic surveys and computer modelling, in co-operation with the local highway authority, and will inform the next consultation draft of the local plan.</p>	<p>Yes</p>	<p>See revised policy SP12 and the new draft Infrastructure Delivery Plan (Appendix C).</p>

<p>Settle a more compelling case for improving rail services at these locations could be made. A further point to consider is that locating development in Skipton as it has a rail station with good services ignores the fact that the station will be difficult to access for new development on the edge of town, relative to the close access that development sites in places such as Settle would have.</p> <p>There is a desperate need for further explanation of the implications for transport as part of this plan. The quantum of development proposed is large enough to cause problems in a constrained transport network, but not large enough to deliver infrastructure solutions, which in any case would not be appropriate to the context and character of Skipton.</p>			
<p>To sum up, last year (2015), after about 3 years of hard work, Gargrave Neighbourhood Planning Group along with Gargrave Parish Council submitted plans to CDC with areas that would best suit what the villagers would accept. I find it somewhat disappointing that CDC appear to have ignored those plans. I therefore favour the proposals that were made in 2015 by the aforementioned, with the exception of GA004 (Neville House) However, I am opposed to any large scale development within Gargrave until a time that the sewage system is updated so as to enable sewage to be transported to the sewage works safely without causing disruption to various properties within the village. At present there is only one sewage pipe running from the north of the river. This is pipework is already inadequate, as, there have been numerous occasions when there has been constant or heavy rainfall where raw sewerage has spilled out of manholes causing disruption for some villagers. I believe that this issue should be addressed before any housing development is started.</p>	<p>The district and parish councils are consulting and cooperating with each other in the local and neighbourhood planning processes. The district council is also consulting and co-operating with the relevant utility companies. Draft local plan policy SP10 does not actually show any specific sites for housing at this stage, but preferred sites will be selected from the pool and added to the policy for inclusion in the next draft of the local plan.</p>	Yes	See revised policy SP10, which now provides full details of specific development areas and development principles.
<p>This plan provides additional housing which local facilities should be able to support whilst maintaining Gargrave as an attractive</p>	<p>This comment is in line with the aims of the draft local plan.</p>	No	

place to VISIT and live. ADOPT IT.			
<p>We enclose two photographs in support of our previous reasoning regarding green space provision.</p> <p>The picture of the meadow shows exactly what was lost when the Bargh's Meadow development was built and the accompanying shot shows part of the narrow and unattractive access that replaced the footpath across the field on which the development was built.</p> <p>We hope that these pictures help to explain the difference between a footpath as a social and environmental asset and one reduced to a sterile access route.</p>	<p>The draft local plan does not, at this stage, show any specific sites to meet the employment and housing requirements set out in draft policies SP2 and SP4. The comments are noted and preferred sites will be selected from the pool and added to the next consultation draft of the local plan.</p>	Yes	<p>See revised policies SP5 to SP11, which now provide full details of specific development areas and development principles, including the treatment of footpaths and the provision of green spaces. New draft policy ENV12 may also be of interest.</p>
<p>After extensive consultation the Parish Council submitted a suitable plan providing adequate housing of the required number. Why ignore it – use it.</p>	<p>The district and parish councils are consulting and cooperating with each other in the local and neighbourhood planning processes. Whilst the draft local plan does not show specific sites for housing at this stage, preferred sites will be selected from the pool for inclusion in the next consultation draft.</p>	Yes	<p>See revised policies SP5 to SP11, which now provide full details of specific development areas and development principles.</p>

\* These are amalgamated points. Similar comments from the consultation have been grouped together in order to formulate a response to that particular issue.

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