

Representations on Main Modifications

Full copies of all representations submitted in response to public consultation on proposed main modifications to the publication draft Craven Local Plan



Introduction

Below are all of the representations submitted to the council in response to the main modifications consultation, which ran from 19th February to 1st April 2019. The original content of representations has been reproduced, but conversion to PDF format may have produced slight differences in appearance. Representations are ordered alphabetically according to the surname of individuals or the name of organisations represented. Each representor has been given an ID number in order to assist referencing and communications between parties during the local plan examination.

Redactions

The following representations are being published on the council's website and anyone with access to the internet will be able to view them. Therefore, in accordance with the Data Protection Act 2018, sensitive information about an individual or their family, or personal information about third parties, has been redacted (blacked-out). However, such information will be retained in the original copies, which are kept on our files. The council has also redacted any material that it perceives as offensive, abusive, libellous, insulting or derogatory.

Navigating the document

This document contains 245 individual items – each comprising all representations from a single representor. They are arranged alphabetically by name, as explained above. Items can be found quickly by using a PDF reader that supports 'bookmarks', as each item has been bookmarked with the representor's name and ID number. The following table of contents will assist those who are unable to access PDF bookmarks.

Name	Page	Name	Page	Name	Page	Name	Page
A	0002 - 0040	G	0356 - 0386	N	0650 - 0681	V	0969 - 0972
B	0041 - 0109	H	0387 - 0488	P	0682 - 0731	W	0973 - 1068
C	0110 - 0227	J	0489 - 0495	R	0732 - 0767	Y	1069
D	0228 - 0289	K	0496 - 0511	S	0768 - 0920		
E	0290 - 0305	L	0512 - 0540	T	0921 - 0965		
F	0306 - 0355	M	0541 - 0649	U	0966 - 0968		

From: Jeff Adams [REDACTED]
Sent: 28 March 2019 17:44
To: Local Dev. Framework
Subject: amends to main mods
Attachments: cdc-mods-rep-form-2019-final (5).docx

Please find attached completed form for your consideration
Could you please advise me of the outcome of my requests
Thank You
Jeff Adams

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mr
First Name:	Jeffrey
Last Name:	Adams
Job Title (where relevant):	
Organisation (where relevant):	
Address 1:	██████████
Address 2:	██████████
Address 3:	

Address 4:	
Postcode:	██████
Telephone:	██████████
Email:	████████████████████

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM:6 MM:64 MM:70 MM:71 MM:78 MM:79 MM:120 MM:121	

Section 4: Legal Compliance & Duty to Cooperate

Do you consider that this modification of the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant		
2. Sound (MM:6,MM:64,MM:70,MM:71,MM:78,MM:79,MM:120,MM:121)		No
3. In Compliance with the Duty to Cooperate		

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravencdc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

MM:6
SP3 Housing Mix and Density

(b) 'regard to local and site-specific circumstances' is non specific and should be replaced with wording more in keeping with **SP12 and INF7**

MM:64
SP10 Site (GA031)

The conditions of development only refer to conserving the significance of heritage assets and a conditional reference to SUDS. This should be widened to bring it in line with **SP12 and INF7**

MM:70
Supporting text for Policy SP12 Paragraphs 4.67, 4.69

Includes 'provision of the following broad types of infrastructure But it does not include Highways

MM:71
Policy SP12

Policy SP12 refers to the council 'will work to mitigate and minimise adverse impacts.....in terms of infrastructure provision' This is too general and needs modifying to bring it in line with **INF7**

MM:78
Supporting text to Policy ENV4 Paragraph 5.45

Reference is made to Bio-diversity with an emphasis placed on 'internationally, nationally and local designated sites'

Many developments are on green field sites of a known rich diversity of protected species and all such sites should be subject to an 'appropriate assessment'

MM:79
Policy ENV4 Bio-diversity Part a) and f)

Refers to 'growth in housing.....will be accompanied by improvements in bio-diversity. This means that a) where possible....'

This is too open and needs amending

MM:120

Supporting text for New Policy INF7-Sustainable Transport and Highways

Refers to 'The provision of a safe, suitable and convenient access to new development sites should be agreed' the word 'should' is too ambiguous

MM:121

Policy INF7 Sustainable Transport and Highways

e) 'providing safe, suitable and convenient access to all development sites...' is too site specific and misses the point that much of a sites impact will probably be between the site itself and the centre of the conurbation it is located alongside.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

MM:6

SP3 Housing Mix and Density

Regard to local should be followed by 'sustainability issues, infrastructure requirements, safety and inclusivity'

MM:64

SP10 Site (GA031)

The reference to SUDS should be changed from 'will' incorporate... unless this is not possible or feasible to 'must incorporate to ensure no detrimental impact on existing residents and the existing sewage system'

The paragraph should also include reference to 'highways and access to the centre of the village to be improved up to the required standards of the highways authority to ensure the safety of residents, sustainability, access to transport networks and inclusivity'

MM:70

Supporting text for Policy SP12 Paragraphs 4.67, 4.69

'Highways' should be included in the 'broad types of infrastructure listed

MM:71
Policy SP12

Should read.....'**ensure there are no adverse impacts**'
(Note: many developments are large and unless infrastructure is improved they will not deliver sustainability, safety, accessibility and inclusivity)

MM:78
Supporting text to Policy ENV4 Paragraph 5.45

The last sentence referring to 'development proposals likely to have a significant effect on a European site.....' should be widened to include '**greenfield site, or a site of known bio diversity**'.....when considered alone

MM:79
Policy ENV4 Bio-diversity Part a) and f)

'wherever possible' should be replaced with '**development will be required to**'

And later 'i) Ensure that there is no adverse impact on any internationally designated sites integrity' should include '**or a site of known bio-diversity or inhabited by protected species**'

MM:120
Supporting text for New Policy INF7-Sustainable Transport and Highways

Replace 'should' with '**must**'

MM:121
Policy INF7 Sustainable Transport and Highways

After 'to all development sites' include '**and from the sites to the centre of the conurbation**'

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)


Yes, I do wish to be notified

No, I do not wish to be notified

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	X
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	27-03-19

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ
| www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



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

Craven Local Plan Examination



Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mr
First Name:	David
Last Name:	Aldersley
Job Title (where relevant):	N/A
Organisation (where relevant):	N/A
Address 1:	██████████
Address 2:	██████████
Address 3:	██████████

Address 4:	
Postcode:	████████
Telephone:	██████████
Email:	██

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	N/A
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	David Aldersley
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: Equality	
Insufficient level of equality assessment conducted on site G2/4 gargrave (off Walton close/Marton Road).	

Section 4: Legal Compliance & Duty to Cooperate

Do you consider that this modification of the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant	<input type="checkbox"/>	<input type="checkbox"/>
2. Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. In Compliance with the Duty to Cooperate	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

<p>Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.</p>
<p>If you wish to support the legal compliance or soundness of this Main Modification to the Local</p>

Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

Craven Local Plan - Public consultation to main modifications required to fully consider equality at this site, the surrounding area and safe access into Gargrave village. Although it may be considered a late submission, equality legislation should be considered irrespective of timing and any other comments seen to be out of time or late.

Road closures on the A59 and A65 are common practise and traffic gets diverted through to Marton Road, Gargrave. Marton Road is frequently grid locked with heavy traffic and farm vehicles, it is dangerous road and the lack of footpaths makes it hazardous at any time of day.

The Local Plan does not sufficiently cover the fundamental equality factors that need to be addressed prior to any site being selected that already infringes on disability rights and legislation.

A person with disability is already being treated less favourably than others in the same situation as site G2/4 has a lack of safe access to Gargrave village. There is insufficient pavement provision in place and where there are pavements they are not suitable for wheelchair access.

This cannot be remediated by the builder due to the road width in some areas of Marton Road being too narrow to erect footpaths. This is already a known fundamental safety issue that needs to be addressed. Wheel chair users already experience road safety issues travelling on Marton Road. Inclusive design for this site and the surrounding area is fundamental and is not being addressed within the plan.

Marton Road is poorly lit which is unacceptable, dangerous and is not a sustainable distance for people with lesser abilities. Building on this site does not allow everyone to participate equally.

There are common problems that already exist that will prevent people from accessing public amenities e.g. shops, bus stops etc. For the whole 800m into Gargrave from Walton Close, wheelchair users, people of all abilities and parents with children have to use the road.

insufficient social implications of wheelchair usage/disability is not being addressed sufficiently within the local plan for Gargrave for this site.

Exposes parishioners to a great risk of harm and risk of injury accessibility is poor on foot or by wheel chair, parents pushing prams, and children running into the road, issues are known but no resolution is being made to rectify this.

Gargrave Train Station (access via Church Street) - North Bound does not have disabled access off the platform. There is no provision made for remediating this issue.

Key issues which needs to be addressed and remedial actions put in place:

Accessibility to village (safe access)

Doesn't treat everyone with the same level of accessibility, how is this going to be addressed

Gradient of hill makes it difficult for people with disability

Road safety (sleeping policeman, road calming measures) change speed limit out side Milton House from 60 to 30 mph.

Poor lighting and visibility lack of suitable footpaths or no footpaths (install additional lighting, erect footpaths and procure additional land to build footpaths where the road is too narrow.

Distance from site to nearest bus stop in village centre 800m (look at putting a bus service onto Marton Road)

Rural infrastructure not being in place for building additional houses without significant investment. (Put building conditions onto the builder to ensure that infrastructure is upgraded)

Cost for rural investment no one has the budget

Green spaces being utilised ineffectively, where more suitable sites are available and more accessible.

Open landscape is an integral part of the village and attracts visitors.

Does not contribute to sustainable development due to the distance of site and the nearest bus stop 800m away.

G2/4 This extends the village boundary and is a green field site extending the village form further out.

There are no recreation facilities this side of the village. All facilities are the far extreme of the other side of the village. To use recreational facilities from G2/4 it will require a car.

Site sustainability being car orientated which goes against the aims and objectives of national and local travel.

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

G2/4 – Gargrave, (Walton close, off Marton Road) requires a full equality assessment to be conducted with remediating actions put in place.
Or choose an alternative suitable site.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.


Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

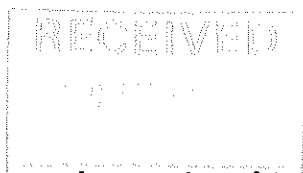
Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	27 03 2019



Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravendc.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mrs
First Name:	Jacque
Last Name:	Aldersley
Job Title (where relevant):	N/A
Organisation (where relevant):	N/A
Address 1:	
Address 2:	
Address 3	
Postcode:	
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	N/A
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FOIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FOIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

If you wish your personal details to be treated in confidence and not published please tick the box below:

I wish to request that the personal details submitted with this representation are treated in confidence and not published.	<input type="checkbox"/>
---	--------------------------

Please explain below, why you have made this request:

I would like my telephone number not to be published, as this is my company mobile. Thank you.

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Jacque Aldersley
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: Equality	
Insufficient equality assessment made on site G2/4 gargrave (off Walton close/Marton Road) which will have a negative effect on minority group.	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

Craven Local Plan - Public consultation to main modifications.

The equality legislation should be considered irrespective of timing and any other comments seen to be out of time or late.

Everyone deserves the right to be treated fairly. Government housing policies are impacting rural locations by insufficient infrastructure being available. Building in rural locations causes intense local impacts.

The secretary of State, Rt Hon James Brokenshire has recently communicated with me and notes that Craven District Council does not have a CiL in place. CiL was established on the principle that those responsible and benefiting from new development can and should make a contribution to the additional infrastructure to fund the provision of improvement, replacement and additional infrastructure.

At an early stage in the plan making process, strategic policy making authorities need to work alongside infrastructure providers to identify infrastructure deficits and requirements and look for opportunities to address them. The letter I received from Rt Hon James Brokenshire encourages me to discuss our specific issues with this site with our local authorities to see how they intend to address the issue. I have already done this a number of times however to no resolution. This site was adopted from Gargrave Parish Council Neighbourhood Plan by the Craven District Councils Local Plan. Gargrave Neighbourhood Plan has not addressed Equality and recommendations to move to referendum was to conduct an equality assessment.

Road closures on the A59 and A65 are common. In the past two weeks the A65 bridge at conniston cold has been closed twice and the traffic has been diverted through Marton Road, Gargrave. Marton Road is frequently grid locked, dangerous and the lack of footpaths makes it hazardous day and night. Local councillors at Craven District Council will validate that this is a correct and accurate statement. Farm traffic also cause issues as two tractors cannot pass each other side by side without mounting the grass verges.

Dog walkers frequently take their lives into their own hands due to the high speeding traffic that uses this road. Since 2015 the speed of vehicle using Marton Road has been discussed at Gargrave Parish Council Meetings and are recorded.

I would like to provide you with my objections/considerations to the Local Plan and the fundamental factors that have not been taken into account and need to be addressed.

Article 14 No discrimination

There has not been sufficient equality assessment made on the suitability of site G2/4 Gargrave (Walton Close, Marton Road).

Disability - person is being treated less favourably than others in the same situation. Site G2/4 -

currently there is a lack of safe access to Gargrave town Centre for able bodied parishioners, due to existing insufficient pavement provision being in place already on (Marton Road). Where existing pavements are in place (Marton Road/Church Street) these do not meet the minimum legal standard (extreme circumstances) for wheelchair width. This cannot be remediated by the builder due to the road width in some areas of Marton Road being too narrow to erect footpath provision. This is already a known fundamental safety issue that needs to be addressed. Wheel chair users already experience road safety issues travelling on Marton Road. Inclusive design is important to us as we have a higher than average disability ratio on this part of the village which includes people with mental health, long term sickness (cancer) wheel chair users and children who have hidden disabilities.

Marton Road is poorly lit and urge that a night time inspection is carried out which will show how it currently unacceptable, dangerous and is not a sustainable distance for lesser ability parishioners, which does not allow everyone to participate equally. They are common problems that exist that will prevent people from accessing public amenities e.g. shops, bus stops etc. Insufficient social implications of wheelchair usage is not being addressed sufficiently within the local plan for Gargrave.

To enter the village from Marton Road, you would have to travel along church street over a grade 2 listed bridge which already exposes parishioners to a great risk of harm and risk of injury. Two narrow paths run along either side of it. Parents with Prams struggle when crossing the bridge as well as people crossing from opposite directions where they have to walk in the road.

Disabled parishioners (young and old) already struggle with safety travelling into Gargrave from Marton Road. Demographically we have an ageing population in gargrave especially on this side of the village, accessibility is poor on foot or by wheel chair, parents pushing prams, and children running into the road, issues are known but no resolution is being made to rectify this.

North Yorkshire County Council have been contacted who have offered solutions for wheelchair access over the Grade 2 listed bridge however, there are no funds available to remediate this issue which will severely compromise the safety of the individual. (Only access into Gargrave centre). Spatial Committee are already in receipt of this documentation.

Gargrave Train Station (access via Church Street) - North Bound does not have disabled access off the platform. There is no provision made in anyones budget for gargrave station to be remediated. Northern Railways have validated that the money is to be spent elsewhere. Spatial committee are already in receipt of this documentation.

Rt Hon Julian Smith MP has been contacted and is going to pass on my concerns to the secretary of state for Transport with regards to North bound disability access and the inaccessibility of funding to upgrade this platform by any party.

Currently if a disabled person needs to get to Gargrave they cannot do this via train as Gargrave Train station is not accessible for people with disabilities.

Fails to treat people differently when they are in significant different situations. G2/4 does not allow for minority groups to be catered for to the following reasons:

Accessibility to village

Gradient of hill makes it difficult for people with disability

Road safety

Poor lighting and visibility (people have to carry torches at night)

Lack of suitable footpaths or no footpaths

Distance from site to nearest bus stop in village centre 800m.

Due to the demand for rural housing to be built Craven District Council are building houses in locations that they know that are not suitable and have insufficient infrastructure to support them. Craven District Council should have a duty of care to impose uplifts of infrastructure deficiencies to builders to ensure that houses are built in accessible locations and treat everyone with the same level of accessibility. The spacial committee have already confirmed that the road is not wide enough for a pavement on some parts of Marton Road.

Applying policies that has a disproportion impact on individuals or groups. G2/4 It is already known that there are severe infrastructure issues residing that this site location. Failure to meet policies will be due to the inherent existing features of rural infrastructure at this site. This is going to have a negative impact on the already disadvantaged disabled group.

Unequal treatment will cause direct discrimination by policies being applied to building in rural locations by not discriminating on the face of it, discriminating in practise against minority groups. Unable bodied people will

severely be impacted by the distance, highways safety, highways lighting and steep gradient of hill to the proposed site. CDC and GPC are aware of the key factors and impacts however, propose sites that are unsuitable for development. The nearest bus stop is 800m away from this site.

Additionally I would like to conclude with the following:

Sites that are not protected by EU Birds and Habitats Directives should still have consideration when endangered species reside at them. Site visits in Jan & Mar 2016 is insufficient to assess the endangered species that reside there, this site has not been sufficiently impact assessed. This information has been in the public domain since 2015 by parishioners of Gargrave of endangered species that reside there.

Green spaces being utilised ineffectively, where more suitable sites are available and more accessible. Open landscape is an integral part of the village and attracts visitors.

Designated heritage assets - G2/4 runs along the side of the pennine way footpath. Ramblers etc use the route down Mosber lane onto Marton Road in winter as the pennine way route is water logged.

Grade 2 listed building adjacent to G2/4 not considered.

Areas of outstanding beauty - driving/walking/cycling/horse riding coming into the village from Bank Newton up Marton Road you see natural beauty and rambling hills.

National cycle route.

Detracts and extends too far out the existing building boundary/building line profile of existing properties. Not an infill of existing building settlement.

Existing issues reside with sewers overflowing into residents houses on Marton Road and into the drains which feed into the river.

Extensive flooding is experienced on Marton Road.

Not sustainable as transport is required.

Low priority road in winter.

Increase in the volume of traffic

Great crested newt is internationally important. Breeding sites and resting places are protected by the law. Both CDC and GPC are aware from residents feedback during consultations process for a number of years now. However the desktop assessment and two site visits out of season seem to suffice basic audit governance. Requests made to CDC and GPC for Biodiversity assessments to be made. None have been made.

Bats and their roosts are protected by law. Bats nest in the trees on and around this site. Bats hibernate from Oct-Mar/Apr. What assessment/bat surveys have been made that covers habitat of this species.

Oyster Catchers nest yearly at this site. Protected by the wildlife and countryside act 1981. What assessment has been made?

There are lots of other animals and birds that reside at this site which need to be considered and assessed owls, wood peckers, deer etc.

G2/4 does not contribute to sustainable development due to the distance of site and the nearest bus stop 800m away. G2/4 will be via car access.

G2/4 This extends the village boundary and is a green field site extending the village form further out.

Policy G11 promoting and enhancing location recreational facilities. There are no recreation facilities this side of the village. All facilities are the far extreme of the other side of the village. To use recreational facilities from G2/4 it will require a car.

Site sustainability being car orientated which goes against the aims and objectives of national and local travel.

Landscapes such as the G2/4 are worthy of long term preservation and kept for scenic and environmental value.

Marlon Road is going to be one of the "village safe walks". this walk is an initiative that is being introduced next year into the village where people will be walking up by the Anchor Inn, along the canal to the aqua duct then onto Marlon Road back into the village. Additional volumes of traffic and existing infrastructure issues will impact highway safety for walker

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

G2/4 – Gargrave, requires a full equality assessment to be conducted with remediating actions taken in place.
 G2/4 – Gargrave , requires a full biodiversity assessment to be conducted.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)

Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)

Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:

Signature	
Date	27-MARCH 19'

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ |
www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



INVESTOR IN PEOPLE



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

Craven Local Plan Examination



Ministry of Housing,
Communities &
Local Government

Rt Hon Julian Smith MP
House of Commons
London
SW1A 0AA

Rt Hon James Brokenshire MP
Secretary of State for Housing, Communities
and Local Government

**Ministry of Housing, Communities & Local
Government**

Fry Building
2 Marsham Street
London
SW1P 4DF

Tel: [REDACTED]

Email: [REDACTED]

www.gov.uk/mhclg

Our-Ref: 4038000

11 March 2019

Dear Julian,

Thank you for your letter of 1 February, on behalf of your constituent Mrs Jacque Aldersley, about infrastructure in rural communities.

Local planning authorities use the Community Infrastructure Levy (CIL) and section 106 planning obligations to capture a proportion of increases in land value which occur as a result of planning permission being granted.

I note that Craven District Council does not have a CIL in place. CIL was introduced in 2010 and allows local planning authorities to raise funds from new development, to help fund infrastructure to support the development of their area. CIL was established on the principle that those responsible for, and benefitting from, new development can and should make a reasonable contribution to the costs of providing the necessary additional infrastructure. CIL can be used to fund the provision, improvement, replacement, operation or maintenance of a wide range of infrastructure, including roads, schools, health facilities and flood defences.

Section 106 of the Town and Country Planning Act 1990 enables a local planning authority to seek agreement from developers to enter into section 106 planning obligations, to mitigate the impact of otherwise unacceptable development, to make it acceptable in planning terms. To constitute a reason for granting planning permission for development, a planning obligation must meet three statutory tests. It must be:

- necessary to make the development acceptable in planning terms;
- directly related to the proposed development; and
- fairly and reasonably related in scale and kind to the proposed development.

The revised National Planning Policy Framework requires local authorities to set clearer policy requirements for infrastructure and affordable housing through plans. These policies should be informed by appropriate and proportionate evidence including infrastructure needs and costs.

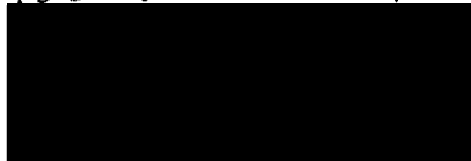
At an early stage in the plan-making process, strategic policy-making authorities will need to work alongside infrastructure providers to identify infrastructure deficits and requirements, and opportunities for addressing them.

Following the announcement made at Budget, the Government has also recently consulted on draft amended Community Infrastructure Levy regulations.

These changes will ensure developers know what contributions they are expected to make towards affordable housing and essential infrastructure, that local communities are clear about the infrastructure and affordable housing they will get, and that local authorities can hold developers to account.

I would encourage you to speak to your local authority to discuss the details of this specific issue further.

Yours ever,



RT HON JAMES BROKENSHIRE MP

From: David Aldersley [REDACTED]
Subject: Fwd: Take into consideration additional information Gargrave bridge grade 2 ga031 gargrave
Date: 18 December 2018 20:56
To: Robert Bryan [REDACTED]
Cc: Marton Road [REDACTED] Jeff Adams [REDACTED]

Hello mr Bryan

I have been asked to provide you with NYCC response to the bridge and whether or not it could be altered for wheel chair access (grade 2 listed bridge)

Below is the response I received.

If you require any further information please let me know.

Thankyou for all of your help.

Regards

Jacque

Sent from my iPad

Begin forwarded message:

On 6 Dec 2018, at 13:12, Daniel Harry [REDACTED] wrote:

Dear Jacque

I have spoken with colleagues in Highways about the bridge and I have been informed that the creation of a footpath on either side of the bridge that would be wide enough for wheel chair access would reduce the roadway over the bridge to a single carriageway. This would then need traffic lights to be put in place at either end of the bridge and other measures to manage traffic flow due to the proximity of the bridge to a junction. This is something that is not feasible at present.

The alternative is for a footbridge to be built. This would have to be at least

10m from the existing bridge. I have been told that there is no funding available at the County Council for such a project at the moment but that the funding could be sought locally.

I hope that this helps.

All the best

Daniel

Daniel Harry
Democratic Services and Scrutiny Manager
North Yorkshire County Council
County Hall
Northallerton
DL7 8AD

[REDACTED]

[REDACTED]

From: David Aldersley [REDACTED]
Subject: Fwd: Local housing - gargrave
Date: 21 February 2019 18:47
To: Chris Waterhouse [REDACTED]
Cc: [REDACTED]

Hi Chris

Please would you add this correspondence into the pack for Monday's spatial meeting

Thankyou

Jacquie

From: David Aldersley [REDACTED]
Date: 31 January 2019 21:31:17 GMT
To: Julian SMITH [REDACTED]
Subject: Local housing - gargrave

Dear Mr Smith

Further to our meeting in December 2018, I asked if you would forward to the housing minister an email from me.

I appreciate your help and support. Below is the email.

Regards

Jacquie Aldersley

To The Rt hon James Brokenshire MP

North Yorkshire is adapting to a changing world, where local councils are focused on delivering housing in line with central government directives, however the old creaking infrastructure it resides on is breaking at the seams

and is impacting our local communities.

Investment needs to be made in infrastructure and revenue provided by central government to North Yorkshire County Council to facilitate this remediation activity that is urgently required.

In rural communities there is the inability to support people of all ages/disabilities with basic infrastructure needs. The challenges that local communities are faced with is that existing issues are compounded by further building development at locations that are greenfield sites and are not suitable for development.

An example of this is a rural village in Gargrave which is poorly lit, majority of the road without footpaths (road widths not wide enough to put paths on), nearest village centre 700 m away, only one way to enter the nearest village via a grade 2 listed bridge, the full length of this journey unsuitable for wheelchairs on a very busy, dangerous road. It already impacts the local community on a daily basis as wheelchair users put their own lives at risk every time they leave their homes along with walkers and small children using the route to school.

The local train station (Gargrave) northbound has a steep staircase (not accessible for disabled passengers), enters onto an unlit 60 mph road, with no footpaths. Although the footfall is 29k and up by 50% there are no grants available to allow access for disadvantaged groups not to be discriminated against.

The responsibility of upgrading the poor rural infrastructure is left to the builder to resolve. However, it is not always possible to put building restrictions onto them to finance upgrades to pavements, bridges and to make the local train station accessible for residents with all abilities.

The welfare of existing communities are being impacted by developments being inappropriately built on to meet government directives with total disregard to the safety, health and wellbeing of those communities that it impacts.

Building in rural locations needs major capital investment as the infrastructure is incapable of just being plumbed into. A pragmatic approach needs to be made to complex challenges of building in rural locations than the urge to miss the bigger picture of reducing the impact on local communities.

Everyone deserves the right of basic infrastructure.

I would like to thank you for giving me the opportunity to present this email to you.

Kind regards

Jacquie Aldersley

Sent from my iPad

From: David Aldersley [REDACTED]
Subject: Fwd: Local housing - gargrave
Date: 21 February 2019 19:16
To: Chris Waterhouse [REDACTED]
Cc: [REDACTED]

Hi Chris

Please would you pass onto the spatial committee members for Monday's meeting.

Thankyou

Jacquie

Sent from my iPad

Begin forwarded message:

From: David Aldersley [REDACTED]
Date: 3 February 2019 19:31:40 GMT
To: [REDACTED]
[REDACTED]
[REDACTED]
Cc: Councillor Simon Myers [REDACTED] Daniel Harry
[REDACTED] Marton Road
[REDACTED], Jeff Adams
[REDACTED]
Subject: Fwd: Local housing - gargrave

Dear Mr Flinton/Mr Les

I was totally inspired by the detail within the "annual report of the director of public health for North Yorkshire 2018".

Your mantra to reduce health inequalities, improve the health and wellbeing of people with the poorest health and to address the key factors that influence people and communities in North Yorkshire.

Where people live is a significant factor within North Yorkshire and the surrounding area they live in. Poor health can hit us at any age or stage in our life and also to take into account the increasing dependency ratio which is higher in North Yorkshire than for England with a forecast to increase more rapidly.

Inequalities are being experienced without mitigation being taken into account, if we use as an example the governments directive to build more houses. Discrimination to minority groups is becoming increasingly more apparent. How? In areas where designated building is on parish/local plans, assessments are being made in theory, however in reality building goes ahead in areas where it is unrealistic, unsafe and disadvantage people in poor health or are less able.

I live in a parish where there is a designated site, which is a good 10 mins brisk walk away from the village by an able bodied person. On a dangerous road, 1:6 gradient of hill, it is over 700 m away to the village/bus stop with insufficient footpath, poor lighting etc. Wheelchair users have to undertake the whole of this journey on busy rural country road's. However it seems to be acceptable due to insufficient funds at NYCC, so there is no current solution to remediate this known issue. I have asked for building conditions to be put onto the builder but have been told that this is not the builders responsibility or would not be fair to do so.

There is a train station which is not wheelchair accessible, with no plans and no finance to upgrade the station. The equality act does not seem to be followed as building a housing development should have basic infrastructure to improve the general wellbeing of minority groups not disadvantage or isolate them further from the community by putting them on the fringe of a village.

Improvement to transport is a key barrier for people with ill health or ability, where housing is built and the impact on sustainability needs to be fully understood and stringently impact assessed. Part of the early stages of building housing development plans, specific barriers are not being considered sufficiently to address population health. Supporting of local

communities needs to be addressed, understanding community needs, focusing on determinants of health for example housing, air quality and transport.

Also maximising the use of assets in North Yorkshire and encouraging children to go out to play is also not being considered. The nearest playground is approx 1400 m away with inaccessibility to children from the proposed site, due to distance and having to cross the main A65 trunk road along with a number of B roads.

Would you please be able to advise me how this is going to be addressed. This issue is a significant issue that villages are experiencing.

Look forward to hearing from you. Below is the email I have sent to the housing minister for your reference.

Kind regards

Jacquie

From: David Aldersley

>

Date: 31 January 2019 21:31:17 GMT

To: Julian SMITH

Subject: Local housing - gargrave

Dear Mr Smith

Further to our meeting in December 2018, I asked if you would forward to the housing minister an email from me.

I appreciate your help and support. Below is the email.

Regards

Jacquie Aldersley

To The Rt hon James Brokenshire MP

North Yorkshire is adapting to a changing world, where local councils are focused on delivering housing in line with central government directives, however the old creaking infrastructure it resides on is breaking at the seams and is impacting our local communities.

Investment needs to be made in infrastructure and revenue provided by central government to North Yorkshire County Council to facilitate this remediation activity that is urgently required.

In rural communities there is the inability to support people of all ages/disabilities with basic infrastructure needs. The challenges that local communities are faced with is that existing issues are compounded by further building development at locations that are greenfield sites and are not suitable for development.

An example of this is a rural village in Gargrave which is poorly lit, majority of the road without footpaths (road widths not wide enough to put paths on), nearest village centre 700 m away, only one way to enter the nearest village via a grade 2 listed bridge, the full length of this journey unsuitable for wheelchairs on a very busy, dangerous road. It already impacts the local community on a daily basis as wheelchair users put their own lives at risk every time they leave their homes along with walkers and small children using the route to school.

The local train station (Gargrave) northbound has a steep staircase (not accessible for disabled passengers), enters onto an unlit 60 mph road, with no footpaths. Although the footfall is 29k and up by 50% there are no grants available to allow access for disadvantaged groups not to be discriminated against.

The responsibility of upgrading the poor rural infrastructure is left to the builder to resolve. However, it is not always possible to put building restrictions onto them to finance upgrades to pavements, bridges and to make the local train station accessible for residents with all abilities.

The welfare of existing communities are being impacted by developments being inappropriately built on to meet government directives with total disregard to the safety, health and wellbeing of those communities that it impacts.

Building in rural locations needs major capital investment as the infrastructure is incapable of just being plumbed into. A pragmatic approach needs to be made to complex challenges of building in rural locations than the urge to miss the bigger picture of reducing the impact on local communities.

Everyone deserves the right of basic infrastructure.

I would like to thank you for giving me the opportunity to present this email to you.

Kind regards

Jacquie Aldersley

Sent from my iPad

From: David Alderson [REDACTED]
Sent: 14 March 2019 14:23
To: Local Dev. Framework
Subject: Local Plan consultation Hellifield Flashed

Please note that we consider that the area in and around Galliber pond should be classified as Local Green Space. The site has a long record of providing a resource to avian wildlife – migratory birds in particular. The site is not particularly extensive and would provide protection from the possible ribbon development on A65 towards Long Preston

David and Susan Alderson
[REDACTED]

Sent from [Mail](#) for Windows 10

From: Adrian Allen [REDACTED]
Sent: 11 March 2019 11:03
To: Tony Blackburn; Sian Watson; Councillor John Dawson
Subject: Park Hill

I have today submitted a Main Modifications Consultation Representation Form with my objection to the deletion of SK-LGS64 from the Local Green Space Designation and a suggestion of an area reduction that may allow a way for a potential review. My letter attached to this form is attached to this e-mail for your consideration.

Regards
Adrian Allen

**NAME ADRIAN ALLEN
REGARDING MM:87**

Objection to the deletion of the proposed local green space designation of SK-LGS64 from the draft Craven Local Plan and suggestion of a reduced area for consideration as local green space

The original tract of land designated SK-LGS64 includes Skipton Woods, Skipton Castle and grounds, fields to the east of Skipton Woods (Storems Laithe) and the Old Cemetery (Raikes Road). These together with the land to the west of Skipton Woods amounts to over 75 hectares as pointed out by the Planning Inspectorate inspector in his letter to Craven District Council.

Skipton Woods and the Old Cemetery are already protected under INF3 and Skipton Castle and grounds are of such historical and cultural significance they do not need to be included in the local green space classification. The land to the east of Skipton Woods (Storems Laithe) comprises agricultural fields with no historical or recreational significance. Whilst these areas have been demonstrated to pass many aspects of tests 1,2 and 3 in the LGS assessment in the draft local plan they could arguably be excluded from the blanket SK-LGS64 LGS classification on the above basis.

This would leave the land to the west of Skipton Woods which passes all the LGS tests 1,2 and 3 and would be less than half the area of SK-LGS64 of the draft plan of March 2018 and as such may well not then conflict with paragraph 77 of the 2012 National Planning Framework.

This reduced area contains the earthworks and Civil War Battery ancient monuments, two long distance footpaths (the Dales High Way and the Lady Anne Clifford Way) and a footpath running northwest from The Pinfold to Short Lee Lane close to its junction with Grassington Road, it is rich in wildlife (Ecological Data Centre) and is easily accessible from Skipton Town centre (the entry to the footpaths via The Pinfold at the bottom of Chapel Hill is just 160 metres, 3 minutes walk from the top of the High Street opposite Holy Trinity Church).

This land is well used for recreation by Skipton residents for casual walking, dog exercising, children and parents tobogganing in winter snow and also by ramblers, locals and tourists using the long distance footpaths and also the circular walk round Skipton Woods and Park Hill. It is also used for grazing sheep and dairy cows on occasions and is managed by the farmer using the land in a sustainable way consistent with unimproved grassland containing many sensitive plant species. Little Wood which stretches about 80 metres into the area from Grassington Road houses a large Rookery and the Rooks use the land to feed and forage as do many other birds who reside in Little Wood and Skipton Woods. Little Wood also contains the site of an old limekiln which is of historical interest.

The area has outstanding long distance views in all directions and because it is so readily accessible by residents of Skipton, apart from recreational value, it offers peace and tranquillity leading to improved wellbeing for the people of Skipton. It is the last area of green space in Skipton offering these advantages. Classification as a Local Green Space would ensure it endures; if it is not, then despite assurances to the contrary, at some stage in the future it would be developed for housing and lost.

I sincerely hope that this reduced area of land can be given Local Green Space status.

From: Charlotte Allen [REDACTED]
Sent: 31 March 2019 19:20
To: Sian Watson
Subject: Objection: removal of Local Green Space Park Hill

Dear Ms Watson,

I wish to write to you to clearly state our objection to the deletion of the proposed local green space designation of SK-LGS64 from the draft Craven Local Plan and suggestion of a reduced area for consideration as local green space. I write on behalf of myself and my husband as residents of the neighbouring area.

The original tract of land designated SK-LGS64 includes Skipton Woods, Skipton Castle and grounds, fields to the east of Skipton Woods (Storems Laithe) and the Old Cemetery (Raikes Road). These together with the land to the west of Skipton Woods amounts to over 75 hectares as pointed out by the Planning Inspectorate inspector in his letter to Craven District Council.

Skipton Woods and the Old Cemetery are already protected under INF3 and Skipton Castle and grounds are of such historical and cultural significance they do not need to be included in the local green space classification. The land to the east of Skipton Woods (Storems Laithe) comprises agricultural fields with no historical or recreational significance. Whilst these areas have been demonstrated to pass many aspects of tests 1,2 and 3 in the LGS assessment in the draft local plan they could arguably be excluded from the blanket SK-LGS64 LGS classification on the above basis.

This would leave the land to the west of Skipton Woods which passes all the LGS tests 1,2 and 3 and would be less than half the area of SK-LGS64 of the draft plan of March 2018 and as such may well not then conflict with paragraph 77 of the 2012 National Planning Framework.

It is important to note that this reduced area contains the earthworks and Civil War Battery ancient monuments, two long distance, well-used footpaths (the Dales High Way and the Lady Anne Clifford Way) and a footpath running northwest from The Pinfold to Short Lee Lane close to its junction with Grassington Road, it is rich in wildlife (Ecological Data Centre) and is easily accessible from Skipton Town centre (the entry to the footpaths via The Pinfold at the bottom of Chapel Hill is just 160 metres, 3 minutes walk from the top of the High Street opposite Holy Trinity Church).

The land in question is cherished by local residents and tourists alike and is well used for recreation by Skipton residents for casual walking and dog exercising. Ramblers, locals and tourists using the long distance footpaths and also the circular walk round Skipton Woods and Park Hill. As parents we value the wildlife exploration opportunities it offers to families, as well as the well-loved tradition of tobogganing in winter snow. The land is also used for grazing sheep and dairy cows on occasions and is managed by the farmer using the land in a sustainable way consistent with unimproved grassland containing many sensitive plant species. Little Wood which stretches about 80 metres into the area from Grassington Road houses a large Rookery and the Rooks use the land to feed and forage as do many other birds who reside in Little Wood and Skipton Woods. Little Wood also contains the site of an old limekiln which is of historical interest.

The area has outstanding long distance views in all directions and because it is so readily accessible by residents of Skipton, apart from recreational value, it offers peace and tranquillity leading to improved wellbeing for the residents of Skipton. It is the last area of green space in Skipton offering these advantages. Classification as a Local Green Space would ensure the community continues to enjoy these benefits rather than the devastating possibility, despite assurances to the contrary, that at some stage in the future it would be developed for housing and lost. This would be a tragic loss for future generations.

We are hopeful that residents will be heard, objections taken seriously and that the Local Green classification will be maintained. We thank you for your consideration and wait for the outcome with anticipation.

Yours sincerely,

Charlotte Allen and Robert Allen

From: susan allen [REDACTED]
Sent: 31 March 2019 12:17
To: Tony Blackburn; Sian Watson; Councillor John Dawson
Subject: Park Hill

Dear Sirs,

I object to the removal of Park Hill as a Protected Green Space because of its unique importance to Skipton. It is the only natural open area adjacent to the town centre. It is easily accessible from and close to the High Street and should be regarded as a jewel in Skipton's crown.

It is an area full of history containing a civil war battery and 2 long-distance footpaths (one being the famous Lady Anne's Way). Once an historical site is vandalised it is lost forever.

It is a peaceful area with impressive views over Skipton and walking there offers a welcome relief from the stresses of modern life. As such it is a boon to the mental health of all who walk there.

Yours faithfully,
S. E. Allen ([REDACTED])

From: Alastair Allen [REDACTED]
Sent: 31 March 2019 23:16
To: Councillor John Dawson
Cc: Tony Blackburn; swatson@cravenc.gov
Subject: Park Hill Consultation

Dear Mr Dawson,

I am writing to you in reference to Park Hill's status as a Local Green Space.

I am a resident of [REDACTED] Skipton of 10 years, and was formerly brought up in Thorlby. I am a teacher in the local area and soon to be employed in one of the towns secondary schools. I have one child currently at Skipton Girls and two children at Waterstreet Primary.

As such, I feel compelled to inform you of my dismay and genuine fear that the aggressive and destructive development plan for Skipton has lead to the removal of protected green space status for Park Hill. I am not a serial complainer (this being my first ever letter) but the recent blitzkrieg of development in Skipton is permanently and negatively altering the town and I surely represent the majority opinion in voicing my concerns.

I would like to express my profound objection to the removal of the protected status and appeal to you to reinstate this protection as a matter of importance.

My street, amongst many others looks directly over the beautiful fields and I regularly utilise Chapel Hill and the footpath within the field as an amenity. It is worth noting that there are no designated green space play areas within a reasonable walking distance for children in our part of town. Local children even use the hill on snowy days as a sledging run. Park Hill has historical importance (due to its role as the Battery location for Parliamentarian Forces) and is vital in retaining the semi-rural nature of the northern part of Skipton. It, alongside Skipton Woods, is an important habitat for wild life - something which is very apparent to me as we have a plethora of bird life thriving in and around Park Hill (including numerous tawny owls (that will surely lose vital hunting habitat should development occur on Park Hill) and herons, amongst many others). Living on [REDACTED], I genuinely feel connected to these rural areas which offer me and my young family the freedom to be connected to the natural world and the agricultural surroundings that make Skipton such a fulfilling place to live. This, to me, constitutes quality of life, NOT the obsession for economic and developmental growth and formalised town centre events which appear to be the priority of Craven Council (no doubt linked to increased revenue for the council).

With regards to the destruction of the town's greenbelt, it is not too strong a statement to say that the local long term residents of the town are currently being betrayed by the council.

PLEASE reinstate the Local Green Space protection to Park Hill.

Yours sincerely,

Alastair Allen
[REDACTED]

----- Forwarded message -----

From: **Roger Anderson** [REDACTED]

Date: Fri, 8 Mar 2019 at 12:47

Subject: Park Hill

To: [REDACTED]

Dear Councillor Dawson

I live at 5 primrose hill skipton and wish to oppose the removal of park hill as a protected green space
I regularly use and take delight walking on park hill , it is beautiful and adds character to skipton and is one of
the reasons I moved here. It is also part of a circular walk next to the woods

Please oppose this removal of protection as it truly adds something to skipton !!!!

Help protect it & keep Skipton a lovely place to live and work

Kind regards
Roger Anderson

From: JACQUI BAINES [REDACTED]
Sent: 27 March 2019 10:50
To: Tony Blackburn; David Sykes; Sian Watson
Subject: Park Hill

Dear Sirs/Madam,

We are writing to ask that Park Hill, Site SK-LGS64, land north of Skipton should be kept as protected local greenspace in the Local Plan. As two people born and brought up in Skipton, we have known and loved walking up Park Hill for over 50 years. It is the most peaceful yet interesting viewpoint of Skipton that you could get, plus of course it has important historical relevance to the town. It really is a special place and we would be distraught if it was developed on.

At one point in our lives we lived on Castle View Terrace in Skipton which looks out towards Park Hill, and it was one of our favourite Sunday morning walks. We have a photo of our first son in a back-pack at the top of the hill, and only a couple of weeks ago we walked up there again with him as a 30 year old! It really is a special place and we would be distraught if it was developed on. We would urge all parties to re-consider any proposal to remove the site as listed greenspace, and instead protect this area for the enjoyment and education of future generations.

Thank you.

Jacqui & Paul Baines
[REDACTED]

From: lesley ball [REDACTED]
Sent: 24 March 2019 15:23
To: Local Dev. Framework
Subject: ack email sent 25.3.19 by RP Hellifield flashes

I have lived in hellifield most of my life and what a joy it has been....My children also born and bred in this wonder place...

We are so lucky to have the flashes...over the years I have seen it flourish with all sorts of wild life and feel blessed that they have picked us to make there home.

The wonderful times that I went as a child then when I took my children and told them about the different birds ...the wonderful deer all living in peace...I now have grandchildren and again another generation are appreciating the wonders of the flashes.

Please don't take that away from us,the wildlife picked us to make there home...we are so so lucky...if it goes nothing will be the same...a large part of the heart of our wonderful countryside will be ripped out.

Thank you for reading this.

Yours sincerely

Lesley Ball



From: Roger Beck [REDACTED]
Sent: 11 March 2019 12:30
To: Local Dev. Framework
Subject: ack email sent by RP 11.3.19 Reinstatement of Local Green Space at Park Hill, Skipton (SK-LGS64)
Attachments: cdc-mods-rep-form-2019-final.docx

Sir/Madam

I **attach** my comments on the reinstatement of Park Hill at Skipton (SK-LGS64) as Local Green Space in the Draft Craven Local Plan.

Yours sincerely

Roger Beck MRTPI

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mr
First Name:	Roger
Last Name:	Beck
Job Title (where relevant):	Chartered Planning Consultant (MRTP)
Organisation (where relevant):	
Address 1:	█
Address 2:	██████████
Address 3:	██████████

Address 4:	██████████
Postcode:	██████████
Telephone:	██████████
Email:	████████████████████

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM:	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

SK-LGS64 Local Green Space

The Draft Craven Local Plan was submitted to the Secretary of State on 29 March 2018. The Council's Local Green Space Assessment (2017), which accompanied the above document, is sound and robust and evidence based.

The Inspector has erred in his interpretation of the advice in National Planning Policy Guidance (February 2019), when deciding not to designate Park Hill (SK-LGS64) as a Local Green Space. The Government advice, in paragraph 100 of the above document, is clear regarding the criteria for Local Green Space designation.

Park Hill (SK-LGS64) is an elevated and imposing open area of land abutting the community it serves. It is demonstrably special to the local community of Skipton and holds a particularly local significance. The top of Park Hill is the site of a Scheduled Local Monument, namely a Civil War Battery. The site forms a backcloth and an extremely important setting not only to the Skipton Parish Church, an imposing building at the head of Skipton High Street, but also to the Grade 1 Listed Skipton Castle. Park Hill is well-used by local people due to a Public Footpath, the route of which runs from near the edge of Skipton Woods over the top of Park Hill and down to Chapel Hill. The Public Footpath offers fantastic and unparalleled views of the whole of Skipton.

The whole of Park Hill (SK-LGS64) is located within the designated Skipton Conservation Area. It constitutes an extremely important setting to the town, especially Skipton High Street.

It is concluded that the Inspector, for all the sound reasons stated above, should re-consider and reinstate Park Hill as a Local Green Space (SK-LGS64). It clearly satisfies all the criteria in paragraph 100 of the National Planning Policy Framework (February 2019).

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your

suggested revised wording to the Main Modification. Please be as precise as possible.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please **note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)

Yes, I do wish to be notified

No, I do not wish to be notified

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)

Yes, I do wish to be notified

No, I do not wish to be notified

Section 9: Signature & Date of Representation

Please sign and date below:

Signature



Date

11 March 2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ
| www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



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

Craven Local Plan Examination

-----Original Message-----

From: irmeli benjamin [REDACTED]
Sent: 20 March 2019 10:08
To: Tony Blackburn
Subject: Status of Park Hill, Skipton

Dear Tony Blackburn,
Re: Draft Policy ENV10: Local Green Space SK-LGS64.

I am writing to object to the removal of Park Hill's status as a Local Green Space from The Local Plan.

The Government guidelines states that Local Green Space designation should only be used where the green space is:

1. In reasonable close proximity to the community, it serves.
2. Demonstrably special to a local community and holds a particular local significance.
3. Local in character and is not an extensive tract of land.

Park Hill is fulfilling all 3 points, and should therefore keep the status as Local Green Space.

It is in close proximity to the whole of Skipton, and is next to Skipton Castle Woods, now maintained by The Woodland Trust.

It is the only Green Space of natural character left in town, and is NOT an extensive tract of land.

Park Hill is within the town's Conservation Area.

The public footpath to the top of Park Hill, has the best view over Skipton for everyone to enjoy.

The footpath is much used by locals, as well as visitors and people who work in Skipton, as it enables you to do either a circular or short walk from Skipton town centre without having to use any form of transport to enjoy our beautiful countryside.

I trust, you will give due consideration to this objection.

Yours sincerely,
Irmeli Benjamin

Sent from my



22 March 2019

Ms Sian Watson
Craven District Council

Dear Ms Watson

PARK HILL SKIPTON

Once again a beautiful and historical part of Skipton is under threat in the name of profit.

Park Hill is right on the edge of the town centre at the top of a very steep slope, enhancing the setting of the castle and Skipton woods, a very popular and well visited breathing space for the town's people and its visitors.

Removing this land from its protected status and allowing it to be built on will add to the chaos of our groaning infrastructure , already loaded with recent developments evident especially when roads are closed for much needed repair. The layout of the town with its canal and railway making hold ups and diversions doubly difficult.

I am also concerned with the increased flood risk if this site goes under concrete as water will flow directly into the town centre (so close is it). Add to this that an area of the floodplain is about to be built on.

Can we not see what we are doing piece by piece to our home town, to the county, to the planet? Its flora and fauna which is different from that of the woodland, will be destroyed by any development, impoverishing us all. This would be yet another building site inflicted on our town, destroying wildlife and pushing further out the little that escapes the bulldozers. All life needs its green spaces, please assist in restoring Park Hill to its protected status.

Yours sincerely



Margaret Benson

RECEIVED

15 MAR 2008

TEL. [REDACTED]

Dear Sir

We are writing to support Hellifields bid to have the Flashes designated a green space.

It is not just a extensive tract of land.


The Flashes are very important to Hellifield, particularly to both people and wildlife. The wildlife is very special, and can not be moved to a different place.

People of Hellifield use the flashes to have a nice walk a bit of peace and quiet and see the wild life

Plus a lot of people from away,
also feel the same way.

We know there has to be changes.
But Hellifield does not need a
holiday village, it does need the flashes.

So would you please consider
letting us keep the flashes as a green
space.



-----Original Message-----

From: julian berry [REDACTED]

Sent: 24 March 2019 07:25

To: Tony Blackburn; Sian Watson; Councillor John Dawson;

Subject: Consultation on changes to Craven local plan

I refer to the proposed changes to an area of land noted as SKLGS64 to the north of town, adjacent to Grassington Road, known locally as Park Hill or Battery Hill.

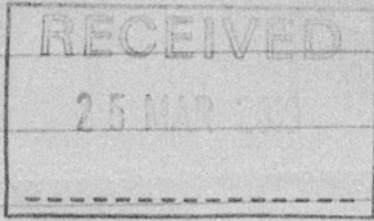
I understand it is proposed to re-designate this land from green belt to potential development land. I would like to raise an objection. The hill at the rear of Grassington Road, accessed via Chapel Hill is one of Skipton's gems. We often walk over the top and through Skipton Woods, and our children sledge there whenever there is enough snow. We take visitors there for walks to show them the great views of Skipton, and explain Cromwell's battery of the Castle and how the siege went on for so long.

We believe it would cause an irreversible change of character to Skipton to lose these amenities. Not only would future generations lose great memories of walking/playing on the hill, but a major local landmark would be tarnished by development, and with the hill having such a forbearing position, many areas of Skipton would lose a lovely view or feel over-looked, changing the image of Skipton from far up the Aire Valley.

Kind regards

Julian Berry

Sent from my iPad



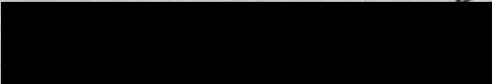
18 03 19

Dear Sian Watson.

I am 83 years old, and have lived all that time in Skepton and have the town's interests in mind.

I object most strongly the decision to remove Park Hill from the Local Plan as a designated Local Green Space, with the prospect of this unique area open to future development

It is some years since I have walked over Park Hill because I am not as mobile as I used to be, but that green space is visible from many parts of our town, and as such should be preserved as it is for everyone to enjoy in the future

Yours sincerely,


From: Katie Birks [REDACTED]
Sent: 10 March 2019 21:25
To: Sian Watson
Subject: Protecting Park Hill

I'm writing to express my concern about the decision of a government inspector to remove the protected Local Green Space Designation of Park Hill.

It is such a fantastic asset for the town, keeping the countryside close by and offering easy walks for all Skipton residents, not to mention the many visitors who come to walk our long distance footpaths. (See Section 8, para 74 of the National Planning Policy Framework - Promoting healthy communities)

Park Hill clearly meets the Local Green Space criteria (see Para 77):

- being reasonably close to the community it serves (couldn't be closer to the very heart of Skipton - it's next to the High Street!)
- demonstrably special (it's the site of an ancient monument! And the views are fabulous, tranquility is wonderful - all meeting the criteria in the National Planning Policy Framework)
- the green area is most definitely local in character, with its sheep farming and dry stone walls. It's not extensive, owing to the A road behind.

All in all, this reallocation of status at such a late stage seems almost Machiavellian in its tactics; a greedy landowner trying to slip it through using 'experts' who don't know the area. Skipton MUST hold on to this special green space.

Please let us know what we as local residents can do to make the voice of sanity heard.

Many thanks,

Katie, Malcolm, Rosa and Joe Birks
[REDACTED]

From: Derek B [REDACTED]
Sent: 28 March 2019 10:50
To: Local Dev. Framework
Subject: Main Modifications representation - deletion of SK-LGS64
Attachments: cdc-mods-rep-form-2019 MM87 SK-LGS64 Derek Blackwell.docx

I attach a copy of my representation concerning the above modification. I will also shortly hand in a hard copy to the reception at Belle Vue Mills.

Derek Blackwell
[REDACTED]

Sent from [Mail](#) for Windows 10

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mr
First Name:	Derek
Last Name:	Blackwell
Job Title (where relevant):	None – local resident and community group member
Organisation (where relevant):	Various including member of Friends of Raikes Road Burial Ground and a local branch of a political party, plus involvement in other social and community groups.
Address 1:	██████████
Address 2:	██████
Address 3:	██████████
Address 4:	

Postcode:	██████
Telephone:	██████████
Email:	██████████████████

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	None
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Derek Blackwell
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: MM87, deletion of SK-LGS64, land to north of Skipton.	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

I am making this submission as a local resident:

- who lives in sight of the space under investigation
- has enjoyed it with family and friends for 24 years
- has been prepared to accept the necessity for substantial building growth in Skipton including that adjacent to where I live without complaint
- is active with the Raikes Road Burial Ground Group amongst other concerned local community groups both social and political

I share the belief with many other local people with knowledge of this area (SK-LGS64) that this modification to the local plan is unsound and that there are important local considerations that justify the designation of an area of this size. To remove its designation is in contravention of specific parts of the National Planning Policy Framework (I understand reference should be made to the 2012 version rather than the more recent framework). Specifically the following paragraphs in Section 8 (2012) are relevant, particularly Paragraphs 76 and 77.

Paragraph 73: Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities...

For generations parts of this open space have been accessed by local people informally for walking, sledging in winter, or just enjoying the space and views. Other unprotected parts of Skipton in the local plan have never been open in the same way. As important is the fact that this area is high quality open space, often acting as a buffer, and to remove its designation will be to impact on other neighbouring protected areas both in terms of the quality of people's enjoyment, and their environmental balance (e.g. Skipton Castle Woods and the Raikes Road Burial Ground), as will be outlined below.

Paragraph 75: Planning policies should protect and enhance public rights of way and access...

Rights of way have been important to enable this access. Protection of this area includes protection of this access and enhances the public's use.

Paragraph 76: Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances.

1. Local identification: those with local knowledge (councillors, officers, local residents and groups) have been part of the process of producing a local plan for the town which is sympathetic to all concerns. This has been achieved as part of a plan which allows very significant growth and development in other parts of the town (including North Skipton), both under way and potentially taking place under the scope of the local plan. Furthermore the decision by the inspector to confirm the removal of the designation is being made in a mechanistic manner by someone who inevitably cannot have the appreciation of local issues or the nature of this area, which have been considered by the council and residents.
2. Special circumstances: The wording of the planning guidance suggests the default position is to allow local communities to designate important areas. It is difficult to see any special circumstances which would justify NOT protecting this area, particularly when so much other development is being allowed within the town. Pressure which may ultimately lead to development in this space is most likely coming from those with no investment or concern

about the local area and community.

Paragraph 77: The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:

1. *where the green space is in reasonably close proximity to the community it serves;*
2. *where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
3. *where the green area concerned is local in character and is not an extensive tract of land.*

1. Close proximity: the green space as originally proposed is close to its community. It could not be closer. It is a green space resource which projects into the historic heart of the town within easy walking distance for nearly everyone. These areas are important to the character of the town and enjoyed by local residents and visitors alike.

2. It is demonstrably special.

Beauty and tranquillity: It gives access to open peaceful vistas for all, just a short stroll from the town centre. To remove the designation, or to limit it to small pockets, would destroy this tranquillity.

Historic significance: It includes historic sites associated with the castle which can only be appreciated as part of a wider open space. It gives protection to the neighbouring Raikes Road Burial Ground which has great historic (and environmental) significance and which, without this designation could become hemmed in by building development.

Richness of wildlife: Protection is vital for environmental and wildlife reasons. It is important to nature in its own right. For example, deer regularly cross the space, birdlife can be observed, and for all wildlife it enjoys a close symbiotic relationship with the neighbouring special areas of Skipton Castle Woods and Raikes Road Burial Ground, whilst also providing a buffer for these sites from developed zones. Visit the woods during most of the year and the open space around is part of the experience. The woods are carefully managed by the Woodland Trust and enjoyed by a huge number of people of all ages from all parts of Skipton and by visitors to the town. Potentially opening the door to building close to this area will additionally impact on the wider prosperity of the town as a tourist centre. Parts of the wood already are impacted by the proximity of the by-pass. To allow building on the green space in this dispute will severely add to this by increasing noise and visual impact, and interfering with wildlife.

Flooding: This is an appropriate place at which to add a further environmental point. Whilst this adjudication does not propose or confirm future building on parts of this space, this is highly likely to take place if it is not protected. If this does happen it would carry a high level of risk of impacting the neighbouring areas by greatly increasing surface and through flow into the undeveloped areas, including the woods and burial ground. Both have suffered in recent years during times of high rainfall and flooding, and though Skipton has improved flood defences these will not help to protect these areas from damage. Such flow may even impact and flood the town centre by diverting water rapidly into Eller Beck below the location of the flood defences. Eller Beck has frequently been the source of much flooding being the water course bringing rainfall off the moors into the heart of the town,

3. It is local in character and not an extensive tract of land

Hopefully the above comments have explained the local character of this area, recognised

by local people.

A key issue here is the inspector's judgement that this area is an 'extensive tract of land'. He himself states that there are no 'hard and fast rules' on size:

'With regard to size, the Planning Practice Guidance ('the PPG') advises that there are 'no hard and fast rules' on how big Local Green Spaces can be. Instead, because places differ, a degree of judgement will be required. It does, however, confirm that the blanket designation of open countryside adjacent to settlements is not appropriate, that and Local Green Spaces should not be used as a 'back door' to achieving a new area of Green Belt.'

First, if there are no hard and fast rules, then the nature of the area and its interaction with other neighbouring areas has to be judged locally, with an appreciation and understanding of the areas importance.

Secondly, I do not believe that this can be called an extensive tract of land. A tract, yes, but extensive, no. It is not an attempt to give blanket designation to an area with considerable variety within it. If it were smaller it would be difficult to perform the functions outlined above.

Thirdly, there is no way this designation can be considered as trying to achieve a new Green Belt or protect one that exists. It is the nature of this area itself which means it needs protection. It is not part of any contiguous designation which is being used to limit or contain development in Skipton. Indeed, development IS taking place and potentially WILL take place to the north of Skipton which, if there were an attempt to impose a green belt, would not have been allowed.

Conclusion

It is clear that other land in other parts of the fringes of Skipton does not carry the significance that this green space has, historically, environmentally and as an informal public space. It is not possible for it to perform its functions if only small fragmented parts are protected from development. If there are no hard and fast rules about how large a Local Green Space can be then it is best determined by local understanding of these functions.

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

Option 1

I believe that to make this modification sound, it should be removed entirely, and the designation of this area (SK-LGS64) as Local Green Space be restored. This would mean that:

1. Access to high quality open spaces is ensured
2. Local identification is recognised as being paramount and there are no special circumstances to overrule the default position of allowing local determination
3. The designation is being applied to a space in close proximity to its community, with special

qualities of beauty, historical significance, wildlife and environment, whose damage could impact on the wider town, including increased risk of flooding. It is a distinct area with a common character, which cannot be perceived as a back door to a Green Belt.

Option 2

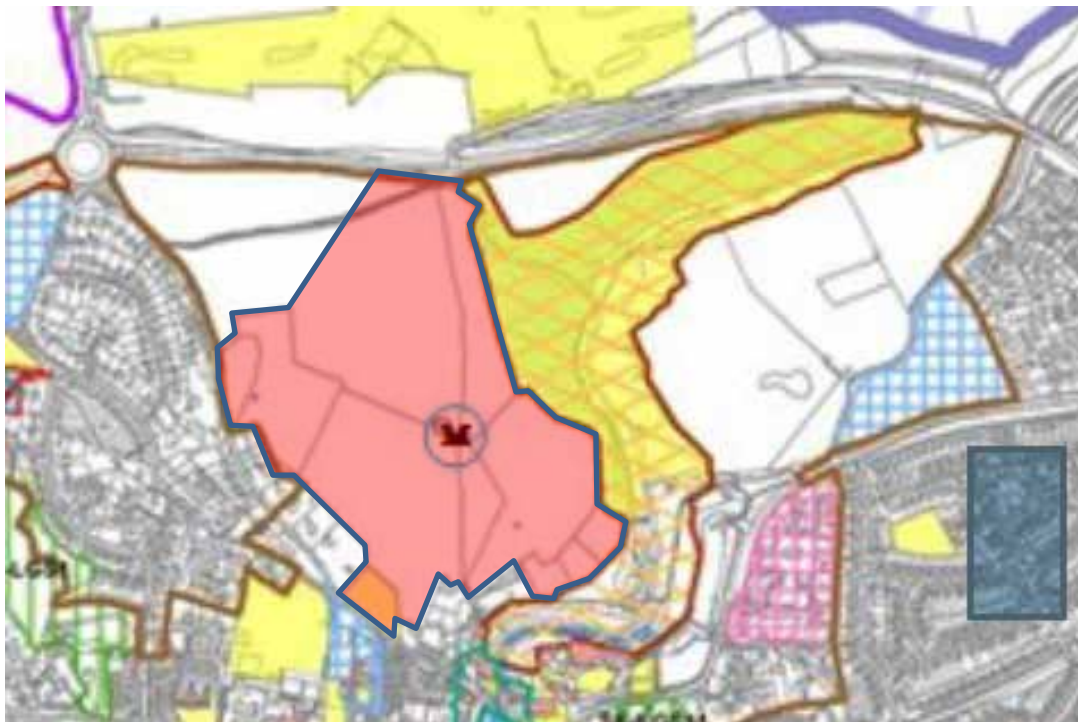
If the appeal to restore designation to the whole area is unsuccessful, then I would propose that the following area (shown in pink on the map below) be designated as a priority, being the land which:

For purposes of 'Beauty and tranquillity' protects the conservation area in Skipton woods for those enjoying them and maintains the access to open peaceful vistas for all from Park Hill and the battery site. It is the zone of open space most used by local people, being adjacent to rights of way.

Recognises 'Historic significance' and protects the historic sites associated with the castle within a wider open space, so that the context of sites such as the Battery can be seen and understood. It gives protection to the neighbouring Raikes Road Burial Ground and limits the chance of development impacting on it.

Protects the 'Richness of wildlife' and provides space that wildlife can thrive in, by:

- giving open space between the Burial Ground, Skipton Woods and the woods on Grassington Road, as a buffer or broad corridor for wildlife that moves between these three;
- retaining a habitat of enough size that could continue to function for nature found in the open space.



Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	a
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	a
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	21 March 2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ
 | www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk

From: Peter Bolton [REDACTED]
Sent: 15 March 2019 13:17
To: Local Dev. Framework
Subject: Local Plan 6 week Consultation ending Monday 1st April 2019 - HELLIFIELD FLASHES

Dear Sirs,

This is a response to the above consultation as it pertains to the designation of all or part of the area known as Hellifield Flashes as green space.

I wish to strongly support this designation as green space as I believe that it fulfils the following tests under para. 77 of the NPPF, specifically in the following aspects:

- the area known as the Flashes is bounded by housing on the east side (Station Road), partially on the south side (Kendal Road/A65) and the Community Railway Station on the north side. This demonstrates that it is in **reasonably close proximity to the community it serves.**
- there is a clearly marked public footpath through the centre of the Flashes which is regularly used by walkers and bird watchers. It is well documented that the ponds in the Flashes are used by water birds, both wintering and passage birds. On a recent walk, I myself, no expert, was able to identify whooper swans, pintail ducks, wigeon, tufted ducks, mallards and black-headed gulls. I believe that this demonstrates that the area is **of local significance, in terms of recreational value and the richness of wildlife.**

For the reasons stated above, I wish to register my strong support for the designation of the whole area or at minimum the Flash Ponds as green space.

I would greatly appreciate an acknowledgement of this response and any updates regarding further meetings and decisions relating to this vital issue for myself as one of the residents of Hellifield Village.

With Regards

Peter Bolton

[REDACTED]

Sent from my iPad

From: RICHARD BOOTHMAN [REDACTED]
Sent: 21 March 2019 10:11
To: Local Dev. Framework
Cc: Karen Boothman
Subject: Local Green Space at Hellifield

We welcome the opportunity to respond to Craven District Council's desire to designate the area bounded by Station Road, Hellifield, the A65 and the section of railway line between Hellifield and Long Preston (HE-LGS1) as Local Green Space.

We are residents of Long Preston but our house is at Bridge End, on the Hellifield end of the village. The area between here and Hellifield is an area on which we enjoy walking. The footpaths between Long Preston and Hellifield which cross this area are an opportunity for us to walk to Hellifield on a largely traffic-free route to use local facilities in Hellifield. This area is close to both villages but is, in effect, at the heart of Hellifield. Despite the area's proximity to the railway line and to the (increasingly busy) A65, it remains sufficiently remote as to be relatively tranquil and an opportunity to observe and experience nature at close quarters. Wetland is a diminishing resource in both the UK and elsewhere and if designation as Local Green Space can help to conserve this area for future generations, the opportunity should be taken.

Last Friday (15 March 2019) saw more than 1.5 million schoolchildren across the world protesting at our leaders' inability to deal with the crisis of climate change. Climate change will be exacerbated by any additional development that takes place on this site so it deserves protection. In addition, a forthcoming UN report will say that the crisis affecting the natural world is potentially even more threatening than climate change. Tens of thousands of species worldwide are at risk of extinction and as an important part of the upland wetland area around Long Preston and Hellifield, Hellifield Flashes are an important link for native and migrating wetland bird species. It is easy to say that this small area does not make a difference in the global situation but if everyone charged with protecting our natural world was to think in the same way, there would be nothing left.

We believe we owe it to future generations to provide whatever small degree of protection we can to these small but nevertheless vitally important Local Green Spaces. We commend Craven District Council and the villagers of Hellifield for their desire to offer this space, so important for community and nature, some protection.

We hope you will find our support helpful.

Richard & Karen Boothman

[REDACTED]
Telephone: [REDACTED]

email: [REDACTED]

****Please think before printing this email****

CONFIDENTIALITY NOTICE AND DISCLAIMER

This message is intended for the addressee only and contains information that is confidential and may also be privileged. If you are not the intended recipient, and you receive this communication in error, please notify me immediately by replying to this e-mail and return the original message and its attachments to me by e-mail.

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). Please fill in a separate form for each representation you wish to make.

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	MRS
First Name:	IRENE
Last Name:	BRADLEY
Job Title (where relevant):	
Organisation (where relevant):	
Address 1:	[REDACTED]
Address 2:	
Postcode:	[REDACTED]
Telephone:	[REDACTED]
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	N/A
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FOIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FOIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

If you wish your personal details to be treated in confidence and not published please tick the box below:

Please explain below, why you have made this request:

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: Equality	
Insufficient level of equality assessment conducted on site G2/4 gargrave (off Walton close/Marton Road).	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

Concern over pedestrian and wheelchair facilities as bringing extra volume of traffic on manor Road will create safety issues. On many occasions I have had to take to the grass verge to avoid traffic approaching from both directions

There is no play area for children so having to use the main road to go to the village playground would also be a safety issue

The proposed site for building on is a haven for wildlife with crested and common newts, frogs, toads, hares, rabbits and even deer.

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

- Significant investment made to infrastructure
- Equality assessment to be conducted with remediating actions put in place
- Or alternative suitable site which will cater for all disadvantaged groups

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.


Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	28-5-19

From: Michael Bramley [REDACTED]
Sent: 27 March 2019 11:04
To: Tony Blackburn; Sian Watson
Subject: Fwd: Craven planning consultation

Dear Both

I hope my submission re Skipton Park Hill, below, is in the correct format.

I'd be grateful if you'd let me know if not.

Regards

Michael

Begin forwarded message:

From: Michael Bramley [REDACTED]
Date: 27 March 2019 at 10:49:41 GMT
To: localplan@cravenc.gov.uk
Subject: Craven planning consultation

Dear Craven planning,
Please find my response attached.

Regards

Michael Bramley

[REDACTED]
[REDACTED]
[REDACTED]
Mobile [REDACTED]

**Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)
Main Modifications Consultation Representation Form**

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:
Planning Policy, Craven District Council, 1 Belle Vue Mills,
Broughton Road, Skipton, North Yorkshire, BD23 1FJ
Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone [01756 706472](tel:01756706472)

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title : Mr	
First Name: Michael	
Last Name: Bramley	
Job Title (where relevant):	
Organisation (where relevant):	
Address 1: [REDACTED]	
Address 2: [REDACTED]	

Address 3:	
Address 4:	
Postcode:	██████████
Telephone:	██████████
Email:	████████████████████
	██████████

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

If you wish your personal details to be treated in confidence and not published please tick the box below:

I wish to request that the personal details submitted with this representation are treated in confidence and not published.

Please explain below, why you have made this request:

Part B
Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM:87	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council’s Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

MM87 Policy ENV10 Local Green Space. I oppose deletion of SK-LGS64

To keep Park Hill as green space. I agree it is an extensive tract of land. An extensive tract of land that is integral to the character of the town.

1. Life in Skipton. Park Hill is vitally important to the wholeness of Skipton.

To walk out the top of the high street and climb a green hill

It is the green heart.

What is the experience of visiting Skipton to be in future.

To build over or adjacent to every walkable route within walking distance of the town.

Because for developers it converts views of countryside, canals or the town into share price. Building over open country walks; Carleton/Waltonwrays, walk to Embsay, canal borders east and west. Destroys that. For 30 years I have lived here found employment here and my home has been a place for friends and family to visit. The walk through the woods and back over battery hill is the epitome of the town's healthy inspiring worth.

2. Health and well-being. Removing the green space acts against the health of the town.

People (like me) who do not habitually drive become limited in exercise and health.

3. The environment. Paving over more land runs counter to the longer term needs of our local and national ecosystem.

Giving up this green space is the equivalent of turning Aireville Park into a car park or demolishing the castle and Holy Trinity and building a few houses there instead.

[footnote:where homes are needed : we have acres of car parks, perhaps adventurous planners could make a name for Skipton promoting handsome low rise 1,2,3 bed affordable zero-heating bill accommodation over sunken parking]

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

Protect all of Park Hill

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

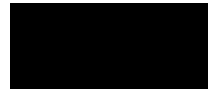
Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	<input type="checkbox"/>
	<input type="checkbox"/>

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	<input type="checkbox"/>
	<input type="checkbox"/>

Section 9: Signature & Date of Representation



Please sign and date below:	
Signature	
Date	27/03/2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ | www.cravenc.gov.uk
Planning Policy Team | [01756 706472](tel:01756706472) | localplan@cravenc.gov.uk



INVESTOR IN PEOPLE



If you would like to have this information in a way that's better for you, please telephone [01756 700600](tel:01756700600).

Craven Local Plan Examination

From: Peter Brewer [REDACTED]
Sent: 31 March 2019 22:50
To: Local Dev. Framework
Subject: Main Modification Representation
Attachments: Craven Local Plan Representation MM17+MM119_PB.pdf

Dear Sir,

Please find attached a representation against two of the Local Plan Main Modifications (MM17 & MM119). In the attached there are two Part B sections, one for each of the representations.

Regards

Peter Brewer

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk


For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mr
First Name:	Peter
Last Name:	Brewer
Job Title (where relevant):	
Organisation (where relevant):	
Address 1:	
Address 2:	
Address 3:	

Address 4:		
Postcode:		
Telephone:		
Email:		

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: 17	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

The reasons for objection/representation are against areas SK081, SK082 and SK108:

- Infrastructure and Access : The proposed changes will mean the planned development will not be supportable by the existing infrastructure, e.g. roads, drains, access
- Site of Historical Importance: The site of the proposed Primary School in the above areas is a site of local historical importance. There was the Raikeswood Prisoner of War Camp on the site and the archaeological remains would be completely destroyed if the school or additional housing was to be allowed on the site. This would prevent any future examination of the site, which is important to the history of the town
- Detrimental to the Existing Community : A new school or additional housing on the scale proposed in the Main Modification 17 would cause a major detrimental effect on the existing local community. The extent of the changes are completely out of scale for the local area
- Loss of existing Greenfield Site: A new school or additional housing on the scale proposed in the Main Modification 17 would cause an unacceptable detrimental impact to the existing residents and loss of wildlife, flora and fauna in the area
- Skipton Approach & National Park Proximity : A new school or additional housing on the scale proposed in the Main Modification 17 would cause a detrimental effect on the westerly approach to the town, and given the proximity to the Yorkshire Dales National Park, would damage the towns "Gateway To The Dales" philosophy

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

Removal of, or massive reduction in scale, of the planned changes affecting areas SK081, SK082 and SK108

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.


Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	<input checked="" type="checkbox"/>
No, I do not wish to be notified	<input type="checkbox"/>

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	<input checked="" type="checkbox"/>
No, I do not wish to be notified	<input type="checkbox"/>

Section 9: Signature & Date of Representation

Please sign and date below	
Signature	
Date	31/03/2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ |
www.cravendc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravendc.gov.uk



INVESTOR IN PEOPLE



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

Craven Local Plan Examination Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: 119	

Section 4: Legal Compliance & Duty to Cooperate

Do you consider that this modification of the Local Plan is: (tick as appropriate)

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravencdc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

Point B (i)

The reasons for objection/representation are against areas SK081, SK082 and SK108:

- At a time when there is an existing Primary School in Skipton which is being allowed to be closed by the Education Authority, it is unacceptable to plan or approve a new Primary School in the town. Clearly the requirement for Primary education is currently being met in the town. If there is a firm future requirement for additional Primary School places then the existing Primary School pupil numbers should be re-allocated within the town to maintain Broughton Road Primary school up to the time when new housing raises the pupil numbers.
- It makes no commercial or practical sense to close one Primary school only to build a new school at a different location at some point in the foreseeable future.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

Delete Point B (i) from the Local Plan and replace it with a description / process to maintain the existing Broughton Road Primary School in the Plan

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	v
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	v
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below	
Signature	[REDACTED]
Date	31/03/2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ |
www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



INVESTOR IN PEOPLE



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

From: Roy Bridges [REDACTED]
Sent: 01 April 2019 16:15
To: Local Dev. Framework
Subject: Craven Local Plan 2012 - 2032 Consultation
Attachments: R Bridges Consultation Craven Local Plan Mod 1 April 2019.pdf

Please find attached representations detailed in the appropriate completed form, parts A & B, regarding the Craven Local Plan consultation.

If any clarification is required please do not hesitate to contact me.

Best wishes
Roy Bridges

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk


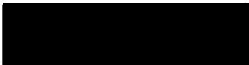
For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). Please fill in a separate form for each representation you wish to make.

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	MR.
First Name:	ROY
Last Name:	BRIDGES
Job Title (where relevant):	—
Organisation (where relevant):	—
Address 1:	
Address 2:	
Address 3:	

Address 4:	[REDACTED]
Postcode:	[REDACTED]
Telephone:	[REDACTED]
Email:	[REDACTED]

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

If you wish your personal details to be treated in confidence and not published please tick the box below:

I wish to request that the personal details submitted with this representation are treated in confidence and not published.	<input checked="" type="checkbox"/>
---	-------------------------------------

Please explain below, why you have made this request:

Do not wish details to be available to third parties without my permission.

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	ROY BRIDGES (individual)
To which Main Modification (MM) does this representation relate?' (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: 17 (Sustainability Report)	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

Regarding access to sites referenced 081, 082, 080a & 108, the Sustainability Report identifies four possible access routes. Two of these routes are through residential streets on an existing housing estate (Park Wood Way & Parkwood Drive). Given that the proposed plan includes 339 houses, we could expect that more than 500 cars would regularly use this route on a daily basis. In addition, significant traffic would be generated by the proposed school.

To use one of these two routes would be ~~dangerous~~ ^{& inappropriate}

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what change(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

It should be stipulated that access cannot be through existing residential streets on the Rockwood estate (Park Wood Way & Parkwood Drive).

Direct access from Gargrave Road is acknowledged to be possible (NYCC Highways), so routing traffic of such volume through a housing estate is unnecessary.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	✓
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	✓
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	[REDACTED]
Date	01/04/2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ | www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



INVESTOR IN PEOPLE



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

Craven Local Plan Examination

From: Andrew Brown [REDACTED]
Sent: 19 February 2019 09:17
To: Local Dev. Framework
Subject: ack email sent 19.2.19 Park Hill
Attachments: local plan representation cdc-mods-rep-form-2019.docx

Follow Up Flag: Follow up
Flag Status: Completed

Attached is a representation on amendments to the local plan. I'd be grateful if you could acknowledge that I've sent it to the right place

Cllr Brown

Andy Brown stood for Parliamentary for the Green Party in the constituency of Skipton and Ripon. 3,734 people voted for him in 2017 an increase of over 600 votes
He is District Councillor for Aire Valley with Lothersdale
Follow him on Twitter via [@voteandybrown](#)
See his blog via [votegreenandybrown.weebly.com](#)
You may also wish to become a friend of Facebook of Skipton and Craven Green Party
The Green Party - for the common good.

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Councillor
First Name:	Andrew
Last Name:	Brown
Job Title (where relevant):	District Councillor for Aire Valley with Lothersdale
Organisation (where relevant):	Green Party
Address 1:	██████████
Address 2:	██████████
Address 3:	██████████

Address 4:	██████████
Postcode:	██████████
Telephone:	██████████
Email:	██

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal and Habitats Regulation Assessment that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal and Habitats Regulation Assessment will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Councillor Andrew Brown
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: MM87 The deletion of Local Green Space SKLGS64 under Policy ENV10 Local Green Space. This deletion does not comply with national planning policy*.	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

The Park Hill area is an important piece of green space that is integral to one of the most important heritage and tourism walks that Skipton has to offer. Castle Woods provides one of the best woodland walks in the country that can be accessed from a town centre. Park Hill is the prime return route for circular walkers.

It is also an area of major historical importance having been the prime site of importance in the siege of Skipton Castle. It was from this hill that the artillery battered the castle and the remains of that siege would be disturbed in any development

Finally the area of land is important in its own right as a wildlife refuge. An important starling murmeration has been taking place above this land every evening during the winter and there is a risk of losing that spectacular natural event and of weakening an important area for wildlife that adjoins the nationally significant refuge of Skipon Woods.

The Park Hill area of land is not large and it is not unreasonable to designate it as a Green Space. The intention of legislators when they insisted that large new areas of Green Space could not be designated was to prevent the establishment of new Green Belts. This area of land does not fall under that category and is clearly in line with the intention of legislators to allow local planners who meet their housing need to identify important heritage spaces of high quality and define them as Green Spaces to be protected. Should inspectors insist that spaces of this size cannot be protected then they are making new law and virtually guaranteeing that no quality green space can be protected as almost all biodiverse green space needs to be of at least the size of Park Hill to permit plant, insect and bird species to have sufficient space to breed.

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

The full extent of the Park Hill area must be designated as a local Green Space in line with every previous version of the plan that went out to public consultation

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published


Would you like to be notified that the recommendations of the Craven Local Plan Inspector have

been published? (please select one answer with a tick)	
Yes, I do wish to be notified	yes
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	Yes
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	19 th Feb 2018

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ
 | www.cravencd.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravencd.gov.uk



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

Craven Local Plan Examination

From: Andrew Brown [REDACTED]
Sent: 28 February 2019 14:54
To: Local Dev. Framework
Subject: Main modifications - objections
Attachments: cdc-mods-rep-form-2019-final andy brown Hellifield flashes.docx

Dear CDC

Attached are some comments I would like to see taken into consideration during the investigation of main modifications to the local plan as regards Hellifield Flashes

Andy

Andy Brown stood for Parliamentary for the Green Party in the constituency of Skipton and Ripon. 3,734 people voted for him in 2017 an increase of over 600 votes
He is District Councillor for Aire Valley with Lothersdale
Follow him on Twitter via @voteandybrown
See his blog via votegreenandybrown.weebly.com
You may also wish to become a friend of Facebook of Skipton and Craven Green Party
The Green Party - for the common good.

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Councillor
First Name:	Andy
Last Name:	Brown
Job Title (where relevant):	District Councillor Aire Valley with Lothersdale
Organisation (where relevant):	Green Party
Address 1:	[REDACTED]
Address 2:	[REDACTED]
Address 3:	[REDACTED]

Address 4:	██████████
Postcode:	██████████
Telephone:	██████████
Email:	██

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Craven District Green Party
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM:87 in particular HE LGS1	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your

comments.

I believe it is unsound to restrict the designated area of Green Space at Hellifield flashes to a small area. The whole point of listing this as a Green space is to protect a rare wildlife haven of wetland. There is very little natural wetland in Craven and none of this size and importance adjacent to the National Park. The space needs protecting as a whole to provide a proper refuge for migrating birds and is valued as a whole by local Hellifield walkers and by walkers and wildlife specialists from across the District and beyond. There are great crested newts on this site that need freedom of movement between the different ponds. There are populations of eels that are now rare and threatened and will be important for restoring healthy populations to local rivers. Protecting small sections of this site simply doesn't cut it in terms of preserving the wildlife refuge.

The intention of the act was never to forbid local councils from designating areas of only small farm size from being designated as protected Green Spaces if the overall housing need was met and these areas were widely recognised as being important heritage assets. The intention of the legislators was to prevent new Green Belts from being established inappropriately. There is nothing out of line with the act in protecting the whole of this important Green Space in line with the expressed wishes of local citizens. It is only necessary to study the letters pages of the Craven Herald over the past two years to find ample evidence of the long term value the community places on the entirety of this wildlife resource.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

List the whole of Hellifield flashes not part.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.


Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	Yes
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	Yes
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	28th Feb 2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ |
www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



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

Craven Local Plan Examination

-----Original Message-----

From: Toby Butcher [REDACTED]
Sent: 31 March 2019 22:28
To: Tony Blackburn; Councillor John Dawson; Sian Watson; [REDACTED]
Subject: Park Hill

Good evening

I would like to object in the strongest possible terms to any houses being built on Park Hill, on the north edge of Skipton.

Park Hill is the gateway to the dales, it is part of a walk used by hundreds of people every week as they walk around Skipton Forest, a forest dating back to 1066. It is also the start of the Dales Highway, which is used by hikers and ramblers on a daily basis, it forms an amazing start as you walk out of Skipton and in no time at all are faced with the glorious Yorkshire Dales.

Having witness the destruction of a conservation area already on Chapel Hill, to grant planning permission for 2 poorly designed and unnecessary houses, I hope that common sense can prevail and people see we must protect these wonders that we have at our doorstep and not take them for granted. Once destroyed, they cannot be replaced and do not recover, the destruction on Chapel Hill that has occurred in a single week has shown that already and quite frankly an investigation should be run to see how that was approved and those involved in it should be thoroughly ashamed by the section they have made and the wildlife they has destroyed.

So I ask you to be able to hold your head high and protect the natural beauty we have, so that future generations can enjoy it and remind you that Skipton is the Gateway to the Dales and Park Hill is what physically connects Skipton to it.

Toby and Elizabeth Butcher.



From: Emmeline [REDACTED]
Sent: 31 March 2019 19:44
To: Tony Blackburn; Sian Watson
Subject: Local Green Space Designation for Park Hill

Dear Tony Blackburn and Sian Watson,

We would like to object to the removal of the Local Green Space Designation for Park Hill in the recent changes to the Local Plan.

Although we no longer live in Skipton, we regularly walk through Skipton Woods and over Park Hill as a good circular route. It is one of the only places you can get a really good bird's-eye view of the town without doing a good hike, so it is valuable as a walk for those who cannot access more remote areas, so we often do this when people come to visit. It is within easy walking distance from the town and is the only short circular route through countryside which is available from the centre.

Removal of the Local Green Space Designation will leave Park Hill at risk of development which would ruin this area of countryside and the enjoyment of people in and around Skipton.

Please would you take these comments into consideration as part of this public consultation.

Regards,

Mark and Emmeline Butler

From: Simon Tucker [REDACTED]
Sent: 01 March 2019 15:14
To: Local Dev. Framework
Subject: Proposed Main Modifications to the Publication Draft Craven Local Plan - Comments form the Canal & River Trust
Attachments: cdc-mods-rep-form-2019-final.docx

Dear Sir/Madam

Thank you for your consultation on the Main Modifications for the Craven Local Plan.

Please find our comment on MM22, relating to SK101 attached.

I hope this is of use. If you have any questions, please feel free to contact me on the details below.

Kind Regards

Simon Tucker MSc MRTPI
Area Planner North East, Canal and River Trust

T [REDACTED]
E [REDACTED]

Canal & River Trust

Fearns Wharf; Neptune Street; Leeds; LS9 8PB

www.canalrivertrust.org.uk

Sign up for the Canal & River Trust e-newsletter www.canalrivertrust.org.uk/newsletter

Follow @canalrivertrust from the Canal & River Trust on Twitter

Please visit our website to find out more about the Canal & River Trust and download our 'Shaping our Future' document on the About Us page.



Keep in touch

Sign up for the Canal & River Trust e-newsletter <https://canalrivertrust.org.uk/newsletter>

Become a fan on <https://www.facebook.com/canalrivertrust>

Follow us on <https://twitter.com/canalrivertrust> and <https://www.instagram.com/canalrivertrust>

This email and its attachments are intended solely for the use of the intended recipient. If you are not the intended recipient of this email and its attachments, you must take no action based upon them; please delete without copying or forwarding and inform the sender that you received them in error. Any views or opinions expressed are solely those of the author and do not necessarily represent those of The Canal & River Trust.

Canal & River Trust is a charitable company limited by guarantee registered in England & Wales with company number 7807276 and charity number 1146792. Registered office address First Floor North, Station House, 500 Elder Gate, Milton Keynes MK9 1BB.

Cadw mewn cysylltiad

Cofrestrwch i dderbyn e-gylchlythyr Glandŵr Cymru <https://canalrivertrust.org.uk/newsletter>

Cefnogwch ni ar <https://www.facebook.com/canalrivertrust>

Dilynwch ni ar <https://twitter.com/canalrivertrust> ac <https://www.instagram.com/canalrivertrust>

Mae'r e-bost hwn a'i atodiadau ar gyfer defnydd y derbynnydd bwriedig yn unig. Os nad chi yw derbynnydd bwriedig yr e-bost hwn a'i atodiadau, ni ddylech gymryd unrhyw gamau ar sail y cynnwys, ond yn hytrach dylech eu dileu heb eu copïo na'u hanfon ymlaen a rhoi gwybod i'r anfonwr eich bod wedi eu derbyn ar ddamwain. Mae unrhyw farn neu safbwynt a fynegir yn eiddo i'r awdur yn unig ac nid ydynt o reidrwydd yn cynrychioli barn a safbwyntiau Glandŵr Cymru.

Mae Glandŵr Cymru yn gwmni cyfyngedig drwy warant a gofrestrwyd yng Nghymru a Lloegr gyda rhif cwmni 7807276 a rhif elusen gofrestredig 1146792. Swyddfa gofrestredig: First Floor North, Station House, 500 Elder Gate, Milton Keynes MK9 1BB.

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	MR
First Name:	Simon
Last Name:	Tucker
Job Title (where relevant):	Area Planner (Yorkshire and North East)
Organisation (where relevant):	Canal & River Trust
Address 1:	Fearns Wharf
Address 2:	Neptune Street
Address 3:	Leeds

Address 4:	
Postcode:	LS9 8PB
Telephone:	██████████
Email:	██

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Canal & River Trust
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: 22	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

This modification relates to site SK101 (East of Keighley Road), which sits to the east of the Leeds & Liverpool Canal.

Although the Trust do not object in principle to the proposed modification, we wish to highlight that the new wording, which states that a PROW will be created along the proposed green infrastructure corridor, could indirectly encourage the removal of mature vegetation on site.

The land alongside the canal is heavily wooded in this location. We are concerned that the above wording implies that a PROW will be created along the canal itself (which forms a central part of the green infrastructure corridor). As a result, there is a risk that the imposition of a new footpath or other PROW could require the removal of trees. The existing vegetation adds significantly to the existing character of the canal and also provides a habitat for wildlife. As such, their removal could be contrary to the aims of draft policies ENV3 and ENV4 of this Local Plan document and also the aims of paragraph 170 (part d) of the National Planning Policy Framework, which seeks to avoid harm to biodiversity.

We therefore would advise that the wording is amended to make it clear that the construction of the PROW will not be at the expense of existing trees fundamental to the function of the Green Infrastructure Network.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

We advise that, in the event that the PROW is promoted in the site allocation, the wording should imply that the route should safeguard existing trees on site.

This would make the Main Modification sound, as it would not indirectly promote the removal of trees that could otherwise be contrary to the aims of draft policies ENV3 and ENV4 and NPPF paragraph 170.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

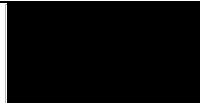
Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)

Yes, I do wish to be notified	X
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	X
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	01.03.2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ | www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



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

Craven Local Plan Examination

From William Carmichael

[REDACTED]

[REDACTED]

[REDACTED]

Dear Sir or Madam:

I wish to object to the removal of Park Hill as a protected Local Green Space from the Craven District Council local plan.

Apparently, this has been done at the request of a landowner whose agent has claimed that Park Hill is not important to the locality.

Park Hill is a beautiful green space very close to the town centre offering superb views of Skipton and is highly valued by the people who live close by as well as visitors to the area.

As a Skipton resident of more than 20 years standing I can state that this is emphatically not the case.

It forms part of two long distance footpaths – A Dales High Way and Lady Anne’s Way and is part of the Conservation area.

It also has historical significance in that it was the site of a battery during the English Civil Wars of the 17th Century.

It is not an extensive tract of land as it consists of not more than a couple of fields closely bounded by Skipton Woods and Grassington Road.

Government guidelines state that Local Green Space Designation should only be used where the green space is:

- (a) In reasonably close proximity to the community it serves.
- (b) Demonstrably special to the local community and holds a particular local significance, for example because of its beauty, historic significance, recreation value, tranquility or richness of its wildlife.
- (c) Local in character and not an extensive tract of land.

For the reasons highlighted above Park Hill unquestionably fulfills all of these requirements.

I trust that having become aware of the strength of local feeling and the value attached by local people to Park Hill that the decision to remove its designation as a protected Local Green Space will be reversed.

Yours Sincerely

William Carmichael



23 March 2019



Mrs Sian Watson
Spatial Planning Manager
Craven District Council
1 Belle View Square
Broughton Road
Skipton
BD23 1FJ

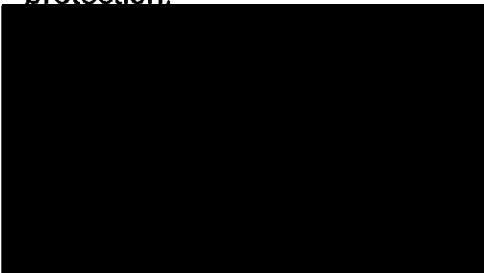
Dear Mrs Watson

Protection of the Park Hill area of Skipton

I am concerned to learn that the Park Hill area of Skipton, bounded by Grassington Road, Short Lee Lane, Skipton Woods and Chapel Hill could be deleted as a local green space from Craven District Council's spatial plan.

This area of countryside is of particular beauty and historic significance and is in fact the area where the 'Gateway to the Dales' starts. The area is tranquil and has a vast assortment of wildlife. Any development in this area would have an adverse effect on the character and appearance of the countryside. The whole of the area is used for recreation. Many people visit Skipton Woods via Short Lee Lane (off Grassington Road) including local dog walkers, ramblers and birdwatchers.

The Craven District Council's Local Plan has allocated sufficient land for future housing needs without having to adopt the Park Hill area for development. The Park Hill area needs to have protection.



Geoffrey Carter

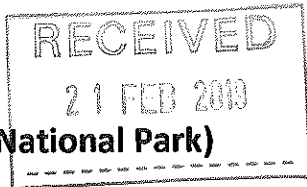
25 MAR 2010

20-3-19



To Sian Watson

I have lived in Skipton for eighty seven years and walked over Park Hill many times. I have met and talked with visitors on the hilltop and they all told me it was a super walk with great views and only 5/10 minutes from the High Street. It is part of the town's history and I cannot believe that the local Green Space Designation could even consider the proposed plan. This great green hump, a background for Skipton, can be seen from many places and belongs to the community. It may not mean anything to people who do not live here and have no conception of its demise. I am begging for the plan to be dropped and I speak for many local people who feel as I do. It would be a disaster and more green space gone with The Wind.



Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk


For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). Please fill in a separate form for each representation you wish to make.

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mr
First Name:	David
Last Name:	Chadwick
Job Title (where relevant):	
Organisation (where relevant):	
Address 1:	
Address 2:	
Address 3:	

Address 4:	
Postcode:	
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal and Habitats Regulation Assessment that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal and Habitats Regulation Assessment will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM:87 The deletion of Local Green Space SK-LGS64 under policy ENV10 Local Green Space	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

I find the decision to delete LGS64 unsound. It is not justified based on the available evidence set out below.

The National Planning Policy Guidelines state that a Local Green Space (LGS) should be:

1. Reasonably close to the community it serves.
2. Demonstrably special to the community
3. Holds a particular local significance
4. Local in character and not a large tract of land

- **LGS 64 is close to the community it serves.** It connects the Castle, Skipton Woods with the town centre and local residents. Reasonably close is usually classed as within walking distance or 1.5 miles. This makes this piece of land accessible by most Skipton residents.

- **LGS 64 is special to the community.** At a Local Community Engagement Event held in 2013 as part of the preparation of the Local Plan the site LGS 64 was overwhelmingly rejected as a development site. It had the most objections and least support of all the main proposed development sites. Many positive comments were left about its special character. Below are some examples taken from the report:

- "Key part of Skipton's setting and history. High amenity value. Should not be developed."

"This should become part of Skipton Woods. This area has Yorkshire Dales character. People don't come to view housing on surrounding hillsides> protect hills visible from the town"

"To develop Whitehills Road / Grassington Road would result in Skipton no longer being the gateway to the Dales"

"Impact upon the High Street and impact on Skipton Woods. Massively devastating. Visual impact. Possible flood risk."

"Beauty spot / woods impact (SK084)"

The full summary report can be viewed here:

https://www.cravendc.gov.uk/media/2501/skipton_event_feedback_information.pdf

After the news that SK084 had been rejected there was an outpouring of local support on social media. See the links below:

<https://www.facebook.com/photo.php?fbid=365940650907787&set=gm.2223039627950137&type=3&eid=ARCNrutk9tRK8jiTgz7m3DABaOb9-t3Cmfqoab3pXC8yUh9iUcJhqcB-JKBnLbRFaxrZdyZ-wMds6hQl&ifg=1>

<https://www.facebook.com/SkiptonCivicSociety/posts/1234744926694959>

The area is crossed by 2 public rights of way. The area is used by the majority of Skipton's dog owners as a scenic route around the Woods and town as well as by many tourists and taking a route out from the top of the ever popular Skipton Woods, many pausing to take photographs. On some days there is a procession of people walking along the lane and enjoying this unique vista.

I would imagine that mine is not the only representation in support of this LGS given the mounting local concern.

All of the above prove that this area of land is special to the local community.

- **SK 64 Holds a special local significance** The top of Park Hill houses a scheduled local monument – a civil war battery. From the top of the hill there is a unique vantage point overlooking the Castle, Church and high street in one direction whilst in the other, views over Skipton Woods and over the fields to the Dales and Embsay Crag. This is part of the reason Skipton is dubbed the “Gateway to the Dales”.

Historic England, Skipton Civic Society and Craven Council all support this area as LGS. It lies within the Skipton Town conservation area and has done for a long time.

Historic England’s Planning Advisor, Ian Smith wrote:” In view of the acknowledged importance that this area makes to the character of the town, it is wholly appropriate that the Vision and, especially, Policy ENV2 identifies this area as an element to which particular attention will be made in decision-making”.

He further added :

“Map 4 of the Appraisal identifies the most significant views and vistas across the Conservation Area. The view over the town, from Park Hill is identified as one of the most important of those views. Map 6 of the Appraisal identifies all the land between the Castle and the A65 as making an important contribution to the character of the Conservation Area. Paragraph 4.11.1 identifies the grounds of Skipton Castle and Park Hill, specifically, as forming part of this open area which enhances the environment and character of the Conservation Area.”

The land was gifted to the Jesuits 200 years or so ago and has been enjoyed by generations of towns people and tourists ever since as a place to view the town and Dales as well as enjoy the walking and open space so close to their community.

The site is directly adjacent to Skipton Woods which is a listed area steeped in history and varied flora and fauna. The site has large lengths of ancient hedgerows, either side of the lane and many mature trees and copses that support many species of flora and fauna. In addition when the lower levels flood and leave temporary ponds this attracts wetland birds such as Curlew, Lapwing and Dunlin.

- **SK64 is local in character.** The land is mainly open farmland which is prone to occasional flooding. It has sheep and cows kept there. It is bordered by hedgerows abundant in wildlife as well local stone walls. It’s green, open and hilly. As character goes you could not get more local.

Is not a large tract of land. This point is debatable. The National Planning Policy Guidelines do not give any specific size guide lines as to what is too large. It does state that” a degree of judgement will be required” as all places are different. Skipton’s Park Hill area is one of those places. It is naturally bordered by Skipton Woods, the town

centre, Grassington road and the bypass.

In response to SK LGS64 being rejected as LGS because of its size the Council proposed a smaller part of this area SK LGS50 which is about a third of the original size. This was objected to by representation from YoungsRPS (EL5.0087) on behalf of the land owners . He argued that the land was not “demonstrably special to the local community” and that there was “no evidence of local support”. Both these points are ill-judged and without evidence. I refer to the points raised above as to the reasons why.

The letter from YoungsRPS (EL5.0087) also casts doubt that the site “has historic significance, is rich in wildlife and of recreational value” . Clearly the Land Agent is not a local person or he would know that these statements are easily justified. Indeed the Government Inspector acknowledges that the area is “locally important” and “historically significant” in his letter (EL5.003) All the arguments for LGS64 hold true for LGS50 apart from the listed monument site.

A further claim from YoungsRPS suggests that at 5.5ha SKLGS50 is “still an extensive tract of land”. A quick search of other district’s LGS designations yields many sites that are bigger but have not been challenged as “extensive tracts of land” and have been passed. For example LGS5 in South Downs area which is 6.8ha. This area is also an open field system with hedges and historical significance.

https://www.southdowns.gov.uk/wp-content/uploads/2017/10/local_green_spaces_and_green_infrastructure_report.pdf

Harrogate and Knaresborough also have larger pieces of land designated as LGS. Many precedents have been set and so this argument should be dismissed.

The reason given by the Government Inspector was that the land in LGS50 did not conform to paragraph 77 of the framework. Again I refer to the points raised above why this is not the case.

Comparing LGS50 with other LGS in Skipton

LGS 46, LGS47, LGS48, LGS49 and LGS51 were other sites proposed for LGS but these were not recommended for deletion. Yet these are similar sized pieces of farmland on the approach roads in to Skipton and very similar in nature and size to LGS50. There is no clear evidence of local historical significance, recreational amenity or community support for these areas yet they were allowed to stay in the plan. The only difference was that these were not objected to by a Land Agent who had an active interest in increasing the value of the land for their client. Hence it is significant that LGS50 was only rejected after a representation (EL5.087) that can be argued is inaccurate and misleading and could have unfairly influenced the Government Inspector in his decisions.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

If the inspector is adamant that the original LGS64 does not meet the criteria of the framework due to its size then the alternative proposed LGS50 should be accepted. It is much smaller and there are already larger designated LGS sites elsewhere in the country and similar LGS sites in Skipton that have been passed without objection.

Modification:

Retain SK64 as a LGS

OR

Adopt SK50 as a LGS

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.


Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	X
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	X
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	20/2/2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ |
www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



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

Craven Local Plan Examination

From: Debbie Chalashika [REDACTED]
Sent: 30 March 2019 11:20
To: Local Dev. Framework
Subject: Park Hill

Dear Sir

I would like to raise a concern about Park Hill being removed from the Skipton designated green space status. Park Hill is a well used resource as part of the circular walk through Skipton Woods, a lovely walk that attracts visitors to the area as part of a Skipton experience. Over the last few years there has been an effort to develop the amenities in the woods creating a truly wonderful walk. Removing designated green space status from Park Hill would be a travesty, conflicting with what is being achieved in the Woods.

Skipton Woods enjoys a rich biodiversity of both flora and fauna. The bird life is amazing. In order to maintain that rich biodiversity, surely we need to maintain a variety of ecosystems. The contrasting nature of the grassland / meadow ecosystem of Park Hill and the woods, encourages a variety of organisms to use the area so maintaining the food chains in the woodland. Surely we should not jeopardise this.

Park Hill is part of a refuge for both humans and another animals, in a town that seems to be growing at an alarming rate. Surely we need to maintain the historical significance of the Hill, the fanstatic view of the town for all to enjoy, as well as the biological significance of the area. Please do not ruin what Skipton to means to so many people. The heart of the town is being eroded away in the name of development.

Kind regards

Debbie
Debbie Chalashika

Sent from my iPad

[https://image.ibb.co/dBE9qJ/bgs_main_school_identity_rgb.jpg]

This communication contains information which is confidential and may also be privileged. It is for the exclusive use of the intended recipient(s). If you are not the intended recipient(s) please note that any distribution, copying or use of this communication or the information in it is strictly prohibited. If you have received this communication in error please notify us by e-mail ([REDACTED]) or by telephone ([REDACTED]) and then delete this e-mail and any copies of it.

Any opinions expressed in this e-mail are those of the sender, except where specifically stated to be those of Bradford Grammar School.

Follow us on Twitter: @BradfordGrammar

Find and like us on Facebook:

www.facebook.com/bradfordgrammarschool<<http://www.facebook.com/bradfordgrammarschool>>

Connect with us on LinkedIn:

www.linkedin.com/company/bradfordgrammar<<http://www.linkedin.com/company/bradfordgrammar>>

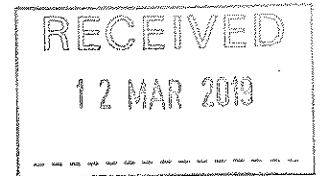
Visit our website:

<span style="color: #1155

SIAN WATSON,
(SPATIAL PLANNING MANAGER)
CRAVEN DISTRICT COUNCIL,
1, BELLE VUE SQUARE,
BROUGHTON ROAD,
SKIPTON.



9.3.2019.



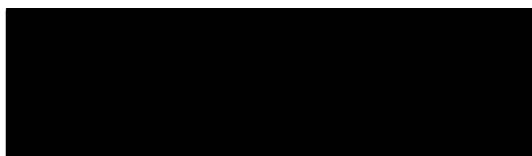
Dear SIAN WATSON,

Re Park Hill Local Green Space Designation, Skipton.

Park Hill, in the Town's Conservation Area, needs to be re-instated as a Local Green Space. I object to its removal.

Reasons:

- * It is a vital Green Space to the setting of the historic market Town- a Town characterised by many rows of tightly packed terraced housing with no gardens, amongst its other buildings.
- * The top of Park Hill commands a spectacular view of the Town, its setting, and the River Aire valley.
- * The Norman Castle, Grade 1* Listed, still lived in, is adjacent. Its setting would be compromised by any housing development.
- * Park Hill is a mere 300- 400 meters from the earliest (1300s or earlier) part of Skipton, still an historic market Town. Park Hill has an historic, scheduled Battery on it – a reminder of the turbulent times of the 1600s Civil War.
- * Park Hill is part of "The Dales High Way" and "The Lady Anne Way", distance footpaths. It is special, and enjoyed by local and visiting walkers, with access so near the Town centre.
- * The adjacent Skipton Woods' historic waterworks comprising, the leat to the Corn Mill, once powered by its still extant waterwheel, dams and sluices whose water powered mills down to and along Broughton Road, would be compromised by any housing development.
- * The hard standing of any development, roofs, walls, garages, access roads, would create a huge flooding risk to the whole of the Conservation Area of Mill Bridge, Raikes Road, Water Street, when heavy rainstorms shoot water down Chapel Hill, Eller Beck, Springs Canal off the steep Park Hill.
- * 6 Green Field sites in the Town are about to be, or are being built on, or have already been built on recently. Plus Park Hill?? Where are all the jobs for these "Housing Target" residents? In Manchester? Leeds? Sheffield? They are not in Skipton. The resulting commuter traffic pollution is not acceptable in today's world. It is bad enough now.
- * Separate Park Hill from the field to the east of Skipton Woods. It is a special place, not too big, with a variety of fauna and flora. Who did the required wildlife assessment of the area? Park Hill should never have had its protected Local Green Space designation (March 2018) removed.



From: JCF [REDACTED]
Sent: 31 March 2019 23:39
To: Tony Blackburn; Sian Watson; Councillor John Dawson; [REDACTED]
Subject: Re: Craven District Councils removal of Park Hill as designated area of protected green space from the Local Plan: Schedule of Policy Map Changes (EL6.008)

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Re: Craven District Councils removal of Park Hill as designated area of protected green space from the Local Plan: Schedule of Policy Map Changes (EL6.008)

Dear Councillors/Council Officers/Julian Smith M.P

I write with disappointment and disgust at the decision to remove Park Hill as protected Local Green Space from the designated Local Plan (March 2018).

My family has been a part of the community in Skipton since the early 1800's. Over the years we have enjoyed many walks over Park Hill especially more recently, when my children were younger.

It is a beautiful place enriched by interesting flora and fauna, outstanding views and home to a unique site of historical significance: Park Hill earthwork - Civil war battery. Historic England, scheduled monument list entry no: 1004878

https://mapservices.historicengland.org.uk/printwebservicehle/StatutoryPrint.svc/4914/HLE_A4L_NoGrade%7CHLE_A3L_NoGrade.pdf

It is without question a hugely important and significant part of the town that needs preserving for future generations.

I simply fail to understand how this has changed from being protected Local Green Space from the designated Local Plan (March 2018) within less than 12 months with no logical explanation.

As elected Councillors surely it is your responsibility to protect areas such as this for the people of Skipton whom you have been selected to represent.

Yours faithfully

Jill Clayton French

Copy to:

ABlackburn@cravenc.gov.uk

swatson@cravenc.gov.uk

[REDACTED]

[REDACTED]

From: Steve Coetzer [REDACTED]
Sent: 31 March 2019 14:53
To: Local Dev. Framework
Cc: Steve Coetzer
Subject: Main Modifications Consultation Representation Form Local Plan 2012 – 2023
Attachments: CCE31032019.pdf

Importance: High

Please find attached comments on the modifications made on the Craven Local Plan 2012 – 2023

Steve Coetzer

E: [REDACTED]
M: [REDACTED]

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

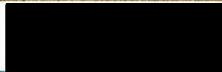

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mr
First Name:	Stephen
Last Name:	Coetzer
Job Title (where relevant):	
Organisation (where relevant):	
Address 1:	
Address 2:	
Address 3:	

Address 4:	
Postcode:	██████████
Telephone:	██████████
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM:6 MM:64 MM:70 MM:71 MM:78 MM:79 MM:120 MM:121	

Section 4: Legal Compliance & Duty to Cooperate

Do you consider that this modification of the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant	Yes	
2. Sound (MM:6,MM:64,MM:70,MM:71,MM:78,MM:79, MM:120,MM:121)		No
3. In Compliance with the Duty to Cooperate		

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

MM:6
SP3 Housing Mix and Density

(b) 'regard to local and site-specific circumstances' is non specific and should be replaced with wording more in keeping with **SP12 and INF7**

MM:64
SP10 Site (GA031)

The conditions of development only refer to conserving the significance of heritage assets and a conditional reference to SUDS. This should be widened to bring it in line with **SP12 and INF7**

MM:70
Supporting text for Policy SP12 Paragraphs 5.67, 4.69

Includes 'provision of the following broad types of infrastructure But it does not include Highways which is crucial

MM:71
Policy SP12

Policy SP12 refers to the council 'will work to mitigate and minimise adverse impacts.....in terms of infrastructure provision' This is too general and needs modifying to bring it in line with **INF7**

MM:78
Supporting text to Policy ENV4 Paragraph 5.45

Reference is made to Bio-diversity with an emphasis placed on 'internationally, nationally and local designated sites'

Many developments are on green field sites of a known rich diversity of protected species and all such sites should be subject to an 'appropriate assessment'

MM:79
Policy ENV4 Bio-diversity Part a) and f)

Refers to 'growth in housing.....will be accompanied by improvements in bio-diversity. This means that a) where possible....'

This is far too open ended and needs amending

MM:120

Supporting text for New Policy INF7-Sustainable Transport and Highways

Refers to 'The provision of a safe, suitable and convenient access to new development sites should be agreed' the word 'should' is too ambiguous. The proposed site GA031 Walton Close Gargrave does meet even the most basic needs as set out in this section.

MM:121

Policy INF7 Sustainable Transport and Highways

e) 'providing safe, suitable and convenient access to all development sites...' is too site specific and misses the point that much of a sites impact will probably be between the site itself and the centre of the conurbation it is located alongside.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

MM:6

SP3 Housing Mix and Density

Regard to local should be followed by '**sustainability issues, infrastructure requirements, safety and inclusivity**'

MM:64

SP10 Site (GA031)

The reference to SUDS should be changed from '**will**' incorporate... unless this is not possible or feasible to '**must incorporate to ensure no detrimental impact on existing residents and the existing sewage system**'

The paragraph should also include reference to '**highways and access to the centre of the village to be improved up to the required standards of the highways authority to ensure the safety of residents, sustainability, access to transport networks and inclusivity**'

MM:70

Supporting text for Policy SP12 Paragraphs 4.67, 4.69

'**Highways**' should be included in the 'broad types of infrastructure listed

**MM:71
Policy SP12**

Should read.....'**ensure there are no adverse impacts**'
(Note: many developments are large and unless infrastructure is improved they will not deliver sustainability, safety, accessibility and inclusivity)

**MM:78
Supporting text to Policy ENV4 Paragraph 5.45**

The last sentence referring to 'development proposals likely to have a significant effect on a European site.....' should be widened to include '**greenfield site, or a site of known bio diversity**'when considered alone

**MM:79
Policy ENV4 Bio-diversity Part a) and f)**

'wherever possible' should be replaced with '**development will be required to**'

And later 'i) Ensure that there is no adverse impact on any internationally designated sites integrity' should include '**or a site of known bio-diversity or inhabited by protected species**'

**MM:120
Supporting text for New Policy INF7-Sustainable Transport and Highways**

Replace 'should' with '**must**'

**MM:121
Policy INF7 Sustainable Transport and Highways**

After 'to all development sites' include '**and from the sites to the centre of the conurbation**'

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	X
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	X
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	[REDACTED]
Date	30-03-19

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ |
www.cravencd.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravencd.gov.uk

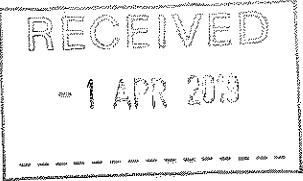


INVESTOR IN PEOPLE



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

Craven Local Plan Examination



Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). Please fill in a separate form for each representation you wish to make.

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	MR. & MRS. JOHN & MARGORIE COLLINGS
First Name:	MARGORIE & JOHN
Last Name:	COLLINGS
Job Title (where relevant):	TEACHER (MARGORIE) HEAD TEACHER (JOHN) (RETIRED)
Organisation (where relevant):	NORTH YORKSHIRE
Address 1:	COUNTY HALL
Address 2:	NORTHALLERTON
Address 3:	[REDACTED]

Address 4:	[REDACTED]
Postcode:	[REDACTED]
Telephone:	[REDACTED]
Email:	[REDACTED]

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM:	

Section 4: Legal Compliance & Duty to Cooperate

Do you consider that this modification of the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant		<input checked="" type="checkbox"/>
2. Sound		<input checked="" type="checkbox"/>
3. In Compliance with the Duty to Cooperate		<input checked="" type="checkbox"/>

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

- 1 ~~Q~~ ^{Previous} consultations seemingly are not listened to.
- 2 People making decisions do not live here and obviously are not around when things are at the worst - previously complained about to no avail.
- 3 Wildlife in the area is vast, rare birds, pheasants even deer seen on proposed area.
- 4 Number of houses have increased - schools are at maximum, traffic appalling, queues everywhere.
- 5 No school places for houses already being built.

6) 324 houses mean at least extra 500 cars
(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

I have answered in laymans terms - cannot do more. Green field sites should be left. There are brown field and disgraceful areas all around the county which should be built on. We have a duty to future generations to keep places like Skepton beautiful, quiet and a market town!

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	✓
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	✓
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	[REDACTED]
Date	30/3/19

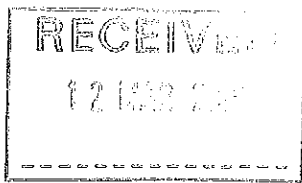
Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ | www.cravendc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravendc.gov.uk



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



**Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)
Main Modifications Consultation Representation Form**

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s).

Please fill in a separate form for each representation you wish to make.

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	DR.
First Name:	IAIN
Last Name:	CONNELL
Job Title (where relevant):	
Organisation (where relevant):	
Address 1:	
Address 2:	
Address 3:	
Address 4:	
Postcode:	
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

If you wish your personal details to be treated in confidence and not published please tick the box below:

I wish to request that the personal details submitted with this representation are treated in confidence and not published.	✓
---	---

Please explain below, why you have made this request:

I AM A PRIVATE INDIVIDUAL WHOSE PERSONAL DETAILS (ADDRESS, EMAIL ADDRESS) ARE NOT OF INTEREST, OR RELEVANT, TO PERSONS OR ORGANISATIONS OUTSIDE THIS PLANNING PROCESS.
(AND I SHOULDN'T HAVE TO REQUEST THIS!)

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	J. W. CONNELL
-----------------------	---------------

To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)

MM: SCHEDULE OF POLICY MAP CHANGES SK-LGSG4 (DOCUMENT P.18)

Section 4: Legal Compliance & Duty to Cooperate

Do you consider that this modification of the Local Plan is: (tick as appropriate)

	Yes	No
• Legally Compliant		
• Sound		✓
• In Compliance with the Duty to Cooperate		✓

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

THE AREA TO THE NORTH OF SKIPTON DESIGNATED SK-LGSG4 WAS PREVIOUSLY DESIGNATED AS LOCAL GREEN SPACE. THE MODIFIED LOCAL PLAN WOULD REMOVE THIS SPECIAL STATUS. THOUGH IT IS CLAIMED THAT THE LOCAL PLAN WOULD STILL OFFER "CONSIDERABLE PROTECTION" TO THIS AREA, EXPERIENCE OF RECENT DEVELOPMENTS IN CRAVEN DC STRONGLY SUGGESTS THAT ANY LOOPHOLE OR REDUCED PROTECTION STATUS WOULD BE EXPLOITED BY DEVELOPERS. THIS PIECE OF LAND IS THE LAST ^{LARGE} OPEN (GREEN) SPACE INSIDE SKIPTON'S BYPASSES, AND NEEDS ALL THE PROTECTION IT CAN GET. SAVE OUR PARK HILL FOR FUTURE RESIDENTS OF SKIPTON!! WHY REMOVE THE ^{SPECIAL} PROTECTION ALREADY ALLOWED FOR IN THE LOCAL PLAN? WHAT'S THE REAL REASON

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates) FOR THIS MODIFICATION ??

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

If you wish your personal details to be treated in confidence and not published please tick the box below:

I wish to request that the personal details submitted with this representation are treated in confidence and not published.



Please explain below, why you have made this request:

I AM A PRIVATE INDIVIDUAL WHOSE PERSONAL DETAILS (ADDRESS, EMAIL ADDRESS) ARE NOT OF INTEREST, OR RELEVANT, TO PERSONS OR ORGANISATIONS OUTSIDE THIS PLANNING PROCESS.
(AND I SHOULDN'T HAVE TO REPEAT THIS!)

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	J. W. CONNELL
-----------------------	---------------

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

REPLACE THE PROPOSED SPECIAL STATUS OF AREA SK-LGSG4 AS "LOCAL GREEN SPACE".

NO CHANGE, THEREFORE, TO THE PROPOSAL IN THE ORIGINAL LOCAL PLAN REGARDING THE SPECIAL STATUS OF SK-LGSG4 AS LOCAL GREEN SPACE (SCHEDULE OF POLICY MAP CHANGES P.18 of 57):-
REMOVE "DELETION OF SK-LGSG4".

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)

Yes, I do wish to be notified

✓ BY E-MAIL

No, I do not wish to be notified

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)

Yes, I do wish to be notified

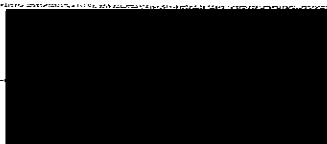
✓ BY E-MAIL

No, I do not wish to be notified

Section 9: Signature & Date of Representation

Please sign and date below:

Signature



Date

8/6 MARCH 2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ |

www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk

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

Craven Local Plan Examination

From: Richard Copley [REDACTED]
Sent: 01 April 2019 19:25
To: Local Dev. Framework
Subject: MM17
Attachments: cdc-mods-rep-form-2019-final Copley MM17.docx

Regards,

[REDACTED]

Richard Copley

[REDACTED]

m: [REDACTED]
s: [REDACTED]

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravendc.gov.uk


For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mr
First Name:	Richard
Last Name:	Copley
Job Title (where relevant):	
Organisation (where relevant):	
Address 1:	
Address 2:	
Address 3:	

Address 4:	██████████
Postcode:	██████████
Telephone:	██████████
Email:	████████████████████

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Richard Copley
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: 17	

Section 4: Legal Compliance & Duty to Cooperate

Do you consider that this modification of the Local Plan is: (tick as appropriate)		
	Yes	No
· Legally Compliant		
· Sound		X
· In Compliance with the Duty to Cooperate		

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

I am not currently competent to make a definitive judgement on the compliance of this modification, having only learned last week of the consultation exercise.

My objections to it are based on its soundness, and in particular on its effectiveness and justification.

In terms of justification:

- Are between 339 and 400 houses (if the school is not built) needed in Skipton, in addition to all the other developments? Who needs them? There are now houses on what will be the neighbouring Rockwood estate that are not selling at all, a situation that was unthinkable some years ago.
- One of the key drivers of demand in this area is the proximity of the local secondary schools, especially the two selective schools. However, unless the intakes of these schools change, there will not be places at them for any school-age children resident in the new development (other than by displacement). This is likely to dampen some of the potential demand for them.
- The proposed development is significantly bigger than the neighbouring Rockwood Road development (which I believe numbers some 230 houses). Rockwood does at least have the merit of being a “through” development (Gargrave Road at one end and Raikeswood Drive at the other). Short of exiting onto White Hills Lane, which is not practical for a development of this size, this development will end up being single entrance, single exit. It has significant potential to be a shapeless piece of sprawl.

In terms of effectiveness:

- This will essentially be a standalone-community. Integration with the Rockwood estate will be difficult, as there will be no common roads (unless Park Wood Drive and/or Park Wood Way are somehow extended into the new development – although the use of these roads to gain an exit to Gargrave Road via Rockwood Drive would be unthinkable in both safety and volume terms).
- The Rockwood development essentially faces away from the proposed new development, as a simple examination of its layout would confirm. Similarly, the proposed new development would equally face away from Rockwood, with its main spine located much closer to the HML/ComputerShare side of the area.
- So, what is being proposed is merely suburban sprawl, not any cohesive attempt at community building. In fact, it will make Skipton less of the market town it is now, and will destroy part of its character by increasing its suburban appearance and feel by intensifying the concentration of its housing. The fine words about “recreational walking” are just that – fine words. In practice, recreational walking will only be achieved by getting in a car and driving further out of Skipton (and see below for thoughts on how easy that will be).
- Further, the modification makes no mention of how access to, and exit from, this development would occur. It appears that this can only be on its south side, at Gargrave Road, and given CDC’s proposed preservation of the green wooded spaces adjacent to Gargrave Road’s north side, this would mean that the only possible location for this exit would be right next to Aireville Grange, opposite the Craven College/Craven Leisure Centre complex entrance road. That would necessitate significant road widening to accommodate another roundabout. That, in turn, would mean another roundabout on Gargrave Road, and even greater congestion, particularly in the late afternoon, which was made much worse by the HML building (despite the assurances of NYCC), and has been exacerbated by the success of the Keelham Farm Shop. Another 400 families trying to get in and out of their estate, plus the parents of any children who go to the primary school, if it is built, will ensure the everyday gridlocking of Gargrave Road, probably from SGHS to the Little Chef

roundabout.

- Given this, what thought has been given to construction access?
- In terms of schools, two points need making. The first is about primary schools. It is less than two years ago that a primary school closed in Skipton, due to lack of demand. The building is still there, and presumably, given its architecture, perfectly capable of being refurbished as a modern primary school. Why would we need to build another school, in what is likely to be a relatively inaccessible location, and quite probably a very noisy location, given its proximity to the by-pass?
- The second is about secondary schools. Presumably, all secondary school children living in this new development will need accommodating in one of the three schools, and, for the reasons outlined above, this is likely to have more impact on the Academy than on the selective schools. Is the Academy ready for an increased headcount?

Some minor points, should this development proceed:

- On the east side of this site is an electricity pylon, with wires running across the site westwards, via intermediate pylons. These will need re-siting, or circumventing – what is the plan?
- For as long as we have lived here, curlews have nested in the middle section of this area (the bottom half of SK108). What plans do CDC have to protect their habitat?
- The proposed site has natural watercourses on its west side. How well protected will these be?
- Two drystone walls run the width of the site. What is the pain for these – will they be retained as plot boundaries, or will they simply be knocked down, thus causing further loss of a traditional landscape feature?
- What stronger assurances can CDC give regarding the trees in the south-east corner? Longer-term Rockwood residents will remember the assurances given regarding the HML development, on the west side of this development. In the event, more trees were removed than had been allowed (HML admitted this themselves), but as far as I could ascertain at the time, no sanctions were ever applied to HML, or to CDC and its officers.

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

My preference is to delete the modification altogether, and leave this land as a greenfield buffer between the residential areas of Gargrave Road and the Computershare site, in order to retain some of what little charm is left in the initial approach to Skipton from Gargrave Road.

If the development is to proceed, I would like to see a reduced volume of new houses, with SK082 left untouched, and only the lower part of SK108 developed. This would leave a greenfield area to the north of the development and to the west of Stirtonber.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

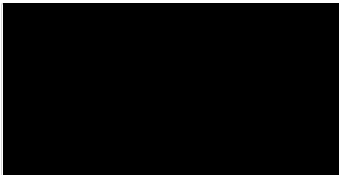
Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	<input checked="" type="checkbox"/>
No, I do not wish to be notified	<input type="checkbox"/>

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	<input checked="" type="checkbox"/>
No, I do not wish to be notified	<input type="checkbox"/>

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	1 April 2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ
 | www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



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

Craven Local Plan Examination

-----Original Message-----

From: Elizabeth Cowan [REDACTED]
Sent: 24 March 2019 15:14
To: Tony Blackburn; Sian Watson; Councillor John Dawson;
Subject: Park Hill Skipton

Dear all

I am writing to you to raise my strong objection against the changes made to remove Park Hill as a protected space from the Skipton Local Plan. It is utterly disgraceful that it should not be considered as protected green space. It holds a prominent position in Skipton and is essential for the local community both as a place to walk, for recreation and to view from the surrounding area.

The hills that surround Skipton, where livestock graze, are essential in maintaining the historic market town of Skipton and preserving it for generations to come. Skipton is known as the Gateway to the Dales - purely because it currently feels like it borders the National Park. By potentially allowing building on Park Hill you would be ruining that importance. You instead need to recognise it's historic and cultural significance for current and future generations and take action to preserve it now.

Park Hill is next to the historic heart of Skipton (the Corn Mill) which has characterful minor roads, borders Skipton Woods, the Castle and Raikes Road Burial Ground. By not protecting Park Hill as green space you are are ruining the character of the town and exactly what makes it so important. My family and I often walk on and near Park Hill, I go running along there and i want my children to be able to do so too. It would be utterly disgraceful if this was not to be designated as green space. Please ensure Park Hill is reinstated.

Thank you.

Kind regards
Elizabeth Cowan

Resident of Skipton

From: CPRE North Yorkshire [REDACTED]
Sent: 01 April 2019 15:34
To: Local Dev. Framework
Subject: CPRENorthYorkshire response to the Craven Local Plan Main Modifications
Attachments: CPRENY response to Main Modifications April 2019.pdf; Form A
CPRENorthYorkshire.pdf; Form B1 CPRENorthYorkshire.pdf; Form B2
CPRENorthYorkshire.pdf

Good Afternoon,

Please find attached a consultation response from CPRENorthYorkshire in relation to the Craven Local Plan Main Modifications.

Yours Sincerely

Fran Evans
Administrator of CPRE North Yorkshire

You can help us to save rural North Yorkshire from as little as £3 per month
www.cprenorthyorkshire.co.uk

[REDACTED]
The North Yorkshire Branch of the Campaign to Protect Rural England CIO number 1174989
President The Lord Crathorne KCVO Chair Mrs J Marley
[REDACTED]

CONFIDENTIALITY NOTICE: This message is from CPRENorthYorkshire CIO and may contain confidential charity information. It is intended solely for the use of the individual to whom it is addressed. If you are not the intended recipient please contact the sender and delete this message and any attachment from your system. Unauthorized publication, use, dissemination, forwarding, printing or copying of this E-Mail and its attachments is strictly prohibited.

Consultation Response

Authority: Craven District Council

Type of consultation: Local Plan Main Modifications Consultation

Full details of application/consultation: Response to Council's Main Modifications for the Craven Local Plan

Type of response: Comment

Date of Submission: 1st April 2019

All responses or queries relating to this submission should be addressed to
The Chair, The North Yorkshire Branch of the Campaign to Protect Rural England
CIO number 1174989

www.cprenorthyorkshire.co.uk

The charity will be referred to as CPRENorthYorkshire throughout this document

All CPRENorthYorkshire comments are prepared by the charity using professional planners whose research and recommendations form the basis of this response in line with national CPRE policies.

External planning consultant:



KVA Planning Consultancy
Katie Atkinson MRTPI
www.kvaplaning.co.uk

The North Yorkshire Branch of the Campaign to Protect Rural England CIO operates with the help of planning wardens in the different local authority administrative districts reporting directly to the branch following a recent restructure. All correspondence should therefore be directed to the 'Chair of CPRENorthYorkshire'. CPRENorthYorkshire is the only authorised body to represent CPRENorthYorkshire issues within the local area.

Comment

CPRENorthYorkshire welcomes the opportunity to comment on the Council's Main Modifications to the Craven Local Plan.

CPRENorthYorkshire is largely supportive of the proposed modifications made as a result of the evidence presented and discussed at the Examination in Public held in October 2018. It is felt that the modifications provide helpful clarity which will ensure all readers of the planning document will understand the Council's intentions and priorities.

Comments have been provided on the Council's response form and have been limited to those of importance to CPRE. It is considered that previous comments made by this charity are still of relevance and are already before the Inspector.

CPRENorthYorkshire believe that the Modifications suggested by the Council will ensure that the Plan is considered sound.

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravendc.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mrs
First Name:	Jules
Last Name:	Marley
Job Title (where relevant):	Chair
Organisation (where relevant):	CPRE North Yorkshire
Address 1:	C/O Agent
Address 2:	
Address 3:	

Address 4:	
Postcode:	
Telephone:	
Email:	████████████████████

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	Katie Atkinson
Address:	KVA Planning Consultancy 8 Acres Close Helmsley North Yorkshire YO62 5DS
Telephone number:	██████████
Email:	████████████████████

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	CPRENorthYorkshire
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: MM7	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

CPRENorthYorkshire welcomes the clarity that the additional text provides at paragraph 4.40 in relation to Tier 5 settlements. This clearly describes the service role as being limited to the residents of the settlements – for settlements which have 15 or more closely grouped residential properties. This helpfully distinguishes between those settlements in Tier 4 and those considered to be within the ‘open countryside’.

It goes on to clarify at paragraph 4.46 to set out what will be allowed (limited development) in relation to Tier 5 settlements – i.e. 1.5% of total housing growth across the plan period in these settlements.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

N/A

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.


Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	✓
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	✓
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	27 th March 2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ |
www.cravencd.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravencd.gov.uk



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

Craven Local Plan Examination

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	CPRENorthYorkshire
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: MM87 / ENV10	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

Whilst this matter does not extend to soundness, CPRENorthYorkshire believe that a Local Green Space Designation should be given to the areas covering and immediately surrounding Little Dunbar's Flash and Dunbar's Flash at Land to the west of Hellifield.

CPRENorthYorkshire welcomes the designation of Gallaber Pond under (HE-LGS7), however, due to the unique nature of the site and the abundance of rich biodiversity found at the location (as set out in previous submissions) feel that these smaller areas should receive either a single or two smaller designations also. This would further reiterate their importance to nature conservation within the area especially as they were previously recommended for a SINC designation.

Should a future developer wish to apply for a permission under the new policy EC4B and include areas adjacent to grey hatched areas (the area covered by the extant permission), there is a clear danger that these areas will be detrimentally impacted upon, especially the larger Dunbar Flash which is already immediately adjacent to the extant area.

Such designation would ensure their protection whilst still providing sufficient flexibility for the provisions of EC4B to be applied given the amount of 'white land' within the overall site.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

A further modification to allow the 2 flashes to be awarded LGS designation as discussed above.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published


Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)

Yes, I do wish to be notified	√
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	✓
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	27 th March 2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ |
www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



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

Craven Local Plan Examination

From: Peter Crangle [REDACTED]
Sent: 31 March 2019 10:32
To: Sian Watson
Subject: Park Hill - Local Green Space Designation

Dear Madam,

I wish to object in the strongest possible terms to the removal of the Local Green Space designation for the land at Park Hill Skipton comprising the fields to the north of the High Street between Grassington Road and Skipton Woods. This area is of major importance to the locality. The long distance public footpaths "A Dales Highway" and Lady Anne's Way run over the top of Chapel Hill to Short Lee Lane and hold spectacular views over the town and long distance vistas towards the Yorkshire Dales. The area is exactly what Local Green Space designation is intended to protect:

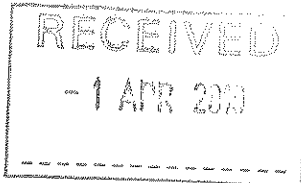
1. It is in close proximity to the centre of town
2. It holds a special place in the lives of many residents who use it to access the countryside and the Dales affording them spectacular and beautiful views as they walk.
3. The area is of historical significance containing, as it does, the site of the medieval battery at the top of the hill.
4. The area is rich in wildlife providing habitat for several species of ground nesting birds all of which return to the area year after year.
5. The area is regarded as a jewel in the crown of Skipton as the Gateway to the Yorkshire Dales.

For these reasons it is imperative that the whole of the green space behind Grassington Road including Park Hill be protected in order to preserve it for future generations and hopefully the Council will do all it can to restore Park Hill as protected green space.

Your sincerely,

Peter and Christine Crangle.
[REDACTED]

Acknowledged, scanned
d saved to system
1/4/19 (RC)



Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	MRS
First Name:	CLARE
Last Name:	NASH
Job Title (where relevant):	SECRETARY
Organisation (where relevant):	Craven (Skipton) Walkers WFL
Address 1:	[REDACTED]
Address 2:	[REDACTED]
Address 3:	[REDACTED]

Address 4:	
Postcode:	[REDACTED]
Telephone:	[REDACTED]
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

If you wish your personal details to be treated in confidence and not published please tick the box below:

I wish to request that the personal details submitted with this representation are treated in confidence and not published.	<input checked="" type="checkbox"/>
---	-------------------------------------

Please explain below, why you have made this request:

The workers who have signed the letter do not wish to have their addresses published. Only their names.

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Craven Walkers
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: 87 deletion of SK LGS64	

Section 4: Legal Compliance & Duty to Cooperate

Do you consider that this modification of the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant		<input checked="" type="checkbox"/>
2. Sound		<input checked="" type="checkbox"/>
3. In Compliance with the Duty to Cooperate		

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

We wish to oppose deletion of
Park Hill as protected green
space.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

The plan would be sound if it
protected this highly valued
greenspace from development

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.


Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	<input type="checkbox"/>
No, I do not wish to be notified	<input type="checkbox"/>

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	<input type="checkbox"/>
No, I do not wish to be notified	<input type="checkbox"/>

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	28/3/2019

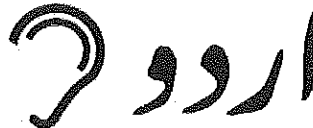
Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ |
www.cravencd.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravencd.gov.uk



INVESTOR IN PEOPLE



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

NPPF 170

“Planning policies and decisions should contribute to and enhance the natural and local environment by:
protecting and enhancing valued landscapes,
(in a manner commensurate with their statutory status or **identified quality in the development plan**)”

The Development Plan as proposed clearly identified Park Hill as a valued landscape by giving it Local Green Space designation. This is what was consulted on with local people during the long consultations over the Plan, and the consultation and the proposed designation in the development plan both clearly identified Park Hill as a landscape that was highly valued by local people (as well as by visitors and tourists).

So did previous Plans and so does the 2002 Landscape Study cited in the documents that formed a background to the current draft Plan. A landscape not only valued locally but regionally.

Removing the Local Green Space designation without replacing it with another identification as a locally (and regionally) valued landscape does not give Park Hill the necessary protection as a valued landscape which it has enjoyed until now.

The Inspector said that too large a space had been designated, but Park Hill alone is not an extensive area of land. It can be walked across in 10 minutes by our group who have health problems, in far less time by someone fit.

Our walking group works with local surgeries to cater for people with physical or mental health problems that can be improved by gentle exercise in green surroundings. We have led walks in Skipton every Monday that attract 20-30 people each week. We often cross Park Hill or use Short Lee Lane. We highly value the local landscape and wish the value of the landscape to continue to be recognised in this local plan as it was in previous plans and in the draft Plan. We can see no reason why recognition of the quality and value of this landscape should suddenly be omitted from the Plan as it has not changed in quality or value.

The proposal to remove the Green Space designation makes the Plan unsound because it fails to protect a valued landscape as per the NPPF 170 above.

We support the introduction of MM74 Policy ENV2 addition of point (v) in (a) - Insert [v] Skipton Castle, the castle grounds and the castle's extensive landscape setting, including the medieval hunting park, Skipton Woods and Civil War Battery;]

NPPF is supposed to be about sustainability. We think that means having green spaces in towns for people to walk, not requiring them always to drive somewhere to get access to greenspace.

Dear Craven District Council,

I am one of a walking for health group called Craven Walkers that is based in Skipton and we have short walks within Skipton every Monday and we regularly use Skipton Woods, Park Hill footpath, Chapel Lane and Short Lee Lane.

I highly value the benefits brought to Skipton by having Park Hill as a local green space, both because I use it and because it is a highly important part of the local landscape which can be seen and enjoyed from many parts of Skipton.

I find it difficult to get out into the countryside further from Skipton town centre. I rely a lot for my health on walking within Skipton, often with the walking for health group.

I want to object to your and the Inspector's proposal to delete protection of Park Hill as a local green space.

I don't agree that it is an extensive tract of land. We don't walk fast, but I and the group can walk over Park Hill or along Short Lee Lane in about 10 minutes.

Yours sincerely,

A large black rectangular redaction box covering the printed name of the sender.

WILLIAM
TYLER
SKIPTON

Dear Craven District Council,

I am one of a walking for health group called Craven Walkers that is based in Skipton and we have short walks within Skipton every Monday and we regularly use Skipton Woods, Park Hill footpath, Chapel Lane and Short Lee Lane.

I highly value the benefits brought to Skipton by having Park Hill as a local green space, both because I use it and because it is a highly important part of the local landscape which can be seen and enjoyed from many parts of Skipton.

I find it difficult to get out into the countryside further from Skipton town centre. I rely a lot for my health on walking within Skipton, often with the walking for health group.

I want to object to your and the Inspector's proposal to delete protection of Park Hill as a local green space.

I don't agree that it is an extensive tract of land. We don't walk fast, but I and the group can walk over Park Hill or along Short Lee Lane in about 10 minutes.

Yours sincerely,

[REDACTED]

[REDACTED]
JOAN WATERFALL,
ELIZABETH WHITAKER,
[REDACTED]

Dear Craven District Council,

I am one of a walking for health group called Craven Walkers that is based in Skipton and we have short walks within Skipton every Monday and we regularly use Skipton Woods, Park Hill footpath, Chapel Lane and Short Lee Lane.

I highly value the benefits brought to Skipton by having Park Hill as a local green space, both because I use it and because it is a highly important part of the local landscape which can be seen and enjoyed from many parts of Skipton.

I find it difficult to get out into the countryside further from Skipton town centre. I rely a lot for my health on walking within Skipton, often with the walking for health group.

I want to object to your and the Inspector's proposal to delete protection of Park Hill as a local green space.

I don't agree that it is an extensive tract of land. We don't walk fast, but I and the group can walk over Park Hill or along Short Lee Lane in about 10 minutes.

Yours sincerely,

A large black rectangular redaction box covering the signature area.

ALAN JOWETT

Dear Craven District Council,

I am one of a walking for health group called Craven Walkers that is based in Skipton and we have short walks within Skipton every Monday and we regularly use Skipton Woods, Park Hill footpath, Chapel Lane and Short Lee Lane.

I highly value the benefits brought to Skipton by having Park Hill as a local green space, both because I use it and because it is a highly important part of the local landscape which can be seen and enjoyed from many parts of Skipton.

I find it difficult to get out into the countryside further from Skipton town centre. I rely a lot for my health on walking within Skipton, often with the walking for health group.

I want to object to your and the Inspector's proposal to delete protection of Park Hill as a local green space.

I don't agree that it is an extensive tract of land. We don't walk fast, but I and the group can walk over Park Hill or along Short Lee Lane in about 10 minutes.

Yours sincerely,

[REDACTED]

[REDACTED]

DAVID ANDERTON [REDACTED]

DIANE ANDERTON [REDACTED]

[REDACTED]

Dear Craven District Council,

I am one of a walking for health group called Craven Walkers that is based in Skipton and we have short walks within Skipton every Monday and we regularly use Skipton Woods, Park Hill footpath, Chapel Lane and Short Lee Lane.

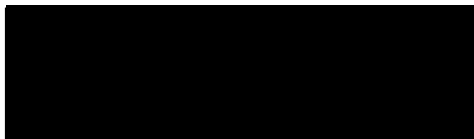
I highly value the benefits brought to Skipton by having Park Hill as a local green space, both because I use it and because it is a highly important part of the local landscape which can be seen and enjoyed from many parts of Skipton.

I find it difficult to get out into the countryside further from Skipton town centre. I rely a lot for my health on walking within Skipton, often with the walking for health group.

I want to object to your and the Inspector's proposal to delete protection of Park Hill as a local green space.

I don't agree that it is an extensive tract of land. We don't walk fast, but I and the group can walk over Park Hill or along Short Lee Lane in about 10 minutes.

Yours sincerely,

A large black rectangular redaction box covering the signature area.

LITTLE FIRTH, SKIPTON

Dear Craven District Council,

I am one of a walking for health group called Craven Walkers that is based in Skipton and we have short walks within Skipton every Monday and we regularly use Skipton Woods, Park Hill footpath, Chapel Lane and Short Lee Lane.

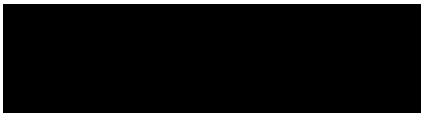
I highly value the benefits brought to Skipton by having Park Hill as a local green space, both because I use it and because it is a highly important part of the local landscape which can be seen and enjoyed from many parts of Skipton.

I find it difficult to get out into the countryside further from Skipton town centre. I rely a lot for my health on walking within Skipton, often with the walking for health group.

I want to object to your and the Inspector's proposal to delete protection of Park Hill as a local green space.

I don't agree that it is an extensive tract of land. We don't walk fast, but I and the group can walk over Park Hill or along Short Lee Lane in about 10 minutes.

Yours sincerely,



LYNN BENTHAM,
SKIPTON

Dear Craven District Council,

I am one of a walking for health group called Craven Walkers that is based in Skipton and we have short walks within Skipton every Monday and we regularly use Skipton Woods, Park Hill footpath, Chapel Lane and Short Lee Lane.

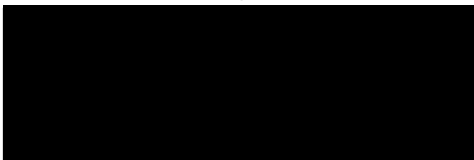
I highly value the benefits brought to Skipton by having Park Hill as a local green space, both because I use it and because it is a highly important part of the local landscape which can be seen and enjoyed from many parts of Skipton.

I find it difficult to get out into the countryside further from Skipton town centre. I rely a lot for my health on walking within Skipton, often with the walking for health group.

I want to object to your and the Inspector's proposal to delete protection of Park Hill as a local green space.

I don't agree that it is an extensive tract of land. We don't walk fast, but I and the group can walk over Park Hill or along Short Lee Lane in about 10 minutes.

Yours sincerely,



TESSA DENNIN,
SKIPTON

Dear Craven District Council,

I am one of a walking for health group called Craven Walkers that is based in Skipton and we have short walks within Skipton every Monday and we regularly use Skipton Woods, Park Hill footpath, Chapel Lane and Short Lee Lane.

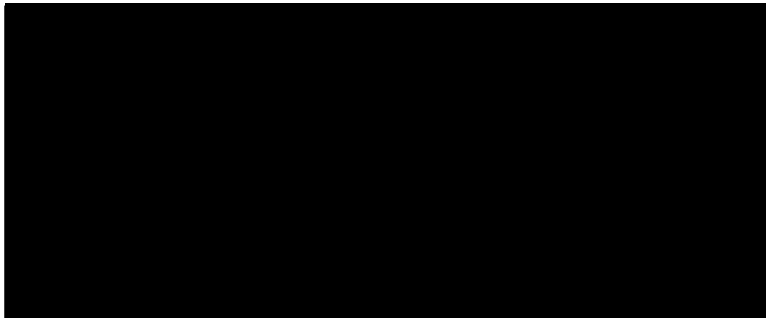
I highly value the benefits brought to Skipton by having Park Hill as a local green space, both because I use it and because it is a highly important part of the local landscape which can be seen and enjoyed from many parts of Skipton.

I find it difficult to get out into the countryside further from Skipton town centre. I rely a lot for my health on walking within Skipton, often with the walking for health group.

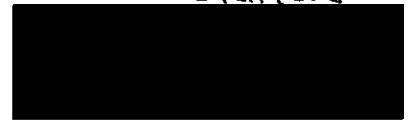
I want to object to your and the Inspector's proposal to delete protection of Park Hill as a local green space.

I don't agree that it is an extensive tract of land. We don't walk fast, but I and the group can walk over Park Hill or along Short Lee Lane in about 10 minutes.

Yours sincerely,



MARJORIE LLOYD,
SKIPTON



Dear Craven District Council,

I am one of a walking for health group called Craven Walkers that is based in Skipton and we have short walks within Skipton every Monday and we regularly use Skipton Woods, Park Hill footpath, Chapel Lane and Short Lee Lane.

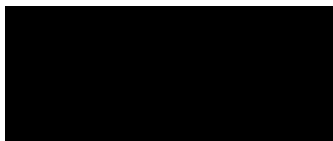
I highly value the benefits brought to Skipton by having Park Hill as a local green space, both because I use it and because it is a highly important part of the local landscape which can be seen and enjoyed from many parts of Skipton.

I find it difficult to get out into the countryside further from Skipton town centre. I rely a lot for my health on walking within Skipton, often with the walking for health group.

I want to object to your and the Inspector's proposal to delete protection of Park Hill as a local green space.

I don't agree that it is an extensive tract of land. We don't walk fast, but I and the group can walk over Park Hill or along Short Lee Lane in about 10 minutes.

Yours sincerely,



MAUREEN MOORE,
SKIPTON

Dear Craven District Council,

I am one of a walking for health group called Craven Walkers that is based in Skipton and we have short walks within Skipton every Monday and we regularly use Skipton Woods, Park Hill footpath, Chapel Lane and Short Lee Lane.

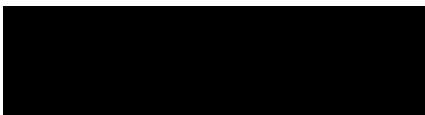
I highly value the benefits brought to Skipton by having Park Hill as a local green space, both because I use it and because it is a highly important part of the local landscape which can be seen and enjoyed from many parts of Skipton.

I find it difficult to get out into the countryside further from Skipton town centre. I rely a lot for my health on walking within Skipton, often with the walking for health group.

I want to object to your and the Inspector's proposal to delete protection of Park Hill as a local green space.

I don't agree that it is an extensive tract of land. We don't walk fast, but I and the group can walk over Park Hill or along Short Lee Lane in about 10 minutes.

Yours sincerely,



BRENDA HOWARTH,
SKIPTON

Dear Craven District Council,

I am one of a walking for health group called Craven Walkers that is based in Skipton and we have short walks within Skipton every Monday and we regularly use Skipton Woods, Park Hill footpath, Chapel Lane and Short Lee Lane.

I highly value the benefits brought to Skipton by having Park Hill as a local green space, both because I use it and because it is a highly important part of the local landscape which can be seen and enjoyed from many parts of Skipton.

I find it difficult to get out into the countryside further from Skipton town centre. I rely a lot for my health on walking within Skipton, often with the walking for health group.

I want to object to your and the Inspector's proposal to delete protection of Park Hill as a local green space.

I don't agree that it is an extensive tract of land. We don't walk fast, but I and the group can walk over Park Hill or along Short Lee Lane in about 10 minutes.

Yours sincerely,

[REDACTED]

[REDACTED]

PAT SLATER, SILSDEN

ANN RAWSON

THOMAS ALLEN, SKIPTON

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title:	MRS
First Name:	CAITRE
Last Name:	NASH
Job Title (where relevant):	SECRETARY
Organisation (where relevant):	Craven (Skipton) WALKERS WFTS
Address 1:	[REDACTED]
Address 2:	[REDACTED]
Address 3:	

Address 4:	
Postcode:	[REDACTED]
Telephone:	[REDACTED]
Email:	[REDACTED]

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

If you wish your personal details to be treated in confidence and not published please tick the box below:	
I wish to request that the personal details submitted with this representation are treated in confidence and not published.	<input checked="" type="checkbox"/>
Please explain below, why you have made this request:	
<p><i>NO addresses for water to be given out. Only for Secretary.</i></p>	

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Craven (Skipton) Walkers Wether
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM:	7A

Section 4: Legal Compliance & Duty to Cooperate

Do you consider that this modification of the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Sound	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. In Compliance with the Duty to Cooperate	<input type="checkbox"/>	<input type="checkbox"/>

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

Supporting documents attached,
as per NMB7 letter

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	✓
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	✓
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	[REDACTED]
Date	29/3/2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ |

www.cravendc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravendc.gov.uk



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

Craven Local Plan Examination

NPPF 170

“Planning policies and decisions should contribute to and enhance the natural and local environment by:
protecting and enhancing valued landscapes,
(in a manner commensurate with their statutory status or **identified quality in the development plan**)”

The Development Plan as proposed clearly identified Park Hill as a valued landscape by giving it Local Green Space designation. This is what was consulted on with local people during the long consultations over the Plan, and the consultation and the proposed designation in the development plan both clearly identified Park Hill as a landscape that was highly valued by local people (as well as by visitors and tourists).

So did previous Plans and so does the 2002 Landscape Study cited in the documents that formed a background to the current draft Plan. A landscape not only valued locally but regionally.

Removing the Local Green Space designation without replacing it with another identification as a locally (and regionally) valued landscape does not give Park Hill the necessary protection as a valued landscape which it has enjoyed until now.

The Inspector said that too large a space had been designated, but Park Hill alone is not an extensive area of land. It can be walked across in 10 minutes by our group who have health problems, in far less time by someone fit.

Our walking group works with local surgeries to cater for people with physical or mental health problems that can be improved by gentle exercise in green surroundings. We have led walks in Skipton every Monday that attract 20-30 people each week. We often cross Park Hill or use Short Lee Lane. We highly value the local landscape and wish the value of the landscape to continue to be recognised in this local plan as it was in previous plans and in the draft Plan. We can see no reason why recognition of the quality and value of this landscape should suddenly be omitted from the Plan as it has not changed in quality or value.

The proposal to remove the Green Space designation makes the Plan unsound because it fails to protect a valued landscape as per the NPPF 170 above.

We support the introduction of MM74 Policy ENV2 addition of point (v) in (a) - Insert [v] Skipton Castle, the castle grounds and the castle’s extensive landscape setting, including the medieval hunting park, Skipton Woods and Civil War Battery;]

NPPF is supposed to be about sustainability. We think that means having green spaces in towns for people to walk, not requiring them always to drive somewhere to get access to greenspace.

From: Gareth Croll [REDACTED]
Sent: 21 March 2019 21:45
To: Local Dev. Framework
Cc: Councillor Chris Moorby
Subject: Objection to proposed development of Hellifield Flash

Sir, Madam,

We are writing to object to the proposed development of Hellifield Flashes, and are stunned that the idea is even being given consideration.

We are residents of Long Preston but have often used the Flashes to walk, relax and enjoy the immense wildlife that it attracts. With busy working lives we don't have much time, but with such an amenity within walking distance we are able to take an afternoon to unwind there.

The Flashes are unique in the landscape – a peculiar and fascinating contrast to the fells and dales further north, and one that is enjoyed and should clearly be protected.

As parents of two children, we strongly believe in educating them in our natural world, and Hellifield Flashes provides us with just that – the numbers of birds, ducks wildfowl and animals is quite wonderful. This has to be protected – we cannot lose such an educational asset, or one that brings families together.

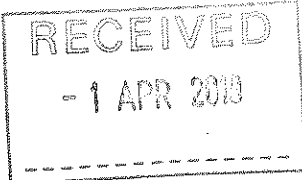
We have friends and relatives in Manchester, who all love to visit the Flashes having escaped the city for the day. We walk from Long Preston down New Hall Lane, and they are amazed at the numbers and variety of birds to spot. It is exceptionally important to us and to so much of the local (and wider) community.

We live in an increasingly stressful world, and one where corporations and developers continue to ride roughshod over local communities and ordinary people in the pursuit of ever increasing profit for themselves. We must protect Hellifield Flashes as being a unique and special haven for the most wonderful abundance of wildlife, and where many people, both local and visitors, can enjoy that special environment.

We trust you to represent the views of the local community, and to protect what previous generations have left in our care.

Yours,

Gareth & Elaine Croll.
[REDACTED]



300+ houses + school

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). Please fill in a separate form for each representation you wish to make.

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	MRS.
First Name:	STEPHANIE
Last Name:	CROLLA
Job Title (where relevant):	RETIRED TEACHER
Organisation (where relevant):	N/A.
Address 1:	[REDACTED]
Address 2:	
Address 3:	

Address 4:	
Postcode:	
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM:	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

I think the plan to build 300[?] houses has been made surreptitiously. It is the first I've heard of it, since living here for 4 years. It would alter the nature of this lovely desirable town. People love living here because it is surrounded by green fields. The proposed new houses would not be 'affordable', I understand. There is already a strain on Gargrave Rd since Keelham opened and it already has three or four schools along it, as well as the college, swimming, pool etc. The access on Park Wood Way, at present blocked, is not suitable for 300 more vehicles, that is presuming the proposed new houses would have just one car. I understand that the local schools are already full. There is just not the infrastructure required. Surely there are some brownfield sites available.

Apart from anything else, it would change the character of the town. Personally speaking, I chose to live here because it was a small town set in the Dales. I have been prepared to accept closure of my bank, a diminutive post office and poor bus connections, because it is rural not urban.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Address 4:	
Postcode:	
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

From: James Ellis [REDACTED]
Sent: 20 March 2019 17:32
To: Roy Banks
Cc: Local Dev. Framework; Will Kemp
Subject: CST Response on Main Modifications Consultation
Attachments: CDCLP modifications cov letter v.3 (WKje) 19.3.19 FINAL.doc; 19.03.20.CST.cdc-mods-rep-form-2019-3 of 3.docx; 19.03.20.CST.cdc-mods-rep-form-2019-1 of 3.docx; 19.03.20.CST.cdc-mods-rep-form-2019-2 of 3.docx

Roy,

Further to the informal engagement with you and David following the examination session, please find attached our formal representation on the Local Plan Main Modifications.

Please let me know if you have any queries in relation to the above and thanks as ever for your input on the policy creation front.

Best regards,

James

James Ellis
Associate Director



t: [REDACTED] | m: [REDACTED] | w: ruralsolutions.co.uk
Canalside House, Brewery Lane, Skipton, North Yorkshire, BD23 1DR

The information contained in this communication is confidential, may be privileged and is intended for the exclusive use of the above named addressee(s). If you are not the intended recipient(s), you are expressly prohibited from copying, distributing, disseminating, or in any other way using any information contained within this communication. We have taken precautions to minimise the risk of transmitting software viruses, but we advise you to carry out your own virus checks on any attachment to this message. We cannot accept liability for any loss or damage caused due to software viruses. If you have received this communication in error please contact the sender by telephone or reply via email.

P Please consider the environment before printing this e-mail

19th March 2019

Our Ref: P&D/Plans/CDC/L Plan/PDCLP/WK

By email

Planning Policy Team
(f.a.o. Ms S Watson)
Craven District Council
1 Belle Vue Square
Broughton Road
Skipton BD23 1FJ

Dear Sirs

Proposed Main Modifications to the Publication Draft Craven Local Plan (PMMPDCLP) 2019: Formal response

I am writing on behalf of The Trustees of the Chatsworth Settlement (also known as the Chatsworth Settlement Trustees (CST)) to submit our formal response to the above. As such, I outline related matters herein and attach the related documentation outlined below.

Proponent

The Chatsworth Settlement, known internally as the Devonshire Group, owns the land and estates of the Dukedom of Devonshire. Its main estates are in the vicinity of Chatsworth in Derbyshire and Bolton Abbey in North Yorkshire. It also runs visitor and other businesses on these estates, including: hotels; retail and catering outlets; forestry; livestock and arable farming. It employs over 650 full time employees. It is committed to quality in all its activities and takes a responsible approach to development; as such, it measures performance in financial as well as social and environmental terms.

CST's Yorkshire Estate provides 160 full time equivalent jobs at Bolton Abbey, receives 450,000 visitors per year and contributes c.£8m of enabled Gross Value Added to the local economy each year (Source: New Economics Foundation 2014). Its income funds socio-economic facilities (e.g. village shop/post office) and environmental management activities (e.g. architectural conservation) without grant support. CST thereby provides benefits far beyond "just the estate".

Context

CST has to ensure projects are viable, yet its visitor operation in the Bolton Abbey Core Visitor Area (BACVA) is being diminished by: little secondary spend; seasonal bias; vulnerability to bad weather; no sense of arrival; high maintenance costs; increased competition; major planning constraints; limited visitor accommodation; limited staff accommodation; services at risk; no play areas.



Since 2009 CST has therefore been looking at ways to diversify the “visitor offer” in its BACVA from Bolton Bridge to Barden Tower (including land in both Craven District Council (CDC) and the Yorkshire Dales National Park (YDNP)), gathering related evidence and participating in the preparation of related local plans.

As such, CST has commissioned a suite of technical documents culminating in the production of the Bolton Abbey Development Options Appraisal Study (BADOAS) 2017 (by Lichfields), as referenced in the PMMPDCLP. The BADOAS process also included some community liaison, allowing CST to present its long-term proposals for the BACVA and glean related feedback.

CST has also engaged extensively with related local planning authorities (LPAs) to provide a policy framework for development over the periods covered by the respective Local Plans (though CST’s needs and intended proposals extend beyond these plan periods).

The policy approach included in the PMMPDCLP and especially draft policies SP4 and EC4a has therefore been developed in a collaborative way between CST, CDC and other stakeholders, principally Historic England (HE) and the YDNP Authority (YDNPA) over many years and positively addresses the need for development in that part of the CVA which falls within the CDC plan-area.

As such, CST submitted detailed representations to CDC in October 2014, May 2016, July 2017 and February 2018. More recently CST submitted hearing statements for the public examination into the PDCLP and attended related sessions on 11th and 23rd October 2018. Further to these sessions, CST engaged informally with CDC on modifications to the plan before the publication of the PMMPDCLP for consultation.

A significant amount of resources has therefore been invested by CST and CDC in identifying a policy-based approach to support development at Bolton Abbey, and CST would like to thank CDC for its input in this regard.

Response (summary)

CST’s response to the PMMPDCLP 2019 as attached can be summarised as follows:

- **STRONG SUPPORT** for Proposed Main Modification MM8 regarding policy SP4 Spatial Strategy and Housing Growth which makes the policy more effective, in particular the additional text in criterion I, sub-criterion a), which clarifies that Bolton Abbey should receive limited new housing during the plan period; such housing will help to maintain the economic viability of the relatively high amount of employment uses at Bolton Abbey and also reduce the related carbon footprint of journeys to work, thus making the settlement even more sustainable than at present



- **STRONG SUPPORT** for Proposed Main Modification MM103 regarding policy EC4a Tourism-Led Development at Bolton Abbey which makes the supporting text (para 7.27) clearer insofar as sensitive and sustainable tourism-led, mixed-use development at Bolton Abbey will be supported subject to a comprehensive strategy and Masterplan for the BACVA being produced to the satisfaction of CDC and the YDNPA (as local planning authorities) in liaison with other key stakeholders (including Historic England, Natural England and the Environment Agency); this will in effect provide for a more democratic and deliverable means of securing approval for the BACVA Masterplan than would be the case if such approval had to be granted by the other key stakeholders identified as well

- **STRONG SUPPORT** for Proposed Main Modification MM104 regarding policy EC4a Tourism-Led Development at Bolton Abbey which makes the policy itself clearer insofar as sensitive and sustainable tourism-led, mixed-use development at Bolton Abbey will be supported subject to a comprehensive strategy and Masterplan for the BACVA being produced to the satisfaction of CDC and the YDNPA (as local planning authorities) in liaison with other key stakeholders (including Historic England, Natural England and the Environment Agency); this will in effect provide for a more democratic and deliverable means of securing approval for the BACVA Masterplan than would be the case if such approval had to be granted by the other key stakeholders identified, and reflects the changes as discussed during the public examination

- **CAVEATED SUPPORT** for Main Modification PMO4 (from Schedule of Policy Map Changes) which seeks to amend notations in all relevant inset maps for Key Locations for Tourism Development as identified in EC4, changing the notation concerned “from a blue ‘T’ in a black circle to a red triangle” so as to improve the clarity of inset maps; whilst CST considers it appropriate to include a red triangle on the Bolton Abbey Inset Map as proposed by CDC, it is concerned that a Development Management Officer or other could mistakenly think the proposed red triangle on a purple line run is pointing towards something on the map which it is not intended to; as such, and for the avoidance of doubt, CST would suggest that the red triangle is moved to another location on the map where it is surrounded by white space (and not intersected by a purple line) as shown in its detailed representation attached

- **CAVEATED SUPPORT** for Main Modification PMO5 (from Schedule of Policy Map Changes) which seeks to amend the full plan area policies map to reflect changes to the notation for Key Locations for Tourism Development as identified in EC4A, changing the notation concerned from a blue ‘T’ in a black circle to a red triangle (at Skipton, Gargrave and Embsay); whilst CST considers it appropriate to include a red triangle on the Bolton Abbey Inset Map as proposed by CDC, it is concerned that a Development Management Officer or other could mistakenly think the proposed red triangle on a purple line run is pointing towards something on the map which it is not intended to; as such, and for the avoidance of doubt,



CST would suggest that the red triangle is moved to another location on the map where it is surrounded by white space (and not intersected by a purple line) as shown in its detailed representation attached.

I therefore look forward to hearing from you in due course.

Yours faithfully



WILL KEMP
MA MSc DipTCP MRTPI
Planning and Development Manager



Enc: Summary Comments and Detailed Comments on the Proposed Main Modifications to the Publication Draft Craven Local Plan (PMMPDCLP)



Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravendc.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mr
First Name:	Will
Last Name:	Kemp
Job Title (where relevant):	Planning & Development Manager
Organisation (where relevant):	Chatsworth Settlement Trustees
Address 1:	Estate Office
Address 2:	Bolton Abbey
Address 3:	Skipton

Address 4:	North Yorkshire
Postcode:	BD23 6EX
Telephone:	██████████
Email:	████████████████████

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	James Ellis
Address:	Rural Solutions, Canalside House, Brewery Lane, Skipton, North Yorkshire, BD23 1DR
Telephone number:	██████████
Email:	████████████████████

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Chatsworth Settlement Trustees
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: · MM8	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your

comments.

Introduction

- Chatsworth Settlement Trustees (CST) has engaged in the Craven Local Plan (CLP) process throughout its production process, submitting detailed representations to Craven District Council (CDC) in October 2014, May 2016, July 2017 and February 2018.
- CST submitted examination hearing statements and attended examination hearing sessions on 11th and 23rd October 2018.
- Following the examination sessions, we have informally engaged with CDC on modifications to the plan in advance of the publication of the main modifications for consultation.
- In addition to direct engagement with CDC, and the Planning Inspector at the examination sessions, CST has engaged on its proposals with Historic England (HE, Yorkshire Dales National Park Authority (YDNPA) and Natural England (NE). CST has commissioned a suite of technical documents culminating in the production of the Bolton Abbey Development Options Appraisal Study (BADOAS) 2017 (by Lichfields), which is referenced in the Submission Local Plan. Community consultation formed a key part of the BADOAS process, allowing CST to present its long-term proposals for Bolton Abbey and the CVA and to take on board feedback.

Comments on Main Modifications MM8

MM8 relates to policy SP4 Spatial Strategy and Housing Growth in the draft Craven Local Plan.

CDC propose a number of changes to the policy 'in the interests of clarity and to make the policy effective.'

CST has engaged informally with CDC on the amendments, as they relate to Bolton Abbey, and would concur that changes to the policy make it more effective. In particular, CST supports the addition of additional text in criterion I, sub-criterion a) of policy SP4, which clarifies that Bolton Abbey should receive limited new housing during the plan period:

'a) it can be demonstrated that the planned growth in the spatial strategy for the settlement will not be delivered during the plan period, with the exception of Bolton Abbey (where Policy EC4A of this plan provides for limited new housing) and Long Preston,'

Main modification MM8 is therefore strongly supported by CST.

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

N/A

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	✓
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	✓
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	[REDACTED]
Date	8 th March 2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ
 | www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



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

Craven Local Plan Examination

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravendc.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mr
First Name:	Will
Last Name:	Kemp
Job Title (where relevant):	Planning & Development Manager
Organisation (where relevant):	Chatsworth Settlement Trustees
Address 1:	Estate Office
Address 2:	Bolton Abbey
Address 3:	Skipton

Address 4:	North Yorkshire
Postcode:	BD23 6EX
Telephone:	██████████
Email:	████████████████████

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	James Ellis
Address:	Rural Solutions, Canalside House, Brewery Lane, Skipton, North Yorkshire, BD23 1DR
Telephone number:	██████████
Email:	████████████████████

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Chatsworth Settlement Trustees
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: <ul style="list-style-type: none">MM103 and MM104 (both relating to draft policy EC4a)	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

Introduction

- Chatsworth Settlement Trustees (CST) has engaged in the Craven Local Plan (CLP) process throughout its production process, submitting detailed representations to Craven District Council (CDC) in October 2014, May 2016, July 2017 and February 2018.
- CST submitted examination hearing statements and attended examination hearing sessions on 11th and 23rd October 2018.
- Following the examination sessions, we have informally engaged with CDC on modifications to the plan in advance of the publication of the main modifications for consultation.
- In addition to direct engagement with CDC, and the Planning Inspector at the examination sessions, CST has engaged on its proposals with Historic England (HE, Yorkshire Dales National Park Authority (YDNPA) and Natural England (NE). CST has commissioned a suite of technical documents culminating in the production of the Bolton Abbey Development Options Appraisal Study (BADOAS) 2017 (by Lichfields), which is referenced in the Submission Local Plan. Community consultation formed a key part of the BADOAS process, allowing CST to present its long-term proposals for Bolton Abbey and the CVA and to take on board feedback.

Comments on Main Modifications MM103 and MM104

MM103 and MM104 both relate to policy EC4a Tourism-Led Development at Bolton Abbey in the draft Craven Local Plan.

MM103 proposes changes to the supporting text to Policy EC4A Para 7.27 'In the interests of clarity' and proposes the following text changes:

7.27 The Council therefore proposes to include an additional, but related policy to EC4 (EC4A), to support sensitive and sustainable tourism-led, mixed-use development at Bolton Abbey, in the general locations identified at Bolton Abbey and Bolton Bridge (see Policies Inset Map No.24), subject to a comprehensive strategy and Masterplan for the Core Visitor Area being produced ~~in collaboration with and to the satisfaction of itself (as local planning authority) and other key stakeholders, including the Yorkshire Dales National Park Authority, to the satisfaction of itself and the Yorkshire Dales National Park Authority (as local planning authorities) and in consultation with other key stakeholders, including~~ Historic England, Natural England and the Environment Agency. Development proposals will be expected to accord with the principles of the Masterplan and development proposals which would prejudice the delivery of the related strategy for the Core Visitor Area will not be permitted.

This change is fully supported by CST and considers that the change is helpful in relation to the clarity and interpretation of the policy.

MM104 proposes changes to policy EC4a 'In the interests of clarity and to make the policy effective'. The main modification includes a text changes to the policy. These text changes were discussed at the examination hearing session at which the policy was considered and have also formed the basis of informal discussions between CST and CDC in advance of formal publication of the main modifications for consultation.

CST strongly supports the text changes to EC4a as proposed by MM104.

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

N/A

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)

Yes, I do wish to be notified	✓
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)

Yes, I do wish to be notified	✓
-------------------------------	---

No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	[Redacted Signature]
Date	8 th March 2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ
 | www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



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

Craven Local Plan Examination

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravendc.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mr
First Name:	Will
Last Name:	Kemp
Job Title (where relevant):	Planning & Development Manager
Organisation (where relevant):	Chatsworth Settlement Trustees
Address 1:	Estate Office
Address 2:	Bolton Abbey
Address 3:	Skipton

Address 4:	North Yorkshire
Postcode:	BD23 6EX
Telephone:	██████████
Email:	████████████████████

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	James Ellis
Address:	Rural Solutions, Canalside House, Brewery Lane, Skipton, North Yorkshire, BD23 1DR
Telephone number:	██████████
Email:	████████████████████

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Chatsworth Settlement Trustees
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
<p>MM:</p> <ul style="list-style-type: none"> • PM04 and PM05 (From Schedule of Policy Map Changes (EL6.008) propose the following changes: <p style="padding-left: 40px;">PM04: 'Amend all relevant inset maps to include the notation for Key Locations for Tourism Development identified in EC4, and include in all relevant keys. This notation is to be changed from a blue 'T' in a black circle to a red triangle, in order to improve the clarity of inset maps.'</p> <p style="padding-left: 40px;">PM05: 'Amend the full plan area policies map to reflect changes to the notation for Key Locations for Tourism Development, which is to be changed from a blue 'T' in a black circle to a red triangle. Include this notation at Skipton, Gargrave and Embsay. Alter key'</p>	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravencd.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

Introduction

- Chatsworth Settlement Trustees (CST) has engaged in the Craven Local Plan (CLP) process throughout its production process, submitting detailed representations to Craven District Council (CDC) in October 2014, May 2016, July 2017 and February 2018.
- CST submitted examination hearing statements and attended examination hearing sessions on 11th and 23rd October 2018.
- Following the examination sessions, we have informally engaged with CDC on modifications to the plan in advance of the publication of the main modifications for consultation.
- In addition to direct engagement with CDC, and the Planning Inspector at the examination sessions, CST has engaged on its proposals with Historic England (HE, Yorkshire Dales National Park Authority (YDNPA) and Natural England (NE). CST has commissioned a suite of technical documents culminating in the production of the Bolton Abbey Development Options Appraisal Study (BADOAS) 2017 (by Lichfields), which is referenced in the Submission Local Plan. Community consultation formed a key part of the BADOAS process, allowing CST to present its long-term proposals for Bolton Abbey and the CVA and to take on board feedback.

Comments on Main Modifications PM04 and PM05:

CST considers that the changes proposed by PM04 and PM05 are helpful in clarifying the key locations for tourism development on the full plan area policies map and inset map.

The proposed inset map for Bolton Abbey includes, as well as the red triangle for the 'Key Location for Tourism Development', the three 'general locations' for development, as referenced in draft policy EC4a, identified by red circles:

- Land including and surrounding the main village car park at Bolton Abbey village
- Land to the north-north-west of the B6160 / A59 roundabout at Bolton Bridge
- Land north of the highway spur (part of former A59) to the west of the B6160 at Bolton Bridge

Whilst CST considers it appropriate to include a red triangle on the Bolton Abbey Inset Map as proposed by CDC, it queries whether a Development Management Officer, consultee or member of the public could mistakenly consider that the positioning of the red triangle, which a purple line runs through the centre of, is pointing towards something on the map, which it is not intended to.

Therefore, in order to ensure the effectiveness of the inset map we suggest that the red triangle is moved to a different position on the map where it is surrounded by white space.

At Fig.1 below we suggest an alternate position where the red triangle could be located for greater clarity.



Fig. 1. The proposed location to move the red triangle (solid line) to is identified by a red triangle (dashed line).

CST can offer caveated support for modifications PM04 and PM05.

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

CST *suggests* that CDC and the Planning Inspector should *consider* amending the inset map for Bolton Abbey as highlighted in section five.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	✓
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	✓
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	[REDACTED]
Date	8 th March 2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

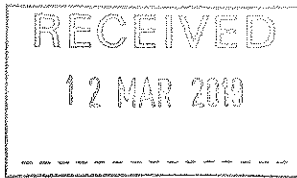
Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ
 | www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



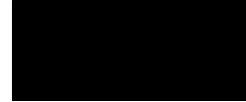
If you would like to have this information in a way that's better for you, please telephone 01756 700600.

Craven Local Plan Examination



Sian Watson
(Spatial Planning Manager)
Craven District Council,
1 Belle Vue Square,
Broughton Road,
Skipton,
BD23 1FJ

Rob Davey,



10/03/2019

Dear Sian Watson,

Removal of Green Space Designation for Park Hill

I am dismayed to learn of the proposal to remove the Green Space designation from Park Hill, Skipton. I strongly object to the proposal.

Has anything changed between the original designation being made and today apart from a change of ownership of some of the land?

Park Hill includes the historic site of the gun battery used to bombard the castle into surrender in 1645 during the English Civil War. It is very important that the historic site of the battery is preserved together with the aspect that allows the castle to be clearly seen when standing at the battery site.

Park Hill is also a recreational area (popular for tobogganing whenever it snows) being so close to the town that it is easily accessible on foot. It provides a tranquil setting from which to enjoy the wildlife, particularly the Curlew which are beginning to be heard at this time of year. Screech owls live in the nearby wood and Barn owls are seen still hunting in the early morning. It is a magnificent setting viewpoint to see the murmuration of starlings in the winter as they roost in the adjacent woodland.

It is not an extensive tract of land, and provides a key amenity to Skipton Town.

There is every reason to retain the Green Space Designation for Park Hill. There is no good reason to revoke it.

Yours faithfully



Rob Davey

From: Rob Davey [REDACTED]
Sent: 16 March 2019 14:18
To: Local Dev. Framework
Subject: ack email sent 13.3.19 by RP Green Space Designation at Park Hill Skipton

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sir

I am dismayed to learn of the proposal to reject the Green Space designation from Park Hill, Skipton. I strongly object to this.

Park Hill includes the historic site of the gun battery used to bombard the castle into surrender in 1645 during the English Civil War. It is very important that the historic site of the battery is preserved together with the aspect that allows the castle to be clearly seen when standing at the battery site.

Park Hill is also a recreational area (popular for tobogganing whenever it snows) being so close to the town that it is easily accessible on foot. It provides a tranquil setting from which to enjoy the wildlife, particularly the Curlew which are beginning to be heard at this time of year. Screech owls live in the nearby wood and Barn owls are seen still hunting in the early morning. It is a magnificent setting viewpoint to see the murmuration of starlings in the winter as they roost in the adjacent woodland.

It is not an extensive tract of land and provides a key amenity to Skipton Town.

There is every reason to allow the Green Space Designation for Park Hill. There is no good reason to reject it.

Yours faithfully

Rob Davey
[REDACTED]

From: Gregory Davies [REDACTED]
Sent: 28 March 2019 10:57
To: Sian Watson
Subject: Re-Instate Park Hill (Skipton) as a Local Green Space

Dear Sian

I am writing to you regarding the removal of the Local Green Space Designation for Park Hill in Skipton, to which I strongly object. I realise that proponents of its removal might define Park Hill as one of many green spaces that surround the town and which can be accessed by the public. However, I re-located to Skipton from Sheffield just over 2 years ago and already recognise the special meaning and value attached to Park Hill by local residents and visitors alike:

Firstly, the hill can be defined as part of what I would term "The Historic Castle Complex." This complex includes the castle, the adjacent woods, Skipton's early industrial and residential buildings near to Mill Bridge and Chapel Hill. The hill lies immediately west of Castle Woods, is accessed via Chapel Hill (where John Wesley once preached), and is crowned by the site of a 350-year-old battery, used by Oliver Cromwell's Roundheads during their 3-year siege of Skipton Castle, a Royalist stronghold during the English Civil War.

Secondly, the hill provides a unique viewpoint, leisure-space and walking-paths for locals, where couples and families routinely walk their dogs on an evening or weekend. Some stop at the top of the hill, sit on the wall and admire the amazing views in every direction; southward along the Aire Valley, westward towards Pendle, and north and eastward towards Sharp-haw, Embsay Crag and the Dales. Others continue over the wall and down the back of the hill towards Castle Woods, along the designated tourist pathways "Dales High Way" and "Lady Anne's Way." There is no other hill in the area that can be accessed so quickly by local residents and with such brilliant rewards. Furthermore, the hill is a well-known spot for sledging! During the 2018 "Beast from the East" the hill was crowded with young parents and their kids enjoying the snow and the perfect gradient of Park Hill. In other words, the hill is a SIGNIFICANT SOURCE OF HAPPINESS, ESPECIALLY FOR LOCALS.

Thirdly, the hill is also home to wildlife, including wild deer, which use the hill as a pathway between Castle Woods and the Dales towards Rylstone.

Finally, Park Hill is an integral part of Skipton's brand as "The Gateway to the Dales." I live opposite the hill and regularly watch hikers steaming up the hill at the crack of dawn, in both rain and shine, during the first stage of their day's hike. In this sense, the hill provides the most organic way for hikers to access the Dales; without it, they would either have to walk up Grassington Road, alongside traffic and eventually with no pavement, or catch a bus.

I sincerely hope these comments help to re-instate the protection of Park Hill as a Local Green Space.
Kind Regards, Greg Davies ([REDACTED])

From: Councillor John Dawson
Sent: 28 March 2019 15:52
To: Local Dev. Framework
Subject: Fwd: Local Plan modifications
Attachments: cdc-mods-rep-form-2019-final (1).docx; ATT00001.htm

Please see attached my representation on Modification MM75 to the Local Plan as Ward Councillor, Skipton North.

John Dawson

Councillor John Dawson
Craven District Council Member Skipton North Ward
tel: [REDACTED]

 Please consider the environment before printing this e-mail.

Begin forwarded message:

From: [REDACTED]
Date: 28 March 2019 at 15:48:19 GMT
To: [REDACTED]
Subject: Local Plan modifications

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Councillor
First Name:	John
Last Name:	Dawson
Job Title (where relevant):	Ward Councillor Skipton North
Organisation (where relevant):	
Address 1:	████████████████████
Address 2:	██████
Address 3:	

Address 4:	
Postcode:	██████
Telephone:	██████████
Email:	██

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	N/A
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Cllr John Dawson
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: 75	

Section 4: Legal Compliance & Duty to Cooperate

Do you consider that this modification of the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Sound	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. In Compliance with the Duty to Cooperate	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravencdc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

My comment relates to Policy ENV2 Heritage.

I wish to support the modification made here by adding a sentence (v) to section (a) adding "Skipton Castle, the castle grounds etc.

This is a valid recognition of the historic significance of these areas of land and their importance to the town and people of Skipton.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

Nothing to add to what is said above.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the

name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)

Yes, I do wish to be notified	<input checked="" type="checkbox"/>
No, I do not wish to be notified	<input type="checkbox"/>


Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)

Yes, I do wish to be notified	<input type="checkbox"/>
No, I do not wish to be notified	<input checked="" type="checkbox"/>

Section 9: Signature & Date of Representation

Please sign and date below:

Signature	
Date	28.3.19

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ
| www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



INVESTOR IN PEOPLE



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

Craven Local Plan Examination

From: Councillor John Dawson
Sent: 28 March 2019 15:35
To: Local Dev. Framework
Subject: Fwd: Local Plan modifications
Attachments: cdc-mods-rep-form-2019-final.docx; ATT00001.htm

Please note my attached representation on the Modifications to the Local Plan sent as Ward Councillor for Skipton North.

John Dawson

Councillor John Dawson
Craven District Council Member Skipton North Ward
tel: [REDACTED]

 Please consider the environment before printing this e-mail.

Begin forwarded message:

From: [REDACTED]
Date: 28 March 2019 at 15:31:54 GMT
To: [REDACTED]
Subject: Local Plan modifications

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravendc.gov.uk


For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Councillor
First Name:	John
Last Name:	Dawson
Job Title (where relevant):	
Organisation (where relevant):	Ward Councillor for Skipton North
Address 1:	
Address 2:	
Address 3:	

Address 4:	
Postcode:	██████
Telephone:	██████████
Email:	██

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	N/A
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: 87	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

Policy ENV10 on Local Green Space should continue to include Land at SK-LGS64 as such local green space.

The Inspector did not take account of or was not aware of the importance of this area of land at Park Hill to the people of Skipton. This could be because, as the land was proposed to be designated as local green space in the submitted Plan, there was little comment from residents as they thought effectively the job was done with such a designation.

Now residents have become aware of the modification, they have expressed their views. As Ward Councillor, I have had over 50 emails or letters on this one issue and I have replied to them all.

To me, the key issues are that this land is of great importance to the people of Skipton as it is close to the centre and dominates this part of town. It is widely used for walking and leisure activities but, most of all, it is of huge historical significance. The Castle was subject to a long siege during the English Civil War and all this surrounding land is relevant to those events.

Para.77 of the NPPF clearly states that the designation as local green space should only be used when it is demonstrably special to a local community and holds a particular local significance for various reasons including its beauty, historic significance and recreational value. This land meets all these tests. Further it is in reasonably close proximity to the Skipton community it serves and it is local in character. I do not consider it an extensive tract of land.

Hence, I ask that the land be reinstated as local green space.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main

Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

As stated above, I would ask that this land be redesignated as local green space for the reasons outlined above.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)

Yes, I do wish to be notified	<input checked="" type="checkbox"/>
No, I do not wish to be notified	<input type="checkbox"/>

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)

Yes, I do wish to be notified	<input type="checkbox"/>
No, I do not wish to be notified	<input type="checkbox"/>

Section 9: Signature & Date of Representation

Please sign and date below:

Signature	
-----------	---

Date	
------	--

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ
| www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



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

Craven Local Plan Examination

From: Gillian Dean [REDACTED]
Sent: 27 March 2019 20:50
To: Sian Watson
Subject: The Removal of the Green Space Designation for Park Hill, Skipton

Dear Ms. Watson,

We are submitting our objection to the removal of the designated 'Local Green Space' status of Park Hill in Skipton.

Initial disbelief became shock and anger, that this action has already been taken without it would appear consultation. We want to add our voice to the many others that feel as strongly as ourselves and wish to see the Local Green Space Designation re-instated.

We understand that Park Hill remained a designated protected Local Green Space within the recent Local Plan (March 2018), but that this protection has since been removed after pressure from the land owner. The landowner's agent main claim was that Park Hill was not important to the local community. This begs the question of how on earth would they know this, and what evidence they have of its use? How many residents of Skipton have they contacted to ask how they would feel about Park Hill being considered unimportant, no longer being a green space, or that the land may potentially be developed? I assume development could now happen without the protected Green Space designation, which would be a travesty.

The government guidelines state that Local Green Space Designation should only be used where green space is:

- a. In reasonably close proximity to the community it serves;
- b. Demonstrably special to a local community and holds a particular local significance
- c. Local in character and is not an extensive tract of land

These points are easy to answer; Park Hill could not be any closer to the town and the community it serves and who enjoy it. It is accessible directly from the town either via Chapel Hill or Short Lee Lane. It is a very accessible space for all ages to enjoy a short hill climb and to admire the extensive views of the countryside and townscape. This is also without the need for transport to get to the start point.

It remains a special place. The long distance footpaths 'A Dales High Way' and 'Lady Anne's Way' run over the top of Park Hill from Chapel Hill to Short Lee Lane. These are used regularly throughout the year. We often walk this way and encounter individuals and walking groups. The woodland trust has done extensive work within Skipton Castle Woods over the past couple of years attracting many more visitors from near and far. The walk over Park Hill is a wonderful extension to these paths and again is accessible for all ages. It is so very special to ramblers, families, dog walkers for both visitors and locals alike.

How can anyone argue that it isn't local in character? Park Hill sits at the head of the town alongside the Castle and woods. It is a clearly visible focal point from many parts of the town, a backdrop to the castle and an important part of Skipton's English civil war history. It is a key part of what makes Skipton so special, not only for local residents but also for the tourism on which so many of our local businesses, and certainly our enviable High Street, rely upon.

James and Gillian Dean
[REDACTED]

From: Louis Devenish [REDACTED]
Sent: 21 February 2019 10:21
To: Local Dev. Framework
Subject: Ack email sent RC 21.2.19: Craven Local Plan: Main Modifications Representation Form
Attachments: cdc-mods-rep-form-2019-final_Louis Devenish_Feb_19.docx

Follow Up Flag: Follow up
Flag Status: Completed

Dear CDC,

Please see attached my completed representation form regarding the Main Modifications proposed to the Craven Local Plan regarding the deletion of Local Green Space SKLGS64 (MM87). I hope you consider the points raised and will consider the reversal of its deletion from the Local Plan.

Could you please confirm safe receipt of this email and its attachment.

Many thanks,

Louis Devenish

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mr
First Name:	Louis
Last Name:	Devenish
Job Title (where relevant):	n/a
Organisation (where relevant):	n/a – former local resident
Address 1:	[REDACTED]
Address 2:	[REDACTED]
Address 3:	
Address 4:	
Postcode:	[REDACTED]
Telephone:	[REDACTED]
Email:	[REDACTED]

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	n/a
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	n/a – former local resident
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM87 The deletion of Local Green Space SKLGS64 ‘Land to north of Skipton’ under Policy ENV10 Local Green Space.	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council’s Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

I am writing to oppose the deletion of the designation of Park Hill (SKLGS64) as safeguarded local green space. I understand that its status was changed as the landowner made representations for the land to be developed for housing on the basis that it is not valuable to the community. I believe that this area of green space absolutely fulfils National Planning Policy criteria for safeguarded Local Green Space, in terms of:

- Demonstrable value to the local community
- Proximity to the local community
- Of particular historic / local significance

For these reasons, which I explain further below, its status as Local Green Space should therefore be retained.

I was born and raised in Skipton, living in the town for 18 years, attending Ermysted's Grammar School. My family continue to live in the town and I regularly visit and spend time there. My visits often include a short local walk, perhaps round Skipton woods, or up loops beyond Raikes towards Sharpshaw. The routes are often not very long as my mother's mobility and fitness are not great, and we don't own a car due to her health, meaning that a pleasant, green local loop is of real value to our life in the town.

One regular feature of our walks is up and across Park Hill. I have particularly clear memories of sitting on the stile at the top of the hill on sunny days looking down the Aire valley towards Cononley, with Skipton in the foreground. I also remember completely opposite conditions on rare snowy days in winter, sledging down the ideal, steep, open slopes.

There are other reasons for its value, which include historic significance – the location of a Civil War battery – and its inclusion in long-distance walking paths – Lady Anne's Way and the Dales High Way. However, I think the argument for its retention does not even need these additional reasons; the land's value to the local community is reason enough.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

My proposed modification is simple: to reverse the deletion of Local Green Space SKLGS64 'Land to north of Skipton' under Policy ENV10 Local Green Space so that it complies with National Planning Policy.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)

Yes, I do wish to be notified	√
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)

Yes, I do wish to be notified	√
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	21/02/19

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ |
www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



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

Craven Local Plan Examination

From: Thorfinn Caithness [REDACTED]
Sent: 01 April 2019 14:05
To: Local Dev. Framework
Cc: Admin; Planning Group
Subject: Craven Local Plan - Main Modifications - MM40 - HB024 - Land North of Lakeber Drive, High Bentham (Area and Yield) - Dickinson / Edwardson Associates
Attachments: MM40 - HB024 - Area and Yield.pdf

Dear Local Plan Team

Please find attached a representation in relation to MM40 - HB024 - Land North of Lakeber Drive, High Bentham (Area and Yield), on behalf of our client Mr Adrian Dickinson.

Regards

Thorfinn Caithness BA (Hons) MA Town & Reg Plng MRTPI

Edwardson Associates Ltd.
Planning and Diversification Consultants
Paddock House
10 Middle Street South
Driffield
East Yorkshire
YO25 6PT

Tel: [REDACTED]
Fax: [REDACTED]

This email is confidential and may be privileged. It is intended for the use of the intended recipient only. Any opinions or advice contained within the email are personal between ourselves and the client and may not be relied upon by anyone else, nor held out by third parties as being advice upon which they may have relied. If you receive it in error please call me on [REDACTED] then delete the email and do not copy it or forward it to any third party. I believe but do not warrant that this email and any attachments are virus free. Thank you

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mr
First Name:	Adrian
Last Name:	Dickinson
Job Title (where relevant):	
Organisation (where relevant):	
Address 1:	c/o Edwardson Associates Ltd
Address 2:	
Address 3:	

Address 4:	
Postcode:	
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	Gemma Edwardson
Address:	Edwardson Associates Ltd, Paddock House, 10 Middle Street South, Driffield, East Yorkshire, YO25 6PT
Telephone number:	[REDACTED]
Email:	[REDACTED]

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Gemma Edwardson, Edwardson Associates
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: 40 (HB024) – Land North of Lakeber Drive, High Bentham (Site Area and Yield)	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council’s Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

We agree that the modifications to the area of the site and approximate yield are effective and reflect the most up to date evidence concerning site delivery.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

No changes required.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	X
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	X
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature AP	[REDACTED]
Date	01/04/19

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ | www.cravendc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravendc.gov.uk



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

Craven Local Plan Examination

From: Thorfinn Caithness [REDACTED]
Sent: 01 April 2019 14:07
To: Local Dev. Framework
Cc: Planning Group; Admin
Subject: Craven Local Plan - Main Modifications - MM43 - HB024 - Land North of Lakeber Drive, High Bentham (Housing Allocation) - Dickinson / Edwardson Associates
Attachments: MM43 - HB024 - Housing Allocation.pdf

Dear Local Plan Team

Please find attached a representation in relation to MM43 - HB024 - Land North of Lakeber Drive, High Bentham (Housing Allocation), on behalf of our client Mr Adrian Dickinson.

Regards

Thorfinn Caithness BA (Hons) MA Town & Reg Plng MRTPI

Edwardson Associates Ltd.
Planning and Diversification Consultants
Paddock House
10 Middle Street South
Driffield
East Yorkshire
YO25 6PT

Tel: [REDACTED]
Fax: [REDACTED]

This email is confidential and may be privileged. It is intended for the use of the intended recipient only. Any opinions or advice contained within the email are personal between ourselves and the client and may not be relied upon by anyone else, nor held out by third parties as being advice upon which they may have relied. If you receive it in error please call me on [REDACTED] then delete the email and do not copy it or forward it to any third party. I believe but do not warrant that this email and any attachments are virus free. Thank you

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mr
First Name:	Adrian
Last Name:	Dickinson
Job Title (where relevant):	
Organisation (where relevant):	
Address 1:	c/o Edwardson Associates Ltd
Address 2:	
Address 3:	

Address 4:	
Postcode:	
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	Gemma Edwardson
Address:	Edwardson Associates Ltd, Paddock House, 10 Middle Street South, Driffield, East Yorkshire, YO25 6PT
Telephone number:	██████████
Email:	██

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Gemma Edwardson, Edwardson Associates
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: 43 (HB024) – Policy SP7 - Land North of Lakeber Drive, High Bentham (Housing Allocation)	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

We agree that the modifications clarify and make the policy effective. We welcome the clarity that access from Lakeber Drive remains an option, subject to appropriate investigations. We are currently investigating the feasibility of this option. We reiterate that our client has no objections to the provision within HB024 of an emergency access to serve HB044 and HB052. Our client is fully committed to engaging with the owners and developers of HB044 and HB052 to facilitate and ensure the development of all three sites in a timely fashion. Finally, we consider that the requirement to conserve the landscape and scenic beauty of the Forest of Bowland AONB clarifies and makes the policy effective.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

No changes required.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)

Yes, I do wish to be notified	X
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)

Yes, I do wish to be notified	X
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:

Signature	PP [Redacted]
Date	01/04/19

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ |
www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



INVESTOR IN PEOPLE



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

Craven Local Plan Examination

From: Thorfinn Caithness [REDACTED]
Sent: 01 April 2019 14:08
To: Local Dev. Framework
Cc: Planning Group; Admin
Subject: Craven Local Plan - Main Modifications - MM48 - HB044 - Land to West of Goodenber Road, High Bentham (Housing Allocation) - Dickinson / Edwardson Associates
Attachments: MM48 - HB044 - Housing Allocation.pdf

Dear Local Plan Team

Please find attached a representation in relation to MM48 - HB044 - Land to West of Goodenber Road, High Bentham (Housing Allocation), on behalf of our client Mr Adrian Dickinson.

Regards

Thorfinn Caithness BA (Hons) MA Town & Reg Plng MRTPI

Edwardson Associates Ltd.
Planning and Diversification Consultants
Paddock House
10 Middle Street South
Driffield
East Yorkshire
YO25 6PT

Tel: [REDACTED]
Fax: [REDACTED]

This email is confidential and may be privileged. It is intended for the use of the intended recipient only. Any opinions or advice contained within the email are personal between ourselves and the client and may not be relied upon by anyone else, nor held out by third parties as being advice upon which they may have relied. If you receive it in error please call me on [REDACTED] then delete the email and do not copy it or forward it to any third party. I believe but do not warrant that this email and any attachments are virus free. Thank you

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mr
First Name:	Adrian
Last Name:	Dickinson
Job Title (where relevant):	
Organisation (where relevant):	
Address 1:	c/o Edwardson Associates Ltd
Address 2:	
Address 3:	

Address 4:	
Postcode:	
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	Gemma Edwardson
Address:	Edwardson Associates Ltd, Paddock House, 10 Middle Street South, Driffield, East Yorkshire, YO25 6PT
Telephone number:	██████████
Email:	██

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Gemma Edwardson, Edwardson Associates
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: 48 (HB044) – Policy SP7 - Land to west of Goodenber Road, High Bentham (Housing Allocation)	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

We act for the owner of HB024. We can confirm that our client has no objections to the provision within HB024 of an emergency access to serve HB044 and HB052. Our client is fully committed to engaging with the owners and developers of HB044 and HB052 to facilitate and ensure the development of all three sites in a timely fashion

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

No changes required.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	X
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	X
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature <i>PP</i>	[REDACTED]
Date	<i>01/04/19</i>

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ | www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



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

From: Thorfinn Caithness [REDACTED]
Sent: 01 April 2019 14:08
To: Local Dev. Framework
Cc: Planning Group; Admin
Subject: Craven Local Plan - Main Modifications - MM49 - HB052 - Land to north west of Bank Head Farman and south of Ghyllhead Farm, High Bentham (Housing Allocation) - Dickinson / Edwardson Associates
Attachments: MM49 - HB052 - Housing Allocation.pdf

Dear Local Plan Team

Please find attached a representation in relation to MM49 - HB052 - Land to north west of Bank Head Farm and south of Ghyllhead Farm, High Bentham (Housing Allocation), on behalf of our client Mr Adrian Dickinson.

Regards

Thorfinn Caithness BA (Hons) MA Town & Reg Plng MRTPI

Edwardson Associates Ltd.
Planning and Diversification Consultants
Paddock House
10 Middle Street South
Driffield
East Yorkshire
YO25 6PT
Tel: [REDACTED]
Fax: [REDACTED]

This email is confidential and may be privileged. It is intended for the use of the intended recipient only. Any opinions or advice contained within the email are personal between ourselves and the client and may not be relied upon by anyone else, nor held out by third parties as being advice upon which they may have relied. If you receive it in error please call me on [REDACTED] then delete the email and do not copy it or forward it to any third party. I believe but do not warrant that this email and any attachments are virus free. Thank you

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mr
First Name:	Adrian
Last Name:	Dickinson
Job Title (where relevant):	
Organisation (where relevant):	
Address 1:	c/o Edwardson Associates Ltd
Address 2:	
Address 3:	

Address 4:	
Postcode:	
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	Gemma Edwardson
Address:	Edwardson Associates Ltd, Paddock House, 10 Middle Street South, Driffield, East Yorkshire, YO25 6PT
Telephone number:	██████████
Email:	██

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Gemma Edwardson, Edwardson Associates
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: 49 (HB052) – Policy SP7 - Land to north west of Bank Head Farm and south of Ghyllhead Farm, High Bentham (Housing Allocation)	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

We act for the owner of HB024. We can confirm that our client has no objections to the provision within HB024 of an emergency access to serve HB044 and HB052. Our client is fully committed to engaging with the owners and developers of HB044 and HB052 to facilitate and ensure the development of all three sites in a timely fashion.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

No changes required.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	X
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	X
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature <i>PP</i>	[REDACTED]
Date	<i>01/04/19.</i>

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ | www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



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

Craven Local Plan Examination

From: john dickson [REDACTED]
Sent: 21 March 2019 14:34
To: Local Dev. Framework
Subject: Hellifield Flashes

Dear Sirs,

I should be grateful if you would register my support for declaring the Hellifield Flashes a "Local Green Space" for the following reasons:

The beauty and tranquility of the place in its natural state;
The richness of the birdlife in this area and its significance for migrators;
The archaeological significance of the site which remains to be explored.

Thank you and regards,

John Dickson



From: Angela Dowbiggin [REDACTED]
Sent: 01 April 2019 15:36
To: Local Dev. Framework
Subject: Main Modifications representation form
Attachments: main modifications representation form.docx

Dear Sir/madam

Please find attached the completed representation form

Thank you

Angela Dowbiggin

Angela Dowbiggin DipPFS
Partner of St. James's Place Wealth Management

[REDACTED]
Mobile: [REDACTED]

If you wish to view the St. James's Place Partnership email disclaimer, please access the link below

<https://www.sjp.co.uk/site-services/site-disclaimer/sjpp-email-disclaimer>

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mrs
First Name:	Angela
Last Name:	Dowbiggin
Job Title (where relevant):	
Organisation (where relevant):	Neighbourhood Plan Group
Address 1:	██████████
Address 2:	██████
Address 3:	██████

	██████████
Postcode:	██████████
Telephone:	██████████
Email:	████████████████████

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Angela Dowbiggin – Carleton neighbourhood plan group
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM:8 – changes to policy map MM7 – Housing growth	

Section 4: Legal Compliance & Duty to Cooperate

Do you consider that this modification of the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. In Compliance with the Duty to Cooperate	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

Changes made to the policy map should also be reflected in the housing numbers tables on page 16 to reflect the most up to date position to ensure that ;-

- The level of housing is achievable in each Tier
- To comply with the spatial strategy for each Tier
- To satisfy the legal requirements under the NPPF – sections 157 & 182
-

It should also be made clear that if housing allocations are lost in the individual Tiers then what is the strategy for replacing those allocations.

We are particularly concerned with the housing numbers for the village of Carleton – a Tier 4 service village which under the plan should have a “ Limited level of growth to maintain vitality and function to not undermine the role of Tier 4 settlements in the Settlement hierarchy.

Under the settlement Hierarchy Tier 4 villages were given a Site led approach to the number of housing allocations based on the known available sites. As Carleton at the time had a brownfield site with 24 permissions it was attributed a higher number of allocations than other villages in the Tier 4 which have better services and transport links. This Brownfield site has now been lost as the developer has decided to reduce the numbers to only 4. Therefore the housing allocations for Carleton should be brought in line with others under Tier 4 i.e reduced by 20 and this should be reflected in the housing numbers table on page 16.

This ties in quite significantly with the concerns we have with the policy wording changes under SP4 (section MM7 – 4.47 to 4.51).

We are particularly concerned with the wording on

- page 9 section 4.47 “In order to ensure that the plan’s balanced sustainable spatial strategy is implemented, the focus of growth will be through the plans land allocations for housing and any opportunities that come forward during the plan period on previously developed land or OTHER APPROPRIATE LAND” - (What is meant by appropriate ? this is very woolly and subjective and is open to misinterpretation).
- Page 9 section 4.49 page 10 sections 4.50 and 4.51 – We are concerned with the wording regarding the land on the edge of settlements and particularly if land does not come forward. We believe this does not comply with the policies contained within the NPPF which give protection for the countryside and therefore the wording needs amending to afford stronger protection to the rural countryside.

The wording as it stands could allow the system to be manipulated to allow Greenfield Land or land on the edge of settlements to be unnecessarily developed – particularly where Brownfield sites are available but land agents and developers choose not to bring those forward

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

Please see section above

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.


Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	yes
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	yes
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	31/03.2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ
| www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



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

Craven Local Plan Examination



Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). Please fill in a separate form for each representation you wish to make.

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

X

Title:	MRS.
First Name:	JILL
Last Name:	DOWNS
Job Title (where relevant):	
Organisation (where relevant):	
Address 1:	[REDACTED]
Address 2:	[REDACTED]
Postcode:	[REDACTED]
Telephone:	[REDACTED]
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	N/A
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

If you wish your personal details to be treated in confidence and not published please tick the box below:	
Please explain below, why you have made this request:	

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: Equality	
Insufficient level of equality assessment conducted on site G2/4 gargrave (off Walton close/Marton Road).	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

<p>Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.</p> <p>If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.</p>

X
 MARTON ROAD IS DANGEROUS.
 TRAFFIC GOING TOO FAST.
 NO PAVEMENTS.
 TRACTORS USING THE ROAD ALL
 THE TIME AND GOING FAR TOO FAST -
 NEVER STOP FOR ANYTHING.
 CERTAINLY NOT SAFE FOR CHILDREN.
 MUCH TRAFFIC CUTS THROUGH ONTO
 THE GIBBURN ROAD.

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

- Significant investment made to infrastructure
- Equality assessment to be conducted with remediating actions put in place
- Or alternative suitable site which will cater for all disadvantaged groups

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
X Signature	
Date	

From: Ron Eccles [REDACTED]
Sent: 12 March 2019 21:06
To: Local Dev. Framework
Subject: ack email sent 13.3.19 by RP Green Spaces Hellifield

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sirs.

I would like to state my reasons for keeping the Flashes complete as a Green Space for both Hellifield and Long Preston villagers.

As I understand it, it is proposed that only the large pond area is to be designated as a Green Space. It is not a reasonably close area, as to get to the area involves quite a trek for people with mobility problems. Also when people do reach the space, it is not actually Green, it is a pond.

The area now is used for walking, playing and in the winter, snow prevailing, sledging for all the family. This would be a loss when there is only a pond to look at. It is an area where you can sit, relax and take in the tranquility of the space, where other areas in the village are basically farm tracks. The area has Marl mounds that date back millennia and is an area that is alive with migratory and resident bird and animal life. It is an area often visited by deer.

Finally, how do you define an extensive tract of land, when compared to the amount of non accessible farmland around?

Yours

Ron Eccles

[REDACTED]

From: Vic Edy [REDACTED]
Sent: 17 March 2019 14:12
To: Sian Watson
Cc: Councillor John Dawson; Tony Blackburn
Subject: Park Hill and the Local Plan

Dear Ms Watson,

I write to you (copied to Mr Blackburn and Cllr. Dawson) concerning the removal of Park Hill as a Local Green Space from the Local Plan. Whilst I appreciate and accept the need for development land around Skipton, it seems to me that Park Hill meets the criteria for designation as a Local Green Space. It is adjacent to the centre of the town, and to the Grassington Road, it is a beautiful, tranquil and natural addition to the town's attractiveness and is regularly used as a walking route by tourists and locals coming from the town via Skipton Woods and back into town, as well as being of historic significance as the site of a Civil War battery during the siege of Skipton Castle. It is not especially extensive; I admit you cannot see one side from the other but this is because it is a hill. For all of these reasons, I feel very strongly that the Inspector was wrong in his decision to remove the Local Green Space designation from Park Hill, and that this decision should be reversed. The proposal to designate merely the small field alongside the bypass and a tract from Short Lee Lane along the Grassington Road is inadequate, for these areas are neither special, historic nor of recreational value.

Yours sincerely,

V.G Edy
[REDACTED]

From: Judith Edy [REDACTED]
Sent: 17 March 2019 17:54
To: Tony Blackburn
Subject: Park Hill

I would like to comment on the removal of the Local Green Space designation for Park Hill, Skipton from the Craven Local Plan.

I cannot see how Park Hill can be considered an extensive tract of land as it seems to meet all the requirements of a designated Green Space. It is in very close proximity to Skipton, is local in character (agricultural pasture), and is not extensive (being bounded by Skipton Woods, Short Lee Lane, Grassington Road and Skipton itself). It is of great importance to the people of Skipton (and visitors to our town) as both a tranquil, green setting for the town itself but also as a popular place to walk and enjoy the views of the hills around and of Skipton set out below - whether as a close and handy place for a short bit of exercise or as the setting off point for the wonderful Lady Anne's Way. It has great historic significance too being the site of the Civil War battery. To lose this precious green space to development would be a tragedy for Skipton and I hope it can be protected.

Regards,
Judith Edy

[REDACTED]

From: Embsay Parish Council
Sent: 29 March 2019 13:22
To: Local Dev. Framework
Subject: Local Plan - Main Modification Consultation Representation Form -Completed
Attachments: cdc-mods-rep-form-2019-final for ga[25515].docx

Please find attached completed form on behalf of Embsay with Eastby Parish Council.
Please acknowledge receipt.

Regards

Gillian Alcock
Parish Clerk for Embsay with Eastby

This e-mail and any files transmitted with it are confidential and solely for the use of the intended recipient. If you receive this in error, please do not disclose any information to anyone, notify the sender at the above address and then destroy all copies.

Although we have endeavoured to ensure that this e-mail and any attachments are free from any virus we would advise you to take any necessary steps to ensure that they are actually virus free.

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravendc.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mrs
First Name:	Gillian
Last Name:	Alcock
Job Title (where relevant):	Clerk to the Council
Organisation (where relevant):	Embsay with Eastby Parish Council
Address 1:	██████████
Address 2:	████████████████████
Address 3:	██████████

Address 4:	██████
Postcode:	██████
Telephone:	██████████
Email:	██████████████████

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	n/a
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Embsay with Eastby Parish Council
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: 87	

Section 4: Legal Compliance & Duty to Cooperate

Do you consider that this modification of the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. In Compliance with the Duty to Cooperate	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

The Parish Council acknowledges that the designated area, identified within the original reference SK LGS 64 of the submission Draft Plan dated March 2018 (bordering onto Skipton Road Embsay, Grassington Road Skipton and the Skipton bypass), is too large to qualify within the criteria for Local Green Spaces. Whilst the whole area has the integrity of history, natural history, recreation and amenity, of particular concern to the Parish Council and parishioners of Embsay with Eastby is the land bounding onto Cross Bank, Skipton Woods and the Skipton / Embsay Road.

This latter parcel of land effectively creates a green 'buffer' maintaining a clear green division between the primarily rural parish of Embsay with Eastby and the extending urbanisation of Skipton. The 'buffer' helps to retain and identify the rural separations, characteristic of the Craven area with its separate communities and settlements. Indeed, this latter aspect has been acknowledged by the Inspector himself in his recognition and acceptance of the Local Green Spaces 'buffer' (Craven Draft LDP ref EM LGS 11) between Embsay and Eastby villages themselves.

In addition, there is a high landscape value from the heavily and regularly used footpath flanking the north western edge of Skipton Road to the northern horizon – the footpath being frequently used by recreational walkers in addition to residents. It further enhances the amenity aspects of access from Skipton Woods and the nationally recognised Lady Anne's Way, a long-distance footpath extending from Skipton Castle to Brougham Castle near Penrith, travelled by and named after Lady Anne Clifford, the inherited owner of Skipton Castle at the end of the Civil War.

The Parish Council is of the opinion that the whole tract of land is related, given that its major significance is that it forms part of the site from which a 3-year siege was made by Cromwell, during the Civil War, and has remained virtually undisturbed for over three hundred and fifty years.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

The Parish Council considers that the necessary change is the reinstatement of the original reference for the reasons stated above, namely:

MM87 - Policy ENV10 Local Green Space - SK LGS G4
Land to north of Skipton, bounded to the north by Skipton Bypass, to the east by Embsay Road & The Bailey; and to the west by Grassington Road, Skipton

but would suggest a division into three separate parcels, as put forward by Craven District Council in its revised submission of the 22nd January 2019, following the rejection of SK LGS 64 in its entirety, by the Inspector.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	✓
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	✓
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	██████████
Date	27/03/19

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ
www.cravencd.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravencd.gov.uk



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

Craven Local Plan Examination

From: Cathy Emmott [REDACTED]
Sent: 29 March 2019 20:25
To: Local Dev. Framework
Subject: FW: Green Space Designation - Hellifield Flashes

Dear CDC Local Plan

I am writing to you with regard to the Green Space Designation of Hellifield Flashes.

My family and I have lived in Hellifield, at [REDACTED] for 13 years and have had the absolute pleasure of seeing and experiencing the flashes in all their beauty during this time.

Over this period and depending on the level water they provide many feeding stops for thousands of birds including: Lapwing, Oyster Catcher, Curlew, Redshank, Snipe, Mute Swan, Whooper Swan, Pink-footed Goose, Greylag Goose, Canada Goose, Barnacle Goose, Gadwall, Goldeneye, Red-legged Partridge, Cormorant, Heron, Sparrow Hawk and Little Grebe to name but a few.

The flashes also regularly attract a herd of up to 17 roe deer. These include juvenile. They roam throughout the fields and are enjoyed by everyone who uses the public footpath through these fields. It is an absolute privilege to see these creatures and something that we are duty bound to protect.

Also present on the flashes are a large group of Great Crested Newts. These were also discovered within the boundary of our garden and recorded by Richard Sunter (The Yorkshire Naturalist Union). Evidence of this can be provided via Save Our Countryside Campaign Group.

The land over which the flashes can be seen is spread over a number of fields however each 'flash' is used abundantly by various species of wildlife dependant of the time of year. This winter, with the high volume of rainfall we have never seen these flashes as full of water and therefore teeming with birds. **I believe this area is one of the best sites for wild birds in the Craven District and would benefit from proper protection and maintenance.**

We consider the flashes to be a vital, tranquil and peaceful community asset. It has been enjoyed by walkers, bird and wildlife enthusiast and children for generations. It also provides a beautiful gateway to the many adjoining public footpaths which lead into Yorkshire Dales National Park. We as a community regularly walk, exercise and enjoy the Flashes and the wildlife that they attract. Hellifield Community Primary school and many walking groups regularly use the public footpaths through these fields as part of their education and enjoyment.

We strongly believe that this area of land brings many social and environmental benefits to our community and feel strongly that this precious pocket of land be protected and cherished not only for the Hellifield community but for the many visitors to our area. Please allocate this area as local green space.

Thank you
Catherine Emmott

Dear Emma Designs
dear-emma.com

From: Jamie Emmott [REDACTED]
Sent: 31 March 2019 20:34
To: Local Dev. Framework
Subject: Consultation on the Hellifield Green Space - Hellifield Flashes

Follow Up Flag: Follow up
Flag Status: Completed

Dear CDC Local Plan

I am writing to you with regard to the application for Green Space Designation for Hellifield Flashes.

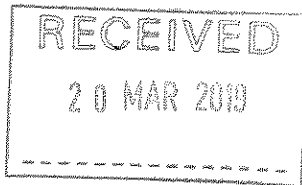
I support designation of the flashes as Green Space due to the significance they have for the village throughout the year. Placed as they are, at the edge of the village, they are frequently enjoyed by the village as they walk through them to watch the abundant wildlife, particularly during winter and spring when the flashes are full and home to a wide variety of wild birds, Great Crested Newts and wild deer.

Before we moved to the village some 12 years ago we were made aware of the famous flashes which are stop over point for migrating Canada geese, and enjoy them ourselves. They really are a beautiful part of the village, the wide open fields which are easily accessible to all, should be protected for the community to enjoy in the future.

I strongly believe that this area of land brings many social and environmental benefits to our village and feel strongly that the land should be protected and cherished not only for the Hellifield community but for the many visitors to our area. I would be great grateful if area was allocated as local green space.

Kind Regards

Jamie



Planning Application No. 42/2016/17496

The Planning Department (CDC Local Plan)
Craven District Council
Council Offices
Belle View Mills
Broughton Road
Skipton
North Yorkshire BD23 1 FJ

[Redacted] (Home)

[Redacted] (Mobile)

FAO: The Planning Inspector

18th March 2019

Dear Sir/Madam,

Application for Leisure Village on Hellifield Flashes – Green Spaces Designation

It is understood that the designation of ‘Green Spaces’ to 2 certain areas included in the above planning application is not accepted by you; as such areas are deemed to be ‘extensive tracts of land’, rather than ‘Green Spaces’ – which are ‘spaces’ which have specific importance to local residents and wildlife, for their preservation.

With all the other planning applications for the Village currently under consideration; large parts of play areas and recreational land (‘green spaces’) will soon be disappearing under concrete/tarmac. The 4 semi-detached houses planned to go up, along the north end of Haw Grove, mean that the Village football ground and the adjacent playground will have to move to the eastern end of this recreational area, with more congestion being created in Thorndale Street. The 22 houses planned for the area behind Townson Tractors/Beck’s Plant have no plans for any recreational areas and with the above, will lose any facility on the opposite side of the A65. The road access for these houses (which may become 43) is off the A65, almost opposite to the proposed entrance for the ‘Flashes Hotel’ and within 40m of the local school. Providing vehicle access to the complex will mean the loss of more grassed areas.

If the 2 Green Areas within the ‘Flashes’ development, behind Station Road, are de-classified, the only recreational area at this end of the Village (and the Village Junior School) will be the small playground in Station Road/Midland Terrace by the railway. The development will also remove the Pendle Hill/open country views currently enjoyed by the residents of Station Road/Midland Terrace. If such adjacent ‘Green Spaces’ are ‘developed’, where will residents walk and play? What will be the access for residents to walk towards Gallaber Pond and Long Preston and will there be additional road hazards, created by the development in this area? These 2 areas also help to reduce the carbon footprint of Hellifield Station, through which both diesel and steam trains operate. How far are residents expected to walk before they are in a ‘traffic free’ area; or, do we all have to drive to Gargrave/Long Preston to be able to walk in the countryside?

I believe that the de-classification of the 2 ‘Green Spaces’ within the proposed ‘Flashes’ development should be rescinded; because of the direct environmental effect that this will

CDC plan flashes 1901.doc

have on the residents at the western end of the Village and, because of the overall reduction in recreational space within the Village. Village children already have to play games on public roads.

The fundamental question remains with this commercial planning application. Why does Hellifield need another Hotel; another caravan and holiday lodges complex; and which already has 3 golf courses within 20 miles? Residents have already been told that such amenities within the 'Flashes' development will not be available to them.

Yours sincerely

Paul & Sue Emsley

Enclosures:

Copy to: Cllr C Moorby CDC;

From: Philip Eva [REDACTED]
Sent: 29 March 2019 09:54
To: Sian Watson
Subject: ParkHill Skipton

Dear Ms Watson,

I am writing to you concerning the recent removal of Park Hill's Local Green Space status. This action was a terrible mistake and must be reversed, it is based on flawed thinking as Park Hill surely meets the government guidelines on Local Green Space. Failure to do so leaves the land open for sale by a greedy landowner to a greedy property developer at the expense of the town's heritage which will be lost for all time. Is there not enough new house building going on in Skipton? Several sites are in full flow and work is commencing on another 180+ homes off the bypass. The nature and feel of the town is being worsened. Unless Park Hill is saved for the town, all of the green spaces inside the ring roads will be gobbled up by cramped and characterless housing estates whose appearance regrettably in most cases deteriorates over time. Park Hill is such a dominant high feature over the north part of Skipton, a lovely historic green space next to the Woods, and to cover it over with yet more stone brick tile and asphalt will be a shameful tragedy. I implore you to do everything within your power to ensure Park Hill's Local Green Space status is restored to protect this most important aspect of the town's heritage. Thank you for your attention.

Yours sincerely

Mr P J Eva

[REDACTED]

From: ian gillian [REDACTED]
Sent: 21 March 2019 20:29
To: Local Dev. Framework
Subject: Response re Hellifield Flashes

Hello, I wish to add my views to the responses to the Inspector reviewing whether the land should be classed as a 'Local Green Space'.

The whole site is unusual and integral to the village.

It is unusual in that there are other wetlands in Craven but these are generally associated with rivers. Other nearby lakes, Malham Tarn and Coniston Cold Lake, are on similar glacial clays but are man-made whereas the Flashes are largely natural. These flashes are an important area on bird migration routes and indeed there are about 12 species on the RSPB 'red list' that use this area.

It is a self-contained area of undulating fields and flashes that seems to retain a unique wildlife site right on Hellifield's doorstep. The railway defining it to the north, the A65 to the south and Hellifield to the East seem to add to the area's natural tranquil wilderness feel.

There are 2 footpaths through the site both of which are used a lot with dog-walkers and people watching the wildlife. Hellifield used to be part of Long Preston Parish and only came into existence due to the siting of the rail junction away from Long Preston village. One of the footpaths is the only route now connecting Long Preston to its former area that does not involve the A65 or railway.

The views of the site from the National Park to the north also help to define Hellifield and protect the views south to Pendle Hill.

Ian Evans
[REDACTED]

(Not acknowledged
as requested)

Scanned & saved 1/4/19 (R)

RECEIVED
- 1 APR 2019

[Redacted]

The Planning Dept,
Craven District Council,

Dear Sir/Madam,

RE: PARK HILL, SKIPTON,

I am just writing to
lend my support for your policy
that the above area maintains
special status to prevent any
future development.

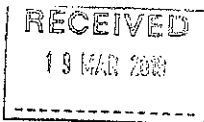
Yours faithfully,

[Redacted]

e mail :

[Redacted]

P.S. Reply not necessary, thanks.



Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk



For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). Please fill in a separate form for each representation you wish to make.

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mr
First Name:	Andrew
Last Name:	Fletcher
Job Title (where relevant):	Company Director
Organisation (where relevant):	
Address 1:	
Address 2:	
Address 3:	

Address 4:	
Postcode:	██████
Telephone:	
Email:	██████████████████

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM:	

Section 4: Legal Compliance & Duty to Cooperate

Do you consider that this modification of the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Sound	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. In Compliance with the Duty to Cooperate	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

SK-LG564

I consider myself lucky to call Skipton home, the gateway to the dales. A town of historic value and natural beauty.

Only in January we had friends to stay, on a walk over Park Hill (5mins from my home) our friends said how lucky we were to be able to leave the high street and walk into an area of such natural beauty and amazing views.

A feeling shared by residents and visitors to the town, most weekends I witness both residents alike enjoying the green spaces around skipton and significantly Park hill with its close proximity to Skipton woods and the Castle alike. Places like this give Skipton its unique character. Not only is Park Hill significant and loved by generation of Skiptonians it also holds great historical value all linked to the history of the Town.

The Civil War is just one episode in History that helped to shape Skipton and Park hill holds the site of a battery aimed at the castle. Historical relics like this need to be protected and remembered for generations of visitors and residents to come.

How sad it would be if our children and grand children can't enjoy the freedom of the green spaces Skipton affords, this is the reason we live here to enjoy the benefits of a small town and close proximity of outdoor space! We must protect these spaces not just lose it on the whim of a planning inspector with no ties to the area and certainly no idea of its significance to the residents of Skipton.

Park Hill is where I walk with my family, run, sledge with my son, enjoy the wildlife and fresh air. We've given up a enough green space around Skipton, but to lose Park hill would be too much and a huge mistake.

Let's hope mine and other people views can help to protect this space.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.


Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	<input checked="" type="checkbox"/>
No, I do not wish to be notified	<input type="checkbox"/>

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	<input checked="" type="checkbox"/>
No, I do not wish to be notified	<input type="checkbox"/>

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	15-3-19.

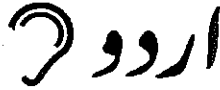
Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ |
www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



INVESTOR IN PEOPLE



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

Craven Local Plan Examination

From: P F
Sent: 31 March 2019 13:11
To: ABlackburn@cravenc.gov.uk
Cc: swatson@cravenc.gov.uk
Subject: Park Hill Skipton

Dear Sir/Madam

I am writing to register my objection to the removal from the Local Plan of Park Hill's status as a Local Green Space.

As building development continues to increase around the outskirts of Skipton, residents are becoming further away from easy walking access to green fields. Park Hill is accessible on foot by the majority of residents. If this valuable asset is lost, however, parents/carers/children and the elderly or disabled will find it increasingly difficult to walk the extra distance to green fields. Some may need to resort to travelling to open fields by car, thereby, increasing traffic and air pollution.

Michael Portillo saved the Ribbleshead Viaduct and is respected for having the wisdom and foresight to protect what has increasingly become an important and essential structure. Please re-instate Park Hill as a protected Local Green Space. Park Hill is our heritage and an important asset for the residents and future generations of Skipton.

Yours faithfully
Pauline Foley (Mrs)

From: Andrew Forman [REDACTED]
Sent: 02 March 2019 11:11
To: Local Dev. Framework
Subject: Ack email sent RP 4.3.19 LGS PARK HILL, SKIPTON

Dear Sir,

Following Julian Smith's correspondence to you and to me, I wish to object to the possibility of Park Hill ever being developed.

It is an asset to the town of both historical, visual and cultural significance. I understand there is a long distance footpath across the site which would become a nonsense if the area was developed.

--

Andrew Forman, [REDACTED] [REDACTED]

From: Samuel Deegan [REDACTED]
Sent: 27 March 2019 16:52
To: Local Dev. Framework
Cc: Jamie Pert
Subject: Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park) - Main Modifications Consultation Representation & Completed Form
Attachments: cdc-mods-rep-form-2019-final.pdf; Main Modifications Consultation Representation_MM32.pdf

Good afternoon

On behalf of my client Francmanis Properties please find attached a representation made in response to Main Modification MM 32, which relates to 'Land to the south of Brockhole View and west of Brockhole Lane, Settle.'

Kind regards

Sam

Samuel Deegan MRTPI
Senior Planner

14 - 15 Regent Parade
Harrogate
HG1 5AW
T: [REDACTED]



www.planningpotential.co.uk

If you are not the intended recipient of this email you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited.

Our terms and conditions are available on our website.

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	C/O The Agent
First Name:	C/O The Agent
Last Name:	C/O The Agent
Job Title (where relevant):	C/O The Agent
Organisation (where relevant):	Francmanis Properties
Address 1:	C/O The Agent
Address 2:	
Address 3:	

Address 4:	
Postcode:	
Telephone:	C/O The Agent
Email:	C/O The Agent

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	Mr Sam Deegan
Address:	Planning Potential 14-15 Regent Parade Harrogate HG1 5AW
Telephone number:	██████████
Email:	████████████████████

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: 32	

Section 4: Legal Compliance & Duty to Cooperate

Do you consider that this modification of the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant	<input checked="" type="checkbox"/>	
2. Sound	<input checked="" type="checkbox"/>	
3. In Compliance with the Duty to Cooperate	<input checked="" type="checkbox"/>	

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

Please see accompanying representation submitted via email.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

Please see accompanying representation submitted via email.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.


Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	✓
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	✓
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	Sam Deegan 
Date	27/03/2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ | www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



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

Craven Local Plan Examination

Main Modifications Consultation - Land South of Brockhole View, Settle



Background & Context

Craven District Council are consulting on their Proposed Main Modifications to the Publication Draft Craven Local Plan until 01 April 2019.

On behalf of Francmanis Properties, Planning Potential have prepared this representation in support of the Council's continued intention to allocate Land to the South of Brockhole View and West of Brockhole Lane, Settle for residential development – identified under site reference SG027 and SG068.

Draft allocation SG027 and SG068 identifies the parcel of land for residential (Use Class C3) development with an approximate yield of 57 dwellings. The allocation includes areas of green infrastructure in the south, western and eastern parts of the site, the purpose of which is to protect the rural nature of Brockhole Lane and the neighbouring Yorkshire Dales National Park (YDNP).

Principles in agreement

Following the submission of the Local Plan to the Inspectorate in March 2018, a series of examinations throughout summer 2018 and comments received throughout this process, the Council has produced a Major Modifications document for consultation, considered necessary to make the plan 'sound' as required by paragraphs 35 and 60 of the NPPF (2019).

The allocation is retained and largely unaffected by the Main Modifications consultation. The thrust of the allocation and supporting text is to deliver residential development at this location in Settle, supporting the wider housing needs of the Local Authority.

The scope of the suggested amendments are testament to the site's suitability to support residential development and Francmanis Properties support its retained inclusion within the Local Plan. Modifications to the draft allocation provide clarity to strengthen the effectiveness of policy. The modification include:

- Reference to the green infrastructure extending approximately 0.8ha and protecting the rural nature of Brockhole Lane, as well as the YDNP;
- Areas of green infrastructure to provide recreational activities to help relieve pressures on surrounding areas of conservation, such as Ingleborough Complex Special Area of Conservation (SAC); and
- The requirement of an assessment of the sites archaeological interest with any mitigation measures secured as appropriate.

The additional clarity regarding the extent and purpose of the Green Infrastructure is supported, as is the requirement for the accompanying suite of technical documents to ensure that any development proposals brought forward are suitable and acceptable with consideration given to all the site-specific considerations. This includes the requirement for an archaeological assessment as well as those put forward in the earlier iteration of the policy such as Landscape Visual Impact Assessment (LVIA); Biodiversity Appraisal; Flood Risk

Planning Potential Ltd

London

Magdalen House
148 Tooley Street
London SE1 2TU

T: [REDACTED]

Harrogate

14-15 Regent Parade
Harrogate HG1 5AW

T: [REDACTED]

Bristol

13-14 Orchard Street
Bristol BS1 5EH

T: [REDACTED]

Report Reference:

19/4620

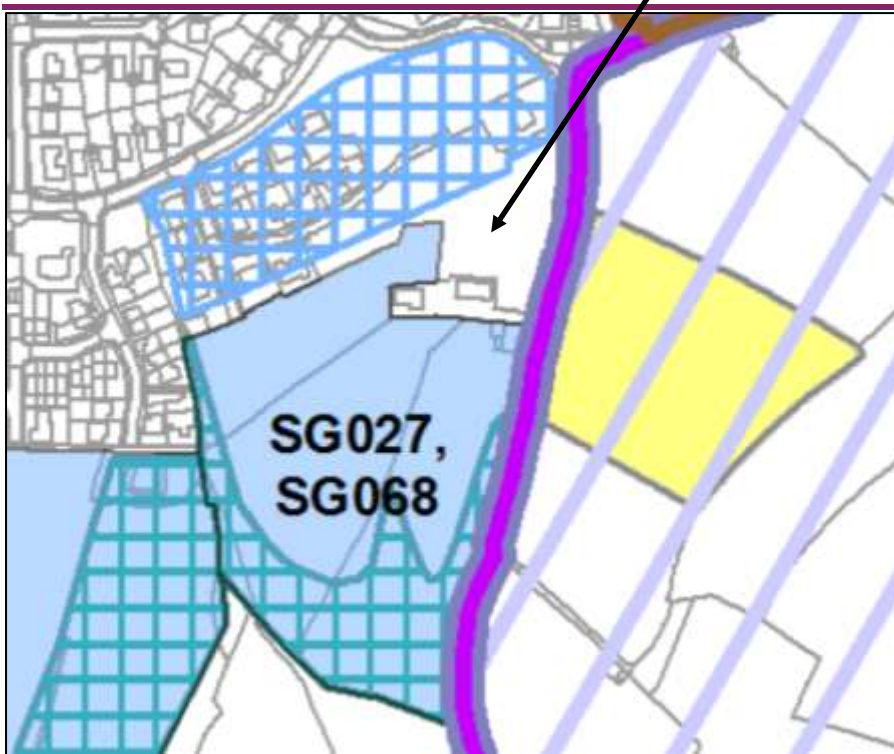
& Drainage Assessment; design cues and; and access being taken via Brockhole View.

Comments for consideration

As commented above, Francmanis Properties are supportive of the Council's aspirations to secure housing allocation SG027 and SG068 as part of the adopted new Local Plan. However, in response to the Main Modifications we put forward two comments for consideration to be included within the final document:

- The parcel of land to the north east of the draft allocation, bound by the existing housing commitment to the north and Brockhole Lane to the east (currently shown without notation) should be included as part of the wider existing housing commitment to the north. The site falls under the same ownership as allocations SG027 and SG068 and benefits from an extant permission for residential development (ref: 62/2015/16414). The 'rounding off' of the existing housing commitment designation is seen as a logical and appropriate amendment to the draft policy map, removing any avoidance of doubt at a later stage.

Figure 1: Location of site with extant planning consent



Source: Policy Map – Publication Draft Craven Local Plan (March 2018)

- It is important that some flexibility is applied when assessing the extent of the Green Infrastructure towards the southwest and east extremes of site allocation SG027 and SG068. Whilst it is important that Green Infrastructure is provided and secured by policy to mitigate any impact on the surrounding views and the YDNP, it is necessary that its requirement is not applied so rigidly such that it prevents a viable and

feasible scheme from coming forward (i.e. strictly in accordance with that *indicatively* shown on the draft allocation). We would encourage and welcome the inclusion of supporting text, which states this.

AOB

Surrounding residential allocations to the south of Settle are retained within the Council's Main Modifications consultation. This adds gravitas to the Council's wider aspirations to deliver housing in this wider location, subject to commensurate consideration given to Green Infrastructure between the proposed allocations and neighbouring YDNP. Francmanis Properties are supportive of the wider aspirations to deliver considered and appropriate housing in this location to the benefit of the community.

From: Julian Franco Montes [REDACTED]
Sent: 27 March 2019 17:35
To: Local Dev. Framework
Subject: Green space

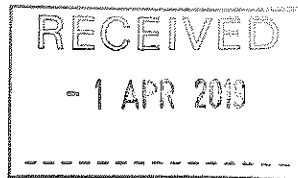
--

Sent from Hotmail Email App for Android

Dear Sir or madam,

I would like to put forward Hellifield flashes as my choice of green space for Hellifield. This particular piece of land holds very special memories of my childhood, where we would skate in winter on the frozen ponds and go sledging too, and the children of today still do in winter. Because of the close proximity of the villagers everyone uses this space and the children play safely. It's a place rich in wildlife and very interesting to all ages. The migration of the birds that come here, which I have experienced all my life is spectacular to see, such a wide variety of birds. People come from miles around to see them such a treat for the eyes. Because of the easy access for everyone there is always people on there walking their dogs or just taking in the fresh air and the beauty of the place. We have runners who do train on there too. It's used by all the village I think because of the tranquility felt there. It's a place for body, mind and spirit, a very special place to me.

Yours faithfully Beverly Franco.



27th March 2019

To the Planning Inspector

Re MM;87 Modification to the local plan site ref. SK-LGS64

The following are my concerns about the reduction of the green space.

- The land is easily accessible from Chapel Hill at the top of the High Street behind Holy Trinity Church and from Skipton Woods. In addition there is access to the area from Short Lee lane off Grassington road. This entrance to the area is used by residents in the Raikes Area of Skipton which now includes a new large development.
- It is special to the local community as it provides a wonderful walking area which has magnificent views over Skipton. From the vantage point at the top it is easy to pin point all local landmarks. The High Street, castle, canal, Embsay Crag etc. Visitors and residents alike comment on how tranquil the setting is and yet unbelievably close to the bustling high street. No wonder Skipton has been voted one of the best places to live.
- Sheep and cows alternately graze in the area adding to the market town image. The old Anglo Saxon name for Skipton was Scaep Tun meaning sheep town. The town sign on Grassington Road features a sheep and there is an Annual Sheep day in the town when sheep invade the High Street. This green belt area has potential to promote Skipton's unique character and historic significance even further by incorporating the footpaths of for example Lady Anne's way with the Skipton Wood trails to publicise the unique historical importance of the area. Sheep and perhaps sheep dog trials need

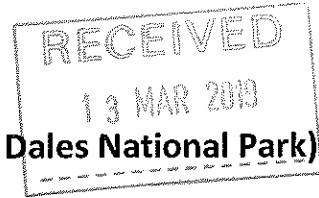
to be in the fields rather than houses to maintain the town's unique market town heritage.

- The area is a fun place for sledging in winter months and is an all year round fantastic dog walking area.
- There is an abundance of wildlife in the area. In particular there is a large rookery in Little Wood and the birds forage in the area. They also provide a wonderful display of "Witches on Broomsticks" in the spring when they are building their nests. At dusk every evening stunning starling murmurations have been seen over the area for the last couple of months. These displays have been reported in the national press. In the morning the woodpecker can be heard calling. The list is endless.
- There are many historical connections associated with the castle which other people will have drawn your attention to
- The green space is a part of the area which includes the castle, the woods, historic significance, recreational value, tranquillity richness of wildlife and local in character. The phrase "The whole of these parts is greater than the sum of its parts" aptly describes this area. Chipping away at the green space would have a considerable effect on the "sum"
- I hope the above explains why Park Hill area is not just an extensive tract of land but a beautiful entrance to Skipton which is in keeping with the phrase-" Gateway to the Dales" A town of which the residents are immensely proud.

Yours sincerely



Dinah Frank



Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	MR
First Name:	PETER
Last Name:	FREEMAN
Job Title (where relevant):	
Organisation (where relevant):	
Address 1:	
Address 2:	
Address 3:	

Address 4:	
Postcode:	
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	CRAVEN DISTRICT COUNCIL
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: 87	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravencd.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

These comments refer to SK L6-S64 as indicated in the Submission Draft Craven Local Plan (Regulation 22 Draft Document for Submission 29th March 2018).

The Modification fails to take account of the beauty, historic significance and recreational value of this Green Space which is in close proximity to Skipton Town.

The Dale High Way and the Lady Anne's Way cross Park Hill which is also known as "Battery Hill" and was once part of Skipton Castle's hunting park. The walks are popular with tourists and locals alike, but the path is also used by many as a round trip with the return through Skipton Woods. The splendid views of Skipton and Sparg How have been painted and drawn by artists including Turner. Finally, the area abuts, and provides context for, Skipton Castle and Holy Trinity Church, both listed.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what change(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	✓
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	✓
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	[REDACTED]
Date	<i>10. March. 2019.</i>

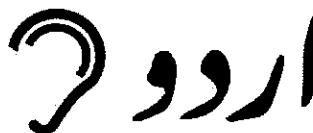
Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ |
www.cravendc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravendc.gov.uk



INVESTOR IN PEOPLE



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

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

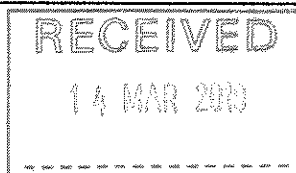
This form has 2 parts: Part A for personal details and Part B for your representation(s). Please fill in a separate form for each representation you wish to make.


Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	MRS
First Name:	SHEILA
Last Name:	GORDON
Job Title (where relevant):	RETIRED
Organisation (where relevant):	FRIENDS OF LADY ANNE'S WAY
Address 1:	
Address 2:	
Address 3:	



Address 4:	
Postcode:	
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM:	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

<p>Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.</p>
<p>If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.</p>

Sec 3 & 4 simply do not understand this part.

I think it is tragic that Park Hill has not been designated as a 'local green space' - to save it from any future development.

The view from the top of Park Hill is unique, both looking backwards to Skipton & also forwards towards Embay Grog.

The Friends of Lady Ames Way - help to support and maintain this important Long Distance Trail which climbs Park Hill before carrying on over to Golf Course

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

Designate Park Hill as a local green space to preserve it for future generations.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published


Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)

Yes, I do wish to be notified	<input checked="" type="checkbox"/>
No, I do not wish to be notified	<input type="checkbox"/>

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	<input checked="" type="checkbox"/>
No, I do not wish to be notified	<input type="checkbox"/>

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	7.3.19.

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ |
www.cravendc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravendc.gov.uk



INVESTOR IN PEOPLE



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

Craven Local Plan Examination



Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	MISS
First Name:	JEAN
Last Name:	ROBINSON
Job Title (where relevant):	CHAIRMAN
Organisation (where relevant):	FRIENDS OF RAIKES ROAD BURIAL GROUND
Address 1:	[REDACTED]
Address 2:	[REDACTED]
Address 3:	

Address 4:	
Postcode:	[REDACTED]
Telephone:	[REDACTED]
Email:	[REDACTED]

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	N/A.
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	FRIENDS OF RAIKES ROAD BUREAL GROUND
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: 87 (SK-L9564 LAND TO NORTH OF SKIPTON)	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

PLEASE SEE ATTACHED PAGES 1-3 AND
ACCOMPANYING MAP.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

PLEASE SEE PAGES 4-5 AND MAP
INDICATED ABOVE

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	✓
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	✓
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date by	[Redacted]
Signature	[Redacted]
Date	20/3/19

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ | www.cravencd.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravencd.gov.uk



INVESTOR IN PEOPLE



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

Craven Local Plan Examination

SECTION 5
BACKGROUND TO DETAILS OF REPRESENTATION

Raikes Road Burial Ground - Background

1. Raikes Road Burial Ground, an old and neglected Victorian cemetery, which was given by the Earl of Thanet for an overspill burial site for Holy Trinity Parish Church in Skipton. It forms part of the area SK-LGS64 shown on map to the draft Local Plan and is coloured pink on the attached map. It stands on the lower part of Park Hill – of which it once formed part - and is adjacent to the B6265. The topography of Raikes Road is such that it is on a sloping site.
2. It was open from 1846 to 1876 when the current municipal cemetery, Waltonwrays, was opened. It is just over an acre in size and is the resting place of around 2,000 people. It was formally closed in 1878 but remained open for burials in existing family plots until 1906, after which it was neglected and forgotten until the Friends came in to work on the site, research it and make it open to the public in 2013. Research and community work continue on the Burial Ground, which provides opportunities for the study of art, architecture, local history, social history, family history, educational opportunities and also a peaceful and pleasant place for the local community to enjoy. The site remains consecrated ground and is the only such site in Skipton still in its original, undisturbed state.
3. This is an ongoing project and, as can be imagined from the length of time it was neglected, there is much to do. However, it is proving to have many interesting features, not just for the local community, but for the wider one. Famous people buried there include the grandparents, the Reverend Joseph and Frances Kipling, of the famous writer, Rudyard Kipling (whose full name was Joseph Rudyard Kipling, named after his grandfather who died before his birth). It is known that Kipling stayed in Skipton during school holidays with his grandmother and it is likely that he was brought to the Burial Ground to pay his respects at his grandfather's grave. Others in Raikes Road have family or other connections to the Brontes, Robert Burns and Beatrix Potter.
4. Three of the original founders of Skipton Building Society have gravestones and the Ground is also the last resting place of the father and grandfather of Thomas Spencer, one of the two founders of Marks and Spencers. Founding members of Skipton Mechanics Institute are also included. There is also a memorial to an Australian Imperial Forces soldier who died in the First World War and whose name appears on the Menin Gate, as well as another one to a man who died in the Crimean War. The Burial Ground also provides the last resting place for Napoleonic War veterans.
5. Although the Burial Ground is Victorian, many of its residents can be considered Georgians, making this site of extreme value to the history and development of Skipton.

6. In addition, there were two buildings on the site – a Chapel and a Mortuary, both now demolished. A limited excavation was undertaken in 2014 of the Mortuary site, which was a subterranean building, and following the findings, it has been suggested by experts in such buildings that the Mortuary may be the only – or the only remaining – one of its kind in the country.

Ecological value

7. Apart from these interesting features, because of the Burial Ground's long-term abandonment and neglect, it has become something of a wildlife haven. The Friends have encouraged this aspect of the site and rare fungi has been found in it. Following a survey, water shrews have also been found on the site – these are uncommon to this part of the world. The oldest tree on the site, which now grows around – and holds - the gravestone of a two-year old girl is suggested to be at least 250 years old. Surveys regularly take place on birds, mammals and flowers.
8. Bug "hotels", bat and bird boxes have been installed in the Ground to encourage and retain this ecology. For example, work in 2019 will encompass cultivating plants in part of the Ground to encourage bees and appropriate advice has been obtained from an expert from Yorkshire Dales Millenium Trust. In the last two weeks, confirmation has been given that the Woodland Trust has approved an application for saplings, which will be planted in the Autumn of 2019.
9. Deer from Skipton Woods were seen in the Burial Ground in 2018 and are seen to be a new and welcome addition to the site. In this respect, Skipton Woods as well as the copse on Grassington Road would appear to show the ecological symbiosis of this part of SK-LGS64.
10. These are just some limited examples of the Burial Ground's rich ecology.

Local Value to the Community

11. As indicated above, the site has many interesting features and talks about it and research which has been done on the people buried have proved a previously-unknown source of information and connections for Skipton's past and its development. Enquiries continue from people from everywhere (the British Isles, Canada and Australia as examples) as to their ancestors.
12. Two benches have now been installed in the Ground (one provided by a Scottish family which was placed next to their family's grave) and it is a peaceful and uplifting place (notwithstanding the traffic) for quiet contemplation. This aspect of the Ground is being encouraged although because of the ongoing work and old damage to the Ground and its monuments, it is not open to the public on a daily basis, although it is hoped this will change over time as work progresses. However, Open Days are held each year and the Ground is opened to those who request it at other times.

European Recognition

13. In line with the value of Raikes Road Burial Ground, the Association of Significant Cemeteries in Europe (ASCE, based in Bologne), approved membership of its organisation in 2018. This carries no special protection for the site.

SECTION 6 – PROPOSED MODIFICATIONS AND REASONS

- (a) It is suggested that Raikes Road Burial Ground by itself meets all the criteria for designation for Local Green Space, viz. it is close to the community it serves, is demonstrably – as shown in Section 5 – special to the local community and holds a particular local significance, is local in character and not an extensive tract of land.
- (b) However, the Burial Ground cannot be seen in isolation from its immediate environs to the north and is dependent on it, especially considering the development which has arisen around it over the years. When Raikes Road was first opened, it was part of an old field system and its shape reflects the agricultural field it once was, as can be seen on Crowe’s Map of Skipton in 1757. At the time of its inception, the Burial Ground was the only development in this area.
- (c) Since then, all the buildings that can currently be seen in the vicinity have been erected, surrounding all of the Burial Ground except for the land to its north and partly to the east, all forming part of SK-LGS64. More development is to take place with the erection of buildings on the Roman Catholic site across the road. Although this is a brownfield site, the felling of many trees which screened the Burial Ground and added to its ecological diversity have gone and, with the footprint of the new development coming closer to the Ground, leaves the Burial Ground vulnerable to added pressure on its nature, fabric and its ecology.
- (d) Whilst appreciating that this is not a planning application, nonetheless it is suggested the Inspector should bear in mind that without such a designation of all or part of SK-LGS64 as a Local Green Space and, as it is understood the owner may be a developer, the chance of further urban development in the future must be high. If this occurred, Raikes Road would be essentially urban-locked with considerable pressure – and likely damage - on all its aspects.
- (e) Moreover, Park Hill and its environs in SK-LGS64 are invariably capable of soaking up considerable rainfall and delay water through-flow to the local watercourses. Should any kind of urbanisation develop on SK-LGS64, even with hard surfaces as sympathetic as possible, this will increase water flow into the Burial Ground and into the becks which are already prone to very fast-flowing water levels and risk of flooding. Indeed, when there were extensive floods in Skipton on Boxing Day, 2015 the newly-laid path into the Burial Ground was washed out, so is indicative of the pressure to which the site was subject.
- (f) Given the proximity of Skipton Woods and the copse on Grassington Road, it is likely that the symbiosis from both have an impact on the Burial Ground’s ecology. It can be seen that the green space to its north and partly to the east is essential to protect this community resource and ecology.
- (g) Should the whole of SK-LGS64 be without any Local Green Space designation, this would leave the whole of this part of Skipton without any such designation at all for

an area which has provided peace, beauty, walks and general recreation for many years and, in recent times, the added value of Raikes Road Burial Ground.

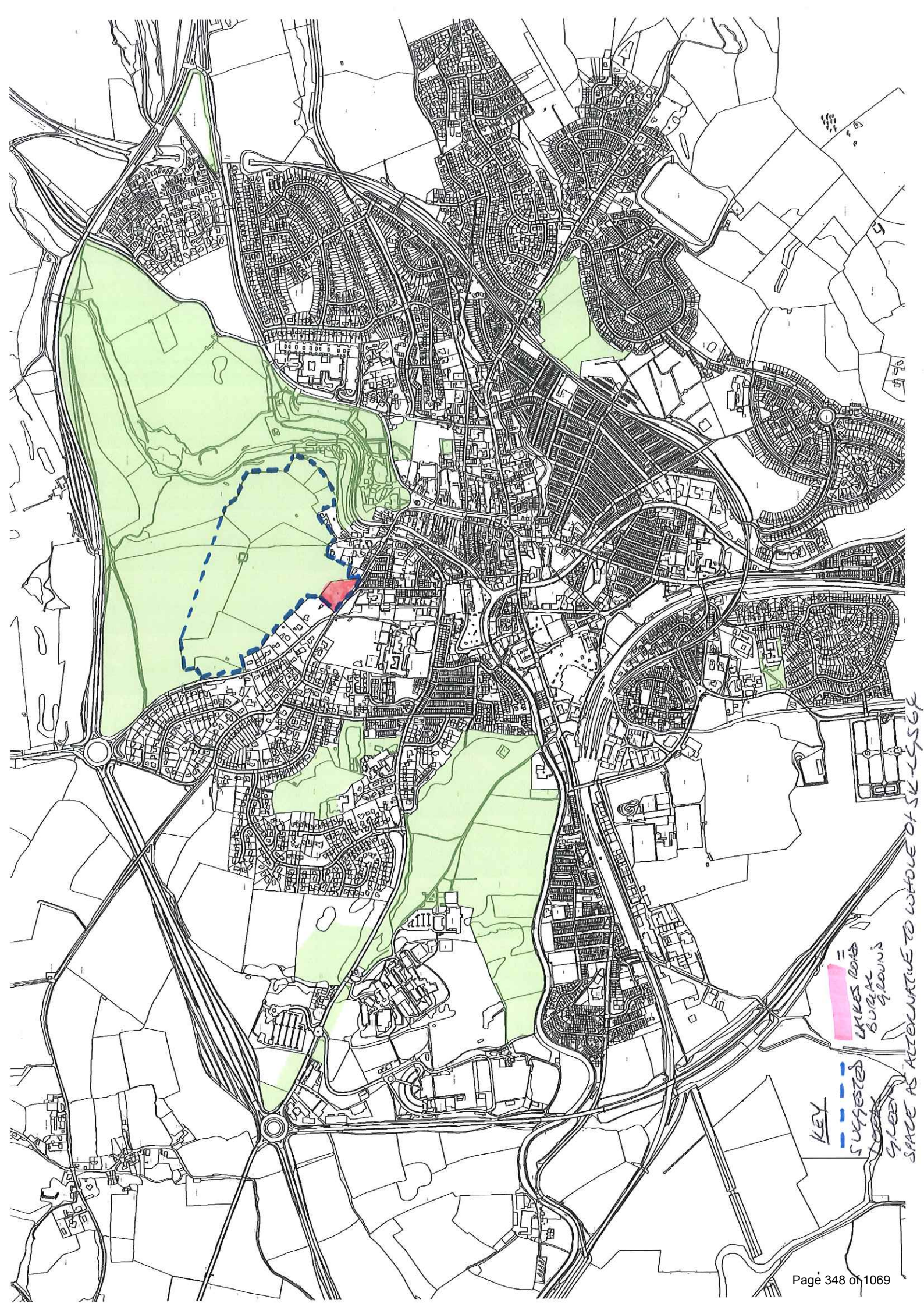
To make this Modification sound:

- (h) That the whole of SG-LGS64 be designated Local Green Space.
- (i) If this is not seen as feasible then as a minimum, I suggest that the area I have indicated by a broken black line on the attached map to be so designated as an alternative Local Green Space designation for SK-LGS64 which would be suitable protection for the Burial Ground whilst meeting the objections which the Inspector had to the whole of SK-LGS64 being designated.
- (j) The area indicated would be in reasonable close proximity to the community it serves and would then “feed” into the historic environment of which Raikes Road and Park Hill are part as well as providing a green corridor, allowing for ecological connection with Skipton Woods and the copse and land on Grassington Road.
- (k) Moreover, it would not impede development along the rest of SK-LGS64 and indeed, should that occur, would act as a suitable break and benefit for any new development in that area.
- (l) I would suggest that this amendment not only satisfies the objections which the Inspector had to the whole of SK-LGS64 being designated Local Green Space but is also in accord with paragraph 77 of the National Planning Policy Framework.

Supporting evidence of all the above can be provided on request and should the Inspector wish to visit the Burial Ground, he is more than welcome to do so.

[REDACTED]

20/3/19



KEY

-  UNDESIRABLE BUILDING GROUPS
-  SUGGESTED GREEN SPACE AS ALTERNATIVE TO WHOLE OF SK-LS-56

From: Ann Shadrake [REDACTED]
Sent: 01 April 2019 13:08
To: Local Dev. Framework
Subject: Main Modifications Consultation Representations
Attachments: cdc-mods-rep-form-2019-final Friends of the Dales.docx

Dear Local Plan team
Please find our comments on the Main Modifications attached.

Regards
Ann

Ann Shadrake
Executive Director
Friends of the Dales

Tel: [REDACTED]

[SIGN UP](#) to our newsletter

Please become a Friend of the Dales if you possibly can. For full details about our charity see [Friends of the Dales](#)

We are on [Facebook](#), [Twitter](#) and [Instagram](#)



Friends of the Dales is a working name of the Yorkshire Dales Society, a registered charity no.515384 and Company Limited by Guarantee No. 1822908
Canal Wharf, Eshton Road, Gargrave, North Yorkshire, BD23 3PN

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravendc.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Ms
First Name:	Nancy
Last Name:	Stedman
Job Title (where relevant):	Trustee
Organisation (where relevant):	Friends of the Dales
Address 1:	Canal Wharf
Address 2:	Eshton Road
Address 3:	Gargrave

Address 4:	
Postcode:	BD23 3PN
Telephone:	██████████
Email:	████████████████████

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Friends of the Dales
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM:101,105,106,107	

Section 4: Legal Compliance & Duty to Cooperate

Do you consider that this modification of the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant	<input checked="" type="checkbox"/>	
2. Sound	<input checked="" type="checkbox"/>	
3. In Compliance with the Duty to Cooperate	<input checked="" type="checkbox"/>	

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

We wish to support the soundness of this Main Modification to the Local Plan.

MM101: Supporting text to Policy EC4

MM105: New Policy EC4B

MM106: Removal/replacement of Diagram EC4

MM107: New Diagram EC4B

Friends of the Dales supports these Main Modifications.

We welcome the expansion, clarification and strengthening of the policy relating to tourist development at Hellifield Flashes, in particular the specific requirement that proposals must promote sustainable development, as well as protecting landscape character, biodiversity and archaeological interest. This policy and its supporting text now reflect much more accurately the situation at Hellifield Flashes, which is such an important asset for the area. The Flashes clearly have biodiversity value, evidenced by the large numbers and range of wetland bird species that have been recorded there. It is also a valued local asset, being well used for walking and birdwatching, and provides an important setting not just for the adjacent settlement of Hellifield but also for the Yorkshire Dales National Park and the Settle - Carlisle Conservation Area.

The amendments to the new diagram EC4B supporting Policy EC4B are strongly supported. Friends of the Dales acknowledges that there is an extant planning permission for part of the area, but the new diagram identifies and makes clear the biodiversity and archaeological interest of the adjacent areas, thus providing clear parameters for any future proposals. The designation of part of the Flashes as Local Green Space is welcome, although it is disappointing that it is not more extensive, to more accurately reflect the value of the area for local residents.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

N/A

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)

Yes, I do wish to be notified	YES
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)

Yes, I do wish to be notified	YES
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:

Signature	
Date	1 April 2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ |
www.cravencd.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravencd.gov.uk



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

Craven Local Plan Examination

From: Craig Barnes [REDACTED]
Sent: 20 March 2019 13:21
To: Local Dev. Framework
Cc: Nicole Penfold
Subject: Craven Local Plan Main Mods - Gladman Reps
Attachments: Craven Local Plan Main Mods Gladman Reps FINAL.pdf

Dear Sir/Madam

Please find attached the representations of Gladman made in response to the consultation on proposed Main Modifications to the Craven Local Plan.

I would be grateful if you could confirm safe receipt of this email and its attachment.

Kind Regards

Craig Barnes

Senior Policy Planner
Gladman Developments Ltd



Planning Policy
Craven District Council
1 Belle Vue Mills
Broughton Road
Skipton
North Yorkshire
BD23 1FJ

Gladman House, Alexandria Way
Congleton Business Park
Congleton, Cheshire
CW12 1LB

T: [REDACTED]
F: [REDACTED]

www.gladman.co.uk

By email only to localplan@cravencd.gov.uk

20th March 2019

Dear Sir/Madam

Proposed Main Modifications to the Publication Draft Craven Local Plan

Introduction

This letter provides Gladman's representations to the current consultation on proposed Main Modifications to the Publication Draft of the Craven Local Plan. Gladman specialise in the promotion of strategic land for residential development with associated community infrastructure.

Gladman welcome the opportunity provided by this consultation to submit comments in response to proposed main modifications to the Local Plan. The comments made in this representation build on those previously submitted at the publication stage. Comments relate only to those proposed changes made to the wording of policies and supporting text as set out within the Schedule of Main Modifications.

Proposed Main Modifications

MM6: Policy SP3 Housing Mix and Density

Gladman welcome the deletion from Part A of the Policy percentages relating to the size of dwellings assessed as required through the SHMA. Gladman held concerns that the previous approach was too prescriptive and risked being imposed as a standard. This would have failed to be sufficiently responsive to change or local conditions and site character. The removal of these percentage requirements provides for a much more flexible approach for decision makers. This will benefit the deliverability of the Plan and ensure that decision making can adapt to change over the plan period.

Whilst supportive of this deletion, Gladman consider that the Council's proposed changes to Policy SP3 do not go far enough. Gladman also believe that consideration of housing market demand indicators should be included within the policy as a factor to be taken into account

for determining housing mix. Failure to satisfy the market could slow the build rate of a site as sales struggle with potential adverse effects on the deliverability of sites allocated in the Local Plan. Failure to satisfy the market is also likely to result in a worsening of market signals contrary to the strategic aims of the Local Plan affecting its overall effectiveness. It is therefore important that decision makers also have regard to market signals/demand indicators.

Gladman broadly support the proposed change made to Part B of the Policy in relation to density. The revised wording provides for a more flexible approach by recognising that local character and site conditions form key considerations in determining the appropriate density of a development.

Again, however Gladman do not consider that these changes go far enough. Gladman believe that the Council should clarify that a higher density would be acceptable in town centres and in locations which are highly accessible to high quality public transport corridors. Lower density development should also be considered acceptable in lower order settlements in response to their form and character.

The application of the above approach would provide additional clarity and certainty for applicants and decision makers alike. The wording more closely reflects the Government's approach to density and future proofs the Local Plan to changes made to Design as introduced through the 2019 NPPF.

MM8: Policy SP4 Spatial Strategy and Housing Growth

Gladman is highly supportive of proposed modifications to Part H and I of Policy SP4 which expand significantly the type of development which might be permitted in locations beyond but adjacent to sustainable settlements where required subject to adherence with defined criteria.

The policy gifts the Council the opportunity to act proactively and positively in its decision making to any problems in housing delivery which may arise during the plan period ahead of any shortfall in supply. The adoption of this approach enhances the flexibility and deliverability of the Local Plan and increases the prospect that new homes will be delivered timely and regularly over the plan period.

The application of Part H of the policy to Tiers 1 – 4 of the settlement hierarchy (with noted exceptions) is particularly welcomed by Gladman. This wording reflects the Council's recognition of the role that every sustainable settlement in the District has in responding to housing needs. The scope provided to nearly all those settlements within Tiers 1 – 4 (less Bolton Abbey and Long Preston) substantially increases the prospect that the policy would be effective in providing an effective and timely solution to any identified supply problem. This is due to the opportunity enabled for development to come forward at a range of settlements across the District.

The modifications made in the table included within the Policy towards total number of houses required at each settlement are broadly supported by Gladman. The modification made provides greater transparency as to how the overall housing requirement is to be met, and what strategy will achieve this. The modification will also improve plan monitoring.

Gladman is however concerned that terminology used in the table is too imprecise, meaning that some settlements in the District may see a substantially lower amount of development over the plan period than envisaged by the spatial strategy. This could also harm the implementation of Part H of the policy if the levels of development for each settlement significantly drop.

In response, Gladman consider that the development requirements for each settlement should be expressed as minimums. The adoption of this approach will provide greater certainty relating to the level of housing needed in each settlement over the plan period. It would also mean that the distribution of housing is better aligned with the overall housing requirement, which is also expressed as minimum level of need.

MM93: Policy H2 Affordable Housing

Gladman remain concerned with the Council's approach to affordable housing and the general absence of flexibility provided within Policy H2. Gladman consider that the term "Exceptional Circumstances" sets a bar which is too high to be considered to be flexible where the Council's affordable housing requirements are not deliverable.

Where it can be demonstrated by an applicant that the policy requirements of the plan cannot be achieved (unless this would make the scheme unsustainable), the Council should be open to discussion and a relaxation of policy requirements where necessarily. This flexibility does not undermine the policy and its requirements. It does however provide room for maneuver for applicants and decision makers to come together and agree as solution in order to promote the delivery of housing. Gladman therefore submit that the word "exceptional" should be removed from the policy.

Conclusions

Gladman welcome the opportunity to submit comments on proposed main modifications to the publication draft of the Craven Local Plan.

Gladman broadly supports modifications made to Policy SP3 to remove reference made to specific housing size requirements. Gladman believe that consideration towards market demand indicators is also required to ensure that an appropriate mix of housing is provided on the Site to satisfy market requirements.

Gladman welcome the flexibility introduced within Policy SP3 towards density requirements. Gladman consider that the Council should clarify that higher densities would be acceptable within town centres and at highly accessible locations, and lower densities in rural areas, to provide greater certainty and reflect national planning policy.

Gladman support the modification made by the Council to Policy SP4 to enable unallocated development to come forward where it is needed to meet the requirements of the Plan. Gladman believe that development requirements for each settlement as set out within the table included in Policy SP4 should be expressed as a minimum.

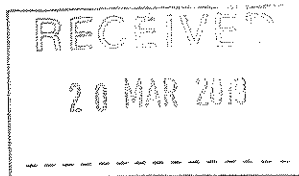
Gladman remain concerned that Policy H2 does not leave sufficient scope for negotiation of affordable housing requirements should it be necessary over the plan period. The terminology "exceptional circumstances" sets the bar too high for permitting dialog to take place in response to this issue.

Gladman hope that the comments made within this representation in relation to the proposed Main Modifications are helpful and is of assistance to the Inspector in concluding the soundness of the Local Plan. Should the Council or the Inspector wish to discuss the content of this representation, please do not hesitate to get in touch.

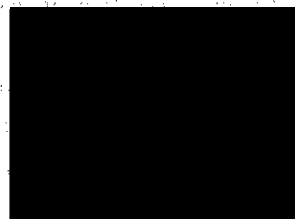
Kind Regards

Craig Barnes
Senior Policy Planner

Gladman Developments Ltd



Local Plan Consultation
Craven District Council
1 Belle Vue Square
Broughton Road
SKIPTON
North Yorkshire
BD23 1FJ



16 March 2019

For the attention of Inspector Matthew Birkinshaw, BA (Hons), MSc, MRTPI

Dear Sir

Local Green Space Designation HE-LGS1

I write in relation to Craven District Council's designation of HE-LGS1 as local green space. While I appreciate that this area is quite large, it is also very rich in wildlife, has areas of historical interest as yet unexplored, is very much valued by the local community, and is within 2 metres of the boundary of my house and other residents on Midland Terrace, Station Road and Kendal Road. All these latter criteria exactly match those set out in Paragraph 77 of the NPPF. I therefore do not agree with your initial decision that this does not meet the majority of the criteria contained in the NPPF. I hope that you reconsider and approve this whole site, HE-LGS1 as Local Green Space.

However, notwithstanding the sentiments expressed above, I would urge you to seriously consider the proposal submitted on 11 January 2019 by CPRE that a smaller area be designated as Local Green Space, replacing Craven District Council's proposal HE-LGS8 and HE-LGS9. This would satisfy the requirements of the NPPF because this area is used every day by local residents and is in very close proximity to the community it serves. It is rich in wildlife, with the waders and waterfowl using the grassland to feed on and nest as well as the flooded areas, is important for amphibians as well as resident mammals, and, according to archaeological surveys, contains remnants of early occupation by man. In addition, the area should be considered as a whole rather than piecemeal, being in full view of people using the Grade II listed Hellifield Station, as well as from the houses of all those whose property abuts this area, which is noted for its tranquillity and beauty.

I would also ask you to look at Craven District Council's revised designation of three areas as Local Green Space, Namely HE-LGS8 and HE-LGS9 as well as HE-LGS7. This last of which you have accepted as being designated Local Green Space for its importance for wildlife, although rather more distant from the local community than the other two areas. While not ideal in preserving the richness of wildlife, for historical value or for recreational value, it would recognise the area for its tranquillity and beauty.

In summary, I believe the area HE-LGS1 should be designated as Local Green Space because:

1. It is in **very** close proximity to the community it serves.
2. It is demonstrably **special** to the community, many of whom use it every day for recreation, all of whom appreciate it for its tranquillity and beauty, and most of whom would want the richness of the wildlife the area supports to be retained.
3. The **whole** of it is within the plain view of people using the area, properties abutting it, the Yorkshire Dales National Park and people using the Settle-Carlisle Railway Conservation area, including those on trains and at the Grade II listed Hellfield Station. One can therefore reasonably consider it as an integral whole, with clearly defined boundaries and hence not "extensive".

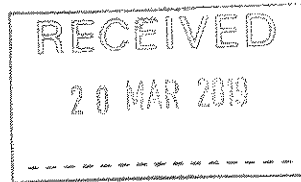
Should you still not accept the designation for HE-LGS1 as Local Green Space, I believe that the proposed modification suggested by CPRE on 11 January, 2019, would be an acceptable compromise. The proposal put forward by Craven District Council relating to HE-LGS7, 8 and 9 would go some way towards satisfying the requirement to preserve the richness of wildlife, although not an ideal outcome.

I hope you will reconsider your initial decision.

Yours faithfully


David Gooch, BSc(Hons), GDBA, PGCE

Local Plan Consultation
Craven District Council
1 Belle Vue Square
SKIPTON
North Yorkshire
BD23 1FJ



Loretta Gooch



16 March 2019

Dear Sir

I wish to submit some comments to the Consultation for the Local Plan, particularly on the Local Green Space issue.

I have a mental health condition, and I get immense therapeutic relief from the Hellifield Flashes and the fields all around them. This is in addition to the clean air I can breathe there, and the peace and tranquillity only disturbed by the huge variety of birds.

I really hope that the plan to designate the entire area HE-LGS1 will be reconsidered and passed, because I believe I am not the only human to benefit from this beautiful piece of land so close to the village. Many other creatures benefit from it too.

Here are some examples:

- The birds that I have been privileged to see while walking the fields and from my bedroom window, and I still see some of them regularly – Bewick swans, pectoral sandpiper, redshank, lapwings, widgeon, tern, shelduck, shoveler, coots, tufted ducks, mallards, skeins of Canada and other geese, sea gulls (indicate the coastal weather), ...
- I know that some folk have seen amphibians including the rare great crested newts
- I see dog walkers and their dogs, and enjoy recognising the 'regulars'!
- I've heard that remnants of early man are thought to be present in the area
- I like to see the flashes come and go, comparing the number and frequency year on year. The maximum number I've seen at any one time is 15! The seagulls we can expect
- I watch the 'rainbow' sheep grazing on the land - noting the cycle of tugging, lambing, and taking to market, and the fertilising and cropping of silage for winter feed.

I understand that the plan for the whole area is too 'extensive' and it has been divided up into three areas, HE-LGS7, HE-LGS8 and HE-LGS9. HE-LGS7 (Gallaber Pond and surrounding area) has already been designated as Local Green Space (even though a great part of it is water, and it is also furthest away from the village) because it is so rich in biodiversity. I need binoculars to enjoy looking at it.

The other two areas are just as rich in wildlife, and they are even more beneficial to me personally – and I think the many other villagers I see using it. If it needs to be a choice, I would imagine Gallaber Pond needs little protection as green space, and it is already in the Long Preston Conservation Area. I would prefer the alternative proposal submitted by CPRE for a larger area, but if that is too 'extensive', HE-LGS8 and 9 would still be of some recreational value to the many villagers who now use it.

By the way, I have never understood the criteria for 'extensive'. It seems quite arbitrary to me.

Yours faithfully



Loretta Gooch, BTech (Hons), PGCE

From: John Goodall [REDACTED]
Sent: 27 March 2019 17:04
To: Local Dev. Framework
Subject: Local Green Space designation for land NW of Hellifield adjacent A65.

I write as an individual and resident of Long Preston for 25 years, in support of designating this land as "Local Green Space".

The points I wish to make are as follows:

This land serves TWO communities and modest circular walks of 2 to 4 miles can easily be made entirely on foot from both Long Preston and Hellifield along local footpaths. The combined residential populations of these two villages (totalling 2100 approx at present) has continuously available access and I hope that this combined population figure is to be used in any evaluation regarding the permitted size of the Green Space Designation. In addition there are numerous visitors from further afield who come because they already know of the importance of this site to national wildlife but I have no figures for these at my disposal.

The area is predominately gentle, smooth and level, so much of it is not difficult terrain for those with small children, the elderly, those with mobility problems or simply those wanting modest exercise or perhaps gentle rehabilitation. At first glance, there rarely seem to be many souls about, but after numerous visits I generally see several people on most occasions, either walking the dog, walking gently, perhaps with sticks, or parked up on the "road to nowhere" just watching through the binoculars as well as those of a more vigorous disposition. It is in effect in fairly constant use in the hours of daylight.

What is pretty unique about "the flashes" is the opportunity this relatively small area presents to every visitor if they go looking. It is relatively easy to be in fairly intimate contact with a large (and well recorded) range of wildlife that does not appear to feel threatened by the presence of humans, their pets, passing traffic on the A65 (including motorbikes, emergency vehicles, HGV's), and on the railway - heavy freight and occasional steam specials with their accompanying enthusiasts. There are many photographs of the main Gallaber Flash with deer and birds in the water together and a great deal of migratory activity as the seasons pass and the water level changes acting as a natural flood plain helping to ameliorate flooding in the lower Ribble..

Moreover unlike so many organised reserves, the wildlife activity can be enjoyed free of intrusion, no entrance gates, site shop, refreshment facility (better that local businesses take the benefit from that).

Protecting it with the Local Greenspace Designation would preserve the present tranquility, prevent repeats of more inappropriate planning applications, such as the one so recently and comprehensively rejected, and give Hellifield and Long Preston a sense of ownership in a priceless asset that is self sustaining.

For all these reasons I hope that you are able to decide that the size guidelines for this Local Green Space Designation are not of over riding importance in relation to the significance of the site to our two communities.

Thank you for this opportunity to express my opinions.

Yours respectfully

John Goodall.

Sent from my iPad

Sent from my iPad

From: Sally Goodman [REDACTED]
Sent: 07 March 2019 14:12
To: Local Dev. Framework
Subject: Craven Local Plan 2012-2032 Main Modifications Consultation Representation Form
Attachments: cdc-mods-rep-form-2019-final SG.pdf

Please find attached.

Kind regards,

Sally Goodman
[REDACTED]

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mrs
First Name:	Sally
Last Name:	Goodman
Job Title (where relevant):	
Organisation (where relevant):	
Address 1:	████████████████████
Address 2:	██████
Address 3:	

Address 4:	
Postcode:	████████
Telephone:	██████████
Email:	████████████████████

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Sally Goodman
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM:87	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

We STRONGLY oppose deletion of SK-LGS64 Land to north of Skipton, bounded to the north by Skipton Bypass, to the east by Embsay Road & The Bailey; and to the west by Grassington Road, Skipton. We want Park Hill to remain protected as local green space.

Park Hill is of historical significance, cultural significance and is important to local fauna given its proximity to Skipton Castle Woods.

During the recent poorly publicised consultation the representative for the current owners of the land (Jesuits etc.) claimed “the site is not demonstrably special to a local community” and “some distance from most of the built-up area of Skipton and the community it supposedly serves”. This is a ridiculous and ignorant comment used to justify the change. The Hill dominates the Castle end of the town which is why it was chosen as the location for a battery in the Civil War. The entrance to Park Hill is roughly 280m from the “top of the High Street”. Nearby St. Stephen’s Catholic Church in the north of town is 310m from the High Street; is it also “some distance” from “the community it supposedly serves”? Using an “opinion” to justify a potentially drastic change is unacceptable.

Skipton prides itself on being the “Gateway to the Yorkshire Dales” and is a magnet for walkers and tourists. Park Hill is the starting point for Lady Anne’s Way and is also stopping off point for the Dales High Way route. Walking and tourism and consequently the business it generates for local shops, restaurants, hotels and B&Bs is crucial to keeping the unique character of Skipton. If Skipton becomes another identikit town, the tourists will stop coming, so the myriad of cafés will close and decline will set in.

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

We think the Council should take up again with the Inspector, the question as to whether Park Hill alone is an extensive tract of land or not. It is bounded by the woods, the bypass, Mill Lane/Chapel Hill, Grassington Road and Raikes Road. The Plan will be stronger with it in, rather than omitting to give fuller protection to such a valued green space visible from many parts of Skipton, in regular use by residents and tourists, valued by local wildlife, part of a Conservation Area, and of historic importance. The area at the top of Park Hill is shown on the map as somewhere where there was an ancient gun emplacement, may go back to Cromwellian times and is the last surviving parliamentarian cannon battery from the civil war. It is/was classed as a protected ancient monument. The area also includes protected Rights of Way.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)

Yes, I do wish to be notified	✓
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	√
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	7/3/19

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ | www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



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

Craven Local Plan Examination

From: Sheila Gordon [REDACTED]
Sent: 21 March 2019 18:13
To: Local Dev. Framework
Subject: Hellifield Flashes

Dear Sir,

I would like to express my support for the Hellifield Flashes to be designated as a 'Local Green Space'. The site is of Archaeological significance, having six identified sites including a ring ditch & potentially remains of Iron Age & Roman homesteads. The area is rich in wild life particularly bird life and is important for its recreational value to the local community.

To allow such a vast commercial enterprise in this beautiful unspoilt landscape would be a total disaster.

Regards Sheila Gordon

[REDACTED]

From: Lesley Gould [REDACTED]
Sent: 28 March 2019 11:28
To: Sian Watson
Subject: Objections to Park Hill

Please see letter as attached.

Lesley Gould

[REDACTED]



28th March 2019

Mr. S. Watson
Spatial Planning Manager
Craven District Council

Dear Mr. Watson,

I am writing to object to the potential removal of the removal of the Local Green Space Designation for Park Hill in Skipton.

- The area has legal protection
Under the National Planning Policy Framework (2012) updated Feb-19
Section 8. Promoting healthy communities

Para 98 “Planning policies should protect and enhance public rights of way and access. Local authorities should seek opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.”

The footpath over Park Hill, a public right of way, carries Lady Anne's Way (named after Lady Anne Clifford) and A Dales Highway, a 90 mile long footpath linking Saltaire and Appleby-in-Westmoreland.

Para 100 “The Local Green Space designation should only be used where the green space is:

- a) in reasonably close proximity to the community it serves;
- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- c) local in character and is not an extensive tract of land.

One can leave the centre of town, walk up the historically significant Chapel Hill and be at the edge of Park Hill within five minutes.

- The area has historic significance:
 - § The site encompasses the earthworks of the Civil War battery (hence it's other name of Battery Hill);
 - § It is adjacent to the grounds and medieval hunting park of Skipton Castle, a Grade 1 listed building and of national importance.
- The area has environmental importance:
 - § Roe deer use the area as an access route into Skipton Woods.
 - § Curlews nest on Park Hill. The curlew is one of our most rapidly declining bird species, with numbers down 50% in the last 20 years and with the fear that it could become extinct in southern England within 20 years.
 - § Skipton Woods – an ancient woodland under the management of the Woodland Trust – would become an increasingly isolated pocket of land with little access for wildlife into the space. Wildlife access routes are essential in order to maintain a healthy biodiversity.

- The area has a lot of importance within the local community:
This was recognised by the 2013 consultation in preparation for the Local Plan. The Park Hill area had the most objections and the least in favour ratio of all the sites in Skipton.
 - § "A much loved green corridor. That many people walk in or through. Would completely change to approach Skipton from Skipton Woods."
 - § "This should become part of Skipton Woods. This area has Yorkshire Dales character. People don't come to view housing on surrounding hillsides> protect hills visible from the town."
 - § "Not suitable because its right next to Skipton Woods."

I have the following objections to specific wording in the Draft Schedule of Main Modifications:

MM7 Supporting Text to SP4. 4.47

I object to insertion of 'or other appropriate land'. This is a significant insertion and in addition to 'previously developed land' which was consulted on and agreed previously. 'Other appropriate land' is a very general term and therefore unclear. It overturns the 'brownfield first' approach of the sentence as previously agreed without any clarity.

I object to this revision.

MM7 Supporting text to SP4. 4.49.

I object to the deletions and insertions. The changes proposed are to allow development on green land adjoining settlements, rather than to encourage use of previously developed land as in the draft Plan.

Original text:

"Nevertheless it may still be appropriate to support the release of land for housing on **previously developed land within the main built up areas in certain circumstances**. If the planned growth for a settlement is clearly not being delivered, then other sustainable housing development **within** that settlement will, in principle, be supported."

Revised text:

"Nevertheless it may still be appropriate to support the release of land for housing on **land outside a settlement's main built up area in addition to the plan's land allocations in Tier 1 to 4 settlements**. If the planned growth for a settlement is clearly not being delivered, then other sustainable housing development **on land adjoining** that settlement will, in principle, be supported."

I object to these revisions.

MM74 Policy ENV2

I support the addition of point (v) in (a)

- the insertion of:

[v) Skipton Castle, the castle grounds and the castle's extensive landscape setting, including the medieval hunting park, Skipton Woods and Civil War Battery;]

MM87 Policy ENV10 Local Green Space.

I object to the deletion of:

SK-LGS64 Land to north of Skipton, bounded to the north by Skipton Bypass, to the east by Embsay Road & The Bailey; and to the west by Grassington Road, Skipton.

I disagree with the Inspector and for all the reasons I have listed above,

- I want Park Hill to remain protected as local green space;
- I do not think Park Hill is an extensive tract of land;
- I want it left in as a whole as in the Draft Plan and not deleted as proposed.

I think the Council should take up again with the Inspector, the question of whether Park Hill alone is an extensive tract of land or not. It is bounded by the woods, the bypass, Mill Lane/Chapel Hill, Grassington Road and Raikes Road. The Plan will be sounder with it in; the Plan needs to give full protection to such a valued greenspace, visible from many parts of Skipton, in regular use by residents and tourists, valued by local wildlife, part of a Conservation Area and of historic importance.

At a time when we have to address the effects of climate change with ever increasing urgency, it is very short sighted to not only be building on ecology rich green spaces such as Park Hill but also degrading adjoining sites like Skipton Castle Woods.

Our housing crisis is a financial crisis at least as much as a house building crisis and needs to be addressed in a coherent and forward thinking manner rather than building over an increasing proportion of our green spaces.

Your Sincerely,

Lesley Gould

From: Cllr.Andy Solloway [REDACTED]
Sent: 01 April 2019 12:00
To: Local Dev. Framework
Subject: Ack email sent on 1.4.19 by RC: Letter from constituent Lesley Gould to Cllr Andy Solloway

Begin forwarded message:

From: democratic services <democratic.services@northyorks.gov.uk>
Date: 1 April 2019 at 11:24:34 BST
To: Cllr.Andy Solloway [REDACTED]
Subject: FW: Letter from constituent Lesley Gould to Cllr Andy Solloway

Dear Councillor Solloway

Please find below email which was sent to the Democratic Services generic email box.

Many thanks

Julie

-----Original Message-----

From: Lesley Gould [REDACTED]
Sent: 28 March 2019 12:15
To: democratic services <democratic.services@northyorks.gov.uk>
Subject: Letter from constituent Lesley Gould to Cllr Andy Solloway

FROM: Lesley Gould, [REDACTED]

PLEASE FORWARD TO: Cllr Andy Solloway

OR, if they are no longer County Councillor, please forward it to the current County Councillor or County Councillors for Skipton West.

IF IT IS NOT YOUR JOB TO FORWARD THIS MAIL, or if there is a more appropriate email address or fax number for messages to this County Councillor, please let us know by sending an email to [REDACTED], quoting reference 61685. This will prevent you from receiving further mail, and improve the service for local people. We also welcome any other feedback you may have.

(Sent via

http://scanmail.trustwave.com/?c=2863&d=3rqc3DLFs94PZkmOFf08QhhPzTXNUG7IkHYk1V_gew&u=http%3a%2f%2fWriteToThem%2ecom a project of UKCOD, registered charity number 1076346.)

Lesley Gould
[REDACTED]

[REDACTED]
Phone: [REDACTED]

Email: [REDACTED]

Thursday 28 March 2019

Dear Andy Solloway,

I am writing to you as our NYCC representative.

I object to the potential removal of the Local Green Space Designation for Park Hill in Skipton.

- The area has legal protection
Under the National Planning Policy Framework (2012) updated Feb-19 Section 8. Promoting healthy communities

Para 98 “Planning policies should protect and enhance public rights of way and access. Local authorities should seek opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.”

The footpath over Park Hill, a public right of way, carries Lady Anne's Way (named after Lady Anne Clifford) and A Dales Highway, a 90 mile long footpath linking Saltaire and Appleby-in-Westmoreland.

Para 100 “The Local Green Space designation should only be used where the green space is:

- a) in reasonably close proximity to the community it serves;
- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- c) local in character and is not an extensive tract of land.

One can leave the centre of town, walk up the historically significant Chapel Hill and be at the edge of Park Hill within five minutes.

- The area has historic significance:

- § The site encompasses the earthworks of the Civil War battery (hence it's other name of Battery Hill);

- § It is adjacent to the grounds and medieval hunting park of Skipton Castle, a Grade 1 listed building and of national importance.

- The area has environmental importance:

- § Roe deer use the area as an access route into Skipton Woods.

- § Curlews nest on Park Hill. The curlew is one of our most rapidly declining bird species, with numbers down 50% in the last 20 years and with the fear that it could become extinct in southern England within 20 years.

- § Skipton Woods – an ancient woodland under the management of the Woodland Trust – would become an increasingly isolated pocket of land with little access for wildlife into the space. Wildlife access routes are essential in order to maintain a healthy biodiversity.

- The area has a lot of importance within the local community:

This was recognised by the 2013 consultation in preparation for the Local Plan. The Park Hill area had the most objections and the least in favour ratio of all the sites in Skipton.

§ “A much loved green corridor. That many people walk in or through. Would completely change to approach Skipton from Skipton Woods.”

§ “This should become part of Skipton Woods. This area has Yorkshire Dales character. People don’t come to view housing on surrounding hillsides> protect hills visible from the town.”

§ “Not suitable because its right next to Skipton Woods.”

I have the following objections to specific wording in the Draft Schedule of Main Modifications:

MM7 Supporting Text to SP4. 4.47

I object to insertion of 'or other appropriate land'. This is a significant insertion and in addition to 'previously developed land'

which was consulted on and agreed previously.

'Other appropriate land' is a very general term and therefore unclear.

It overturns the 'brownfield first' approach of the sentence as previously agreed without any clarity.

I object to this revision.

MM7 Supporting text to SP4. 4.49.

I object to the deletions and insertions. The changes proposed are to allow development on green land adjoining settlements, rather than to encourage use of previously developed land as in the draft Plan.

Original text:

"Nevertheless it may still be appropriate to support the release of land for housing on previously developed land within the main built up areas in certain circumstances. If the planned growth for a settlement is clearly not being delivered, then other sustainable housing development within that settlement will, in principle, be supported."

Revised text:

"Nevertheless it may still be appropriate to support the release of land for housing on land outside a settlement’s main built up area in addition to the plan’s land allocations in Tier 1 to 4 settlements. If the planned growth for a settlement is clearly not being delivered, then other sustainable housing development on land adjoining that settlement will, in principle, be supported."

I object to these revisions.

MM74 Policy ENV2

I support the addition of point (v) in (a)

- the insertion of:

[v) Skipton Castle, the castle grounds and the castle’s extensive landscape setting, including the medieval hunting park, Skipton Woods and Civil War Battery;]

MM87 Policy ENV10 Local Green Space.

I object to the deletion of:

SK-LGS64 Land to north of Skipton, bounded to the north by Skipton Bypass, to the east by Embsay Road & The Bailey; and to the west by Grassington Road, Skipton.

I disagree with the Inspector and for all the reasons I have listed above,

- I want Park Hill to remain protected as local green space;
- I do not think Park Hill is an extensive tract of land;
- I want it left in as a whole as in the Draft Plan and not deleted as proposed.

I think the Council should take up again with the Inspector, the question of whether Park Hill alone is an extensive tract of land or not. It is bounded by the woods, the bypass, Mill

Lane/Chapel Hill, Grassington Road and Raikes Road. The Plan will be sounder with it in; the Plan needs to give full protection to such a valued greenspace, visible from many parts of Skipton, in regular use by residents and tourists, valued by local wildlife, part of a Conservation Area and of historic importance.

At a time when we have to address the effects of climate change with ever increasing urgency, it is very short sighted to not only be building on ecology rich green spaces such as Park Hill but also degrading adjoining sites like Skipton Castle Woods.

Our housing crisis is a financial crisis at least as much as a house building crisis and needs to be addressed in a coherent and forward thinking manner rather than building over an increasing proportion of our green spaces.

Your Sincerely,

Lesley Gould

652306324985528df438/c8f4a6886c4522a3c728

(Signed with an electronic signature in accordance with section 7(3) of the Electronic Communications Act 2000.)

[This message was sent by

http://scanmail.trustwave.com/?c=2863&d=3rqc3DLFs94PZkmOFF08QhhPzTXNUG7IkHYk1V_gew&u=http%3a%2f%2fWriteToThem%2ecom If you have had any problems receiving this message, please email [REDACTED] and we'll get back to you. See <http://scanmail.trustwave.com/?c=2863&d=3rqc3DLFs94PZkmOFF08QhhPzTXNUG7IkHdxgA6yeg&u=http%3a%2f%2fwww%2ewritetothem%2ecom> for more details about the service. We have sent this email to democratic.services@northyorks.gov.uk; if this address is out of date please email us so that we can update our records.]

Get emails when local people report street problems in your ward at:

<http://scanmail.trustwave.com/?c=2863&d=3rqc3DLFs94PZkmOFF08QhhPzTXNUG7IkCwhggjhdw&u=http%3a%2f%2fwww%2efixmystreet%2ecom%2falert>

-----Original Message-----

From: D.Grant [REDACTED]
Sent: 27 March 2019 15:06
To: Tony Blackburn
Subject: Park Hill Protest

Dear Tony,

I wish to protest most strongly against any proposal to change the Green Space Designation for Park Hill. As a citizen of Skipton for over 40 years, a published local historian, and former head of the history department at the grammar school here I am well aware of the historical and recreational importance of the area.

Yours sincerely,

Douglas Grant, M.A.

From: Stan & Liz Gray [REDACTED]
Sent: 26 March 2019 13:32
To: Local Dev. Framework
Subject: Gallerber Flashes

Dear Sir/Madam

I am sending this e-mail to ask you to designate Gallaber Flashes a green space.
I have lived in Hellifield all my life, 70 years next month, and have enjoyed the sights and sounds over these fields since a child.

The diverse wildlife habitat is unique and it would be a sad day if it were taken away

Green space is disappearing fast in this modern world, we must save some for future generations to enjoy.

We look to you to be the guardians of these beautiful places.

Yours Sincerely Mary Elizabeth Gray.

Stan and Liz



Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). Please fill in a separate form for each representation you wish to make.

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	MR .
First Name:	IAN
Last Name:	GRIDGEMAN
Job Title (where relevant):	RETIRED .
Organisation (where relevant):	EX. ORDNANCE SURVEY LAND SURVEYOR .
Address 1:	[REDACTED]
Address 2:	[REDACTED]
Postcode:	[REDACTED]
Telephone:	[REDACTED]
Email:	[REDACTED]

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	N/A
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

If you wish your personal details to be treated in confidence and not published please tick the box below:

Please explain below, why you have made this request:

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	IAN GRIDGEMAN
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: Equality	
Insufficient level of equality assessment conducted on site G2/4 gargrave (off Walton close/Marton Road).	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

AS A RESIDENT AT CURRENT ADDRESS FOR OVER 40 YEARS, I HAVE BEEN VERY FORTUNATE TO SURVIVE THE INADEQUATE CONDITIONS OF MARTON ROAD: POOR STREET-LIGHTING, SPASMODIC AND ILL-CONSIDERED WALKWAYS, DANGEROUS VEHICULAR ACCESS ETC. ETC. ANY FURTHER DEVELOPMENT WOULD ADD GREATLY TO THE ABOVE SITUATIONS.

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

- Significant investment made to infrastructure
- Equality assessment to be conducted with remediating actions put in place
- Or alternative suitable site which will cater for all disadvantaged groups

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	26-3-19

From: David Leighton Griffiths [REDACTED]
Sent: 25 March 2019 16:11
To: Sian Watson; Tony Blackburn; Councillor John Dawson
Subject: Park Hill Development Plans.

Members of Craven District Council.

At a time when faith in our leaders' abilities to plan, make decisions and judge possible outcomes is at an all time low, I consider writing this missive to be an act of pure optimism, hoping of course that these notes are logged and considered.

Having read about plans to develop Park Hill in Skipton I was at first doubtful it was true, then shocked that this may become a reality. I'd like to lodge my objection to a plan which for so many reasons seem to be one step too far for a town already growing beyond its present levels of sustainability.

I don't object to progress, I recognise people need houses, and I would like to see the town grow, become more prosperous and serve it's inhabitants better, but I would hazard a guess that any property built on Park Hill would be of a premium nature, and turn what is now a green space with historic routes traversing it into expensive private property.

There is, you have my opinion, do with it what you will, I will watch with interest as this develops.

Kind regards, and thanks for reading.

Dave Griffiths, [REDACTED]

From: Philip Hadfield [REDACTED]
Sent: 25 March 2019 10:03
To: Local Dev. Framework
Cc: Ruth Parker
Subject: ack email sent by RP 25.3.19 RESPONSE: Public consultation on the Main Modifications to the Publication draft Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)
Attachments: cdc-mods-rep-form-2019-P Hadfield 24 March 2019.pdf
Importance: High
Follow Up Flag: Follow up
Flag Status: Flagged

Dear Craven Local Plan Team

Please see attached my Representation to the Local Plan Consultation.

I understand that an email letter I wrote on this subject has been included in the bundle for consideration by the Planning Inspector.

IF ONLY ONE SUBMISSION FROM ME IS ADMISSIBLE THEN PLEASE SUBMIT THE ATTACHED COMPLETED REPRESENTATION FORM IN PREFERENCE TO THE LETTER.

Thank you for your assistance and patience in this matter.

Best regards
Phil Hadfield

Dr Phil Hadfield
Director: www.philhadfield.co.uk
Advisory Board: Centre for Criminal Justice Studies
School of Law
University of Leeds
United Kingdom

Mob: [REDACTED]
Office: [REDACTED]
Email: [REDACTED]
Homepage: <http://www.philhadfield.co.uk>

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Dr
First Name:	Philip
Last Name:	Hadfield
Job Title (where relevant):	
Organisation (where relevant):	
Address 1:	[REDACTED]
Address 2:	
Address 3:	

Address 4:	██████████
Postcode:	██████████
Telephone:	██████████
Email:	████████████████████

Section 2: Agent Details

Plasesupplythename,address,telephonenumberande-mailofanyplanningagentyouhave working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: 87 Regarding the proposed deletion of Local Green Space SKLGS64 (Land to north of Skipton, bounded to the north by Skipton Bypass, to the east by Embsay Road & The Bailey; and to the west by Grassington Road, Skipton) under Policy ENV10 Local Green Space.	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

The proposal to remove the designation of local green space contradicts many of the Objectives set out in Sustainability Appraisal (SA) in relation to the preferred Option (E – balanced hierarchy of development growth).

Whilst recognising the need for controlled growth to reflect the growing population of Craven, the proposal to remove the designated green space of the area of land known as Park Hill appears contrary to several of the key objectives set out in the spatial objectives and referred to in the SA Policies. For example:

SO12: To conserve and enhance the historic environment and heritage asset. The proximity of the land to Skipton Woods (to support the protection of a key habitat), the historical associations with the Castle, and its inclusion of historic walking paths are important to this objective.

SO13: To protect biodiversity, protected habitats and species: Its proximity to Skipton Woods as noted above is important to protect and preserve a precious environment. It should be importantly noted that Park Hill is historical wet-pasture habitat for highly endangered ground-nesting birds such as the Curlew (and to a lesser degree, the Lapwing). This links to SO12 as the species is iconic within the cultural history of the Yorkshire Dales, supporting the arts, literature and tourism.

SO14: To protect and enhance the open countryside and landscape character. This is essentially the established character / reputation of Skipton as a ‘country market town’, as widely understood; standing within open countryside and not part of an urban conurbation.

SO5: To promote physical, mental and social wellbeing: the green space prominently stands over the town and is clearly visible to the town, promoting a feeling of wellbeing and beauty. Moreover, it is directly and easily accessible from the town using established and well-used footpaths used by locals to access and exit the town centre on foot, by dog walkers, family groups etc.

SO16: Minimise air, noise and light pollution: Development of the land would absolutely affect these aspects of the environment given its prominence, height and proximity to the town and the fact that it is currently open grazing land.

SO11: Ensure the prudent use of land resources: There are more prudent, less-invasive, sites for development in and around Skipton.

SO10: To protect the natural and agricultural conditions to maintain soil quality and grow food: the quality of the land appears prime agricultural and grazing land forming part of the local agricultural economy.

This parcel of land is central to the fabric and charm of the town and the loss of its green character would be absolutely detrimental from ecological, cultural, wellbeing, historical and economic perspectives.

I understand that national planning policy guidance reflects that Local Green Space is *reasonably close to the community, demonstrably special to the community, holds a particular local significance, local in character and not an extensive tract of land*. I would strongly argue that this piece of land absolutely fits those criteria.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

Reinstatement of the proposed area as Local Green Space.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)

Yes, I do wish to be notified

✓

No, I do not wish to be notified

Section 8: Request to be notified of adoption of the Craven Local Plan


Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)

Yes, I do wish to be notified

✓

No, I do not wish to be notified

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	Dr Philip Hadfield 
Date	25 March 2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ
www.cravencd.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravencd.gov.uk



INVESTOR IN PEOPLE



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

Craven Local Plan Examination

From: Steve Coetzer [REDACTED]
Sent: 31 March 2019 14:58
To: Local Dev. Framework
Cc: Steve Coetzer
Subject: Main Modifications Consultation Representation Form Local Plan 2012 – 2023
Attachments: CCE31032019_2.pdf

Please find attached comments on the modifications made on the Craven Local Plan 2012 – 2023

Steve Coetzer

E: [REDACTED]
M: [REDACTED]

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravenc.gov.uk

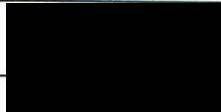
For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mrs
First Name:	Frances
Last Name:	Hall -Coetzer
Job Title (where relevant):	
Organisation (where relevant):	
Address 1:	
Address 2:	
Address 3:	

Address 4:	
Postcode:	
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM:6 MM:64 MM:70 MM:71 MM:78 MM:79 MM:120 MM:121	

Section 4: Legal Compliance & Duty to Cooperate

Do you consider that this modification of the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant	Yes	
2. Sound (MM:6,MM:64,MM:70,MM:71,MM:78,MM:79, MM:120,MM:121)		No
3. In Compliance with the Duty to Cooperate		

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

**MM:6
SP3 Housing Mix and Density**

(b) 'regard to local and site-specific circumstances' is non specific and should be replaced with wording more in keeping with **SP12 and INF7**

**MM:64
SP10 Site (GA031)**

The conditions of development only refer to conserving the significance of heritage assets and a conditional reference to SUDS. This should be widened to bring it in line with **SP12 and INF7**

**MM:70
Supporting text for Policy SP12 Paragraphs 4.67, 4.69**

Includes 'provision of the following broad types of infrastructure But it does not include Highways which is crucial

**MM:71
Policy SP12**

Policy SP12 refers to the council 'will work to mitigate and minimise adverse impacts.....in terms of infrastructure provision' This is too general and needs modifying to bring it in line with **INF7**

**MM:78
Supporting text to Policy ENV4 Paragraph 5.45**

Reference is made to Bio-diversity with an emphasis placed on 'internationally, nationally and local designated sites'

Many developments are on green field sites of a known rich diversity of protected species and all such sites should be subject to an 'appropriate assessment'

**MM:79
Policy ENV4 Bio-diversity Part a) and f)**

Refers to 'growth in housing.....will be accompanied by improvements in bio-diversity. This means that a) where possible....'

This is far too open ended and needs amending

MM:120**Supporting text for New Policy INF7-Sustainable Transport and Highways**

Refers to 'The provision of a safe, suitable and convenient access to new development sites should be agreed' the word 'should' is too ambiguous. The proposed site GA031 Walton Close Gargrave does meet even the most basic needs as set out in this section.

MM:121**Policy INF7 Sustainable Transport and Highways**

e) 'providing safe, suitable and convenient access to all development sites...' is too site specific and misses the point that much of a sites impact will probably be between the site itself and the centre of the conurbation it is located alongside.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

MM:6**SP3 Housing Mix and Density**

Regard to local should be followed by '**sustainability issues, infrastructure requirements, safety and inclusivity**'

MM:64**SP10 Site (GA031)**

The reference to SUDS should be changed from '**will**' incorporate... unless this is not possible or feasible to '**must incorporate to ensure no detrimental impact on existing residents and the existing sewage system**'

The paragraph should also include reference to '**highways and access to the centre of the village to be improved up to the required standards of the highways authority to ensure the safety of residents, sustainability, access to transport networks and inclusivity**'

MM:70**Supporting text for Policy SP12 Paragraphs \$.67, 4.69**

'**Highways**' should be included in the 'broad types of infrastructure listed

MM:71
Policy SP12

Should read.....'**ensure there are no adverse impacts**'

(Note: many developments are large and unless infrastructure is improved they will not deliver sustainability, safety, accessibility and inclusivity)

MM:78
Supporting text to Policy ENV4 Paragraph 5.45

The last sentence referring to 'development proposals likely to have a significant effect on a European site.....' should be widened to include '**greenfield site, or a site of known bio diversity**'when considered alone

MM:79
Policy ENV4 Bio-diversity Part a) and f)

'wherever possible' should be replaced with '**development will be required to**'

And later '(i) Ensure that there is no adverse impact on any internationally designated sites integrity' should include '**or a site of known bio-diversity or inhabited by protected species**'

MM:120
Supporting text for New Policy INF7-Sustainable Transport and Highways

Replace 'should' with '**must**'

MM:121
Policy INF7 Sustainable Transport and Highways

After 'to all development sites' include '**and from the sites to the centre of the conurbation**'

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	<input checked="" type="checkbox"/>
No, I do not wish to be notified	<input type="checkbox"/>

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	X
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below	
Signature	[Redacted Signature]
Date	30-03-19 [Redacted Date]

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ |
www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



INVESTOR IN PEOPLE



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

Craven Local Plan Examination

From: Kellie Hainsworth [REDACTED]
Sent: 01 April 2019 12:00
To: Local Dev. Framework
Subject: Craven Local Plan Main Modifications
Attachments: Reps to Main Modifications-010419.pdf

Please find attached a Representation on behalf of Halton Homes Ltd in relation to the proposed Main Modifications.

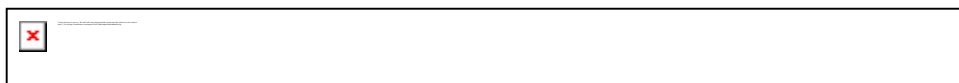
I should be grateful if you could acknowledge receipt.

Kind regards

Kellie Hainsworth



t. [REDACTED]
e. [REDACTED]
w. walton-co.co.uk
a. 2 Queen Street, Leeds LS1 2TW



This email transmission is strictly confidential and intended solely for the addressee. It may contain information which is covered by legal, professional or other privilege. If you are not the intended addressee, you must not disclose, copy or take any action in reliance on this email. If you have received this email in error we would be grateful if you could notify us as soon as possible.

This firm is authorised and regulated by the Solicitors Regulation Authority - SRA No: 525095
Walton & Co is the trading name of Walton & Co (Planning Lawyers) Limited - Limited Company No: 07173302
Registered Office: 2 Queen Street, Leeds, LS1 2TW

 Think before you print.

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	
First Name:	
Last Name:	
Job Title (where relevant):	
Organisation (where relevant):	Halton Homes Ltd
Address 1:	
Address 2:	
Address 3:	

Address 4:	
Postcode:	
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	David Walton
Address:	Walton & Co 2 Queen Street Leeds LS1 2TW
Telephone number:	██████████
Email:	████████████████████

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FOIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FOIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Halton Homes Ltd
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: 101, 105, 107	

Section 4: Legal Compliance & Duty to Cooperate

Do you consider that this modification of the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant	<input type="checkbox"/>	<input type="checkbox"/>
2. Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. In Compliance with the Duty to Cooperate	<input type="checkbox"/>	<input type="checkbox"/>

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

Please see attached sheet.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

Please see attached sheet

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	X
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	X
No, I do not wish to be notified	

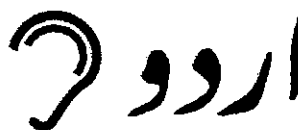
Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	[Redacted]
Date	01/04/2019.

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ |
www.cravendc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravendc.gov.uk



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

Craven Local Plan Examination

HALTON HOMES LTD

LAND AT HELLIFIELD

EXAMINATION OF THE CRAVEN LOCAL PLAN

MAIN MODIFICATIONS CONSULTATION

SECTION 5: DETAILS OF REPRESENTATION

MM101, MM105, MM107 and M154

Representations

'In principle' restriction in Policy EC4B

1. The effect of Policy EC4B: Tourism Development Commitment at Hellifield, as drafted in the main modifications (**MM105**), would be to severely constrain the form of Tourist Development which could come forward on the site¹.
2. Despite ostensibly being a permissive tourism policy it actually establishes an 'in principle' restriction on any tourism development coming forward on the site which is not considered to be "limited in scale" when compared to the amount of operational development granted under a historic permission.²
3. Thus, even where such development would cause no material harm to the important interests of the site and surrounding area (including those recognised in Policy EC4B(I)-(V)), under the policy as currently drafted it would still be contrary to the development plan.
4. This in-principle restriction on tourism development established by Policy EC4B is unsound for a number of reasons:
 - a. First, it is contrary to the objectives of the local plan. In particular, the "important aim" to support sustainable tourism (para 7.15), as well as the vision of the Policy EC4 to "enable established destinations to become even better through the development of new and improved

¹ That is, the area within the red-dashed line identified on Diagram EC4B which constitutes the "Tourism Development Commitment"

² The Council plainly considers policy EC4B, as currently drafted, to provide an 'in principle' restriction on development coming forward on the site. In March 2019, an officer report in relation to an application to develop the site for a tourism development (Ref 42/2016/17496) concluded that the "wholesale development of the area covered by Draft Policy EC4B... would not be acceptable under the emerging Local Plan policy" (para 10.13). This conclusion was arrived at prior to consideration of any of the impacts of the particular proposal and demonstrates that Policy EC4B, as currently drafted, establishes an in principle restriction on such proposals, regardless of their actual impact.

facilities” and “help...up-and-coming destinations to establish themselves and become successful” (Policy EC4(a)&(b)).

- b. Second, the in principle restriction is directly contrary to national policy which requires local plans to “support sustainable rural tourism...include[ing] supporting the provision and expansion of tourist and visitor facilities in appropriate locations” (para 28 NPPF 2012)
- c. Third, the approach taken to the restriction is entirely arbitrary, and lacks any supporting evidence base. There is no rational basis to distinguish between the policy approach to the ‘grey-hatched’ area and the remainder of the site (ie the “white land” within the red-dashed line). The restriction that development outside the grey hatched areas be “limited in scale”, is not based on any assessment of (say) the different sensitivities of the ‘grey-hatched’ and ‘white-land’. It is simply based on the fact that, historically, the Council have permitted operational development ‘grey-hatched’ area. However, it does not follow simply from the fact that permission has been granted for operational development on the ‘grey-hatched’ areas, that the remainder of the site is any less capable of accommodating development or only capable of accommodating development which is ‘limited in scale’. There is no evidence supporting such a conclusion, or justifying the distinction drawn by the policy.
- d. Fourth, the approach is a perverse one. The existence of the ‘in principle’ restriction means that a more restrictive approach would be taken to tourism development on the ‘white land’ area of the Tourism Development Commitment site (the whole of which already benefits from the extant use rights for a tourist-related development³) than would be taken other sites not designated for tourism purposes.
- e. Fifth, the approach is entirely inconsistent. There are other sites in the District which benefit from planning permission for tourism facilities, but which would not be subject to the same ‘in principle’ restriction should they wish to expand their facilities from those already

³ See EL2.015a(i) Matter Statement 15, paras 2.1-2.8. This much was accepted by the Inspector, hence the inclusion of the red-dashed line which represents the area of the application site under permission ref: 42/2082/2763

permitted/implemented.⁴ Such existing tourism sites – which do not ‘benefit’ from the Tourism Development ‘Commitment’ Designation – would be able to draw support from Policy EC4(a), and would not be subject to the in principle restriction that any extension of their facilities must “limited in scale”. It is wholly unclear why Hellifield has been singled out in this regard.

5. The effect of the ‘in principle’ restriction in Draft Policy EC4b would be to prevent sustainable tourist development coming forward on a site which has long been recognised as being an appropriate location for tourism, and which already benefits extant tourist-related use rights.
6. In its current form **MM105** is not **sound**. In particular it is not:
 - a. **Positively Prepared** – because it hinders the achievement of sustainable tourism development
 - b. **Justified** – as it is not the most appropriate strategy based on proportionate evidence; and
 - c. **Consistent with national Policy** – it is contrary to national policy relating to tourism development and, more generally, would inhibit rather than enable, the delivery of sustainable development.
7. In order to ensure the Policy EC4B is sound **MM105** should be modified so that the in principle support for sustainable tourism development on the site applies to the entirety Tourism Development Commitment area (namely all of that all within the red-dashed line). Two alternative proposed modifications are suggested in ‘Section 6: Proposed Modifications’ , with the first being preferred as it is simpler and draws no arbitrary distinction between the “white” and “grey” areas.⁵

⁴ By way of one example, see the Bowland Fell Park, Crow Trees which provides over 40 hectares of land providing pitches for static holiday homes, holiday lodges, residential park homes plus extensive recreational space and leisure facilities including an indoor swimming pool, bar and restaurant. It was granted permission for extension of the caravan park to allow for 51 static caravan pitches (Ref 2018/19292/FUL).

⁵ It also avoids the white areas being described as “non-designated land” despite falling within the Tourism Development Commitment designation.

8. Proposed modifications are also suggested for **M101** to ensure that the supporting text at paragraph 7.19 is consistent with the amendments to Policy EC4B.

Other matters

9. As well as the 'in principle' restriction there are other proposed modifications in **MM105 and 107** which should not be recommended

10. MM105:

- a. The proposed addition of a sixth requirement in Policy EC4B "*VI) Preservation or enhancement of the character and appearance of the local area*" (which was not included in the submission local plan) should not be recommended because:
 - i. It is not needed for reasons of soundness. Landscape and visual impacts of a proposal on the Tourism Development Site will be assessed against Policy ENV1
 - ii. Requirements I)-IV), which were included in the submission local plan, were justified on the basis of interests relevant to the particular site (eg Local Green Space, PROW, proximity to National Park and Heritage Assets). Requirement VI) is not justified in this manner.
 - iii. The requirement to "preserve and enhance" the character of the local area goes beyond what is required by national policy in relation to landscape other than protected area (ie National Parks/AONBs) or valued landscapes (para 109 NPPF 2012). It is also inconsistent with, and goes beyond, Policy ENV1 which, in relation to sites not subject to national landscape designations, requires developments to "*respect, safeguard, and wherever possible, restore or enhance the landscape character of the area.*"
- b. The proposed addition of the requirement that "*Individual proposals that accord with the Council's approach set out above must also accord with all other relevant local plan policies and any relevant neighbourhood plan policies*" (which was not included in the

submission local plan) is not needed for reasons of soundness. It is self-evident that proposals will have to comply with the development plan as a whole. There is no reason for it to be included in relation to Policy EC4b alone.

11. In order that **MM105** is sound, both the sixth requirement in Policy EC4B ("*VI Preservation or enhancement of the character and appearance of the local area*") and the final sentence of the policy ("*Individual proposals that accord with the Council's approach set out above must also accord with all other relevant local plan policies and any relevant neighbourhood plan policies*") must be deleted. Both the proposed and alternative modifications reflect this.

12. MM107:

a. There are a number of factual errors on the "New Diagram EC4B":

- i. First, the grey hatched areas do not accurately represent the full extent of the areas of operational development permitted on the site. First, at the north west of the site, an area of hardstanding was permitted. The front part of which was integral to the hotel complex, and the rear as overflow car parking. Second, there are existing buildings on the site which are not covered by grey-hatching and which should be included. A diagram is attached (plan 1) to reflect the correct extent of the approved operational development, both existing and approved (shown in red). Both should be taken into account when calculating whether any additional development is "limited in scale" (without prejudice to the contentions above).
- ii. Second, the existing public rights of way are not accurately represented. In particular, there is a dotted line to the north of Gallaber's Pond which shows a public right of way which does not exist. A diagram is attached highlighting the inaccurate public right of way (plan 2).

b. No evidence has been provided to justify the 'Potential public right of way', nor is it a requirement of the policy. It should be deleted.

- c. In terms of the "biodiversity value" symbol:
- i. An additional symbol is being proposed on Little Dunbar's Flash. No reason or supporting evidence has been provided for this. It should be rejected.
 - ii. In any event , there is insufficient ecological evidence to include the biodiversity value anywhere on the Site other than Gallaber Pond

13. In order that **MM107** is found sound the corrections to "New Diagram EC4B" listed above must be made.

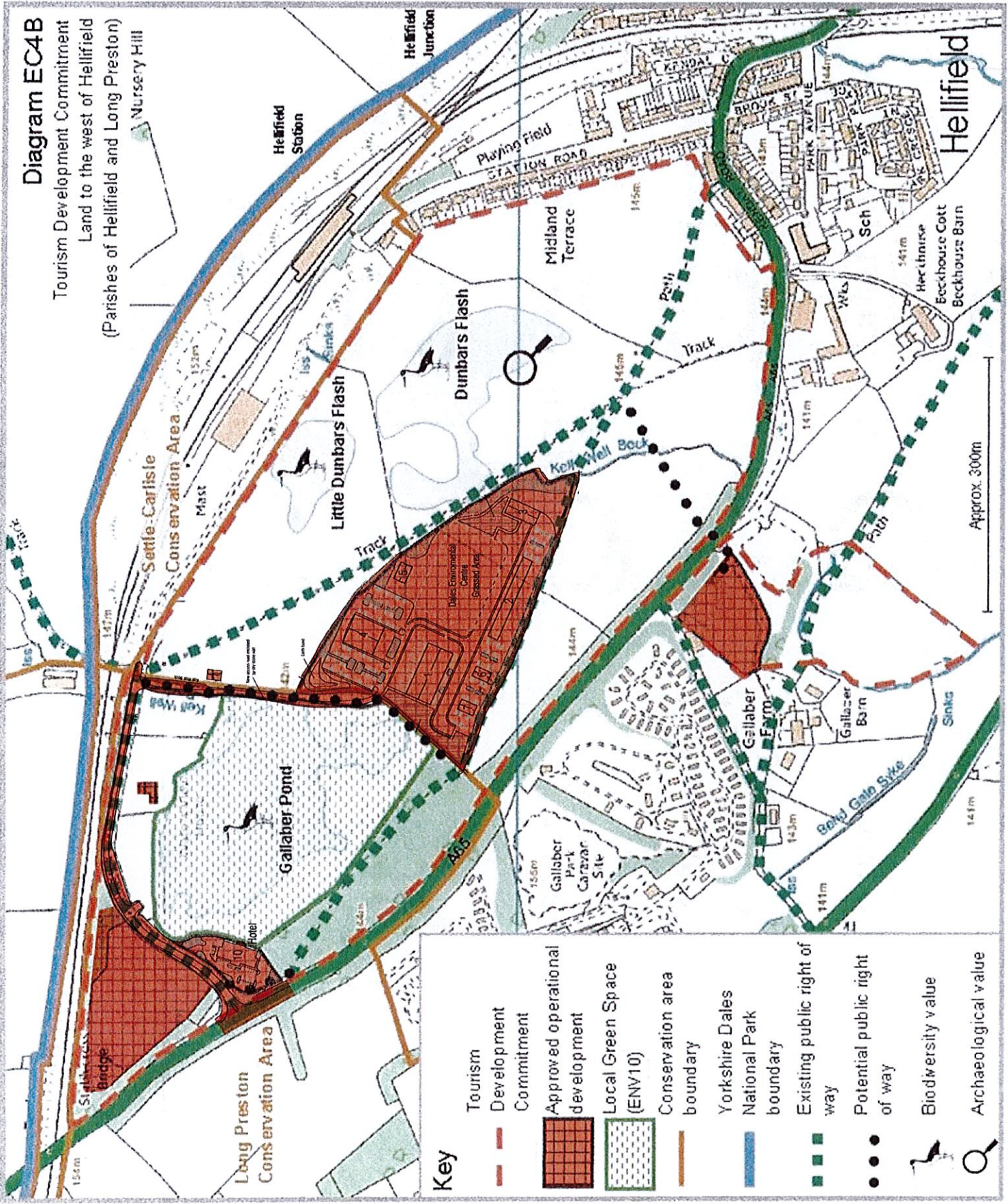
MM154

14. We support the deletion of "HE-LGS1 Land to the west of Hellifield (Hellifield Flashes)" in Policy ENV10 as proposed in **MM154**. The proposed designation was plainly unsound for the reasons set out in Matter Statement 21 and expanded on at the hearing sessions.

Walton & Co
29 March 2019

Diagram EC4B
 Tourism Development Commitment
 Land to the west of Hellfield
 (Parishes of Hellfield and Long Preston)

PLAN 1



Key

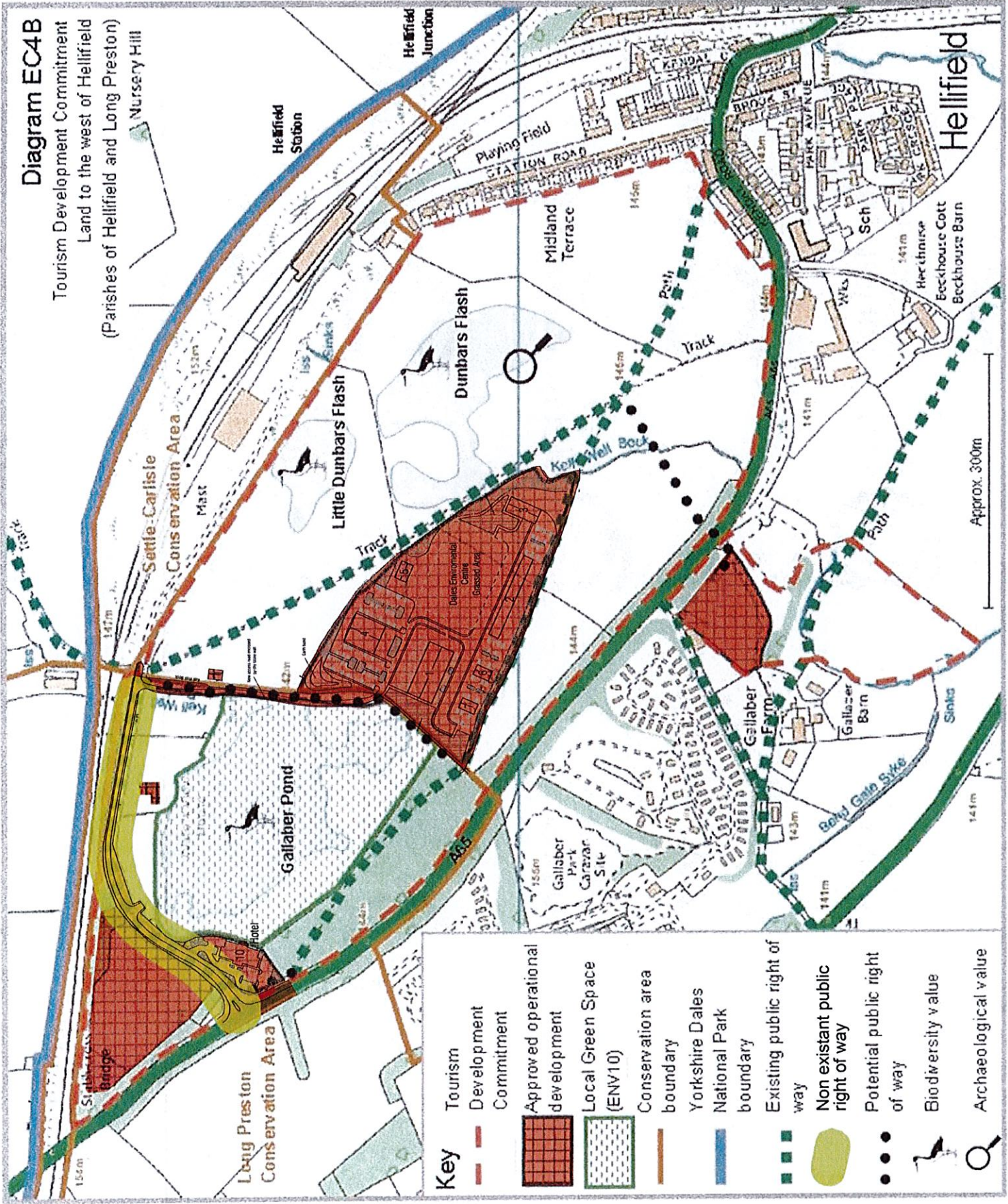
Tourism	Development Commitment	Approved operational development	Local Green Space (ENV10)	Conservation area boundary	Yorkshire Dales National Park boundary	Existing public right of way	Potential public right of way	Biodiversity value	Archaeological value

Approx. 300m

Diagram EC4B

Tourism Development Commitment
Land to the west of Hellfield
(Parishes of Hellfield and Long Preston)

PLAN 2



Key	
	Tourism Development Commitment
	Approved operational development
	Local Green Space (ENV10)
	Conservation area boundary
	Yorkshire Dales National Park boundary
	Existing public right of way
	Non existing public right of way
	Potential public right of way
	Biodiversity value
	Archaeological value

HALTON HOMES LTD

LAND AT HELLIFIELD

EXAMINATION OF THE CRAVEN LOCAL PLAN

MAIN MODIFICATIONS CONSULTATION

SECTION 6: PROPOSED MODIFICATIONS

MM101, MM105, MM107

* We have put forward two alternative modifications to MM105 (and consequentially to MM101. The first modification is to be preferred in both cases for the reasons set out in section 5*

MM105

Representor's Preferred Modification

Policy EC4B: Tourism Development Commitment at Hellifield

Alternative sustainable tourism development will be supported on land at Hellifield identified as ~~grey hatching~~ **within the red dashed line** on Diagram EC4B, provided that the following requirements are met:

- I) Conservation of the landscape and of the setting and special qualities of the Yorkshire Dales National Park
- II) Conservation of heritage assets, including archaeological remains, the Long Preston Conservation Area and the Settle-Carlisle Conservation Area
- III) Conservation of biodiversity value
- IV) Preservation or enhancement of Local Green Space, including its open character, local significance and value to the community
- V) Preservation and enhancement of the existing public rights of way network
- ~~VI) Preservation or enhancement of the character and appearance of the local area.~~

~~Proposals that include the development of non-designated land (shown in white on Diagram EC4B) for the purposes of sustainable tourism will be supported in principle, provided that:~~

- ~~i) the land adjoins an area identified by grey hatching on the policies map and Diagram EC4B; and~~
- ~~ii) the amount of any such land is limited in scale compared to the amount of adjoining land identified by grey hatching; and~~
- ~~iii) the proposal meets the requirements of I) to VI) above.~~

~~Individual proposals that accord with the Council's approach set out above must also accord with all other relevant local plan policies and any relevant neighbourhood plan policies.~~

Representor's Alternative Modification

Policy EC4B: Tourism Development Commitment at Hellifield

Alternative sustainable tourism development will be supported on land at Hellifield identified as grey hatching on Diagram EC4B, provided that the following requirements are met:

- I) Conservation of the landscape and of the setting and special qualities of the Yorkshire Dales National Park
- II) Conservation of heritage assets, including archaeological remains, the Long Preston Conservation Area and the Settle-Carlisle Conservation Area
- III) Conservation of biodiversity value
- IV) Preservation or enhancement of Local Green Space, including its open character, local significance and value to the community
- V) Preservation and enhancement of the existing public rights of way network
- ~~VI) Preservation or enhancement of the character and appearance of the local area.~~

Proposals that include the development of non-designated land (shown in white on Diagram EC4B) for the purposes of sustainable tourism will be supported in principle, provided that:

- ~~i) the land adjoins an area identified by grey hatching on the policies map and Diagram EC4B; and~~
- ~~ii) the amount of any such land is limited in scale compared to the amount of adjoining land identified by grey hatching; and~~

- iii) the proposal meets the requirements of I) to VI) above.

~~Individual proposals that accord with the Council's approach set out above must also accord with all other relevant local plan policies and any relevant neighbourhood plan policies.~~

MM101

Representor's Preferred Modification

7.19 Tourism Development Commitment. Land designated as the Tourism Development Commitment is located to the west of Hellifield and is outlined by a red dashed line in Diagram EC4B. This land benefits from extant planning permission for construction of a rural environmental centre (comprising tourism, exhibition, training, equestrian and livestock buildings, a hotel and nature conservation area). ~~However, the extent of operational development (buildings etc.) allowed by the planning permission is limited to three areas within the red dashed line and identified by grey hatching in the diagram, with most of the land remaining as fields, a nature conservation area, open public space and a grass car park. Designation of the Tourism Development Commitment recognises the extent of operational development already approved and related.~~ Policy EC4B sets out the Council's approach to proposals for alternative sustainable tourism development, which may come forward in the future. Such proposals will be supported, in principle, provided that they promote sustainable tourism and fully address important matters of landscape **impact on the National Park**, heritage, ~~local character and appearance, archaeology, biodiversity, local green space and public rights of way,~~ in accordance with local plan policies ENV1, ENV2, ENV3, ENV4, ENV10 and ENV12.

Representor's Alternative Modification

7.19 Tourism Development Commitment. Land designated as the Tourism Development Commitment is located to the west of Hellifield and is outlined by a red dashed line in Diagram EC4B. This land benefits from extant planning permission for construction of a rural environmental centre (comprising tourism, exhibition, training, equestrian and livestock buildings, a hotel and nature conservation area). ~~However, t~~The extent of operational development (buildings etc.) allowed by the extant planning permission is limited to three areas within the red dashed line and identified by grey hatching in the diagram, with most of the land remaining as fields, a nature conservation area, open public space and a grass car park. Designation of the Tourism Development Commitment recognises the extent of operational development already approved and related Policy EC4B sets out the Council's approach to proposals for alternative sustainable tourism development, which may come forward in the future. Such proposals will be supported, in principle, provided that they promote sustainable tourism and fully address important matters of landscape **impact on the National Park**, heritage, ~~local character and appearance, archaeology, biodiversity, local green space and public rights of way,~~ in accordance with local plan policies ENV1, ENV2, ENV3, ENV4, ENV10 and ENV12.

MM107

New Diagram EC4B should be corrected to:

- a. Accurately represent the full extent of the areas of operational development permitted;
- b. Accurately represent the existing public rights of way
- c. Remove reference to the Potential public right of way
- d. Delete the biodiversity value symbol from Little Dunbar's Flash and Dunbar's Flash.

**Walton & Co
28 March 2019**

From: [REDACTED]
Sent: 20 February 2019 17:46
To: Local Dev. Framework
Subject: RC replied 21.02.19: Public Consultation on the Proposed Main Modifications to the Publication Draft Craven Local Plan: 19/02/19 - 01/04/19

Follow Up Flag: Follow up
Flag Status: Completed

Thank you for this. I must say right away that I find the documentation for this latest consultation very confusing; I am sure everything is set out clearly for those who interact regularly with it all, which does not include me.

Please could you confirm that there has been no written changes to the plan since March 2018, which predates last year's consultation?

I am interested in the area SG021/SG066/SG080: I have seen this on the new maps, and these seem to suggest that it is now proposed that access to the houses within the development will now only be from Cammock Lane. Please can you confirm whether this is indeed correct? The key on the maps that can be downloaded off your website are unreadable, at least they are on my PC as I cannot zoom in sufficiently. The maps last year distinguished between two areas, one for development and one for green screening. The new map seems to no longer make this distinction. Please could you also also clarify this for me?

Thank you in advance for your help.

Keith Hamflett
[REDACTED]

-----Original Message-----

From: Local Dev. Framework <localplan@cravenc.gov.uk>

To: [REDACTED]

Sent: Mon, 18 Feb 2019 16:12

Subject: RE: Public Consultation on the Proposed Main Modifications to the Publication Draft Craven Local Plan: 19/02/19 - 01/04/19

Dear Mr Hamflett,

If you follow the link in the notification email (i.e. www.cravenc.gov.uk/planningpolicyconsultations) tomorrow, when the consultation starts, you should be able to find the documents without any problem.

Sorry for the confusion.

Yours sincerely,

From: [REDACTED]
Sent: 18 February 2019 15:19
To: Local Dev. Framework
Subject: Re: Public Consultation on the Proposed Main Modifications to the Publication Draft Craven Local Plan: 19/02/19 - 01/04/19

Thank you for the notification below. It would however be much more useful if it were possible to find the latest version of the plan and the other documents referred to on the council's website. When one looks for these all one can see is a forest of out-of-date documents. It would actually be useful if these out-of-date documents were moved into an archive and those currently relevant were simple to find.

Could you possibly let me have some links to the documents mentioned below?

Thank you,

Keith Hamflett
[REDACTED]

Local Dev. Framework
Planning Policy Team

t: 01756706472

e: localplan@cravenc.gov.uk

1 Belle Vue Square, Broughton Road, Skipton, BD23 1FJ
www.cravenc.gov.uk

This e-mail, including any attachments, is confidential and intended only for the attention and use of the named addressee(s). It may contain information covered by legal, professional or other privilege. If you are not an addressee, please inform the sender immediately and destroy this e-mail. Do not read, copy, use, retain or disclose this e-mail or any part of it. Its contents do not necessarily represent the views or opinions of Craven District Council. All reasonable precautions have been taken to ensure no viruses are present in this e-mail. Craven District Council cannot accept responsibility for loss or damage arising from the use of this e-mail or attachments and recommend that you subject these to virus checking procedures prior to use.

Please be aware that all communications sent to or from Craven District Council may be subject to recording and/or monitoring in accordance with relevant legislation.

-----Original Message-----

From: Craven District Council <localplan@cravenc.gov.uk>

To: [REDACTED]

Sent: Mon, 18 Feb 2019 11:14

Subject: Public Consultation on the Proposed Main Modifications to the Publication Draft Craven Local Plan: 19/02/19 - 01/04/19

[View this email in your browser](#)

[View this email in your browser](#)

Dear Sir/Madam,

**Public Consultation on the Proposed Main Modifications
to the Publication Draft Craven Local Plan
Tuesday 19th February – Monday 1st April 2019**

I am writing to inform you that Craven District Council will be inviting representations on the Main Modifications to the Publication Draft Local Plan (the Local Plan), submitted for examination on the 27th March 2018. Public consultation runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019. All representations must be

received no later than Monday 1st April 2019.

The proposed Main Modifications are considered necessary following the examination hearings, held during October 2018, to make the Local Plan sound. The Main Modifications put forward within this consultation are made without prejudice to the Inspector's final conclusions on the Local Plan.

The Local Plan sets out the broad spatial planning, policy framework and vision for Craven District (outside the Yorkshire Dales National Park) i.e. the plan area, up to 2032, as well as the necessary development sites and infrastructure to support this growth. The Local Plan will also be used to make decisions on future planning applications.

The following updated supporting documents have been produced to accompany the main modifications and are also available as part of this consultation:

- Sustainability Appraisal
- Habitat Regulation Assessment

In addition the following documents have been produced for information purposes only and are not included in the consultation exercise, but are published for completeness:

- A Schedule of Additional Modifications, which sets out minor changes to the Local Plan that do not materially affect the operation and meaning of policies in the plan.
- A Schedule of Policy Map Changes which details where modifications to the Local Plan have resulted in consequential changes to the policies maps, or where corrections need to be made, for example where a site has been deleted.

At this stage of the examination process:

- **Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal and Habitat Regulation Assessment.**
- **This is not the opportunity to make comments on other aspects of the Local Plan.**
- **If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications proposed to the Local Plan will not be considered by the Inspector.**

For details of how to submit representations on the Main Modifications, please see the Statement of Representation Procedure and the Council's Representation Form Guidance Notes, which can be downloaded from Tuesday 19th February 2019, at www.cravencd.gov.uk/planningpolicyconsultations

Copies of the Representation Form will also be available via this link. Paper copies of the documents listed above will be available from libraries within the plan area and from the Craven District Council office reception desk during the consultation period.

All representations that relate to the Main Modifications, the updated Sustainability Appraisal and Habitat Regulation Assessment will be considered by the Inspector who will decide whether any further examination hearings are required. At the end of the examination process he will present his final conclusions in a report to the Council. If the Inspector concludes that the Local Plan is 'sound' subject to Main Modifications, the Council can move forward to adopt the Local Plan, subject to making the modifications recommended by the Inspector.

You are receiving this letter because you have submitted representations on previous drafts of the Local Plan, your contact details are held on the council's Local Plan consultation database and/or you have submitted representations on the Publication Draft Craven Local Plan. If you no longer wish to be contacted with regard to the Craven Local Plan and/or the contact details are incorrect, please use the 'unsubscribe from this list' and 'update subscription preferences' links included at the bottom of the Council's Mailchimp emails to unsubscribe or update contact details, securely and in accordance with the General Data Protection Regulation (GDPR).

If you require any further information or assistance please do not hesitate to contact the Planning Policy Team at localplan@cravencd.gov.uk or 01756 706472.

Yours faithfully
Planning Policy Team

Copyright © 2019 Craven District Council, All rights reserved.
You are receiving this email because you opted in at our website.

Our mailing address is:

Craven District Council
Craven District Council
1 Belle Vue Square, Broughton Road
Skipton, North Yorkshire BD23 1FJ
United Kingdom

[Add us to your address book](#)

[unsubscribe from this list](#) [update subscription preferences](#)

Facebook

Twitter

Website

From: [REDACTED]
Sent: 21 March 2019 19:45
To: Sian Watson
Subject: Park Hill, Skipton

Dear Mrs Watson

I would like to register my objection to the proposed removal of the Local Green Space Designation for Park Hill from the Local Plan.

Park Hill is a very important asset to the town and to me personally as it is a much-loved area, being adjacent to Skipton Woods and only a stone's throw away from the town centre. I have enjoyed the walk to and from Park Hill into town innumerable times since childhood, and often lingered at the top to make the most of the unique, extensive views of the town and the lovely countryside around. It is a special place. It is also part of the "Dales High Way" and "Lady Ann's Way," and a prized walk to both locals and visitors. The path is so close to the middle of Skipton that it is a good starting/finishing point for a walk, beneficial for both physical and mental health and, if you are a local, without the need for polluting transport to get there.

Being next to Skipton Woods, it is a necessary boundary for the local wildlife - there are often deer seen in that part of the woods nearest the field. The whole area affords pleasure and tranquillity and is a precious local amenity.

It is also of historic significance because of its proximity to Skipton Castle, and the top of Park Hill itself the site of the Civil War battery.

Park Hill is within Skipton's Conservation Area.

Yours sincerely

Mrs Jennifer Harris

[REDACTED]

RECEIVED

21 MAR 2010

Mr N. Watson.

Planning Manager.

18.3.19.

Dear Sirs,

When I moved to Hellifield several years (from Haworth and all its visitors) I was delighted to find a house with fields to the rear of the property and a play ground to the front-

It has been every day a lovely thing to be able to walk through the fields, watch all the animals grazing and see all the birds and wild life visiting these fields. So many people visit the flocks from the village, where would we be without them.

It's a horrifying thought to think that the flocks being taken from us and replaced with what is proposed making a real blot on the landscape and giving us more traffic on the A65 through the village, which is

very high at the best of times.

I do hope these things will be taken into consideration when making a decision.

Yours Sincerely

A solid black rectangular box redacting the signature of the sender.

From: PHIL HARVEY [REDACTED]
Sent: 29 March 2019 08:44
To: Local Dev. Framework
Subject: Fw: Change to Local Plan Protected Green Space Park Hill Skipton
Attachments: Craven Council Local Plan Objection.pdf

Tony

Please find attached our formal objection to the updated local plan and the removal of the Protected Local Green Space allocation of the historic location Park Hill, as this would have a significant and dramatic impact on our property, the local community and visitors to Skipton.

Please can you acknowledge receipt of our formal objection to the change to the Local Plan and the removal of Park Hill as Protected Green Space

Phil & Sally Harvey

[REDACTED]
[REDACTED]
[REDACTED]
Tel [REDACTED]
Email: [REDACTED]

29th March 2019

Dear Sirs,

RE: Change in Local Plan Protected Green Space Park Hill Skipton

Having only recently moved to Skipton a year ago, having studied the current development plan at the time we purchased our property in March 2018 and the new proposed one once it was published it was reassuring that the local council had taken the thoughts and needs of the local community by protecting Park Hill for the local community being designated Protected Local Green Space. This designation was a key factor in the purchase of [REDACTED] that overlooks Park Hill providing beautiful views across this historical open space to Skipton Woods.

The local council have spent several years in consultation with residents and groups developing the local plan to ensure their wishes were represented. It was with great alarm to discover that at the 11th hour this designation had been removed at the request of the landowner and his agent. At the time of writing I am unaware on what ground or rationale has been applied to substantiate this decision of removing the Local Green Space allocation for Park Hill as this was not published on the updated documentation as this was the only change to the Local Green Space plan in Skipton.

While we appreciate this area still falls within the overall conservation area the removal of this classification would make it easier for this land to be developed in the future and therefore must be challenged to ensure the Local Protected Green Space allocation is reinstated as per the original plan.

The decision to amend the plan has been met with alarm by the local community and this has been also documented in the local press, and actions groups and individuals who all agree this is the wrong decision for Skipton.

We therefore must formally object to the updated local plan and the removal of the Protected Local Green Space allocation of the historic location Park Hill, as this would have a significant and dramatic impact on our property, the local community and visitors to Skipton.

Please can you acknowledge receipt of our formal objection to the change to the Local Plan and the removal of Park Hill as Protected Green Space

Yours Faithfully,

Philip & Sally Harvey

Cc Sian Watson Spatial Planning Manger

Cllr John Dawson

Julian Smith MP

Craven Herald

-----Original Message-----

From: Carole Hawkins [REDACTED]

Sent: 22 March 2019 15:49

To: ContactUs

Subject: Planning objection

Dear Sir

Re: change of status of Castle Hill Skipton

I am alarmed to hear the status of this land may be changed allowing part of it to be developed in the future. I understand this land was given to the residents of Skipton to enjoy and have some much needed green space preserved for future generations. This is even more important today with development going on at a fast pace. Research has proved open green spaces are vital for our mental health. I am strongly against any change in status and trust my view and that of others will be considered carefully.

Yours

Carole Hawkins

([REDACTED])

From: David Hawkins [REDACTED]
Sent: 22 March 2019 15:29
To: ContactUs
Subject: Objection to two planning applications

Dear Sir/Madam

I wish to register my objection to two current planning applications;

1. The Change of Status application with regard to Castle Fields, Skipton. This application sounds as if it is a pre requisite to a further application for a house building project. This land is not suitable for this purpose and I strongly hope the Council will turn down this application for Change of Status in order to protect the land in its present status into the future.
2. The Planning Application in Hellifield to Change the Wetland and Wildlife Status on the Levels and therefore seriously impair the wildlife value of this local and important flood plain Nature Reserve. As a conservationist and ornithologist, I sincerely hope that the Council will not consider granting such a request.

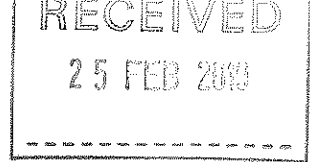
I look forward to hearing your response in due course.

Yours faithfully

David Hawkins
Right Reverend David Hawkins, Assistant Bishop in the Diocese of Leeds.

Sent from [Mail](#) for Windows 10

All email sent by RP 25/2/19.
Scanned + saved in system.



Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

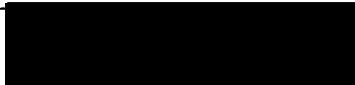

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mrs
First Name:	Catherine
Last Name:	Hawley
Job Title (where relevant):	
Organisation (where relevant):	
Address 1:	
Address 2:	
Address 3:	
Address 4:	

Postcode:	
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

If you wish your personal details to be treated in confidence and not published please tick the box below:

I wish to request that the personal details submitted with this representation are treated in confidence and not published.

Please explain below, why you have made this request:

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal and Habitats Regulation Assessment that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal and Habitats Regulation Assessment will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: MM87 The deletion of Local Green Space SKLGS64 under Policy ENV10 Local Green Space.	
This deletion does not comply with national planning policy.	

Section 4: Legal Compliance & Duty to Cooperate

Do you consider that this modification of the Local Plan is: (tick as appropriate)	
	Yes
1. Legally Compliant	
2. Sound	
3. In Compliance with the Duty to Cooperate	

Please refer to the Council’s Representation Form Guidance Notes at, which can be viewed at:
www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

<p>Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.</p> <p>If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.</p>

This deletion does not comply with national planning policy as it is close to the community, very special to our community for historic, heritage, landscape, social and health, and tourist/business reasons (Short Lee Lane much used by families as a wonderful introduction to nature on their way to castle /Skipton Woods etc and the hill is used by the congregation of Holy Trinity every Easter morning where a special services is held at dawn – this has been going on for years; Park Hill is major feature of walks, much referred too in the press and a historic site connected with the castle and the civil war), holds a particular local significance (the view of Skipton from the hill is one of the best of the church tower and town behind – this is important in a tourist destination, and is local (in aesthetics, landscape and wildlife) in character and not an extensive tract of land. Please see this survey

[https://www.cravenc.gov.uk/media/2501/skipton_event_feedback_information.pdf?](https://www.cravenc.gov.uk/media/2501/skipton_event_feedback_information.pdf?fbclid=IwAR2TBuvqoS_qqs1cNzek9odU6Z0onpyZZ3J5wHkuwySQ4wu4s5aXMn3ynEU)

[fbclid=IwAR2TBuvqoS_qqs1cNzek9odU6Z0onpyZZ3J5wHkuwySQ4wu4s5aXMn3ynEU](https://www.cravenc.gov.uk/media/2501/skipton_event_feedback_information.pdf?fbclid=IwAR2TBuvqoS_qqs1cNzek9odU6Z0onpyZZ3J5wHkuwySQ4wu4s5aXMn3ynEU)

The fact that the whole area including Short Lee Lane is important for tourism can be seen by the fact that at the time of writing Skipton Castle Woods including the pedestrian entrance via Short Lee Lane is at number 2 out of 25 things to do in Skipton on TripAdvisor

https://www.tripadvisor.co.uk/Attraction_Review-g209940-d8775765-Reviews-Skipton_Castle_Woods-Skipton_North_Yorkshire_England.html

and the Skipton Woods own website notes: "Short Lee Lane Entrance – passing through old pines, spruce and oaks, you might even spot a family of deer that make the wood their home" see

<https://skipton.woodlandtrust.org.uk/how-to-get-here/> . This takes the importance beyond tourism to wildlife.

The 90 mile Dales High Way tourist walking route also uses Short Lee Lane <https://www.daleshighway.co.uk/SkiptonALT.htm> and the Yorkshire Post featured Park Hill in its weekend walk feature in September 2016 see <https://www.yorkshirepost.co.uk/lifestyle/walks-and-cycling/weekend-walk-skipton-castle-woods-1-8129644> and in May 2015 the area again featured in a recommended walk this time in the Craven Herald and which stresses the history of the area: "For those wanting another route back, leave the wood at Short Lee Lane and within 50 yards take the footpath on the left which leads out onto farmland and up a steep incline to the Civil War battery. From here, Cromwell's troops set up their gun emplacement to raid cannonballs down on Skipton Castle during its three year siege ending in 1645."

<https://www.cravenherald.co.uk/daleslife/walking/12938970.skipton-woods-offer-a-pleasant-lunch-break-ramble/>

People cut out and keep the above walks and they get stored in folders in

holiday cottages – this a business feature but locals do this too including my elderly mother who used her store of such things to take friends and relatives on walks to show them Skipton.

Also the health and well-being of locals should be taken into account – the local NHS providers prescribe exercise and walking for type 2 diabetes and mental health as well as fitness and weigh loss. The loss of the attractive Short Lee Lane route with its beck and fields of sheep and lambs and the wildlife mentioned on the Skipton Woods website would be huge. Getting to the rest of Skipton Woods would be longer for many locals – a disincentive to exercise. Also grandparents and grandchildren / toddlers in their wellies need quick access not long walks around Skipton before they reach the castle side entrance. As a driver coming into Skipton with this green area to one side makes this one of the prettiest routes: a great feature in a tourist area.

It is clear therefore that Short Lee Lane / Park Hill and surrounding area, designated SKLGS64 in the Local Plan, is very special to the community and to Skipton's tourist status on which many livelihoods depend as well as the well-being of the whole community. Some of my happiest memories of our daughter's early years (and she is still school age so this is fairly recent) are of her puddle jumping, looking at lambs, examining the way for 'mini beasts' and looking for signs of spring and autumn on our walks into the woods via Short Lee Lane. I had hoped it would still be there for her to bring her own children one day – it is a very special area to my family. This area would be a huge loss and needs the long term protection of being designated protected green space in the local plan and I strongly believe leaving it out would be against the legal framework.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

Only the permanent protection of this area would make this legally sound otherwise you are contravening the requirements as this is clearly both special land and of deep local significance, it is close to residents, and of a lovely size for semi-urban (as urban as this market town gets) leisure and wildlife green space.

(Continue on a separate sheet if necessary. Please remember to include

on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)

Yes, I do wish to be notified - tick

No, I do not wish to be notified

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)

Yes, I do wish to be notified - tick

No, I do not wish to be notified

Section 9: Signature & Date of Representation

Please sign and date below:

Signature

[Redacted Signature]

Date

21.2.19

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ |

www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



INVESTOR IN PEOPLE

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

Craven Local Plan Examination

From: Joanne Harding [REDACTED]
Sent: 01 April 2019 09:11
To: Local Dev. Framework
Subject: HBF response to Craven Local Plan Main Modifications
Attachments: 19-04-01 HBF Craven Local Plan Main Modifications.docx

Dear Sir / Madam,

Please find attached the response of the Home Builders Federation (HBF) to the Craven Local Plan Main Modifications.

It would be greatly appreciated if you could confirm receipt of this response.

If you require any further information or if you have any questions or queries please do get in touch at the details below.

Kind regards

Joanne Harding MRTPI

Local Plans Manager - North



HOME BUILDERS FEDERATION

m: [REDACTED]
e: [REDACTED]



This e-mail is confidential, and may be legally privileged. If you are not the intended recipient, do not copy, use or disclose its content, but contact the sender immediately.

Whilst we run anti-virus software on all Internet emails we are not liable for any loss or damage sustained as a result of software viruses. The recipient is advised to run their own anti-virus software.

Registered in England and Wales | Registered office: 27 Broadwall, London, SE1 9PL
Company Reg No. 276 4757 | Vat No. 882 6294 86

Planning Policy Team
Craven District Council
Council Offices
Belle Vue Square
Broughton Road
Skipton
North Yorkshire
BD23 1FJ

SENT BY EMAIL
localplan@cravencd.gov.uk
12/04/2019

Dear Sir / Madam,

CRAVEN LOCAL PLAN: MAIN MODIFICATIONS

Thank you for consulting with the Home Builders Federation on the Main Modifications of the Craven Local Plan.

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

The Council will be aware that the HBF provided comments upon the previous drafts of the plan and attended the Examination.

MM5: Supporting text to Policy SP3

The HBF supports the addition of the full table from the SHMA Update 2017 setting out the proportional mix for market housing, affordable housing and overall. The HBF also support the recognition that other sources of evidence should be considered in relation to the mix and range of housing.

The HBF support the reference to the local planning authority being flexible in its requirements for housing mix and density, within part (c).

MM77: Policy ENV3

The HBF supports the deletion of part (m) and the reference to Lifetime Homes and the amendments to part (u) which adds clarity.

MM91: Policy H1

The HBF generally supports the amendments to part (b) to remove reference to 'lifetime homes'.

MM92: Supporting text for Policy H2

The HBF continues to have concerns in relation to the proposed amendments to paragraph 6.18 which still looks for circumstances to be 'exceptional' for development proposals to provide a lower proportion of affordable housing. Whilst the use of examples is beneficial, the HBF still have concerns that this requirement is overly onerous on the applicant and may lead to the Council refusing to consider viability evidence and homes not being delivered if some circumstances are not deemed 'exceptional' enough.

MM93: Policy H2 Affordable Housing

The HBF consider that the wording 'not less than' in relation to the affordable housing requirement is not necessary and should not be added to the policy.

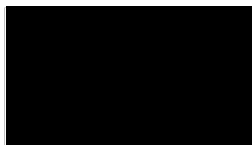
As set out above, the HBF continues to have concerns in relation to part (d) which states that *'development proposals that seek to provide a lower level of affordable housing contribution, will not be acceptable unless it can be clearly demonstrated that exceptional circumstances exist'*. The HBF has concerns that the Council will limit the circumstances within which viability evidence will be considered and this will lead to homes not being delivered. The HBF continues to consider that this text should be amended to delete the reference to exceptional circumstances and potentially amended to directly refer to viability of development.

Future Engagement

I trust that the Council will find these comments useful as it continues to progress its Local Plan to adoption. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

The HBF would like to be kept informed of the adoption of the Local Plan and all forthcoming consultations upon associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,



Joanne Harding

Local Plans Manager – North

Email: 

Phone: 

RECEIVED

20 MAR 2008

Saturday 16th March.

Sir,

you should be here today to see all the water and nowhere for it to go. would be made worse if there was Yarmac everywhere.

The area concerned has a footpath through it which is used every day with dog walkers and hikers.

It's lovely to hear the geese going over and see sheep grazing.

A park in a dip is not good?

think about it.

16 Midland Linn.

Hillyfield

From: Ian Lyle [REDACTED]
Sent: 29 March 2019 15:44
To: Local Dev. Framework
Subject: Local Plan Main Modifications
Attachments: H Boot Reprs.pdf

Please find attached a written representation in relation to MM26 on behalf of Henry Boot Developments Ltd
I would be grateful if you would acknowledge receipt.

Regards

Ian Lyle
Director



[REDACTED]
[REDACTED]

Gateway House, 55 Coniscliffe Road, Darlington Co. Durham, DL3 7EH

@ELGPlanning

www.elgplanning.co.uk

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mr
First Name:	Andrew
Last Name:	Milne
Job Title (where relevant):	Development Surveyor
Organisation (where relevant):	Henry Boot Developments Ltd
Address 1:	Banner Cross Hall
Address 2:	Ecclesall Rd
Address 3:	Sheffield

Address 4:	
Postcode:	S11 9PD
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	Ian lyle
Address:	ELG Planning Gateway House Coniscliffe Rd Darlington DL3 7EH
Telephone number:	██████████
Email:	████████████████████

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Henry Boot Developments Ltd
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM:26	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravencdc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

MM26 proposes a minor rounding of the site area and revised wording to Policy SP5 – Site SK049-Land east of Skipton bypass, Skipton.

Henry Boot Developments Ltd are the owners of this site (SK049) and the adjacent land (Wyvern Park) that already has outline planning permission for a mix of employment, residential and open space. Henry Boot is actively bringing forward Wyvern Park for development, alongside Bellway Homes, with Reserved Matters and Condition Discharge Applications currently being considered by the Council.

As part of the consented Wyvern Park development a new access will be created onto the A629 Skipton By-Pass. It has always been the intention that not only will this access serve the current Wyvern Park site but that it would also provide the principal access to future employment related development opportunities on Site SK049, with SK049 in effect acting as a Phase 2 to Wyvern Park. It was not possible to bring forward SK049 as part of the Wyvern Park application due to viability and flood risk constraints.

Options to extend the consent link road from the A629 from the western edge of Wyvern Park across Site: SK049 to Engine Shed Lane and Ings Lane have been explored and discussed with the Council. Such a link would not only create a good quality access to future development on SK049 but improve the accessibility of businesses in the Engine Shed lane/ Ings lane area and remove HGVs from roads within the main urban area.

H Boot would continue to fully support the continued allocation of Site SK049 for B1, B2 and B8 Employment Uses as allotted in Policy SP5. They note the rounding- down of the site area figure to 6ha and accept this as a minor administrative change that has no implications for the actual site area that is available for development. They also fully accept that: any development proposals on Site SK049 must be supported by a Flood Risk Assessment and drainage strategy which has informed the design, layout and landscaping of the site; and that the Flood Risk Assessment will need to incorporate the findings of both the Environment Agency's Skipton Flood Alleviation Post-Scheme Modelling Report for Eller Beck and Waller Hill Beck and the District Council's Post Scheme Modelling Report for the Ings Beck and Gallow Syke Water Management Project and demonstrate that the proposed B1, B2 and B8 uses can be accommodated on land falling outside Flood Zone 3b.

H Boot's appointed flood risk/ engineering consultants (BWB) are already in discussion with relevant stakeholders about these issues. H Boot is confident that the various alleviation measures will prove effective and that SK049 will as a result provide a suitable / developable employment site in flood risk terms. They are working towards bringing it forward as soon as possible for development.

They do object however to the statement that "Access to the site will be gained from Ings Lane. A possible additional access point is via the Wyvern Park development scheme..." Identifying Ings Lane as the primary access to SK049 in preference to the more obvious/direct link to the A629 via Wyvern Park makes little sense. Vehicles using Ings lane / Engine Shed Lane are required to pass through a circuitous network of urban and largely residential streets not designed for HGV traffic, in order to access the main 'A' road network (A629, A59, A65). By contrast the link via Wyvern Park is direct onto the A629.

It is also the case the Ings lane/ Engine Shed Lane are currently narrow, lack footways and without significant investment are not well suited to accommodating an increase in HGV traffic generated by a further 6ha of employment uses. The link via Wyvern park will be wide, modern, well lit and

have separate footways. It will be readily capable of accommodating additional traffic without further investment.

In our view it makes significantly more sense from a planning, accessibility, journey time and highway safety perspective to identify the Wyvern Park link to the A629 as the primary access route for SK049 with Ings Lane/ Engine Shed Lane the secondary option for local traffic? The Council has always been keen to promote such a link in the past in discussions with H Boot and we fail to understand why they now propose Ings Lane without any apparent change in circumstance or reasoned justification.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

For the reasons outlined above H Boot Developments Ltd would seek the following rewording of the second paragraph of MM26:

From:

Access to the site will be gained from Ings Lane. A possible additional access point is via the Wyvern Park development scheme which has consent for business/employment floorspace and residential dwellings to the south east of the site.

To:

Access to the site will be gained from the Wyvern Park development scheme which has consent for business/employment floorspace and residential dwellings to the south east of the site. A possible additional access point is via Ings Lane /Engine Shed Lane to the north.

Alternatively no preference/ primacy should be expressed in the plan with both access routes being identified as possible options.

Without this change the plan must be considered to be unsound as it would be unjustified and ineffective.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.


Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	X
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	X
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	28/03/2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ | www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



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

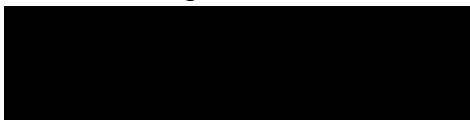
From: Jones, Simon [REDACTED]
Sent: 19 February 2019 10:15
To: Local Dev. Framework
Subject: ack email sent 19.2.19 RE: Public Consultation on the Proposed Main Modifications to the Publication Draft Craven Local Plan: 19/02/19 - 01/04/19

Follow Up Flag: Follow up
Flag Status: Completed

Good morning all

Thank you for the revised consultation in regards to the main modifications document. Highway's England has no changes or amendments/comments to add at this stage. The previously submitted comments in regards to all policies remain as unchanged, and are not superseded in any form at this stage.

Kindest regards



Regional Spatial Planning Manager – West Yorkshire & North Yorkshire

(Yorkshire & North East Team)
Highways England | Lateral | 8 City Walk | Leeds | LS11 9AT

Tel: [REDACTED] | **Mobile:** [REDACTED]
Web: <http://www.highways.gov.uk>
GTN: 0300 470 2472

From: Craven District Council, Planning Policy [mailto:localplan@cravenc.gov.uk]
Sent: 18 February 2019 11:10
To: Jones, Simon [REDACTED]
Subject: Public Consultation on the Proposed Main Modifications to the Publication Draft Craven Local Plan: 19/02/19 - 01/04/19

[View this email in your browser](#)

[View this email in your browser](#)



Dear Sir/Madam,

Public Consultation on the Proposed Main Modifications

to the Publication Draft Craven Local Plan
Tuesday 19th February – Monday 1st April 2019

I am writing to inform you that Craven District Council will be inviting representations on the Main Modifications to the Publication Draft Local Plan (the Local Plan), submitted for examination on the 27th March 2018. Public consultation runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019. All representations must be received no later than Monday 1st April 2019.

The proposed Main Modifications are considered necessary following the examination hearings, held during October 2018, to make the Local Plan sound. The Main Modifications put forward within this consultation are made without prejudice to the Inspector's final conclusions on the Local Plan.

The Local Plan sets out the broad spatial planning, policy framework and vision for Craven District (outside the Yorkshire Dales National Park) i.e. the plan area, up to 2032, as well as the necessary development sites and infrastructure to support this growth. The Local Plan will also be used to make decisions on future planning applications.

The following updated supporting documents have been produced to accompany the main modifications and are also available as part of this consultation:

- Sustainability Appraisal
- Habitat Regulation Assessment

In addition the following documents have been produced for information purposes only and are not included in the consultation exercise, but are published for completeness:

- A Schedule of Additional Modifications, which sets out minor changes to the Local Plan that do not materially affect the operation and meaning of policies in the plan.
- A Schedule of Policy Map Changes which details where modifications to the Local Plan have resulted in consequential changes to the policies maps, or

where corrections need to be made, for example where a site has been deleted.

At this stage of the examination process:

- **Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal and Habitat Regulation Assessment.**
- **This is not the opportunity to make comments on other aspects of the Local Plan.**
- **If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications proposed to the Local Plan will not be considered by the Inspector.**

For details of how to submit representations on the Main Modifications, please see the Statement of Representation Procedure and the Council's Representation Form Guidance Notes, which can be downloaded from Tuesday 19th February 2019, at www.cravenc.gov.uk/planningpolicyconsultations

Copies of the Representation Form will also be available via this link. Paper copies of the documents listed above will be available from libraries within the plan area and from the Craven District Council office reception desk during the consultation period.

All representations that relate to the Main Modifications, the updated Sustainability Appraisal and Habitat Regulation Assessment will be considered by the Inspector who will decide whether any further examination hearings are required. At the end of the examination process he will present his final conclusions in a report to the Council. If the Inspector concludes that the Local Plan is 'sound' subject to Main Modifications, the Council can move forward to adopt the Local Plan, subject to making the modifications recommended by the Inspector.

You are receiving this letter because you have submitted representations on previous drafts of the Local Plan, your contact details are held on the council's

Local Plan consultation database and/or you have submitted representations on the Publication Draft Craven Local Plan. If you no longer wish to be contacted with regard to the Craven Local Plan and/or the contact details are incorrect, please use the 'unsubscribe from this list' and 'update subscription preferences' links included at the bottom of the Council's Mailchimp emails to unsubscribe or update contact details, securely and in accordance with the General Data Protection Regulation (GDPR).

If you require any further information or assistance please do not hesitate to contact the Planning Policy Team at localplan@cravenc.gov.uk or 01756 706472.

Yours faithfully
Planning Policy Team

Copyright © 2019 Craven District Council, All rights reserved.

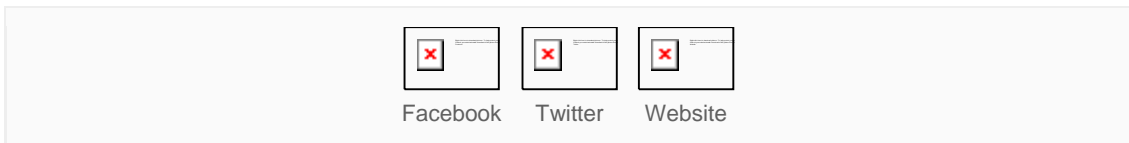
You are receiving this email because you are a statutory consultee to the planning process.

Our mailing address is:


Craven District Council
Craven District Council
1 Belle Vue Square, Broughton Road
Skipton, North Yorkshire BD23 1FJ
United Kingdom

[Add us to your address book](#)

[unsubscribe from this list](#) [update subscription preferences](#)



This email may contain information which is confidential and is intended only for use of the recipient/s named above. If you are not an intended recipient, you are hereby notified that any copying, distribution, disclosure, reliance upon or other use of the contents of this email is strictly prohibited. If you have received this email in error, please notify the sender and destroy it.

Highways England Company Limited | General enquiries: 0300 123 5000 | National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF |
<https://www.gov.uk/government/organisations/highways-england> | 

Registered in England and Wales no 9346363 | Registered Office: Bridge House, 1 Walnut Tree Close, Guildford, Surrey GU1 4LZ

Consider the environment. Please don't print this e-mail unless you really need to.

07/03/19

Dear Sir/Madam,

Removal of Site SK-LGS64 Land north of Skipton from the Local Plan.

MM87 Policy ENV10 Local Green Space.

We STRONGLY oppose deletion of SK-LGS64 Land to north of Skipton, bounded to the north by Skipton Bypass, to the east by Embsay Road & The Bailey; and to the west by Grassington Road, Skipton. We want Park Hill to remain protected as local green space.

We are writing, as people who live in and love Skipton, to express our concern regarding the removal of this local green space designation from Park Hill in Skipton. We can only assume that an application for development on the land will be the next move followed by a sale of the land to developers.

Park Hill is of historical significance, cultural significance and is important to local fauna given its proximity to Skipton Castle Woods.

During the recent poorly publicised consultation the representative for the current owners of the land (Jesuits etc.) claimed “the site is not demonstrably special to a local community” and “some distance from most of the built-up area of Skipton and the community it supposedly serves”. This is a ridiculous and ignorant comment used to justify the change. The Hill dominates the Castle end of the town which is why it was chosen as the location for a battery in the Civil War. The entrance to Park Hill is roughly 280m from the “top of the High Street”. Nearby St. Stephen’s Catholic Church in the north of town is 310m from the High Street; is it also “some distance” from “the community it supposedly serves”? Using an “opinion” to justify a potentially drastic change is unacceptable.

Skipton prides itself on being the “Gateway to the Yorkshire Dales” and is a magnet for walkers and tourists. Park Hill is the starting point for Lady Anne’s Way and is also stopping off point for the Dales High Way route. Walking and tourism and consequently the business it generates for local shops, restaurants, hotels and B&Bs is crucial to keeping the unique character of Skipton. If Skipton becomes another identikit town, the tourists will stop coming, so the myriad of cafés will close and decline will set in.

Now we are aware of this, we will be taking an active role in preventing any development. We will encourage our friends and neighbours to do likewise. This is not a case of nimbyism, it is about protecting the very nature and character of our beautiful town.

We think the Council should take up again with the Inspector, the question as to whether Park Hill alone is an extensive tract of land or not. It is bounded by the woods, the bypass, Mill Lane/Chapel Hill, Grassington Road and Raikes Road. The Plan will be stronger with it in, rather than omitting to give fuller protection to such a valued green space visible from many parts of Skipton, in regular use by residents and tourists, valued by local wildlife, part of a Conservation Area, and of historic importance. The area at the top of Park Hill is shown on the map as somewhere where there was an ancient gun emplacement, may go back to Cromwellian times and is the last surviving parliamentary cannon battery from the civil war. It is/was classed as a protected ancient monument. The area also includes protected Rights of Way.

Yours faithfully,



Sally Goodman & Stephen Hill

-----Original Message-----

From: Keith Hillery. [REDACTED]
Sent: 15 March 2019 19:02
To: Sian Watson
Subject: Park Hill - Consultation

May my wife and I ask you to note our objection to the above land losing it's protected status. Thank you.

Kind regards

Keith & Eileen Hillery

[REDACTED]

From: Smith, Ian [REDACTED]
Sent: 13 March 2019 09:48
To: Local Dev. Framework
Subject: ack email sent 13.3.19 by RP Craven Local Plan Main Modifications
Attachments: i1 MnMods13mar19.pdf; i2 Appendix A MnMods13mar19.pdf; d MnModsSA13mar19.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sir/Madam,

Thank you for consulting Historic England about the Craven Local Plan Main Modifications and the associated Sustainability Appraisal. Please find attached our comments on those documents. Copies of these letters are in the post for your records.

If you have any queries about any of the matters raised in our responses or would like to discuss anything further, please do not hesitate to contact me.

Regards

Ian Smith
Historic Environment Planning Adviser (Yorkshire and East Lancashire)
Planning Group
Historic England
Direct Line: [REDACTED] Mobile phone: [REDACTED]

How can we transform our historic textile mills into 21st century engines of growth? Read our latest report on our [Mills of the North](#) webpage. #lovemills



We are the public body that helps people care for, enjoy and celebrate England's spectacular historic environment, from beaches and battlefields to parks and pie shops.

Follow us: [Facebook](#) | [Twitter](#) | [Instagram](#) Sign up to our [newsletter](#)

This e-mail (and any attachments) is confidential and may contain personal views which are not the views of Historic England unless specifically stated. If you have received it in error, please delete it from your system and notify the sender immediately. Do not use, copy or disclose the information in any way nor act in reliance on it. Any information sent to Historic England may become publicly available. We respect your privacy and the use of your information. Please read our full [privacy policy](#) for more information.



Planning Policy,
Craven District Council,
1 Belle Vue Mills,
Broughton Road,
Skipton,
North Yorkshire, BD23 1FJ

Our Ref: HD/P5336/02
Your Ref:
Telephone: [REDACTED]
Fax:

13 March 2019

Dear Sir or Madam,

Re: Craven Local Plan – Main Modifications

Thank you for consulting Historic England about proposed Main Modifications to the Local Plan. We have the following comments to make regarding the suggested changes to the document:-

General Comments

We are particularly concerned by the amendments which have been made to the Policies Maps as part of these Main Modifications. Our concern relates to the deletion of the areas of green infrastructure provision on the housing allocations.

Regulation 9(1)(c) of the The Town and Country Planning (Local Planning) (England) Regulations, 2012 requires the Policies Map to “*illustrate geographically the application of the policies in the adopted development plan*”.

The consequential changes which have been made by the Council to the graphical depiction of the Housing Allocations shown on the Policies Map has significantly reduced the clarity and effectiveness of the Local Plan Policies. No longer is it clear to users of the Plan where development will or will not be permitted or where the open spaces on these site will be required – so important for ensuring that the development of these sites takes place in a manner which not only conserves the significance of heritage assets within their vicinity but also delivers sustainable development in terms of the other environmental assets of the District.

Since the Policies Map is not a Development Plan Document (and therefore it is not something which the Local Plan Inspector considers in terms of Main Modifications),



Historic England, 37 Tanner Row, York YO1 6WP

Telephone [REDACTED] HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.





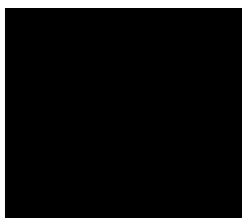
the Council could revert back to the approach adopted in the Submission Plan. Whilst it is accepted that the Inspector felt uncomfortable with defining specific areas to remain undeveloped, this concern could be overcome by renaming them on the Maps as *'Indicative area of proposed green infrastructure'*. The Policies Map would then actually deliver what it is required to do under the Regulations – i.e. illustrate geographically the application of policies of the plan.

Detailed Comments

Our detailed comments on the proposed changes to the Plan are set out in Appendix A, attached.

If you have any queries about any of the matters raised above or would like to discuss anything further, please do not hesitate to contact me.

Yours faithfully,



Ian Smith

Historic Environment Planning Adviser (Yorkshire)

e-mail:



Historic England, 37 Tanner Row, York YO1 6WP

Telephone HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



Appendix A: Table of Historic England's comments on the Proposed Main Modifications to the Craven Local Plan

Mod. No.	Policy/Paragraph/ Site Ref.	Sound/ Unsound	Comments	Suggested Change
MM1a	Vision	Sound	It is important that the growth of Settle takes place in a manner which retains the intimate feel of the town and reinforces its distinctive character. This is now reflected in this part of the Vision.	-
MM8	Policy SP4 Criteria J.c and K.c. ii	Sound	<p>As originally worded, the original Criteria J.c. and K.c. ii appeared to encompass more than simply the conservation of heritage assets. Moreover, since any type of development could, potentially, be used to justify Enabling Development, it was unclear why it was limited to housing in Tier 5 Settlements and in the open countryside.</p> <p>In addition, since it is the conflict with planning Policies which is the test, Enabling Development may be justified within settlements on sites safeguarded by Local Plan Policies (such as undeveloped areas within settlements).</p> <p>This modification addresses the shortcomings of the Criteria in the Submission Plan.</p>	-
MM14	Policy SP5, Site SK058:	Sound	This site lies within the Skipton Conservation Area. The proposed Modification better expresses the requirements for any development proposals insofar as they affect the Conservation Area.	-
MM15	Policy SP5, Site SK060	Sound	This site lies within the Skipton Conservation Area. The proposed Modification better expresses the requirements for any development proposals insofar as they affect the Conservation Area.	-
MM17	Policy SP5, Site SK81; SK82; SK108	Sound	We support the proposed Modifications which relate to the green infrastructure provision and the retention of the tree copses to the south-east of the site. These reflect the	-

Mod. No.	Policy/Paragraph/ Site Ref.	Sound/ Unsound	Comments	Suggested Change
			recommendations of the Heritage Impact Assessment and will help to ensure that the site is developed in a manner which will conserve the character of this part of the Skipton Conservation Area.	
MM23	Policy SP5, Site SK114 and 124	Sound	To the south-east of this area there is a series of Scheduled Monuments. Although the Heritage Impact Assessment considered that the impact upon the Scheduled Monuments themselves would be negligible, nevertheless, there still may be potential for archaeological remain on this site. The proposed Modification better-expresses the requirements relating to archaeology.	-
MM76	Policy SP5, Site SK113, modification relating to the Leeds & Liverpool Canal	Unsound	<p>This site adjoins the boundary of the Skipton Conservation Area. The Heritage Impact Assessment considered that a development of SK113 which ignores the presence of the canal and which simply backs on to it with a domestic rear gardens and/or a hard, blank boundary would have a Moderate Adverse impact on the current semi-rural setting of this part of the canal. Consequently, it recommended that any development should be set back from the canal by 15 metres.</p> <p>The deletion of a specific distance by which any buildings should be set back from the canal makes the Policy less clear and, therefore, less effective.</p>	Delete the modification relating to the Leeds & Liverpool Canal
MM31	Policy SP6, Site SK025, modification relating to the green infrastructure	Unsound	<p>The development of this site could affect the setting of the Grade II Listed Falcon Manor Hotel and the Settle-Carlisle Railway Conservation Area.</p> <p>The deletion from the Policies Map of the area at the centre of the site which is intended to be kept open has made the implementation of this Policy considerably less clear and, therefore, less effective.</p>	<p>Policy SP6, Site SK025, modification relating to the open space at the centre of the site amend to read:-</p> <p><i>“... including green infrastructure areas of</i></p>

Mod. No.	Policy/Paragraph/ Site Ref.	Sound/ Unsound	Comments	Suggested Change
			<p>Without a clear spatial depiction of where the green infrastructure is required the Policy needs to be more specific about where these areas should be provided. It is also important to remember that the open area in the centre of the site was considered necessary to safeguard the setting of the Grade II Listed Building at the Falcon Manor hotel.</p> <p>Therefore, an amendment is needs to better-articulate where this open space is needed.</p>	<p><i>approximately 7.5ha in the following two areas – along the western edge of the site besides the B6480, and to the south of the Listed Falcon Manor Hotel linking with the approved ‘water meadow’ ...</i></p>
MM35	Policy SP6, Site SK079, modification relating to the green infrastructure areas	Sound	<p>This site adjoins the boundary of the Settle-Carlisle Line Conservation Area. Barrel Sykes Farm to the north is a Grade II Listed Building.</p> <p>We support the proposed Modifications relating to the green infrastructure which set out more explicitly where the landscape mitigation measures will be required and how the significance of the heritage assets in the vicinity of this site should be conserved..</p>	-
MM36	Policy SP6, Site SK042, modification relating to the Listed Buildings and Conservation Area	Sound	<p>This site lies within the Settle Conservation Area and its access runs between two Grade II Listed Buildings (Bond End and The Victoria Hall).</p> <p>We support the proposed Modifications relating to these heritage assets which now sets out more explicitly the requirements regarding their conservation.</p>	-
MM39	Policy SP6, Site SG064, modification relating to the Listed Building and Conservation Area	Sound	<p>This site lies close to the boundary of the Settle-Carlisle Railway Conservation Area..</p> <p>We support the proposed Modifications relating to these heritage assets which now sets out more explicitly the requirements regarding their conservation.</p>	-
MM41	Policy SP7, Site	Sound	The local planning authority is currently undertaking as	-

Mod. No.	Policy/Paragraph/ Site Ref.	Sound/ Unsound	Comments	Suggested Change
	HB011, modification relating to the potential Conservation Area		<p>assessment about whether or not High Bentham should be designated as a Conservation Area. The boundary of the Conservation Area as shown in the draft Appraisal would run adjacent to this site.</p> <p>We support the proposed Modifications relating to the potential Conservation Area which now sets out more explicitly how proposals should take account of the work the Authority has already undertaken to assess its significance and will help ensure that the elements which contribute to its character and appearance are not compromised.</p>	
MM55	Policy SP9, Site IN006, modification relating to the Listed Buildings and Conservation Area	Sound	<p>This site lies within the Ingleton Conservation Area and there are several Grade II Listed Buildings in its vicinity. .</p> <p>We support the proposed Modifications relating to these heritage assets which now sets out more explicitly the requirements regarding their conservation..</p>	-
MM56	Policy SP9, Site IN010, modification relating to the Listed Buildings and Conservation Area	Sound	<p>This site lies within the Ingleton Conservation Area and there are several Grade II Listed Buildings in its vicinity. .</p> <p>We support the proposed Modifications relating to these heritage assets which now sets out more explicitly the requirements regarding their conservation.</p>	-
MM57	Policy SP9, Site IN028, modification relating to the Listed Buildings and Conservation Area	Sound	<p>This site lies within the Ingleton Conservation Area and there are several Grade II Listed Buildings in its vicinity. .</p> <p>We support the proposed Modifications relating to these heritage assets which now sets out more explicitly the requirements regarding their conservation.</p>	-
MM59	Policy SP9, Site IN049, modification relating to the Listed	Sound	<p>There is a grade II Listed Building to the west of this site</p> <p>We support the proposed Modifications relating to this heritage asset which now sets out more explicitly the</p>	-

Mod. No.	Policy/Paragraph/ Site Ref.	Sound/ Unsound	Comments	Suggested Change
			requirements regarding their conservation..	
MM64	Policy SP10, Site GA031, modification relating to the Scheduled Monument, Listed Building and Conservation Area	Sound	<p>This site lies close to the boundary of the Gargrave Conservation Area and some 350 metres from the edge of a Scheduled Monument.</p> <p>We support the proposed Modifications relating to these heritage assets which now sets out more explicitly the requirements regarding their conservation.</p>	-
MM66	Policy SP11, Site BU012, modification relating to the Scheduled Monument and Listed Buildings	Unsound	<p>The former Richard Thornton's CE Primary School is a Grade II Listed Building and the development of this site could also impact upon the significance of the Scheduled Monument at Castle Hill.</p> <p>Whilst we support the proposed Modifications relating to these heritage assets (which now sets out more explicitly the requirements regarding their conservation), the site also lies within the Burton-in-Lonsdale Conservation Area. In line with the approach adopted elsewhere, therefore, this designated heritage asset also needs to be included in this part of the Policy</p> <p>..</p>	<p>Policy SP11, Site BU012, modification relating to the Scheduled Monument and Listed Buildings amend to read:-</p> <p><i>"... and their settings (Burton-in-Lonsdale Conservation Area, Grade II Listed ...etc)</i></p>
MM66	Policy SP11, Site BU012, modification relating to the green infrastructure	Unsound	<p>The former Richard Thornton's CE Primary School is a Grade II Listed Building. The Heritage Impact Assessment considered that development to the north-east and south of these buildings would have a large adverse impact upon their setting. The Submitted Policies Plan identified the area in front of the Listed Buildings as being excluded from the developable area.</p> <p>The deletion from the Policies Map of the area to the east of the school which is intended to be kept open has made the</p>	<p>Policy SP11, Site BU012, modification relating to the green infrastructure amend to read:-</p> <p><i>"Approximately 0.3ha of green infrastructure shall be provided to the south-east of the Listed</i></p>

Mod. No.	Policy/Paragraph/ Site Ref.	Sound/ Unsound	Comments	Suggested Change
			<p>implementation of this Policy considerably less clear and, therefore, less effective.</p> <p>Without a clear spatial depiction of where the green infrastructure is required, the Policy needs to be more specific about where this area of open space should be located.</p> <p>Therefore, an amendment is needs to better-articulate where this open space is needed.</p>	<i>Building in order to protect its setting”</i>
MM69	Policy SP11, Site CN006, modification relating to Cononley Mill and the Conservation Area.	Sound	<p>This site lies adjoins the boundary of the Cononley Conservation Area and is prominent in several of the key views across the Conservation Area.</p> <p>We support the proposed Modifications relating to these heritage assets which now sets out more explicitly the requirements regarding their conservation.</p>	-
MM74	Paragraph 5.23	Sound	The proposed Modification now clearly sets out the ‘exceptional circumstances’ when a development which resulted in substantial harm to the significance may be permitted. These reflect the advice in the NPPF and improve the clarity of Policy ENV2	-
MM75	Policy ENV2, part (a)	Sound	<p>The Conservation Area Appraisal notes the important contribution which the landscape setting of the Castle makes to the character and distinctiveness of Skipton. The Appraisal identifies the view over the town from Park Hill as one of the most important of views of the in the Conservation Area and considers that the grounds of Skipton Castle and Park Hill form part of an open area which enhances the environment and character of the Conservation Area.</p> <p>In view of the acknowledged importance of this area to the</p>	-

Mod. No.	Policy/Paragraph/ Site Ref.	Sound/ Unsound	Comments	Suggested Change
			Conservation Area, it is wholly appropriate that the Vision and, especially, Policy ENV2 identifies this area as an element to which particular attention will be made in decision-making.	
MM75	Policy ENV2, part (b)	Sound	The proposed Modification more-closely reflects the advice contained in the NPPF.	
MM104	Policy EC4A, first Paragraph	Sound	The proposed Modification clarifies the intentions of the policy and improves its clarity	
MM105	New Policy EC4B	Unsound	<p data-bbox="920 536 1682 735">Inset Map 13 identifies a 'Key Location For Tourism Development' by means of a red triangle. However, this triangle is shown as lying outside the area denoted as a 'Tourism Development Commitment' within the Settle-Carlisle Railway Conservation Area and adjacent to the Listed Hellifield Station.</p> <p data-bbox="920 775 1682 903">This new addition to the Policies Map is neither clear nor does it make the Policy more effective. Indeed, it gives the impression that that the station area is now identified as a key location for future tourism development.</p> <p data-bbox="920 943 1682 1038">In a similar manner to that adopted for the Bolton Abbey Policy, the triangle should be located in the centre of the dashed red lines</p>	Inset Map 13 move the red triangle to within the area identified as a 'Tourism Development Commitment'
MM117	Policy INF, Footnote for Part(c) and (e)	Sound	The proposed Modification clarifies which parts of the District are to be regarded as 'sensitive' for the purposes of this Policy. This greatly assists the interpretation and understanding of this Policy	-



Planning Policy,
Craven District Council,
1 Belle Vue Mills,
Broughton Road,
Skipton,
North Yorkshire, BD23 1FJ

Our Ref: HD/P5336/03

Your Ref:

Telephone: [REDACTED]

Fax:

13 March 2019

Dear Sir or Madam,

re: Sustainability Appraisal of the Proposed Main Modifications to the Submission Draft of the Craven Local Plan Sites Document

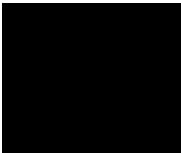
Thank you for consulting Historic England about the Addendum to the Sustainability Appraisal of the Submission Draft of the Craven Local Plan Sites Document.

In terms of our area of interest, we would agree with the conclusions of the screening process regarding which aspects of the Plan may need reviewing and would concur with the conclusions regarding the likely significant effects which the 'screened-in' Modifications would be likely to have upon the historic environment.

This opinion is based on the information provided by you in the document published on 19th February 2019 and, for the avoidance of doubt, does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the plan which is the subject to consultation, and which may, despite the SA/SEA, have adverse effects on the environment.

If you have any queries about any of the matters raised above or would like to discuss anything further, please do not hesitate to contact me.

Yours faithfully,



Ian Smith
Historic Environment Planning Adviser (Yorkshire)
e-mail: [REDACTED]



Historic England, 37 Tanner Row, York YO1 6WP

Telephone [REDACTED] HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



From: Calton Parish Council
Sent: 25 March 2019 15:08
To: Local Dev. Framework
Subject: Hellifield development

Follow Up Flag: Follow up
Flag Status: Flagged

To build a large development on a beautiful natural wildlife reserve is crazy. Soon there will be no places to relax in Craven, it will be one nasty built up area like West Yorkshire. Quite why anyone would want to build a posh complex in a place like Hellifield is again beyond comprehension.

We realise that it is difficult to resist such developers with their expensive lawyers and their hoards of money. No doubt they will say that it will boost the local economy and provide employment. If anyone believes that they are deluded.

Please resist temptation for the well being of peoples' and wildlife's well being.

Yours faithfully,

Mike and Susie Holden.



From: Andy Holden [REDACTED]
Sent: 28 March 2019 11:09
To: Local Dev. Framework
Subject: Hellifield Flashes 'Local Green Space'

Dear Sir

Regarding Hellifield Flashes being designated as Local Green Space:

Close proximity to the community...

The area of land known as Dunbars and Little Dunbars lies on the very edge of the village and is available (could be better for disabled persons but this could be worked on) to the residents at all times of the year.

There is a network of public footpaths that allows a circular walk which also takes in the main Flash known as Gallaber Pond/Lake.

Special to the local community...

Many locals enjoy regular walks over the site, taking in the views and the nature which creates positive wellbeing for the village's residents and other visitors alike.

The site harbours many species of birds some of which are "red and amber list" species: Lapwing, Ringed plover, Curlew, Skylark, Mute swan, Whooper swan, Shelduck, Wigeon, Teal, Mallard, Pintail, Shoveler, Goldeneye, Oystercatcher, Meadow pipit.

One particular species, the Black-tailed godwit, of which there can be upwards of 140 during the winter/spring months, are a Schedule 1 species (Wildlife and Countryside Act 1981).

So it can be seen from the extensive list of special birds that the site is important for our declining wild bird population.

The site is very undulating which helps to hold massive volumes of water in times of heavy rain. The water-holding nature of the site acts as a natural flood break which prevents flash flooding downstream of the site.

This water in turn is one of the reasons why wetland birds find a home here.

Local in character...

Hellifield Flashes is an agricultural area of land that works well for farming, nature and the local people.

The site is a relatively extensive tract of land but not too large that it could not be designated as Local Green Space as a whole.

The fact that it is relatively extensive allows people to enjoy the site without disturbing the nature.

Should the area be secured for Local Green Space I'm sure there could be better management of the site for its nature.

Regards

Andy Holden



21/03/2019

Dear Sir.

RE PARK HILL SKIPTON

I am very concerned that Park Hill, Skipton as a local green space has been removed from the local plan. As can be seen from my address I over-look this area. This area and surrounding fields has always been used as agricultural land mainly for sheep and cattle. This area is used every single day of the year by local residents from dawn till dusk for dog walking, family walks, walking clubs and joggers.

As you will ~~you~~ have no doubt be advised the area ~~is~~ is of historic interest and also runs side by side with Skipton Woods which is the home of much wild life, wild flowers and of course trees.

Any development of Park Hill would damage all the above.

In my opinion it is essential that no ~~date~~ development be allowed in this area. If it is decided that the area become Agricultural land it is essential that it should stipulate no development ever takes place, so that residents and visitors can continue to enjoy.

I hope you will take these points into consideration in making your final decision.

Yours faithfully,

Mr. C.W. Hoole

From: [REDACTED]
Sent: 20 February 2019 18:33
To: Local Dev. Framework
Subject: Main Modifications Consultation Representation Form Jane Houlton
Attachments: cdc-mods-rep-form-2019 Jane Houlton.docx

Dear Sir/Madam

I attach a completed Representation Form in respect of the Main Modifications Consultation. This is in respect of MM87.

Yours
Jane Houlton

A large black rectangular redaction box covering the signature area.

(Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park))

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Ms
First Name:	Jane
Last Name:	Houlton
Job Title (where relevant):	n/a
Organisation (where relevant):	n/a
Address 1:	██████████
Address 2:	██████
Address 3:	██████████

Address 4:	-
Postcode:	██████████
Telephone:	██████████
Email:	██

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	n/a
Address:	n/a
Telephone number:	n/a
Email:	n/a

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal and Habitats Regulation Assessment that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal and Habitats Regulation Assessment will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Jane Houlton
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM87 Deletion of Local Green Space SK-LGS64 Skipton (Park Hill and near area)	

Section 4: Legal Compliance & Duty to Cooperate

Do you consider that this modification of the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. In Compliance with the Duty to Cooperate	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

The deletion of Local Green Space SK-LGS64 Skipton (Park Hill and area) is not sound, because the deletion does not comply with national planning policy. This space is one which is reasonably close to the community it serves, demonstrably special to the community, holds a particular local significance, is local in character, and although extending over a range of fields, the site has integrity, and does not form an extensive tract of land.

My full reasons for stating this are given here, and in the continuation sheets.

There are strong arguments and evidence that the whole area SK-LGS64 (Park Hill and adjacent fields) should not be deleted as a local green space, and that the proposed deletion in MM87 is not in accordance with national planning policy Policy ENV 10.

There is multiple independent evidence to demonstrate that the whole area is of special character, is used extensively by the community from across Skipton, and is highly valued by them. The agricultural land to the west of the site is integral to the amenity of the recreational use, and to its historic topography close to town. The area is a rare example of the origins of the town – integral to its distinctive character, and now a rare survival.

I will comment on the three following aspects:

Historic Importance of the Park Hill area

Significance of the Park Hill area to Views and Landscape

The importance and high value of the Park Hill area to residents, and visitors

Historic Importance of the Park Hill area

The area is important historically, not just for the reported archaeological site of a Civil War battery, but in the part it plays in the topography of a market town, surrounded by countryside.

In the Skipton Conservation Area Appraisal (SCAA) 2008, the reviewers say that the town and its environs form “a natural amphitheatre” Para 2.2, and further that “the rising ground on three sides and part of the south creates unique views into and out of the town” . . . “Open fields and moorlands with trees and heather are visible from the town centre” Para 4.3. The sheep-filled fields close to town are part of its history.

https://www.cravenc.gov.uk/media/1835/skipton_conservation_areas_appraisal_2008_-compressed.pdf

The town of Skipton was built originally in the dip between numerous drumlins – virtually all of these have now been built on in part or totally: the only remaining ones being Cock Hill, Park Hill, Ermysted’s playing fields, and parts of Aireville Park. The loss of Park Hill and the adjacent agricultural land to development would be to lose a rare, major and highly visible element of the history of the topography of the town. In the SCAA 2008, one consultee said: “Essential to designate green fields within conservation area to maintain identity as an historical market town” Para 6.4. These and other consultee responses provide important and consistent data of the special importance of the site.

Jane Houlton MM87

Significance of the Park Hill area to Views and Landscape

The SCAA 2008 also emphasises the specific importance of the Park Hill area to the landscape. “Fields on Park Hill; old hedges and trees blend into former nursery grounds, Mill Lane and the main Skipton woods” Para 6.4. A consultee said “ want ... more green fields to be included in the conservation area .. to keep as many open spaces (green)” Para 4.11, and another “More green fields to be included in conservation area” Para 6.4.

The views, both to and from the area, are important to the quality of the town. The view of the fields and area as you enter Skipton from the bypass via Grassington Road, shows the drumlin topography and the agricultural roots of the origin of the town.

The vista to the north – where the fells of the Dales come into view – is also important, and are highly valued by the many residents and visitors who use the hill, and Short Lees Lane, for recreation and exercise.

The SCAA 2008 produced a map – Map 5 – of the important views, both in and out of the town. The view from the Park Hill area is one of the two most important views on this map, and is a focus for views from within the town heart – copy of Map 5 attached to this.

Consultees particularly valued the views, and did not want to see the view to and from the area lost to them – “The hills, especially Park Hill, views of the hill from town” and “Views of surrounding hills protected” Para 4.6.

The importance and high value of the Park Hill area to residents and visitors

I live perhaps a mile away from the area, and walk it regularly, over the hill, along Short Lees Lane, and to and from Skipton Woods. Whenever I go, I am never the only person using this area for recreation and exercise. When I stop and talk, these others come from all over town, and from beyond – not just from the nearby houses. Short Lees Lane from Grassington Road, or up and over the hill, form a circular walk incorporating Skipton Woods, and the agricultural part of the site to the west is integral to the amenity and pleasure of the circuit.

The area is greatly used, and highly valued by locals, for all its qualities.

In their response to the Planning Inspector on 11 January 2019, the agents for the part landowner stated:

"Finally, the site is not demonstrably special to a local community. Whilst there is existing housing the west (sic) of the site, it is otherwise on the very edge of the settlement boundary and therefore some distance from most of the built up area of Skipton and the community it supposedly serves. It is notable that the site was not put forward by anyone in the community to give evidence of local support."

These remarks are misleading and inaccurate.

Jane Houlton MM87

The “some distance” of the site is less than 2 km from the majority of the built-up area of Skipton – in close proximity, and well within the walking capability of the average non-sporting person.

As for expressed local support, the protection of the whole of the Park Hill area as a green open space has always been wholly supported by the public in any consultation exercise. On 16 July 2013, a Craven Local Plan Community Engagement Event was held by Craven District Council, in which the views of the local community were sought on their preferences for sites for housing development. The full responses and comments from this consultation can be found at:

https://www.cravencdc.gov.uk/media/2501/skipton_event_feedback_information.pdf?fbclid=IwAR3a3Zwldid8JLIeQrTMJHcaAuJgLyEZR_0yyN9S0NZXljJQQBtXa8ZBhpl

The Park Hill site (Ref No SK084 for the purposes of this exercise) received overwhelming objections to its use for housing. Only one comment supported its use for development. The comments objecting to housing development are as follows:

“The plans to build on these sites [SK083 and SK084] are madness. How dare you destroy these beautiful fields. It is vital to conserve the green belt.”

“Beauty spot/woods impact”

“Impact upon the High Street and impact on Skipton Woods. Massively devastating, Visual impact. Possible flood risk.” [SK083 and SK084]

“Key part of Skipton’s setting and history. High amenity value. Should not be developed.”

“A much loved green corridor. That many people walk in or through. Would completely change to approach Skipton from Skipton Woods.” [Sk001 and SK084]

“This should become part of Skipton Woods. This area has Yorkshire Dales character. People don’t come to view housing on surrounding hillsides > protect hills visible from the town”

“Not suitable because it’s right next to Skipton Woods.”

“Development would increase existing traffic issues. Roundabout and local context create very large dangerous conditions.” [SK0001 and SK084]

“Development would impact detrimentally on Skipton Wood.”

“To develop Whitehills Road/Grassington Road would result in Skipton no longer being the gateway to the Dales.”

“A distinct hill with historical view point of the town.”

Jane Houlton MM87

The consultee responses from the SCAA 2008 consultation also provided substantive, overwhelming, independently-collected evidence of how special the Park Hill area is to the local community. Its significance, and value, were volunteered, without being solicited, in many responses to that consultation. Here are some of the relevant responses; the full list is available in Appendix 2 of the SCAA 2008.

“I would like to see:-

Protection for green sites within the by-pass(es)”

“Keep green field sites green”

“Essential to designate green fields within conservation area to maintain identity as an historical market town”

“More green fields to be included in conservation area”

“To keep on many open spaces (green)”

“Agree with proposals for extension to conservation area boundaries to preserve open spaces that give Skipton special character”

“View into Skipton with setting against hills”

“The High Street protected/no high rise/views of surrounding hills protected”

“The hills, especially Park Hill, views of the hill from town”

“Part of the historic side of Skipton should be preserved for its views, open fields kept ... Keep the sheep-filled fields”

The Park Hill area SK-LGS64 very definitely serves its community, is near to most of the town, and is a place of special character, important to many. The landowner’s response to the Planning Inspector in January 2019 makes unfounded claims.

Conclusion

The issue with this site is as much as whether it meets the terms of the NPPF, as that, under these NPPF terms, there is still a strong requirement and presumption for the retention of distinctive elements of landscape and context that make a place its own place. There is judgment and discretion allowed “because places differ” (Inspector’s letter to CDC 13 November 2018).

The openness of the whole Park Hill area is one of the features of Skipton town that gives the town its unique and distinctive character. It is a rare survival, given the recent and planned expansion of the town. To develop this area is to destroy a crucial element of the town’s context and landscape.

Jane Houlton MM87

This area is as important in these matters to Skipton as the Stray is to Harrogate, as London's large parks and squares are to the West End of London, as the parkland in front is to the Royal Crescent in Bath. These spaces in major towns and cities would never lose their protection as local green space, places must be treated equitably, and the proposed deletion, in equity, should not be enacted on the small market town of Skipton.

Jane Houlton
February 2019



Skipton CAA 2008

70. Map 5 - Views into and out of the town

SCALE 1:10,000 @ A3
 DRAWING ISSUED BY:
 DATE: 14th April 2008



Craven Consultants is a registered company in England and Wales, registered number 10305858. Craven Consultants is a member of the Chartered Institution of Building Services Engineers (CIBSE) and the Institution of Professional Surveyors (IPSS).

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

I consider it necessary to **remove the deletion of Sk-LGS64** as proposed in MM87

This whole site should be included as a protected local green space.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	x
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	x
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	[REDACTED]
Date	20 February 2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ | www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



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

Craven Local Plan Examination

From: Paul Howes [REDACTED]
Sent: 14 March 2019 16:29
To: Local Dev. Framework
Subject: Hellifield flashes

Follow Up Flag: Follow up
Flag Status: Completed

Sent from my iPad

Dear sir and madam ,

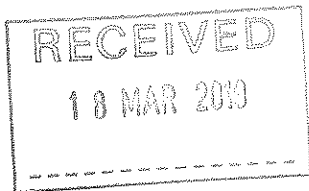
Both myself and my husband are furious about the way craven district council ride rough shod over local public opinions especially when it comes to building on beautiful places like the hellifield flashes ,nature is being squeezed out once again and wildlife doesn't stand a chance anymore ,it all boils down to MONEY and nothing else matters . Craven is a beautiful area and it must not become a huge expanse of houses ,it is about time that the wildlife and countryside is looked after before it is too late .

We know that this letter will fall on deaf ears and the greedy developers will probably win yet again .

The urban sprawl is spreading slowly into people's backyards that definitely do not want it ,what has happened to democracy?how long will it be before Skipton and settle are joined together ,the Aire valley is clogged !!

Yours sincerely

Mr Paul &Mrs Pamela Howes



14th March 2019

Dear Sean

Park Hill Skipton

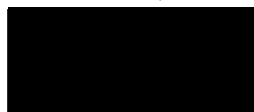
I am most concerned to learn that the above area once designated in the town's Conservation Area as a protected Local Green Space has now had this protection removed.

According to Government guidelines it fulfils the criteria of being in close proximity to the community it serves, is special to the local community and is integral to the outskirts of Skipton Woods it adjoins. The views from its highest point give a spectacular view of Skipton and the Aire Valley.

As a separate issue I note that 2 other areas of land once grazed by sheep have been given over to building ie The area at the junction with the Harrogate Road and Embsay Road and part of The Raikes near Raikeswood Drive. These are not social housing and do nothing to enhance the area.

I would strongly ask you to reconsider and once again **PROTECT THIS SPACE.** Skipton has little enough green space as it is.

Yours sincerely



Mrs June L F Hunt

From: Gareth Hutchinson [REDACTED]
Sent: 22 March 2019 19:07
To: Tony Blackburn; Sian Watson; Councillor John Dawson
Subject: park hill

Dear Sirs

I am a Skipton resident of some 24 years currently living on Grassington Road.

I recently received a flyer through my letterbox from Skipton Civic Society advising that Park Hill in Skipton has been removed from the Local Plan as a protected green space and asking me to write to you as influential members of the council / planners

I do not know whether this action will eventually lead to some form of development but would appeal most strongly that the space be reinstated as Local Green Space

Park Hill clearly meets the criteria required to be categorised as Green, not only is it adjacent to a community and local but is a visible green space from miles around as well as containing a popular marked footpath.

Skipton is the Gateway to the Dales and is a popular tourist attraction, this status is being threatened by the burgeoning building programme already underway in sites like those at upper Raikes and the "pig field" site at Embsay not to mention Wyvern Park and Elsey Croft and I am sure several others which I have missed - all of which are greenfield sites.

The main beneficiaries of this building programme are a few local land owners and the building companies. The existing residents of Skipton only suffer through increased strain on the infrastructure in particular from increased traffic in and around Skipton and pressure on schools and health services

Park Hill is itself a popular walk providing views over Embsay Crag and Pendle Hill, but also provides a green backdrop to much of the triangular walk through Skipton Woods, Short Lee Lane and down Grassington Road. This is advertised as a reason for visiting Skipton and gives visitors a glimpse of the natural beauty around this area. It is also a popular sledging site in winter (although do not tell the farmer who owns it!)

I strongly feel that Skipton needs to maintain its character and history. Who wants to visit a Castle in the middle of a housing estate? The reason people visit Skipton is to see the natural beauty of the dales, building on the green space only diminishes the landscape.

I am sure that none of my comments are new or that you have not heard them before but please add my voice to any others in support of reinstating the Local Green Space status of Park Hill

Thank you

Gareth Hutchinson
[REDACTED]

From: Kenneth Jackson [REDACTED]
Sent: 27 March 2019 14:46
To: Tony Blackburn; Sian Watson
Subject: Park Hill, Skipton

To:
Tony Blackburn (Independent Programme Officer)
15 Ottawa Close
Blackburn
BB2 7EB

Sian Watson (Spatial Planning Manager)
Craven District Council
1 Belle Vue Square, Broughton Road
Skipton BD23 1FJ

Dear Mr Blackburn and Ms Watson

Proposed removal of Park Hill , Skipton, from the Local Plan as a Protected Green Space

I wish to object to the removal of Park Hill as a Local Green Space.

Park Hill is a pleasant place to walk, can be easily reached from Chapel Hill and Short Lee Lane and connects with other footpaths. In addition, it connects with the paths in Skipton Woods, the openness of Park Hill making a contrast with the woods.

The top of Park Hill provides an extensive view of the town and neighbouring countryside. It would make a useful educational resource for local schools. It is a place of historical interest being the site of the Civil War battery, as well as being a resource for geography, geology and agriculture.

It is an uplifting amenity with a peaceful rural atmosphere but is nevertheless in close proximity to the town. It is therefore within easy walking distance for exercise and fresh air without the need to use cars or buses.

I would not wish this amenity to be lost.

Yours sincerely

Mrs Valerie M Jackson

[REDACTED]

From: Kenneth Jackson [REDACTED]
Sent: 28 March 2019 20:04
To: Tony Blackburn; Sian Watson
Subject: Objection to proposed removal of Park Hill , Skipton, from the Local Plan as a Protected Green Space

To:
Tony Blackburn (Independent Programme Officer)
15 Ottawa Close
Blackburn
BB2 7EB

Sian Watson (Spatial Planning Manager)
Craven District Council
1 Belle Vue Square, Broughton Road
Skipton BD23 1FJ

Dear Mr Blackburn and Ms Watson

Proposed removal of Park Hill , Skipton, from the Local Plan as a Protected Green Space

I object to the removal of the above from the proposed Local Plan, on the following grounds:

a) **Park Hill is in close proximity to the community it serves**, adjoining Skipton to the north of the town. Its southern entrance off Chapel Hill/Mill Bridge is less than 300m (a 5 minute walk) from the High Street. It is easy walking distance (less than a 15 minute walk) from many residential areas of the town, and a reasonable walking distance (less than 30 minutes) from almost all residential areas of the town. A significant proportion of the dwellings in Skipton have small gardens or no garden at all, so nearby access to green space is highly advantageous. I confirm that I am a local resident and a regular user of these footpaths.

(b) **Park Hill is special to the local community** of Skipton for several different reasons. It has significant recreational value: there is a footpath running up and over the hill from Chapel Hill to Short Lee Lane that connects with the footpath network north of the A59 bypass. It also connects to the footpaths within Skipton Woods (managed by the Woodland Trust). The contrast between the woodland environment of Skipton Woods and the open countryside of Park Hill makes these walks particularly attractive. Short Lee Lane, along the northern edge of Park Hill, is an important component of the footpath network. These footpaths are within the ability range of a great many people which is important with respect to health benefits. Designating it as a Local Green Space would be beneficial to the people of Skipton both physically and mentally.

The 360 degree views from the top of Park Hill are splendid. Not only can one see the town of Skipton below but also Embsay Crag, Sharp Haw, the Dales and Pendle Hill further afield. Park Hill, visible from many parts of the town, is also an attractive feature itself. It forms part of the tourist package of the town together with Skipton Castle, Skipton Woods, the High Street, the Leeds and Liverpool Canal and Holy Trinity Church, and is therefore economically beneficial to the town. With uncertainty regarding the future of high streets in their current form, all Skipton's other assets relating to tourism should be safeguarded for the future.

Park Hill has local and national historical significance. Its name refers to part of the hunting park of the Clifford family at Skipton Castle. There is a Scheduled Monument (List Entry Number: 1004878, Historic England) close to the top, which is the site of a Parliamentarian Civil War battery. It is visible as a shallow earthwork enclosure and its heritage significance is widely known. The site, on a prominent hill with open views in all directions, can still be appreciated today.

Park Hill's historical and environmental significance are reasons why it could be used as an educational resource for school children. Park Hill is no more than a 15-20 minute walk away from two secondary schools and three primary schools and, with its views over the town and of the wider landscape, is an ideal location to engage school children and college students with a wide range of topics relating to history, geography, geology, agriculture, natural history and art.

(c) **The local character of Park Hill** comprises pasture for sheep and cattle, a typical farming practice for this part of North Yorkshire. Its character has probably changed little during the last three hundred years; one of the earliest paintings of Skipton by Anthony Devis (1729-1817) shows Park Hill in the foreground as cattle pasture. The painting is held by Craven Museum. Field enclosure boundaries, probably dating from the mid-late 18th century, combining traditional hedge banks, prominent trees and dry stone walling, can still be seen on Park Hill. This green hill is visible from many areas of the town and is a highly valued component of the local townscape. Together with Skipton Castle, Skipton Woods, the Deer Park off Embsay Road, the High Street, the Leeds and Liverpool Canal and Holy Trinity Church, the presence of Park Hill as a green hill overlooking the town acts to strengthen the community's sense of pride in its surroundings.

Yours sincerely

Dr Kenneth Jackson



From: [REDACTED]
Sent: 23 March 2019 22:35
To: Local Dev. Framework
Subject: ack email sent 25.3.19 by RP Objection to proposed changes in use of the Hellifield Flashes

Dear member of the Craven District Council [& other concerned parties]

Whilst I do not agree with all the content of "The Craven Herald & Pioneer" newspaper (it even managed to publish a reader's photograph, in the current edition which subtitled a swan instead of it being, quite clearly, a goose [!!]), it must be clear to all its readership of the profound concerns, nay anxiety, caused by the proposed development of one of the most attractive natural features of Hellifield and Long Preston.

My wife and I have paid CDC rates for the last 47 years, owning property in Long Preston, and-upon our retirement-chose to remain in Long Preston where we have been permanently based since 1994, so we do speak with some authority & knowledge of the local area. Indeed I spent over a decade on the LP Parish Council, finishing as its Chair, so I am not unfamiliar with the angst, caused by ill-considered development of the natural beauty of this area.

It is not in dispute that the two parishes of Hellifield and Long Preston have had long association with each other, and many villagers here enjoy the open space of the Flashes, enjoying the openness of undeveloped land where birds, small animals even deer, can walk in an unfettered way, freed from the tyranny of the A65's heavy traffic. This "lung" is within a short walking distance of both villages, has ancient archaeological features, real recreational value- for it even has a playing field- and a wealth of natural life, hardly glimpsed by car-passengers as they race to the Lake District. Our city-bound children, and grandchildren, love to descend upon us, and to the Flashes they go; it has a magnetism inexperienced by those who wish to see powerful, external forces spreading ever-widening acres of concrete in 'England's green and pleasant land'.

Concerned at this unwarranted and undesirable attempt to coerce the local folk into an acceptance of something which they clearly do not want, I went for a quiet stroll in the area, remembering the photograph of the young deer drinking quietly in the water. Away from the noise of the A65, it was a positive delight to drink in the atmosphere of such a tranquil spot where dogs are walked, wild life can be observed at close quarters and recreational relaxation experienced at first-hand.

We cannot believe that such Philistinism should be approved by those who love and care for our Yorkshire heritage.

Sincerely yours,

Philip and Cynthia Johnston,
[REDACTED]
[REDACTED]

From: Pete Jones [REDACTED]
Sent: 19 March 2019 19:57
To: Local Dev. Framework
Subject: Ack e-mail sent by DF on 20.03.2019; Hellifield Flashes

Follow Up Flag: Follow up
Flag Status: Completed

To Whom it may concern

I am responding to the local plan green space designation for Hellifield.

I would like it noted that the the fields adjacent to Midland Terrace are integral part of our community, it's tranquillity and a barrier between us and a major highway. This land is literally behind mine and my neighbours gardens. Although not an official playground my children and those of my neighbours and the village use the fields as a playground, running feral and enjoying the varied habitats, field, ponds, mud and woodland. This isn't a modern phenomena, generations have run free in this safe haven. Historically the Dunbar flashes were used for ice skating the local blacksmith making skates and today the steep slopes left by the mining are used for sledging onto frozen water.

The galaber flash is an obvious attraction to folk both local and visitor attracted by the bird life, many waders and waterfowl using this area. Less known the Dunbar flashes also attract the same birds perhaps escaping the gaze of the twitchers here once in a while and providing residents with great views from their homes. The proximity of the home stop the land also makes it ideal for song birds many flit from the built environment particularly the house martins, swallows and a substantial swift colony. Raptor are often seen quartering the fields and flashes, barn owls, tawny owls, kestrels and my favourite the sparrow hawk.

The area is also home to other fauna for example a herd of red deer often graze the entire area and particularly enjoy the flashes during the rut. Even the more diminutive creatures seen in the area deserve protection. Brown hares, hedgehogs, both struggling species, rabbits, foxes, toads, frogs, newts including the great crested and bats all enjoy this area.

Since my health problems started in 2010. This levelish area has allowed me to exercise and maintain my links with the great outdoors I lost when I was no longer able to follow my career in outdoor pursuits. The area between the road to nowhere and Midland Terrace the flashes Dunbar and Galaber provide me with a tranquil oasis where I am able maintain my sanity and release some of the pressures life is throwing at me. I have walked, stood and lain in the fields unchallenged and find them essential for my mental well being.

This little patch of Yorkshire is not stunning hemmed in by the railway and A65, but it's ours, natures and the farmers, its accessible, it's tiny and it makes Hellifield what it is, a community. It doesnt compare with the vast areas of the Dales national park but it's our little haven, one were we dont have to add to the tourist throng but can enjoy our patch.

Yours sincerely
Pete Jones

From: ian gillian [REDACTED]
Sent: 25 March 2019 20:08
To: Local Dev. Framework
Subject: ack email sent 26.3.19 by RP hellified flashes
Attachments: Hellifield Flashes.docx

Please find attached my comments on the need to include the entire site of the Hellifield Flashes in the local green space designation.

Gillian Jones

Hellifield Flashes: local green space designation.

The site of the Hellifield Flashes is situated in the parish of Hellifield and covers an area in excess of 37 hectares (91 acres).

Apart from one large house on the site, it is virtually undeveloped and should be seen as one unique space rather than a series of fields. As a result, it is an amazing place: 3 large ponds, extensive open green spaces and a well-established wildlife population. This includes many bird species which use it on their migration routes as well as deer and other animals. It provides a large natural space between the 2 existing settlements of Long Preston and Hellifield. It is a space that unites the adjacent Yorkshire Dales National Park and 2 villages that are very different in character. This difference results from the ages at which they developed.

The Flashes site is an important area of open countryside. It has long been used by the inhabitants of Hellifield providing a local recreation area. It is easily accessible with 2 well-positioned definitive footpaths running through it. Without the protection of a local green space designation any building on this site would not only destroy a very special area but would also change the character of Hellifield by almost doubling its physical size if the whole of it were to be developed. (The present population of Hellifield is 1,426; the recently refused planning application for a 100 bed hotel and 300 lodges was calculated to accommodate 1822 people).

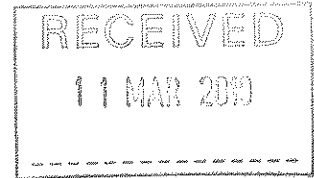
The site also helps to maintain and complement the individual identities of both Hellifield and Long Preston.

The site contains archaeological evidence of early human use, it is a home for wildlife and has wonderful views of the adjacent National Park.

I walked the length of the site very recently and it felt like a space lost in time.

I would urge you to extend the local green space designation to the entire site.

Gillian Jones,

6.3.19

To the Planning Officer,CDC/Local Plan/Park Hill

Sir,

I would like to comment briefly on the Local Plan consultation.

I understand that the inspector has not included historic Park Hill as a protected local green space in the draft.This would obviously leave it open to future development and it would be lost to the local community.

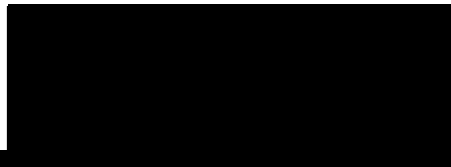
Skipton has already endured too much development in recent years ,much to the delight of the builders.It used to be a charming,compact ,historic market town,now it is bursting at the seams. Any more housing development will increase pressure on the NHS, transport,schools,parking,air pollution,land fill,the police service etc . What we really need are new businesses and real jobs.

The lack of an effective Local Plan,the New Homes Bonus and Help to Buy has done a lot of damage to the town.There are more important things than money.

I urge the inspector to reconsider and designate Park Hill as a local green space to help protect it in the future.

Thank you.

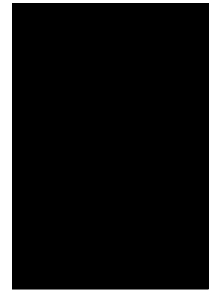
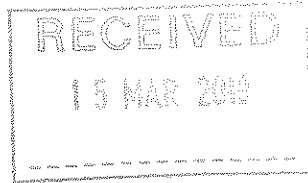
Yours,
Malcolm Keighley.



Email
Tel



PS I recently phoned CDC planning and was told it was OK to submit a letter.I would like to be kept updated if possible.



12th March. 2019

Dear Madam

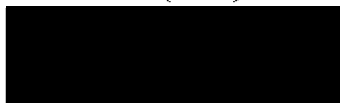
Re Park Hill, Skipton

I am writing to object to the fact that Park Hill, Skipton, which is within Skipton Town's Conservation Area, has been removed from the new Local Plan (March 2018) as a protected Local Green Space.

It is a green space, very close to the centre of Skipton, which local people and visitors enjoy using for recreational purposes. It has historical significance and two long distance walks 'A Dales High Way' and 'Lady Anne's Way' pass over the top of Park Hill. It is an area of unique character and is not an extensive tract of land. For these reasons it should still be a protected Local Green Space.

Yours faithfully

J. Kendrew (Miss)



Sian Watson (Spatial Planning Manager)

Craven District Council

1, Belle Vue Square

Broughton Road

Skipton

BD23 1FJ

----- Forwarded message -----

From: Christie Kennedy [REDACTED]

To: tonyblackburn@cravenc.gov.uk

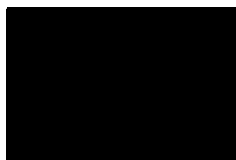
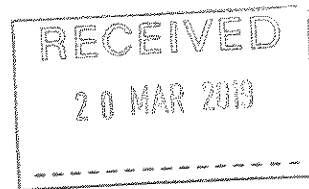
Cc:

Bcc:

Date: Mon, 25 Mar 2019 19:26:23 +0000

Subject: Park Hill

Just an email in support of Park Hill in Skipton being saved as local Green space. This area of land is very important to us as local residents we live on [REDACTED] overlooking the land and it was one of the reasons we chose to move to Skipton from overdeveloped Leeds. We love that Park Hill is a wonderful introduction to Skipton people driving into town are greeted by Park Hill sheep and cows grazing and us dog walkers being able to access the wood from the footpath is wonderful. We have the Higher Raikes development at the end of the road and to have a future housing development would surround us with houses not any green in sight one of the very reasons we moved to the wonderful part of the country. The Wyvern development coming up as well as the one up the Bailey we need to save green spaces. Please can you reconsider the proposed removal of green space designation for Park Hill it is so important to the local community! Please hopefully money and development are not put before green spaces and local council tax paying residents' opinions. Christie Kennedy



Sian Watson [Spacial Planning Manager]
Craven District Council
1 Belle Vue Square
Broughton Road
Skipton
BD23 1FJ

18 March 2019

Dear Madam

re. PARK HILL :- Status in Local Plan

I have become aware that the original Local Green Space Designation has been removed from the Local Plan.

This is clearly an error, its position so close to the town and major visitor features [Castle, Church and Woods for example] surely suggest that its Designation needed reinforcing not removing. Please use your best endeavours to get this mistake corrected.

Yours Sincerely



Ian & Dorene Kernot

From: Louise Kirkbride [REDACTED]
Sent: 26 March 2019 00:02
To: Sian Watson
Subject: Park Hill Local Green Space Designation

Dear Sian Watson

Please find attached my letter that I hope you will take into consideration regarding Park Hill.

Yours sincerely

Louise Kirkbride



26th March 2019

Park Hill, Skipton: Local Green Space Designation

Dear Sian Watson

Park Hill's Local Green Space status should be re-instated due to the following:

Park Hill is within a 5 minute walk of Skipton's High Street- the closest area of open green fields to the centre of Skipton. It is therefore of great benefit not only to locals but also to the many visitors that come here. Having this green space readily accessible is important to human health for the benefits of stress-relief and mental well-being. Park Hill is also important for families and their children- they are able to introduce them to wildlife and the countryside without having to drive out of Skipton. These field are used by children for sledging in the winter.

There are spectacular views to the Yorkshire Dales, down the Aire valley, Pendle and over to Ilkley and over Skipton town. There is a public footpath over the site- part of two long distance walks and linking up with walks into Embsay and Sharphaw hill. The views highlight Skipton's important geographical position in relation to trade both now and over the past few hundreds of years.

Park Hill is an important wildlife area, bordering as it does with Skipton Woods it provides a diverse range of habitats. These include woodland edge habitat, open grazing land, old hedgerow trees, young hedgerows, dry stone walls and single standing veteran trees. It therefore encourages a wide variety of mammals, birds and plant life. I have seen stoats, kestrels, buzzards, lapwings, oyster catchers, curlews, swallows, tawny owls and bats to name a few.

As previously mentioned some of these wildlife habitats link directly with important features unique to the local area. The dry stone walls are constructed of a mixture of local gritstone and shaley

limestone. The old hedges still have evidence of the banks and ditches from when they were first planted- these along with the single veteran trees are part of the local as well as national heritage.

Park Hill has a strong historical significance for both Skipton and British history with the Civil War battery on the summit- the monument doesn't just include the structure but its surroundings and setting.

On a personal level I remember walking over Park Hill as a child and now as an adult I walk over Park Hill nearly every day with my dog. It is an invigorating walk with a beautiful view from the top. I have seen lovely sunsets, walked through snow, horizontal rain, gale force winds and watched the stars from the top of Park Hill. If it were to lose its status as Local Green Space then it would be a devastating loss to me, all the other locals and the visitors that come here too.

Yours sincerely,

Louise Kirkbride

From: Mike Knox [REDACTED]
Sent: 07 March 2019 20:24
To: Tony Blackburn; Sian Watson; Councillor John Dawson;
Cc: [REDACTED]
Subject: Park Hill, Skipton

Dear Madam/Sir,

I wish to raise my concerns regarding the recent decision of the Planning Inspectorate to deny the designation of Local Green Space to a tract of land on the northern edge of Skipton. The relevant reference is MM87 – sub item SK-LGS64.

The Inspectors decision is based in part on the Planning Practice Guidance that large areas cannot be wilfully designated as Local Green Space as “ a ‘back door’ to achieving a new area of Green Belt”. It is obvious that the land that was considered as a single unit is indeed ‘large’ (75 hectares). However I would strongly suggest that this makes no sense. It is not an homogeneous area in that it comprises Park Hill, Skipton Woods, Skipton Castle and agricultural land to the west of Embsay Road. In other words by grouping these disparate areas together a ruling has been applied which, if they were assessed individually, would not be justified. In particular if Park Hill were to be judged on its own then it would tick every Local Green Space box in that:

- It is of local recreational importance being the largest green area accessible from town. It is also crossed by 2 significant walking paths the Dales Highway and Lady Anne’s way.
- It is of considerable historical importance as the site of a Civil War battery and its proximity to Skipton woods. It is a regular walk for local people and tourists both of which enjoy the beauty, historical significance, recreational value , tranquility and richness of its wildlife.
- Aesthetically it provides a wonderful view across town and of Skipton Castle - something that Turner appreciated on his visits to Skipton
- While there are “ no ‘hard and fast rules’ on how big Local Green Spaces can be” a rule of thumb that I believe is often applied is ‘are the borders of the land in question visible from one point?’. In the case of Park Hill they certainly are as from its summit Short Lee Lane, Skipton Wood and Grassington Road are all clearly discernible.

Once the land is not safeguarded as a Green Space I would guess that it would only be a matter of time before someone sees it as a lucrative investment opportunity and applies for permission to build another housing estate. This then raises the potential issue that such a large area of hard standing housing would create a huge flooding risk to the whole historic conservation area of Mill Bridge, Raikes Road, and Water Street when heavy rain comes down Chapel Hill, Eller Beck and Springs Canal off the steep Park Hill.

Environmentally it would create a further problem with more house building. Concrete - which would be used in the process, is known to be one of the worst pollutants in the world and at a time when there is desperate need to reduce environmental damage worldwide, is another housing estate in Skipton really necessary? We already have Elsey Croft, Higher Raikes, Lambert Hills, High Castle, The Bailey and soon Wyvern Park. Where are all the jobs for all these extra people? Will Skipton become a commuter town for Leeds, Manchester etc. ? Skipton presently is an attractive town which attracts many tourists who see it as 'the gateway to the dales'. The town relies on tourism but building yet another housing estate will soon destroy that attraction.

In conclusion, I would ask that serious consideration be given to rejecting the decision to remove the Green Space status and allow this wonderful tract of land to remain as it is for current and future generations to enjoy.

Yours sincerely,

Michael Knox



Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk


For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mr
First Name:	Michael
Last Name:	Knox
Job Title (where relevant):	
Organisation (where relevant):	
Address 1:	
Address 2:	
Address 3:	

u

Address 4:	
Postcode:	
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM:87 Sub item SK-LGS64	

Section 4: Legal Compliance & Duty to Cooperate

Do you consider that this modification of the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant	<input checked="" type="checkbox"/>	
2. Sound		<input checked="" type="checkbox"/>
3. In Compliance with the Duty to Cooperate	<input checked="" type="checkbox"/>	

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

I believe that the rejection of MM87 – sub-item LGS64 is unsound because it is not **Justified**.

The decision to reject the designation of Local Green Space to the total area of 75 hectares I fully understand. However it is the grouping of disparate tracts within that total which I believe is incorrect. The area known as Park Hill is ideally suited to be nominated as a separate Local Green Space (please see attached sheet for a fuller description).

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

The area currently assessed under MM:87 Sub item SK-LGS64 is bordered by the bypass, Embsay Road and Grassington Road. This should be split into Park Hill and the rest and reassessed by the Planning Inspectorate.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	√
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	√
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

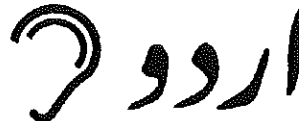
Please sign and date below:	
Signature	[REDACTED]
Date	7/3/2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ |

www.cravencdc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravencdc.gov.uk



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

Craven Local Plan Examination

From: Jo Knox
Sent: 10 March 2019 16:39
Subject: Park Hill MM87 sub item SK-LGS64

Dear Sir/Madam

I am writing with reference to MM87 – sub item SK-LGS64 and wish to raise my concerns regarding the recent decision of the Planning Inspectorate to deny the designation of Local Green Space to a tract of land on the northern edge of Skipton.

I believe the area is of local recreational importance being the largest green area accessible from town. It is also crossed by 2 significant walking paths the Dales Highway and Lady Anne's way. It is also in close proximity to Skipton woods and is a regular walk for local people and tourists both of which enjoy the fresh air, nature, historical significance, recreational value, and richness of its wildlife. It provides a wonderful circular walk and impressive view across town and of Skipton Castle. Furthermore it has historical importance as the site of a Civil War battery and an area the artist Turner appreciated on his visits to Skipton.

The Inspectors decision is based in part on the Planning Practice Guidance that large areas cannot be wilfully designated as Local Green Space as “ a ‘back door’ to achieving a new area of Green Belt”. It is obvious that the land that was considered as a single unit is indeed ‘large’ (75 hectares). However the area is not an homogeneous area in that it comprises Park Hill, Skipton Woods, Skipton Castle and agricultural land to the west of Embsay Road. In other words by grouping these disparate areas together a ruling has been applied which, if they were assessed individually, would not be justified. In particular if Park Hill were to be judged on its own then it would tick every Local Green Space criteria. One of the often applied criteria on judging whether or not the borders of the land in question are visible from one point. In the case of Park Hill they certainly are as from its summit Short Lee Lane, Skipton Wood and Grassington Road are all clearly discernible.

Once the land is not safeguarded as a Green Space I assume the area would represent a lucrative investment opportunity for another housing estate. This then raises the potential issue that such a large area of hard standing housing would create a huge flooding risk to the whole historic conservation area of Mill Bridge, Raikes Road, and Water Street when heavy rain comes down Chapel Hill, Eller Beck and Springs Canal off the steep Park Hill.

Furthermore the impact of another housing estate in Skipton on the infrastructure must be considered. We already have Elsey Croft, Higher Raikes, Lambert Hills, High Castle, The Bailey and soon Wyvern Park. Where are all the jobs, school places, and GP surgeries for all these extra people? As Skipton is ‘the

gateway to the dales’, the town relies on tourism but building yet another housing estate will soon destroy that attraction.

In conclusion, I would ask that serious consideration be given to rejecting the decision to remove the Green Space status and therefore continue to allow this wonderful tract of land to remain as it is for current and future generations to enjoy.

Kind Regards

Jozendra Knox



26th March 2019

RECEIVED

29 MAR 2019

Dear Ms Watson

Please Protect Park Hill, Skipton

As a long time resident of Skipton I am dismayed to discover that this precious tract of greenspace land, as specified in the new Local Plan (March 2018), has now, at the request of the landowner and the Inspector has been reclassified.

MM7 Policy ENV10 Local Green Space

I object to the deletion of SK-49564 land to the north of Skipton, bounded to the north by Skipton bypass, to the east by Embsay Road and The Bailey, and to the west by Grassington Road, Skipton. In my opinion this land should all remain as protected green space. This little parcel of green space is very important to me personally as throughout my life from the age of 8 I have walked over it rain and shine to clear my head, appreciate the wonderful views and celebrate what is Skipton.

My children and friends have run up and down it on numerous occasions. When my daughter was in training to run for Team GB she was able to run many, many "hill repeats" and still get home in time to get ready for school because of its proximity to the town. It is this very proximity that makes this green space all the more important to the town and also helps maintain the tourism that Skipton needs to survive in these difficult financial times. It is not "an extensive tract of land" as stated by the Inspector but rather a modest one but it is a vital green space for our town. I urge you to challenge the declassification and keep this green space protected. The local Plan will be sounder with its inclusion.

I understand that we as a country need more housing but my understanding was that brown field sites would be used first. In the Plan I am particularly concerned in MM7 supporting text to SP4.4.4~~7~~ at the insertion of the words "or other appropriate land". This seems a very woolly, catch all blurring of which land is suitable for building on. Why was this added? Please can this be reconsidered as I feel it undoes the brown field first approach which the draft plan previously stated.

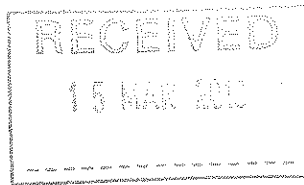
The potential damage of declassifying this green space to our excellent

Skipton Woods is also very relevant. The woods need this space around them to allow the plants and wildlife to continue to flourish, Kingfishers, otters, herons, all thriving in these woods not to mention the deer. All of these species need space, safety peace and ways in and out of the woods. This little area of green space enhances and helps maintain this ecosystem. In conjunction with the walk following "Lady Anne's Way / A Dales High Way" the woods encourage people into the outdoors. If Park Hill was to lose its protected status it would open the possibility of building at some point risking the destruction of these precious places. Once they are gone they are gone and our lives and our town are the poorer.

Please support my plea for the Park Hill green space to be protected in the local Plan in line with the Governments own guidelines.

Yours Sincerely


(Mrs H. Morag Lambson)



13 March 2019

RE PARK HILL SKIPTON

Dear Ms Watson,

I read with astonishment that Park Hill has been removed, as a Protected Green Space, from the Local Plan, and therefore is vulnerable to future development.

We regularly use this open space when we walk over from the Grassington Road towards the town. The view from the Civil War Battery site is a breath-taking historic site.

As a Designated Local Green Space it fulfils all 3 criteria.

- a) Close-proximity to the community it serves
- b) It is special to the local community in terms of historic importance, scenic and recreational value, and richness of wildlife.
- c) Local in character and not an extensive tract of land.

Its loss to more housing development would be a tragedy and I would therefore like to register my concerns and objections.

Yours Sincerely,



David Langham

From: Paul Laycock [REDACTED]
Sent: 18 March 2019 08:17
To: Local Dev. Framework
Subject: ack email sent 18.3.19 by RP Proposed Holiday Park

Dear Sir/Madame

I am writing again in objection to the current plans for the proposed massive holiday park on fields to the west of Hellifield. The village would lose an area rich in wildlife and of particular value for relaxation and exercise to its residents.

The area encompasses the Hellifield Flashes which play host to migrating birds and others of particular significance, all of which are currently enjoyed by Hellifield residents and which will be lost or damaged by the development.

The additional traffic and pollution caused by the proposed holiday park, can not be sustained on an already busy and dangerous A65 road, which runs through the village.

I urge you not to allow planning permission for this development.

Yours faithfully

Paul Laycock
[REDACTED]

Tel: [REDACTED]

From: susan laycock [REDACTED]
Sent: 29 March 2019 16:25
To: Local Dev. Framework
Subject: Local Plan Feedback
Attachments: cdc-mods-rep-form-2019-final.docx

Hi have attached my feedback on the Local Plan in respect of proposals for Park Hill

Best wishes

Susan Laycock

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravendc.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	MS
First Name:	Susan
Last Name:	Laycock
Job Title (where relevant):	n/a
Organisation (where relevant):	n/a
Address 1:	██████████
Address 2:	██████
Address 3:	██████████

Address 4:	
Postcode:	██████
Telephone:	██████████
Email:	████████████████████

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	n/a
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Susan Laycock
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: MM87 Policy ENV10	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

MM87 Policy ENV10 Local Green Space.

I oppose deletion of SK-LGS64 Land to north of Skipton, bounded to the north by Skipton Bypass, to the east by Embsay Road & The Bailey; and to the west by Grassington Road, Skipton. Park Hill abounds Skipton Woods and for this not to be protected as a local green space I believe will impact negatively on the tranquility of one of Skipton's major attractions - Skipton Woods - and the wildlife therein. Furthermore, it is a piece of land which is visible from many parts of Skipton and in my view, it would have a detrimental effect on the look and appearance of the town if it ceased to be a green space. It is not only a beautiful feature of the town, but it is also in regular use by residents and tourists as well as being part of a conservation area - and of historic importance.

I do not think this is an "extensive tract of land" and believe very strongly that it should remain as a whole in the Draft Plan in order to have protection as a much-valued green space and definitely NOT deleted as has been proposed.

My understanding from the local press is that this has been a decision of the Inspector rather than the Council. I believe that the Council should object strongly to this proposal and challenge the Inspector - not least because the land is bounded by the woods, the bypass, Mill Lane/Chapel Hill, Grassington Road and Raikes Road which makes the definition of Park Hill as an extensive tract of land definitely questionable.

I have submitted this on the basis that I do not believe the decision to be sound or justifiable for the reasons given above.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

As outlined above I consider that that Park Hill should remain as a whole in the Draft Plan in order to have protection as a much-valued green space and definitely NOT deleted as has been proposed.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)

Yes, I do wish to be notified	Yes
No, I do not wish to be notified	


Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)

Yes, I do wish to be notified	Yes
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:

Signature	
Date	29 th March 2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ
| www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



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

Craven Local Plan Examination

From: jean [REDACTED]
Sent: 12 March 2019 11:00
To: Local Dev. Framework
Subject: Main Modification Consultation Representation Form
Attachments: cdc-mods-rep-form-2019-final.docx

Please find attached a completed MMCR form for the Craven Local Plan

Jean Ledwon

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Dr and Mrs
First Name:	Richard
Last Name:	Ledwon
Job Title (where relevant):	
Organisation (where relevant):	
Address 1:	████████████████████
Address 2:	██████
Address 3:	██████

Address 4:	
Postcode:	██████
Telephone:	
Email:	██████████

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

If you wish your personal details to be treated in confidence and not published please tick the box below:	
I wish to request that the personal details submitted with this representation are treated in confidence and not published.	yes
Please explain below, why you have made this request:	
We do not want our personal details in the public domain	

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Land North of Skipton
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: MM87 SK-LGS64	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

This land should be designated as Local Green Space as it meets all the required criteria. It is of such significance to the town that it should be given special protection to ensure it is never developed. In addition, its designation as Local Green Space would ensure that, as the town develops ever outwards in future years, a further pocket of green space, in addition to Aireville Park, is left within the town itself.

This land is in close proximity to the community it serves, is local in character, is demonstrably special to the local community by virtue of its historical, natural and recreational connections and has both local and national significance with its connections to the Civil War and Skipton Castle.

It is difficult to see how this land can be considered as Green Belt as it is enclosed on 3 sides by urban development and the by-pass and golf course to the north..

With regards to size, Skipton Woods is already designated as a nature conservation area so the "extra" area of green space would be in the region of 44 hectares. This is less than The Stray in Harrogate which is around 55 hectares (West & South of A61). It is not a vast area.

Park Hill has two public footpaths running through it - Short Lee Lane and the nationally important Lady Anne's Way long distance footpath. This long distance footpath starts at Skipton castle, Lady Annes's birthplace, and runs to Penrith. It would be a travesty if it had to go through an urban development at the start instead of affording the existing extensive views in all directions from Park Hill.

The Civil War battery on Park Hill is of such historical significance that Park Hill should never be developed so as to maintain the existing uninterrupted view across to Skipton Castle.

It is essential to retain the open land around Skipton Woods to provide wildlife corridors for those animals which visit the woods to forage. Leaving the Woods as an island surrounded by urban development will inevitably negatively affect the ecological balance. Countries such as Germany value their wildlife, for example by providing bridges for them across busy roads. We need to show equal consideration for our local deer and other wild life.

Loss of green space in this historic area of Skipton has the potential to so change the area that it will have less appeal as a tourist destination with negative consequences for the local economy.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.


Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	
No, I do not wish to be notified	No

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	
No, I do not wish to be notified	No

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	11/03/2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ | www.cravencd.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravencd.gov.uk



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

Craven Local Plan Examination

From: Ailsa Lewer [REDACTED]
Sent: 01 April 2019 16:42
To: Tony Blackburn
Subject: Park Hill - removal of Local Green Space designation

I'm writing to express my concern that in the Local Plan Park Hill no longer has Local Green Space status. I have lived on [REDACTED] for 20 years. I, and my family, frequently walk in Skipton Wood and often use the footpath over Park Hill. In particular I enjoy taking visitors on this walk as it offers spectacular views in all directions.

The area is easily accessible from the town, but feels very rural and open.

This is a very special space for me, my friends and my family, and, I believe for the whole community and visitors to the town. I feel strongly that the Local Green Space designation should be reinstated.

Yours sincerely,
Ailsa Lewer

From: Linda Liggett [REDACTED]
Sent: 11 March 2019 17:13
To: Tony Blackburn; Sian Watson; Councillor John Dawson; Councillor Paul Whitaker; [REDACTED]
Subject: Skipton Local Plan - Park Hill

Dear Sir,

With regard to the Skipton Town Plan :-

I strongly object to the proposed removal of Local Green Space Designation for Park Hill in Skipton.

1. My family walk there regularly.
2. It is close to the community which it serves and is the only land, without tree cover, that exists close to the town centre, thus providing fresh air away from the traffic. Skipton is no doubt destined to grow greatly in the coming years and all the better cities and large towns of the world have central open spaces (parkland, not a play-park). Such forethought by the planners a hundred years ago have resulted in a better living environment for today's residents in those places. I would ask that future residents of Skipton are given the same opportunity.
3. Park Hill's local historical significance in the Civil War is well known, overlooking the castle and town. Distant views from the hill are wonderful and we have enjoyed watching the wildlife at close quarters, including families of tawny owls and field voles, curlews, lapwings and oystercatchers. This relatively small area of land thus reflects the character of the Yorkshire Dales.

Yours sincerely,

Linda Liggett

[REDACTED]

From: Helen Lindsay [REDACTED]
Sent: 01 April 2019 22:06
To: Tony Blackburn; Sian Watson; Councillor John Dawson
Subject: Park Hill Local Green Space designation

Dear Sir/Madam

We write in response to the ongoing consultation regarding the proposed reduction in size of the land to be allocated as local green space in the emerging Craven District Local Plan (Land north of Skipton – SK-LGS64).

In summary, We are strongly of the opinion that this area is very important to the local community and must be safeguarded by being designated as local green space as part of the emerging Local Plan for Craven. We are residents of [REDACTED] and the site is the rear of our house, we frequently utilise the space for recreational purposes as do many other members of the community. It is used not only by ourselves but many local residents for walking and running.

We believe that this land is of special importance to the local community due to the its visual beauty and its views across and into Skipton; due to its historic significance in terms of its association with Skipton Castle; and also because of its recreational value with many members of the community frequently using the area of land.

For the reasons set out above, we strongly believe that the land is special in terms of its landscape character and for the reasons set out above the whole area should therefore be protected at all costs as part of the emerging Local Plan.

Yours faithfully

K A Lindsay
H Lindsay.

From: Jean Lister [REDACTED]
Sent: 18 March 2019 15:33
To: Local Dev. Framework
Subject: Inclusion of land locally known as The Flashes in the local green space designation.

I wish to protest at the proposed modification of the inclusion of this land in the local plan. It fulfils the terms of the designation because it is close to the village, it is special to the village because of tranquility and the richness of its wildlife, some of which is endangered. The criticism of the inspector that it is too extensive seems to me to be to be invalidated by the fact that a goodly portion is under water for most of the year so can hardly be considered green land. Also to chop it up and interfere with the areas the wildlife uses would be a travesty.

Mrs P.J.Lister
[REDACTED]

Sent from my iPad

From: ian gillian [REDACTED]
Sent: 27 March 2019 11:14
To: Local Dev. Framework
Cc: Councillor Chris Moorby
Subject: hellifield flashes
Attachments: Hellifield Flashes lphg submission.docx

Please find attached the views of the Long Preston Heritage Group re the green space designation for the Hellifield Flashes site.

Regards,
Gillian Jones, Secretary

Hellifield Flashes: local green space designation.

The site of Hellifield Flashes is situated in the parish of Hellifield and covers an area in excess of 37 hectares (91 acres).

Hellifield parish only came into existence in 1908; until then it lay in the ancient parish of Long Preston. The Flashes site is between the 2 villages

To the north and east, the site is bordered by the Leeds/Morecambe and the Leeds/Carlisle railway line, which is a Conservation Area in its own right. (The Leeds/Morecambe line was opened in 1849). The railway line is also the boundary of the Yorkshire Dales National Park. The railway line is on an embankment and the Grade 2 Listed Hellifield station proudly overlooks the site and can be clearly seen. To the south and west the site is contained by the A65.

The Flashes site is an important area of open countryside, both for wildlife and humans.

It has 3 large ponds, extensive open green spaces and a well-established wildlife population. This includes many bird species which use the site on their migration routes. Deer and other animals are frequently seen here. The importance of this site for both birds and wildlife has to be considered in relation to its contribution to the two existing Sites of Special Scientific Interest (SSSIs) at Long Preston Deeps and Pan Beck Fen which is only 600 metres away. Loss of the Flashes site could have a serious impact on the two SSSIs.

The Flashes site has long been used as a local recreation area. It is easily accessible with 2 well-positioned definitive footpaths running through it, thereby providing the inhabitants of Hellifield with open space. It is directly accessible from Long Preston and other parts of the Yorkshire Dales National Park using Newhouse Lane and the footpath under the railway line. From the site itself there are wonderful views of the adjacent National Park.

The site also helps to maintain and complement the individual identities of both Hellifield and Long Preston. Most of the parish of Long Preston lies within a Conservation Area with many Listed Buildings, reflecting the age of the settlement. Long Preston is recorded in the Domesday Book. Hellifield owes its importance to the coming of the railways.

There is evidence of 6 identified archaeological features on the Flashes site including a ring ditch, potential Iron Age and Roman homesteads and field systems.

As can be seen from the description in paragraph 3 above, the Flashes site is a defined area and should be considered in its entirety. We are, therefore, of the opinion that the designation of a local green space for the area of the Flashes is appropriate and important.

Long Preston Heritage Group. March 2019

From: Peter Longbottom [REDACTED]
Sent: 12 March 2019 15:48
To: Councillor Alan Sutcliffe; Tony Blackburn; Sian Watson; Julian SMITH; [REDACTED]
Subject: Park Hill's status as a Local Green Space

Hello all who cherish Skipton,

We would be obliged if you would add our name to those who deeply regret the removal of LOCAL GREEN SPACE status from Park Hill.

Attached are our reasons for wanting it reinstating

Heather & Peter Longbottom



Tel:
e-mail:

To whom it may concern

PROTECT PARK HILL, Skipton

I am a long-time resident in the Skipton area 'born and bred' in the area and know the town very well.

I am very concerned of the way, at the very last minute, the protection of Park Hill's status as a Protected Local Green Space was removed. There has been very little (no) consultation on this decision and I urgently request that every effort is made to reinstate that protection for the following reasons:-

Park Hill is very close to the important historical areas of Skipton including the Castle, Holy Trinity Church, and the old but still working Corn Mill. The Battery in the middle of Park Hill (used in the Civil War) is an important feature being sited in a very elevated position.

There are two long distance footpaths, 'The Lady Anne way' and 'A Dales High Way' which run across the top of Park Hill which locals use as well to gain access to Short Lee Lane. The views from the top are magnificent. It is also linked to Skipton Woods by footpaths, the woods being within the town Conservation Area.

For all these reasons, and as a long time resident who has enjoyed researching the History of Skipton as well as many of the walks across Park Hill, it is important to reinstate Park Hill's Local Green Space designation for future residents to enjoy and respect

Yours faithfully

Heather Longbottom

Tel:
e-mail:

To whom it may concern

PROTECT PARK HILL, Skipton

I am a long-time resident in the Skipton area and know the town well.
I am concerned with local heritage. I live in a Listed cottage and can, for instance, claim some credit for the Listing and saving of the Tithe Barn, Stirton.
My concern extends to the future development of the historic part of Skipton town.

The 11th hour intervention that resulted in the removal of Park Hill status of a 'Local Green Space' is, at best, suspicious and, if we are honest with ourselves, must surely be the first step in the obtaining planning permission for a housing estate on the land.

Park Hill is a drumlin just about visible from Skipton. High Street. Houses arranged around it would certainly be so and destroy the historic feel of the upper High Street.
This has to be stopped at all costs.

Park Hill has every right to its Local Green Space status:-

>"It is reasonably close to the community it serves" – It is only 300m from the High Street.

>"It has local character" The Aire valley, upstream of Skipton is moulded by a receding glacier into Drumlin hills. Park Hill is one such.

>"It is demonstrably special to the local Community" – It is very close to the historically important areas of Skipton which include, Skipton Castle, Norman with Civil War connections; Holy Trinity Church with a Norman Tower and the old but still functional Corn Mill at the bottom of Chapel Hill. The Battery in the middle of Park Hill is an important feature.

>It has "recreational value" in that two long-distance footpaths "The Lady Ann's Way" and "A Dales Highway" cross the field. Paths also link Park Hill to Skipton Woods (which are within Skipton's Conservation area). It enables a 'round' walk for visitors and locals alike culminating in wide-ranging views over Skipton and the Aire valley.

>It is but a single field and not a "large area".

As everyone knows the name 'Skipton' is derived from 'Sheep town'. Skipton remains a market town with a substantial agricultural market dealing in sheep and sheep dogs. Skipton centre is fortunate that there is still an area of land on which houses do not dominate the skyline and on which sheep can be farmed.

Peter Longbottom

From: Alan Lynch [REDACTED]
Sent: 31 March 2019 19:26
To: Local Dev. Framework
Subject: suggested changes to the draft amended plan for consultation by the 31/3/19

Please see the comments below.

These are submitted by AM and MC Lynch of [REDACTED].

1.....MM105 / EC4B

Point iii) states "Conservation of Biodiversity value".

Suggest this is changed to "Should provide net gains in biodiversity" as stated in MM78 which has reference to the NPPF requirements.

2.....MM105/EC4B

EC4B shows a much reduced green space around Gallaber Pond.

It is accepted that the original area of Green Space aligning to the boundaries of the Tourism Development area was too large. It is pleasing to note that the special nature and proximity of Gallaber Pond and its positive effect on the character of Hellifield village have been accepted. However, the amended Green Space is now too small and ignores the biodiversity, archaeology and benefits to the local area of other areas known as The Flashes. The Dunbar Flashes are just as important. They are even closer to the village and are just as significant due to their beauty, historic significance, recreational value, tranquillity and richness of its wildlife.

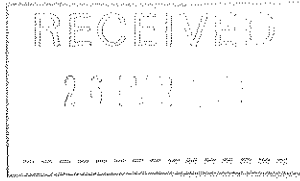
Suggest that EC4B is expanded in its Green Space markings to include the Dunbar Flashes as an addition to the Gallaber pond. This increased Green Space area should be limited to the Flashes as shown on EC4B.

Regards

Alan and Margaret Lynch



Sent from my iPad



Sian Watson (Spatial Planning Manager)
Craven District Council
1 Belle Vue Square
Broughton Road
Skipton
BD23 1FJ

24th March 2019

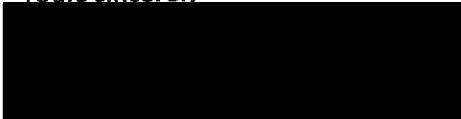
Dear Ms Watson

I am writing to you regarding the Local Green Space Designation for Park Hill and register my objection to its removal from the Local Plan.

I am a local resident and a regular walker who frequently uses the public footpath which passes over it, as do many other locals and ramblers I meet on my hike along it. We all appreciate and comment on the stunning views down into Skipton and across the Dales which are quite breathtaking on a sunny day. The site is also of historical importance as the location of the Roundhead Batteries in the Civil War which laid siege to Skipton Castle. The site is also local in character and close to the local community, a two minute walk from the Castle in the centre of town. In light of all this I am at a loss to understand how Park Hill does not qualify to be considered as a Local Green Space as it appears to qualify on all counts of the Government guidelines as laid out in the national planning policy framework.

The possibility of yet another housing development on such a treasured and locally important site would be a travesty. Consequently I would appreciate your support in the reconsideration of this decision to protect and preserve a well loved part of the heritage of Skipton.

Yours sincerely



J.A. Machell

From: Thorfinn Caithness [REDACTED]
Sent: 01 April 2019 14:06
To: Local Dev. Framework
Cc: Admin; Planning Group
Subject: Craven Local Plan - Main Modifications - MM40 - HB025 - Land East of Butts Lane, High Bentham (Area and Yield) - Marshall / Edwardson Associates
Attachments: MM40 - HB025 - Area and Yield.pdf

Dear Local Plan Team

Please find attached a representation in relation to MM40 - HB025 - Land East of Butts Lane, High Bentham (Area and Yield), on behalf of our client Mr Thomas Marshall.

Regards

Thorfinn Caithness BA (Hons) MA Town & Reg Plng MRTPI

**Edwardson Associates Ltd.
Planning and Diversification Consultants
Paddock House
10 Middle Street South
Driffield
East Yorkshire
YO25 6PT**

Tel: [REDACTED]

Fax: [REDACTED]

This email is confidential and may be privileged. It is intended for the use of the intended recipient only. Any opinions or advice contained within the email are personal between ourselves and the client and may not be relied upon by anyone else, nor held out by third parties as being advice upon which they may have relied. If you receive it in error please call me on [REDACTED] then delete the email and do not copy it or forward it to any third party. I believe but do not warrant that this email and any attachments are virus free. Thank you

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mr
First Name:	Thomas
Last Name:	Marshall
Job Title (where relevant):	
Organisation (where relevant):	
Address 1:	c/o Edwardson Associates Ltd
Address 2:	
Address 3:	

Address 4:	
Postcode:	
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	Gemma Edwardson
Address:	Edwardson Associates Ltd, Paddock House, 10 Middle Street South, Driffield, East Yorkshire, YO25 6PT
Telephone number:	██████████
Email:	████████████████████

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Gemma Edwardson, Edwardson Associates
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: 40 (HB025) – Land East of Butts Lane, High Bentham (Site Area and Yield)	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

We agree that the modifications to the area of the site and approximate yield are effective and reflect the most up to date evidence concerning site delivery.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

No changes required.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

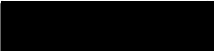
Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	X
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	X
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature <i>PP.</i>	
Date	<i>01/04/19</i>

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ | www.cravendc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravendc.gov.uk



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

Craven Local Plan Examination

From: Thorfinn Caithness [REDACTED]
Sent: 01 April 2019 14:06
To: Local Dev. Framework
Cc: Planning Group; Admin
Subject: Craven Local Plan - Main Modifications - MM40 - HB036 - Land East of Robin Lane, High Bentham (Area and Yield) - Marshall / Edwardson Associates
Attachments: MM40 - HB036 - Area and Yield.pdf

Dear Local Plan Team

Please find attached a representation in relation to MM40 - HB036 - Land East of Robin Lane, High Bentham (Area and Yield), on behalf of our client Mr Thomas Marshall.

Regards

Thorfinn Caithness BA (Hons) MA Town & Reg Plng MRTPI

Edwardson Associates Ltd.
Planning and Diversification Consultants
Paddock House
10 Middle Street South
Driffield
East Yorkshire
YO25 6PT

Tel: [REDACTED]

Fax: [REDACTED]

This email is confidential and may be privileged. It is intended for the use of the intended recipient only. Any opinions or advice contained within the email are personal between ourselves and the client and may not be relied upon by anyone else, nor held out by third parties as being advice upon which they may have relied. If you receive it in error please call me on [REDACTED] then delete the email and do not copy it or forward it to any third party. I believe but do not warrant that this email and any attachments are virus free. Thank you

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mr
First Name:	Thomas
Last Name:	Marshall
Job Title (where relevant):	
Organisation (where relevant):	
Address 1:	c/o Edwardson Associates Ltd
Address 2:	
Address 3:	

Address 4:	
Postcode:	
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	Gemma Edwardson
Address:	Edwardson Associates Ltd, Paddock House, 10 Middle Street South, Driffield, East Yorkshire, YO25 6PT
Telephone number:	██████████
Email:	██

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

If you wish your personal details to be treated in confidence and not published please tick the box below:

I wish to request that the personal details submitted with this representation are treated in confidence and not published.	<input type="checkbox"/>
---	--------------------------

Please explain below, why you have made this request:

--

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Gemma Edwardson, Edwardson Associates
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: 40 (HB036) – Land East of Robin Lane, High Bentham (Site Area and Yield).	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

We agree that the modifications to the policy text are effective and reflect the most up to date evidence concerning site delivery – specifically that the site is no longer available / deliverable.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

No changes required.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	X
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	X
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature <i>RR</i>	[REDACTED]
Date	<i>01/04/19</i>

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ | www.cravendc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravendc.gov.uk



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

Craven Local Plan Examination

From: Thorfinn Caithness [REDACTED]
Sent: 01 April 2019 14:06
To: Local Dev. Framework
Cc: Planning Group; Admin
Subject: Craven Local Plan - Main Modifications - MM40 - HB038 - Land South of Low Bentham Road, High Bentham (Area and Yield) - Marshall / Edwardson Associates
Attachments: MM40 - HB038 - Area and Yield.pdf

Dear Local Plan Team

Please find attached a representation in relation to MM40 - HB038 - Land South of Low Bentham Road, High Bentham (Area and Yield), on behalf of our client Mr Thomas Marshall.

Regards

Thorfinn Caithness BA (Hons) MA Town & Reg Plng MRTPI

Edwardson Associates Ltd.
Planning and Diversification Consultants
Paddock House
10 Middle Street South
Driffield
East Yorkshire
YO25 6PT

Tel: [REDACTED]

Fax: [REDACTED]

This email is confidential and may be privileged. It is intended for the use of the intended recipient only. Any opinions or advice contained within the email are personal between ourselves and the client and may not be relied upon by anyone else, nor held out by third parties as being advice upon which they may have relied. If you receive it in error please call me on [REDACTED] then delete the email and do not copy it or forward it to any third party. I believe but do not warrant that this email and any attachments are virus free. Thank you

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mr
First Name:	Thomas
Last Name:	Marshall
Job Title (where relevant):	
Organisation (where relevant):	
Address 1:	c/o Edwardson Associates Ltd
Address 2:	
Address 3:	

Address 4:	
Postcode:	
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	Gemma Edwardson
Address:	Edwardson Associates Ltd, Paddock House, 10 Middle Street South, Driffield, East Yorkshire, YO25 6PT
Telephone number:	[REDACTED]
Email:	[REDACTED]

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

If you wish your personal details to be treated in confidence and not published please tick the box below:

I wish to request that the personal details submitted with this representation are treated in confidence and not published.	<input type="checkbox"/>
---	--------------------------

Please explain below, why you have made this request:

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Gemma Edwardson, Edwardson Associates
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: 40 (HB038) – Land South of Low Bentham Road, High Bentham (Site Area and Yield)	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

We agree that the modifications to the area of the site and approximate yield are effective and reflect the most up to date evidence concerning site delivery.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

No changes required.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	X
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	X
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature <i>pp</i>	[REDACTED]
Date	<i>01/04/19.</i>

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ | www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



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

Craven Local Plan Examination

From: Thorfinn Caithness [REDACTED]
Sent: 01 April 2019 14:07
To: Local Dev. Framework
Cc: Planning Group; Admin
Subject: Craven Local Plan - Main Modifications - MM44 - HB025 - Land East of Butts Lane, High Bentham (Housing Allocation) - Marshall / Edwardson Associates
Attachments: MM44 - HB025 - Housing Allocation.pdf

Dear Local Plan Team

Please find attached a representation in relation to MM44 - HB025 - Land East of Butts Lane, High Bentham (Housing Allocation), on behalf of our client Mr Thomas Marshall.

Regards

Thorfinn Caithness BA (Hons) MA Town & Reg Plng MRTPI

Edwardson Associates Ltd.
Planning and Diversification Consultants
Paddock House
10 Middle Street South
Driffield
East Yorkshire
YO25 6PT

Tel: [REDACTED]

Fax: [REDACTED]

This email is confidential and may be privileged. It is intended for the use of the intended recipient only. Any opinions or advice contained within the email are personal between ourselves and the client and may not be relied upon by anyone else, nor held out by third parties as being advice upon which they may have relied. If you receive it in error please call me on [REDACTED] then delete the email and do not copy it or forward it to any third party. I believe but do not warrant that this email and any attachments are virus free. Thank you

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mr
First Name:	Thomas
Last Name:	Marshall
Job Title (where relevant):	
Organisation (where relevant):	
Address 1:	c/o Edwardson Associates Ltd
Address 2:	
Address 3:	

Address 4:	
Postcode:	
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	Gemma Edwardson
Address:	Edwardson Associates Ltd, Paddock House, 10 Middle Street South, Driffield, East Yorkshire, YO25 6PT
Telephone number:	██████████
Email:	██

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Gemma Edwardson, Edwardson Associates
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: 44 (HB025) – Policy SP7 - Land East of Butts Lane, High Bentham (Housing Allocation)	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

We agree that the modifications in relation to flood risk, drainage and the requirement to conserve the landscape and scenic beauty of the Forest of Bowland AONB clarify and make the policy effective.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

No changes required.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	X
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	X
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature <i>PP</i>	[REDACTED]
Date	<i>01/04/19.</i>

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ | www.cravendc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravendc.gov.uk



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

Craven Local Plan Examination

From: Thorfinn Caithness [REDACTED]
Sent: 01 April 2019 14:07
To: Local Dev. Framework
Cc: Planning Group; Admin
Subject: Craven Local Plan - Main Modifications - MM46 - HB036 - Land East of Robin Lane, High Bentham (Housing Allocation) - Marshall / Edwardson Associates
Attachments: MM46 - HB036 - Housing Allocation.pdf

Dear Local Plan Team

Please find attached a representation in relation to MM46 - HB036 - Land East of Robin Lane, High Bentham (Housing Allocation), on behalf of our client Mr Thomas Marshall.

Regards

Thorfinn Caithness BA (Hons) MA Town & Reg Plng MRTPI

Edwardson Associates Ltd.
Planning and Diversification Consultants
Paddock House
10 Middle Street South
Driffield
East Yorkshire
YO25 6PT

Tel: [REDACTED]

Fax: [REDACTED]

This email is confidential and may be privileged. It is intended for the use of the intended recipient only. Any opinions or advice contained within the email are personal between ourselves and the client and may not be relied upon by anyone else, nor held out by third parties as being advice upon which they may have relied. If you receive it in error please call me on [REDACTED] then delete the email and do not copy it or forward it to any third party. I believe but do not warrant that this email and any attachments are virus free. Thank you

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mr
First Name:	Thomas
Last Name:	Marshall
Job Title (where relevant):	
Organisation (where relevant):	
Address 1:	c/o Edwardson Associates Ltd
Address 2:	
Address 3:	

Address 4:	
Postcode:	
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	Gemma Edwardson
Address:	Edwardson Associates Ltd, Paddock House, 10 Middle Street South, Driffield, East Yorkshire, YO25 6PT
Telephone number:	[REDACTED]
Email:	[REDACTED]

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Gemma Edwardson, Edwardson Associates
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: 46 (HB036) – Policy SP7 - Land East of Robin Lane, High Bentham (Housing Allocation)	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

We agree that the proposed housing allocation is to be deleted, on the basis that it is no longer available / deliverable.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

No changes required.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	X
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	X
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature <i>pp</i>	[REDACTED]
Date	<i>01/04/19.</i>

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ | www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



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

Craven Local Plan Examination

From: Thorfinn Caithness [REDACTED]
Sent: 01 April 2019 14:07
To: Local Dev. Framework
Cc: Planning Group; Admin
Subject: Craven Local Plan - Main Modifications - MM47 - HB038 - Land South of Low Bentham Road, High Bentham (Housing Allocation) - Marshall / Edwardson Associates
Attachments: MM47 - HB038 - Housing Allocation.pdf

Dear Local Plan Team

Please find attached a representation in relation to MM47 - HB038 - Land South of Low Bentham Road, High Bentham (Housing Allocation), on behalf of our client Mr Thomas Marshall.

Regards

Thorfinn Caithness BA (Hons) MA Town & Reg Plng MRTPI

Edwardson Associates Ltd.
Planning and Diversification Consultants
Paddock House
10 Middle Street South
Driffield
East Yorkshire
YO25 6PT

Tel: [REDACTED]

Fax: [REDACTED]

This email is confidential and may be privileged. It is intended for the use of the intended recipient only. Any opinions or advice contained within the email are personal between ourselves and the client and may not be relied upon by anyone else, nor held out by third parties as being advice upon which they may have relied. If you receive it in error please call me on [REDACTED] then delete the email and do not copy it or forward it to any third party. I believe but do not warrant that this email and any attachments are virus free. Thank you

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mr
First Name:	Thomas
Last Name:	Marshall
Job Title (where relevant):	
Organisation (where relevant):	
Address 1:	c/o Edwardson Associates Ltd
Address 2:	
Address 3:	

Address 4:	
Postcode:	
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	Gemma Edwardson
Address:	Edwardson Associates Ltd, Paddock House, 10 Middle Street South, Driffield, East Yorkshire, YO25 6PT
Telephone number:	██████████
Email:	██

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

If you wish your personal details to be treated in confidence and not published please tick the box below:

I wish to request that the personal details submitted with this representation are treated in confidence and not published.	<input type="checkbox"/>
---	--------------------------

Please explain below, why you have made this request:

--

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Gemma Edwardson, Edwardson Associates
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: 47 (HB038) – Policy SP7 - Land South of Low Bentham Road, High Bentham (Housing Allocation)	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

We welcome the proposed amendment which allows for the land currently proposed for the school extension to be developed for housing if it is no longer needed for the school extension. We note from our attendance at the Examination in Public that the representative of the local Education Authority outlined that future expansion of the school could feasibly be accommodated to the South of the school. We wish to emphasise that our client owns all of the land to the South and West of the school and so there is scope to develop the whole of HB038 with housing and provide additional land to accommodate expansion of the school

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

No changes required.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	X
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	X
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature <i>PP</i>	[REDACTED]
Date	<i>01/04/19.</i>

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ | www.cravendc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravendc.gov.uk



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

Craven Local Plan Examination

From: BESS MARTIN [REDACTED]
Sent: 26 March 2019 15:16
To: Local Dev. Framework
Subject: Ack letter sent by DF on 26.03.2019; Proposed Main Modifications to the Publication Draft Craven Local Plan - invitation to make representations
Attachments: 2019 03 26 Representation Form Response.docx

Dear Sirs

Please find attached my response to your invitation to make representations.

Please confirm receipt and that it is in a format which is acceptable and will be properly considered.

Thank you.

Yours faithfully

Bess Martin

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Miss
First Name:	Elizabeth
Last Name:	Martin
Job Title (where relevant):	n/a
Organisation (where relevant):	n/a
Address 1:	██████████
Address 2:	██████
Address 3:	██████
Address 4:	██████████
Postcode:	██████

Telephone:	██████████
Email:	████████████████████

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	n/a
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them

again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: Main modification number 7 pages 44-48 of the original re Supporting text to SP 4 etc. Now covered on pages 8-12 of the 'Draft schedule of main modifications'.	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

<p>Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.</p> <p>If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.</p>

CDC is proposing what appear to be a small number of minor word changes; however these would have a major impact on the Local Plan. I understand these were not suggested by the Inspector nor brought up by the Council at the Hearing. The emphasis goes from building on 'allocated sites and brownfield sites in settlements' (which makes sense) to building anywhere (with no definition of what anywhere is)!

On page 9 of the new proposed draft for adoption, under section 4.47, a major change is now proposed by CDC which was not suggested by the Inspector nor mentioned by Officers at the Hearing. The previous drafts said that development would be favoured on 'allocated land and previously developed land in tiers 1 to 5'.

We now see the addition of the words 'or other appropriate land'. Not only is that ambiguous (no definition of what 'appropriate' means), but more importantly it drastically widens the scope of the draft that was presented to the public and the Inspector at the Hearing. Any persuasive or influential developer will argue any site as 'appropriate' rendering the Plan effectively useless.

This section of the plan was sound before. No one said at the Hearing that the scope of land would be increased from 'brownfield' to 'brownfield plus any other appropriate land'. If this happens then all the drafts and consultations become meaningless. That cannot be sound, legally compliant or in accordance with the duty to consult.

I suggest the phrase 'or other appropriate land' is removed and revert to what was put to the public during consultation and the public and the Inspector at the Hearing.

Similarly, most of the changes in section 4.49 were not suggested by the Inspector or mentioned by Officers at the Hearing.

In particular the addition of the words 'on land outside a settlements main built up area in addition to the plans land allocations in tier 1-4 settlements' should not be allowed because it would represent a huge shift in policy after consultation and after the Hearing.

We have gone from 'building on allocated sites and previously developed land within the main built up areas' to effectively 'building anywhere that the Council or the influential developers want'. The proposed new wording is ambiguous, and the implications for policy are huge. It cannot be sound or compliant with the duty to consult if CDC then make huge policy changes that were not mentioned at the Hearing by themselves or the Inspector after the Hearing.

The same applies to the crossed out the word 'within' being replaced with the words 'on land adjoining' (section 4.49). The original draft was sound and made sense in planning terms but if this unnecessary modification is allowed, we will go from preserving our countryside by developing within our settlements to building anywhere! It is not only ambiguous but also totally contrary to what planning policy should be. And nothing to do with the discussions that went on at the Hearing.

The only bit of the changes in section 4.49 that can be justified is the modification

that responds to the Inspector's request to have figures updated more frequently than the Council were previously proposing.

I suggest the Inspector look very carefully at the wording in section 4.49 as the small changes proposed would lead to both ambiguity and huge policy changes. They should revert to the version that was put to the Inspector at the Hearing. He and nobody else found fault with it (apart from his request to have regular reviews of numbers as outlined above). To change things now under the pretence of making changes to make the Plan sound would make a mockery of the whole process, be unsound and wholly against the purpose of consultation. The original draft was not unsound; the new draft is.

The wording in sections 4.50 and 4.51 has also been amended despite no one challenging the previous version. However, the implications of the changes are less far reaching than the wholesale policy changes that will come about if the proposed modifications to 4.47 and 4.49 are allowed. Please do not let this happen.

On page 12 (Tiers 1- 4 H.) the words 'previously developed' have been crossed out. So we have gone from building on brownfield land to building on any land albeit within settlements. Again I understand that this was not talked about at the Hearing so I question the soundness of making a clear policy change which was not discussed or requested. The original wording was sound.

I am also concerned to note that various sections about traffic have been deleted and wonder how it can possibly thought as sound to ignore highways and safety issues.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what change(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

Simply revert to the wording that was put to the Inspector and the public at the Hearing.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.


Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	✓
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	✓
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	26 March 2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ
www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



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

Craven Local Plan Examination

From: BESS MARTIN [REDACTED]
Sent: 27 March 2019 06:43
To: Local Dev. Framework
Subject: Proposed Main Modifications to the Publication Draft Craven Local Plan - invitation to make representations MM8
Attachments: 2019 03 27 Representation Form Response re MM8.docx
Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sirs

Please find attached my response dated 27 March 2019 to your invitation to make representations wrt MM8.

Please confirm receipt and that it is in a format which is acceptable and will be properly considered.

Thank you.

Yours faithfully

Bess Martin

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Miss
First Name:	Elizabeth
Last Name:	Martin
Job Title (where relevant):	n/a
Organisation (where relevant):	n/a
Address 1:	██████████
Address 2:	██████
Address 3:	██████
Address 4:	██████████

Postcode:	██████
Telephone:	██████████
Email:	████████████████████

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	n/a
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Elizabeth Martin
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: 8 (with particular reference to its relationship with the Schedule of Proposed Policy Map changes)	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

This latest attempt at an emerging Local Plan is unsound because changes now proposed in one part of the document (the 'Policies' map) are not reflected in the corresponding part of the Plan (the tables showing housing need going forward, on page 16 of the 'Draft Schedule of Main Modifications'). It is also therefore not legally compliant.

Specifically, the Council are now seeking to remove the 'brownfield' Carla Beck site in Carleton from the Plan which has permission to build 24 houses because the new owner/developer has chosen to build only 4 houses there instead of the originally allocated 24. The developer's decision to deliberately under develop this (or indeed, any) site is not a planning matter and should not influence how the Local Plan develops and allocates. I believe that to do so would be ultra vires.

The Council now seem to want the 20 houses 'lost' at Carla Beck simply because the developer made a commercial decision not to develop that site for reasons other than business, to built elsewhere in the village - despite telling the Inspector that they would be built in Tier 2 Settlements (at Settle and Bentham), not elsewhere in Carleton.

The new owner/developer's non-business decision on the Carla Beck site should not affect or influence the Planning Policy. As a result, Carleton's established allocation figures should stand (including the 24 at Carla Beck), otherwise a dangerous precedent would be set.

This principle should apply to all developers who choose to under develop a site otherwise the developers will become the determiners of what is built where and how much etc – led by their own self interest as well as profit. There will be a planning 'free for all' and communities and neighbourhoods will suffer.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.


Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	✓
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	✓
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	27 March 2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ
www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



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

From: BESS MARTIN [REDACTED]
Sent: 27 March 2019 06:43
To: Local Dev. Framework
Subject: Proposed Main Modifications to the Publication Draft Craven Local Plan - invitation to make representations MM8
Attachments: 2019 03 27 Representation Form Response re MM8.docx
Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sirs

Please find attached my response dated 27 March 2019 to your invitation to make representations wrt MM8.

Please confirm receipt and that it is in a format which is acceptable and will be properly considered.

Thank you.

Yours faithfully

Bess Martin

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Miss
First Name:	Elizabeth
Last Name:	Martin
Job Title (where relevant):	n/a
Organisation (where relevant):	n/a
Address 1:	██████████
Address 2:	██████
Address 3:	██████
Address 4:	██████████

Postcode:	██████
Telephone:	██████████
Email:	████████████████████

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	n/a
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Elizabeth Martin
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: 8 (with particular reference to its relationship with the Schedule of Proposed Policy Map changes)	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

This latest attempt at an emerging Local Plan is unsound because changes now proposed in one part of the document (the 'Policies' map) are not reflected in the corresponding part of the Plan (the tables showing housing need going forward, on page 16 of the 'Draft Schedule of Main Modifications'). It is also therefore not legally compliant.

Specifically, the Council are now seeking to remove the 'brownfield' Carla Beck site in Carleton from the Plan which has permission to build 24 houses because the new owner/developer has chosen to build only 4 houses there instead of the originally allocated 24. The developer's decision to deliberately under develop this (or indeed, any) site is not a planning matter and should not influence how the Local Plan develops and allocates. I believe that to do so would be ultra vires.

The Council now seem to want the 20 houses 'lost' at Carla Beck simply because the developer made a commercial decision not to develop that site for reasons other than business, to built elsewhere in the village - despite telling the Inspector that they would be built in Tier 2 Settlements (at Settle and Bentham), not elsewhere in Carleton.

The new owner/developer's non-business decision on the Carla Beck site should not affect or influence the Planning Policy. As a result, Carleton's established allocation figures should stand (including the 24 at Carla Beck), otherwise a dangerous precedent would be set.

This principle should apply to all developers who choose to under develop a site otherwise the developers will become the determiners of what is built where and how much etc – led by their own self interest as well as profit. There will be a planning 'free for all' and communities and neighbourhoods will suffer.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.


Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	✓
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	✓
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	27 March 2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ
www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



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

Craven Local Plan Examination

From: John Mathew [REDACTED]
Sent: 18 March 2019 11:46
To: Local Dev. Framework
Subject: Meeting Long Preston.pdf
Attachments: Meeting Long Preston.pdf

Dear Sirs,
I think the Inspector's comments are justified.
The only lake between Long Preston and Hellifield is man made so what's wrong with making 2 more?
We need more employment in the area and this development would provide it.
Long Preston Deeps provide plenty of natural habitat for birds and animals.
Yours sincerely,
John Mathew
Long Preston.

Sent from my iPad

URGENT **HELLIFIELD FLASHES**

Public meeting March 20th 7-00pm Long Preston Village Hall

Please note the following part statement from the Chairman of Spatial Planning regarding the inspector's findings on the local plan which concerns both Hellifield and Long Preston.

Following the close of examination hearings in October 2018, the inspector undertook a site visit to the proposed Local Green Space at Hellifield. The inspector issued his initial conclusions on this site in a letter dated 13th November 2018, where he was of the opinion that this site should not be designated as a Local Green Space.

The Council held a period of consultation during January 2019 to explore the possibility of replacing the larger area (HE-LGS1) at Hellifield Flashes with three smaller areas (HE-LGS7 – Gallaber Pond, HE-LGS8 – Dunbars Flash and HE-LGS9 – Little Dunbars Flash)

Following consideration of the responses to the alternatives proposed by the Council and re-visiting the sites, the inspector has responded in a letter dated 1st February 2019, that at this stage, in his opinion, the site at Hellifield HE-LGS1 should be modified to include only the 'Gallaber Pond' – identified as HE-LGS7 in the Council's additional assessment.

The inspector's view is his “initial opinion” and he will only declare his final conclusions on all the proposed main modifications after he has considered the representations made during the current public consultation on the Main Modifications to the Publication Draft Local Plan. It is important that any representations relating to the main modifications regarding this site relate to tests in paragraph 77 of the NPPF which state that:

“The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:

Where the green space is in reasonably close proximity to the community it serves.

Where the green area is demonstrably special to a local community and holds particular local significance, for example because of its beauty, a historic significance, recreational value (including a playing field), tranquillity or richness of wildlife; and

Where the green area is local in character and is not an extensive tract of land.

This means that the responses to the current six-week public consultation on the proposed main modifications ending on Monday April 1st 2019 will need to address these points.

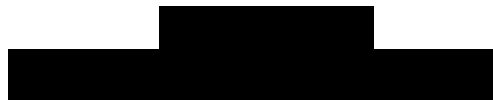
The inspector provides reassurances that Policy EC4: Tourism requires decision-makers to consider impacts on the landscape, the setting of the Yorkshire Dales National Park, heritage assets, biodiversity and existing public rights of way. These criteria, and other relevant policies in the Plan, would be applicable to the determination of any future planning application on any part of this site that falls outside the LGS designation at Gallaber Pond.

I hope this information gives you what to write in a response. This will be our last chance to persuade the inspector that this land is important to the people, not just at Hellifield but at Long Preston.

Responses to go to CDC, Local Plan, Belle View Mills, Broughton Road, Skipton.
BD23 1FJ
or by email to localplan@cravendc.gov.uk

If you have any questions come along to the meeting and see if I can help.

District Councillor Chris Moorby



From: Helen [REDACTED]
Sent: 01 April 2019 13:46
To: Sian Watson
Subject: Park Hill Skipton

Sian Watson Spatial Planning Manager CDC

Dear Mr Watson

Almost 50 years ago, when my husband's career took him to this area, we moved with our four very young children to Skipton.

When we arrived we were bowled over by the sight of Park Hill - a little patch of countryside only a few steps from the High Street. We were also amazed that it was ours to walk over. As they grew up the children played there, they walked the dog over it, sledged down it when the snow came, climbed up it at dawn to welcome Easter Day. We stood at the top, looking over "our" town, accompanied our visitors up it, started or ended many a longer walk over it. We were just so proud of it and loved to hear the admiring and even envious comments of our friends from elsewhere.

We love this little hill and are grateful for what it has given us over the years – not just freedom, beauty, exercise, fun but a greater understanding of what has gone on before – the Civil War means more to me now than it ever did at school. We desperately hope that it will be allowed to continue undeveloped to give much to many generations to come.

Yours sincerely

Helen McAdam

[REDACTED]

From: Archie McAdam [REDACTED]
Sent: 01 April 2019 13:27
To: Tony Blackburn
Subject: Local Green Space Designation for Park Hill, Skipton

Mr Tony Blackburn Independent Programme

Officer CDC1 April 2019

Dear Mr Blackburn

I apologise for emailing you instead of writing a proper letter. I intended to do that but time suddenly ran away and the deadline for this email to you has arrived.

When we came to live in Skipton nearly 50 years ago we were delighted to arrive in a town where the countryside of Park Hill came down almost to Mill Bridge and was visible from the High Street. We still delight in it and friends who visit the town enjoy it and talk about the uniqueness of it.

In our early days our children and the children of the town walked over the grassland, picnicked on it, sledged safely in the snow over it and enjoyed the spacious peace of it as they looked down over the town from it. Children and grownups still enjoy it.

The space is really near the town and is special, among other things, because of its historical importance as the site of a significant battle – a battle re-enacted several times over the years.

It is a relatively small green space of importance because it is near the town and impinges on Skipton Woods. It provides an important ecosystem to enhance that of Skipton Woods. If it were to be degraded in any way, that would diminish the quality of Skipton Woods.

This is a place that has often formed the beginning or end of walks we and our friends have enjoyed. It forms part of the long distance footpaths of Dales High Way and Lady Anne's Way.

It needs to be protected as a Local Green Space - as open countryside beside the town.

I ask and urge you to use your influence to preserve Park Hill for the people of Skipton.

Yours sincerely

Archie McAdam
[REDACTED]

From: Alex Child [REDACTED]
Sent: 01 April 2019 15:43
To: Local Dev. Framework
Subject: Proposed Main Modifications to the Craven Local Plan
Attachments: cdc-mods-rep-form-2019-final[1].docx; WR400-020-842.pdf; Response to Craven LP Main Modifications 01.04.19.pdf

Dear Sirs

Please find attached representations in respect of the proposed Main Modifications to the Draft Local Plan made on behalf of McCarthy & Stone Retirement Lifestyles Ltd, the market leader in the provision of retirement housing for sale

As you will see these raise important questions of a procedural as well as a planning nature

Alex Child

Director, The Planning Bureau

4th Floor, 100 Holdenhurst Road, Bournemouth, BH8 8AQ

t: [REDACTED] | m: [REDACTED] | e: [REDACTED]

Disclaimer – The information in this e-mail and any attachments is confidential and may be legally privileged and protected by law. If you have received it in error please notify us immediately and then delete it. Unauthorised use, dissemination, distribution, publication or copying of this communication is prohibited. You should carry out your own virus checks before opening any attachment. The Planning Bureau accepts no liability for any loss or damage which may be caused by software viruses. The Planning Bureau Limited. Registered in England and Wales No. 2207050. Registered Office: 4th Floor, 100 Holdenhurst Road, Bournemouth, Dorset, BH8 8AQ.

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	
First Name:	
Last Name:	
Job Title (where relevant):	
Organisation (where relevant):	McCarthy & Stone Retirement Lifestyles Ltd
Address 1:	100 Holdenhurst Road
Address 2:	Bournemouth
Address 3:	BH8 8AQ

Address 4:	
Postcode:	BH8 8AQ
Telephone:	██████████
Email	██

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	Mr Alex Child
Address:	The Planning Bureau Ltd 100 Holdenhurst Road Bournemouth BH8 8 AQ
Telephone number:	██████████
Email:	██

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM:	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

McCarthy & Stone Retirement Lifestyles Ltd did not make representations on the publication Draft of the Local Plan as it was content that its representations made on the Draft local Plan in 2017 had been considered. It did not therefore appear at or hear the Examination.

Main Modification 90 introduces definitions of what it refers to as “Age Restrictive Exclusive/Sheltered/Retirement Housing” and “Assisted Living/Extra Care/Very sheltered Housing” and refers to these as C3 uses. As evidenced by the proposed modifications that follow, the whole purpose of doing is to enable the proposed affordable housing policy to be applied.

With reference to the Council’s policy Response Paper on Matter 9 and the Representations made to the Local Plan, **there was no catalyst or requirement for this Modification.** Whilst the Council suggests that it is made in the interests of clarity, it, in fact introduces entirely new requirements and expectations into the Local Plan. To do so, runs contrary to the purpose and remit of a Main Modification and should therefore be withdrawn as a matter of procedure.

Additionally, too, the determination of the Modification that “there are two main types of this specialist C3 housing for older people” is **entirely erroneous.** It is well established that Assisted Living/Extra care proposals (NB Very Sheltered Housing is generally considered to be an outdated term) can fall within either use Class C2 or C3 **dependent on the level of care it provides. Self-containment is not the determining factor as to Use Class** though this principally informs the Modification proposed by the repeated references to it.

For the purposes of precision, a full statement is not presented here but as evidence of its error, the Housing Learning and Improvement Network (HLin) Fact sheet “Extra Care Housing – What is it in 2015 set out the “Core Ingredients” of Extra Care, which includes:

Fully self-contained properties where occupants have their own front doors, and tenancies or leases which give them security of tenure and the right to control who enters their home

And then goes on to discuss the proper considerations that should be applied to determine Use Class. The Modification rather determines that if apartments are self-contained then they must fall within Use Class C3 but a “Core ingredient” is just that and it is well established that EC can fall within C2 or C3 based on the correct assessment, which is the care and support provided. **The approach of the Modification is therefore wholly wrong.**

Relevant Appeal precedents are also an important resource in this respect as they consider the pertinent issues in determination:

- Brooklands Farm, Cheltenham Road, Evesham, Worcestershire WR11 2LW. Dated 15th December 2012. Appeal Ref: APP/H1840/A/13/2193666 (paras 17 -22)
- Land off Manor Road, Stratford-upon-Avon CV37 7EA dated 20 June 2012. Appeal Ref: APP/J3720/A/11/2153222 (para 85-86)
- Former Portishead Primary School Site, Slade Road, Portishead, BS20 6BD) 9 October 2012 Appeal Ref: APP/D0121/A/12/2168918 (paras 17-21 and 29)
- Greaves Hotel, 142 Greaves Road, Lancaster, LA1 4UW dated 24 September 2013. Appeal Ref: APP/A2335/A/13/2195739
- Prewetts Mill, Worthing Road, Horsham, West Sussex, RH12 1ST dated 22nd March 2016. Appeal Ref: APP/Z3825/W/15/3133676 (para 20- 21)
- The Knowle, Station Road, Sidmouth, Devon, EX10 8HL dated 22nd January 2018 Appeal Ref: APP/U1105/W/17/3177340 (paras 37-54)

All determine that the form of accommodation that most Extra Care development takes (that is a single block of apartments with on-site care and as principally provided by McCarthy & Stone) falls within Use Class C2.

I have also attached a further **and very recent Appeal decision** in this respect (App/W0734/W/18/3208917 Land at Strait Lane, Stainton) which reinforces the points being raised (paras 25-28 refer).

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

Main Modification MM90 should be **deleted** in its entirety in order to make the Plan sound and to avoid the potential for a procedural challenge

Modification MM92 for paragraph 6.11 should **delete** " *A definition of the two types of specialist housing for older people set out in this policy is provided in the supporting text to Policy H1 of this plan*"

Modification MM93 for policy H2 should delete sections (b) iii and iv in their entirety

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)

Yes, I do wish to be notified	/
No, I do not wish to be notified	


Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)

Yes, I do wish to be notified	/
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:

Signature	
Date	01.04.19

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ
| www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



INVESTOR IN PEOPLE



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

Craven Local Plan Examination

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	
First Name:	
Last Name:	
Job Title (where relevant):	
Organisation (where relevant):	McCarthy & Stone Retirement Lifestyles Ltd
Address 1:	100 Holdenhurst Road
Address 2:	Bournemouth
Address 3:	BH8 8AQ

Address 4:	
Postcode:	BH8 8AQ
Telephone:	██████████
Email	██

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	Mr Alex Child
Address:	The Planning Bureau Ltd 100 Holdenhurst Road Bournemouth BH8 8 AQ
Telephone number:	██████████
Email:	██

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM:	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

McCarthy & Stone Retirement Lifestyles Ltd did not make representations on the publication Draft of the Local Plan as it was content that its representations made on the Draft local Plan in 2017 had been considered. It did not therefore appear at or hear the Examination.

Main Modification 90 introduces definitions of what it refers to as “Age Restrictive Exclusive/Sheltered/Retirement Housing” and “Assisted Living/Extra Care/Very sheltered Housing” and refers to these as C3 uses. As evidenced by the proposed modifications that follow, the whole purpose of doing is to enable the proposed affordable housing policy to be applied.

With reference to the Council’s policy Response Paper on Matter 9 and the Representations made to the Local Plan, **there was no catalyst or requirement for this Modification.** Whilst the Council suggests that it is made in the interests of clarity, it, in fact introduces entirely new requirements and expectations into the Local Plan. To do so, runs contrary to the purpose and remit of a Main Modification and should therefore be withdrawn as a matter of procedure.

Additionally, too, the determination of the Modification that “there are two main types of this specialist C3 housing for older people” is **entirely erroneous.** It is well established that Assisted Living/Extra care proposals (NB Very Sheltered Housing is generally considered to be an outdated term) can fall within either use Class C2 or C3 **dependent on the level of care it provides. Self-containment is not the determining factor as to Use Class** though this principally informs the Modification proposed by the repeated references to it.

For the purposes of precision, a full statement is not presented here but as evidence of its error, the Housing Learning and Improvement Network (HLin) Fact sheet “Extra Care Housing – What is it in 2015 set out the “Core Ingredients” of Extra Care, which includes:

Fully self-contained properties where occupants have their own front doors, and tenancies or leases which give them security of tenure and the right to control who enters their home

And then goes on to discuss the proper considerations that should be applied to determine Use Class. The Modification rather determines that if apartments are self-contained then they must fall within Use Class C3 but a “Core ingredient” is just that and it is well established that EC can fall within C2 or C3 based on the correct assessment, which is the care and support provided. **The approach of the Modification is therefore wholly wrong.**

Relevant Appeal precedents are also an important resource in this respect as they consider the pertinent issues in determination:

- Brooklands Farm, Cheltenham Road, Evesham, Worcestershire WR11 2LW. Dated 15th December 2012. Appeal Ref: APP/H1840/A/13/2193666 (paras 17 -22)
- Land off Manor Road, Stratford-upon-Avon CV37 7EA dated 20 June 2012. Appeal Ref: APP/J3720/A/11/2153222 (para 85-86)
- Former Portishead Primary School Site, Slade Road, Portishead, BS20 6BD) 9 October 2012 Appeal Ref: APP/D0121/A/12/2168918 (paras 17-21 and 29)
- Greaves Hotel, 142 Greaves Road, Lancaster, LA1 4UW dated 24 September 2013. Appeal Ref: APP/A2335/A/13/2195739
- Prewetts Mill, Worthing Road, Horsham, West Sussex, RH12 1ST dated 22nd March 2016. Appeal Ref: APP/Z3825/W/15/3133676 (para 20- 21)
- The Knowle, Station Road, Sidmouth, Devon, EX10 8HL dated 22nd January 2018 Appeal Ref: APP/U1105/W/17/3177340 (paras 37-54)

All determine that the form of accommodation that most Extra Care development takes (that is a single block of apartments with on-site care and as principally provided by McCarthy & Stone) falls within Use Class C2.

I have also attached a further **and very recent Appeal decision** in this respect (App/W0734/W/18/3208917 Land at Strait Lane, Stainton) which reinforces the points being raised (paras 25-28 refer).

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

Main Modification MM90 should be **deleted** in its entirety in order to make the Plan sound and to avoid the potential for a procedural challenge

Modification MM92 for paragraph 6.11 should **delete** “ *A definition of the two types of specialist housing for older people set out in this policy is provided in the supporting text to Policy H1 of this plan*”

Modification MM93 for policy H2 should delete sections (b) iii and iv in their entirety

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)

Yes, I do wish to be notified

/

No, I do not wish to be notified

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)

Yes, I do wish to be notified

/

No, I do not wish to be notified

Section 9: Signature & Date of Representation

Please sign and date below:

Signature

██████████

Date

01.04.19

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ |
www.cravencd.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravencd.gov.uk



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

Craven Local Plan Examination



Appeal Decision

Hearing Held on 5 December 2018

Site visit made on 5 December 2018

by Beverley Wilders BA (Hons) PgDurb MRTPI

an Inspector appointed by the Secretary of State

Decision date: 22nd January 2019

Appeal Ref: APP/W0734/W/18/3208917

Land at Strait Lane, Stainton TS8 9BB

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.
 - The appeal is made by Angela Swift (Angela Swift Developments Ltd) against the decision of Middlesbrough Borough Council.
 - The application Ref 16/5284/OUT, dated 7 October 2016, was refused by notice dated 6 March 2018.
 - The development proposed is described as outline application for the development of a assisted living apartment building (use class C2), land at Strait Lane, Stainton.
-

Decision

1. The appeal is dismissed.

Procedural Matters

2. The proposal is for outline planning permission with approval being sought for all matters except for landscaping which is a reserved matter.
3. At the hearing the Council stated that it no longer wishes to defend the second reason for refusal relating to highway capacity and safety. This decision was taken following the submission of additional highway evidence by the appellant and further discussions between the appellant and the Council. I have determined the appeal accordingly.

Background and Main Issues

4. The Council dealt with a planning application on land including the appeal site for a residential care home and a supported living accommodation block, granting planning permission in May 2016 (Ref M/FP/0141/16/P). The care home has since been built.
5. The description of development on the Council's decision notice for application reference M/FP/0141/16/P referred to "outline permission for 1no supported living accommodation block with associated access", though no conditions were attached to the permission requiring either the submission of reserved matters or applying any restrictions or limitations to the approved plans to exclude the approval of details shown in relation to the proposed supported living accommodation block. In the absence of this and having regard to the Ashford

judgement¹ provided by the appellant, notwithstanding the description of development and the Council's view of what it thought it had permitted, by granting permission without any specific restrictions relating to the supported living accommodation block, the Council permitted the development as shown on the approved plans. Consequently as the previous permission remains extant, it is a material consideration in the determination of this appeal.

6. The main issues are:

- the effect of the proposal on the character and appearance of the area;
- the effect of the proposal on the living conditions of the occupiers of nearby dwellings having particular regard to privacy and outlook;
- whether there is a requirement for the proposal to make provision for affordable housing;
- the effect of the proposal on highway safety having particular regard to parking provision.

Reasons

Character and appearance

7. The appeal site comprises a rectangular shaped piece of open, undeveloped land. It adjoins Strait Lane to the south west, two storey semi-detached and detached dwellings to the north east and south east forming part of a modern housing estate and a recently constructed three storey care home to the north west. The site is clearly visible from Strait Lane, from surrounding dwellings and there are glimpsed views of it from Low Lane. The land level falls across the site by approximately 3 metres from the south eastern boundary with the dwellings on Primrose Way towards the care home.
8. The proposed building would mainly be three storeys in height and would extend across the majority of the length of the site positioned at an angle to the site boundaries. It would be larger in scale and wider than the adjacent care home and would be significantly larger in scale than the nearby residential dwellings. Though existing land levels would be altered in order to set the building down within the site, it would nevertheless be greater in height than the surrounding dwellings.
9. I note that the design of the proposed building was altered prior to the application being determined by the Council in an attempt to overcome the Council's concerns regarding its scale and design. It now comprises three linked blocks incorporating different materials and design features some of which can be found in the locality. However I do not consider that the elevational details proposed or the staggered and angled footprint and form of the building means that its large scale and mass would not be legible and it would be out of keeping with surrounding development. The proposed building would be a dominant feature and it would be harmful to the character and appearance of the area.
10. At the hearing discussions took place regarding the scale of the proposed building when compared to the building shown on the site plans approved by application M/FP/0141/16/P. Whilst I acknowledge that the previous

¹ R v Ashford Borough Council, Ex Parte Shepway District Council [1999] PLCR 12

permission and approved plans show a footprint and sections for the approved supported living accommodation and that this permission appears to remain extant, I have seen no approved elevations or floor plans for this element of the previously approved scheme. Consequently though it seems that the Council has previously approved a large scale building on the site, it is not clear from the evidence how the appearance of that building would compare with the proposed building and whether or not it would be more or less harmful. In addition, given that further details would need to be approved by the Council, including the external appearance of the previously approved building, I do not consider that at the present time there is a clear prospect of the alternative proposal being carried out. I therefore attach limited weight to the previous permission insofar as it relates to the proposal.

11. Taking the above matters into consideration, I conclude that the proposal would have a significant adverse effect on the character and appearance of the area. It is therefore contrary to policies DC1 and CS5 of the Middlesbrough Local Development Framework Core Strategy adopted February 2008 (CS) and to relevant paragraphs of the National Planning Policy Framework (the Framework). These policies seek, amongst other things, a high standard of design for all development and development to have regard to its relationship with the surrounding area in terms of scale, design and materials.

Living conditions

12. As stated, the appeal site is located near to existing two storey dwellings and a care home. The north eastern and south eastern site boundaries adjoin a number of residential gardens with the rear elevations of a number of dwellings facing towards the site and containing ground and first floor windows. The ground and garden level of the dwellings adjacent to the south eastern boundary is higher than the proposed ground levels and the common boundary is marked by a retaining wall with timber fencing above meaning that the ground floor windows of the dwellings are not visible from ground level within the site.
13. A plan submitted by the appellant shows the distance between the south eastern elevation of the proposed building and nearby dwellings varying between 17.6 metres and 34.5 metres when measured in a straight line from the proposed building with the minimum distance between windows being 27 metres. Whilst the Council does not dispute these figures, it says that the distance should be measured in a straight line from the dwellings rather than from the proposed building and that this measurement provides reduced distances of 23 metres between 34 Primrose Way rising to 33 metres between No 20 and the proposed building. These figures have not been disputed by the appellant.
14. At the hearing discussions took place regarding the Council's privacy standards as set out within Middlesbrough's Urban Design Supplementary Planning Document (SPD) adopted January 2013 (UDSPD) and there was agreement that the proposal exceeds the stated minimum distance of 21 metres between principal room windows which face each other where buildings exceed single storey. The UDSPD does not appear to contain any guidance in relation to situations where residential properties face each other at an angle or differ in height as is the case here. It specifically states that primary room windows would never be bedroom windows.

15. The angle of the proposed building relative to dwellings on Primrose Way means that there would not be a direct facing relationship with the dwellings and gardens. However notwithstanding this and the fact that the Council's minimum distance standards would be met by the proposal, the large scale and particular layout of the proposed building is such that it would result in the potential for significant overlooking of rear gardens and rear facing windows of dwellings on Primrose Way.
16. The south eastern elevation of the proposed building contains a number of living room windows at first and second floor level, in some cases only just beyond the minimum 21 metre distance away from dwellings. Whilst these windows would be at a similar height or above first floor bedroom windows in the dwellings, given their height and the proposed use of the rooms that they would serve, they would allow for and would be likely to result in the undue overlooking at reasonably close quarters of the rear elevations and rear gardens of a number of nearby dwellings. This would be materially harmful to the living conditions of the occupiers of these dwellings.
17. The sheer size and scale of the proposed building relative to nearby dwellings together with its proximity to them also means that it would unduly affect the outlook from these properties, including those located to the north east of the site and facing towards it.
18. Whilst I note that the Council also had concerns regarding the impact of the proposal on the living conditions of residents of the care home, I do not share these concerns noting the larger scale and communal nature of the care home facility and gardens and that at its closest point the proposed building is further away from the care home than is the case with the dwellings.
19. As is the case with the previous issue, though I have had regard to the previous permission and the apparent scale and footprint of the building permitted, I attach limited weight to it for the reasons previously stated.
20. Taking the above matters into consideration, I conclude that the proposal would have a significant adverse effect on the living conditions of the occupiers of nearby dwellings having particular regard to privacy and outlook. It is therefore contrary to Policy DC1 of the CS and to relevant paragraphs of the Framework which seek, amongst other things, to ensure that the effect on the amenities of occupiers of nearby properties will be minimal.

Whether there is a need for affordable housing provision

21. There is disagreement between the main parties as to whether the proposal falls within use class C2 (residential institution) or C3 (dwelling houses) of the Use Classes Order², the appellant favouring the former. The Council's evidence states that which use class it falls within is a matter of interpretation and judgement. At the hearing the Council confirmed that it is generally supportive of assisted living facilities and that its only concern in respect of the use relates to whether or not there is a need for affordable housing provision as a C3 use class would attract a requirement for affordable housing contributions in accordance with Policy H12 of the Middlesbrough Housing Local Plan adopted November 2014 (HLP). A C2 use would not require such a contribution.

² Town and Country Planning (Use Classes) Order 1987 (as amended)

22. The proposed development is described as “a assisted living apartment building (use class C2)”. As originally submitted, the application proposed that residents would need to be a minimum age of 55, with at least one resident occupying each unit being in need of a minimum level of care. Following the determination of the application by the Council, the proposal has been altered and the minimum age requirement has been raised to 60 with the basic care package also having been revised as outlined in the submitted unilateral undertaking.
23. Residential accommodation of varying size and configuration would be provided across three floors together with a number of communal facilities including a restaurant, shop, hairdresser, therapy and treatment room and shared activity and lounge areas. An Operational and Design Overview (ODO) of the proposal has been prepared by the appellant in response to the concerns raised by the Council in respect of the nature of the proposal and the level of care to be provided to residents.
24. In addition to the information provided in the ODO, at the hearing I heard compelling evidence from Ms Swift about the need for a more flexible approach to providing care for people as they move into older age. A model which provides a safe and secure environment for people, a level of independence to suit each individual and allows couples to remain living together even if the support needs of one person are in excess of the other. Such a model aims to meet the changing needs of people in one location, preventing the need to move between facilities as needs change over time.
25. Whilst I understand the Council’s concerns to ensure that affordable housing provision is secured where required, in this case and based on the evidence before me, I am satisfied that what is being proposed is a C2 rather than a C3 use, though I accept that some residents would have a greater level of independence than others. Nevertheless I do not agree with the Council that the different elements of the proposal could be disaggregated and separated into different use classes, particularly given the clear functional relationship between the residential units and the wider communal facilities.
26. I consider that it is clear that the proposal aims to provide much more than residential accommodation for the over 60s but rather that it seeks to offer a flexible package of varying services, including care to residents and including the provision of all meals, as set out within and secured by the submitted unilateral undertaking. The cost of the accommodation would be priced to reflect this and would be likely to be significantly higher than the cost of a more general residential retirement scheme. I agree with the appellant that this is likely to deter prospective occupants who are not in need of such services and facilities. The unilateral undertaking would provide certainty in restricting the age of primary occupants and ensuring that a minimum level of care is needed and taken up by future residents.
27. In reaching my decision I have had regard to the various appeal decisions and guidance relating to assisted living accommodation referred to me and in particular note that what is being provided by the proposal is similar to what was proposed by a scheme for assisted living in Sidmouth accepted as being a C2 use by the Inspector in that case (Ref APP/U1105/W/17/3177340). Though as the Council has pointed out the Sidmouth scheme also appeared to include a staffed physiotherapy and hydrotherapy pool, I do not consider that this means

that the Sidmouth decision is not relevant to the proposal, particularly as the minimum age limit for both schemes is now the same.

28. Taking the above matters into consideration, I conclude that the proposal should be considered as a C2 residential institution use and as such there is no requirement for affordable housing provision having regard to Policy H12 of the HLP.

Highway safety

29. Whilst the Council stated at the hearing that it no longer wishes to defend its reason for refusal relating to highway safety and capacity, I am considering this issue as concerns have been raised in relation to parking and highway safety by interested parties.
30. Following the determination of the application by the Council, a Hearing Statement Relating to Highway Issues dated November 2018 (HSHI) was produced by the appellant. The HSHI concludes that sufficient on-site parking is proposed for the proposal and that there would be no detrimental impact on the highway network resulting in harm to highway safety.
31. The proposal is for a 60 unit assisted living apartment building and 60 parking spaces are proposed. When it considered the application the Council applied a maximum car parking standard of 1.5 spaces per unit giving a total maximum requirement of 90 spaces. It considered that the appellant had not justified a lower amount, particularly given the appeal site location relative to local shops and other facilities and expressed concerns that any overspill parking onto Strait Lane would be detrimental to highway safety. These concerns were also shared by a number of interested parties.
32. As can be seen from my conclusion in relation to the previous issue, I consider that the use of the proposed building is not a C3 dwelling house use but rather a C2 residential institution use. Consequently I agree with the appellant that it is not reasonable to apply the parking standards of 1.5 spaces per unit relating to a C3 use as set out in the Tees Valley Design Guide. I am satisfied based on the evidence including the HSHI, that the amount of parking proposed would be sufficient to serve the needs of the building. If I were allowing the appeal the proposed parking together with the other measures proposed by the appellant included within the submitted unilateral undertaking and the suggested travel plan condition would ensure that the proposal would not result in any harm to highway safety. It would therefore accord with Policy DC1 of the CS insofar as it requires development proposals to have no impact on highway safety.

Other Matters

33. In reaching my decision I have had regard to the fact that the proposal would provide an additional 60 units of assisted living residential accommodation and would contribute to the supply of this type of accommodation in the area. However this benefit of the proposal would not outweigh the significant harm that I have identified to the character and appearance of the area and to the living conditions of the occupiers of nearby dwellings.
34. As referred to above, a unilateral undertaking was submitted by the appellant at the hearing. However as I am dismissing the appeal, there is no need for me to reach a finding on the undertaking.

Conclusion

35. I am satisfied that no affordable housing provision is required in connection with the proposal and that it would not have an adverse impact on highway safety. However the proposal would have a significant adverse effect on the character and appearance of the area and on the living conditions of the occupiers of nearby dwellings having particular regard to privacy and outlook.
36. For the above reasons and having regard to all matters raised, I conclude that the appeal should be dismissed.

Beverley Wilders

INSPECTOR

APPEARANCES

FOR THE APPELLANT:

Sarah Reid	Of Counsel
Richard Borrows	Agent
Chris Shearman	Architect
Neil Appleton	Highways Consultant
Angela Swift	Appellant

FOR THE LOCAL PLANNING AUTHORITY:

Andrew Glossop	Middlesbrough Borough Council
Simon Thompson	Middlesbrough Borough Council

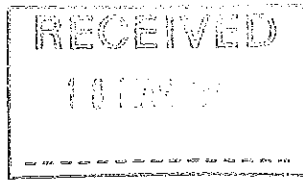
INTERESTED PARTIES:

Alan Liddle	Parish Council
Cllr David Coupe	Ward Councillor
Gail Starling	Manager, Montpellier Manor Care Home
Steven Longstaff	ELG Planning on behalf of Taylor Wimpey
Stephen Winter	on behalf of local resident

DOCUMENTS SUBMITTED AT THE HEARING

1. Copy of S106 legal agreement attached to appeal decision APP/U1105/W/17/3177340 – The Knowle, Station Road, Sidmouth, Devon EX10 8HL.
2. Copy of R v Ashford Borough Council, Ex Parte Shepway District Council [1999] PLCR 12.
3. Copy of decision notice and drawing number 1411 CL (2-) 07 and 1411 CL (0-) 02g relating to application reference M/FP/0141/16/P.
4. Copy of drawing number L5393 920 – Landscape Proposals.
5. Copy of Extract from Tees Valley Design Guide relating to parking standards.
6. Hearing Statement relating to highway issues dated November 2018.
7. Copy of drawing number A173001 SK(2)220 – Proposed site sections outline approval overlay.
8. Suggested wording for travel plan condition.

9. Copy of bus timetable for services 13 and 13A.
10. Operational and design overview in response to local authority's statement of case.



CDS Local Plan,
Belle View Mills,
Skipton,
BD23 1FJ.

14th March, 2019.

Dear Sir,

Re: Local Green Space Designation

I am writing to support the designation of Green Space to Calliber Pond and the area known as the Hellifield Flashes.

Calliber Pond is particularly important to me personally as it is close to my home & therefore I visit it frequently. It is a wonderful & vital habitat for waders & other birds. My late husband found it especially valuable as he could escape from his illness & treatments for cancer, by birdwatching there almost daily, thus improving his sense of well-being. I have a list of all the bird species he recorded on the

✍

Pond, Marshes and locally. It is an important site for its richness in wildlife and as a significant area in terms of its tranquility or as a local amenity.

I very much hope you will consider my points and those of other local people when making your decision about these very important wetland areas.

Yours faithfully.



✓



Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). Please fill in a separate form for each representation you wish to make.

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mr
First Name:	Thomas
Last Name:	Meehan
Job Title (where relevant):	N/A
Organisation (where relevant):	N/A
Address 1:	[REDACTED]
Address 2:	[REDACTED]
Address 3:	[REDACTED]
Address 4:	
Postcode:	[REDACTED]
Telephone:	[REDACTED]
Email:	[REDACTED]

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	N/A
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

If you wish your personal details to be treated in confidence and not published please tick the box below:

I wish to request that the personal details submitted with this representation are treated in confidence and not published.

Please explain below, why you have made this request:

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Thomas Meehan
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: Equality	
Insufficient level of equality assessment conducted on site G2/4 gargrave (off Walton close/Marton Road).	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local

Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

Key issues which needs to be addressed and remediated.

Accessibility for all abilities not discriminating against minority groups or individuals. Site is not inclusive and does not cater for all. It discriminates against minority group with disabilities. The site is not easy to access, the road is dangerous and there is significant deficiency in pavements.

Disabled, parents with children, walkers are put at significant risk by having to use the highway to travel on foot. There is an inherent issue with this site and its location, speeding cars, road visibility, safety of pedestrians.

This rural location doesn't offer opportunities on foot to use recreational facilities, as it is car orientated which goes against sustainability objectives of national and local travel.

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

- Significant investment made to infrastructure
- Equality assessment to be conducted with remediating actions put in place
- Or alternative suitable site which will cater for all disadvantaged groups

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)

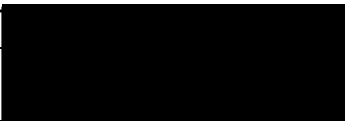
Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)

Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below	
Signature	
Date	28-3-19

From: Maddy Mercer [REDACTED]
Sent: 01 April 2019 11:26
To: Local Dev. Framework
Subject: local plan consultation
Attachments: cdc-mods-rep-form-2019-final.docx

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mrs
First Name:	Madeline
Last Name:	Mercer
Job Title (where relevant):	N/A
Organisation (where relevant):	N/A
Address 1:	██████████
Address 2:	██████
Address 3:	

Address 4:	
Postcode:	██████
Telephone:	██████████
Email:	████████████████████

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

If you wish your personal details to be treated in confidence and not published please tick the box below:	
I wish to request that the personal details submitted with this representation are treated in confidence and not published.	P
Please explain below, why you have made this request:	
Privacy	

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Madeline Mercer
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM:87	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

Removal of SKLG564 from list of Local Green space is not justified. This is an important green space that connects other areas of countryside and is included in two long distant walks with a public footpath running across it. The land is used extensively by locals and visitors (enhancing the contribution tourism plays in local economy) to improve their health and well being – walking, running, dog walking – and as the ground to the east is steeply sloping – enhances the health giving effects. The eastern end of the land (nearest to and to the west of Skipton Woods) is visible from many parts of the town and if not preserved by designation of green space would potentially be available for development. The land adjoins the most historic part of Skipton and is the site of a historical feature

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

If the land designated SKLG564 cannot be designated Green Space, could the eastern portion adjacent to and to the west of Skipton Woods and the most visible from the town be designated Green Space?

The whole space could not be treated as one.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.


Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	<input checked="" type="checkbox"/>
No, I do not wish to be notified	<input type="checkbox"/>

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	<input checked="" type="checkbox"/>
No, I do not wish to be notified	<input type="checkbox"/>

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	1/4/19

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ
www.cravencd.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravencd.gov.uk



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

From: Catherine Mercer [REDACTED]
Sent: 01 April 2019 10:36
To: Tony Blackburn
Cc: Sian Watson; Councillor John Dawson
Subject: Local Plan - Park Hill

Dear all,

I'm writing to you to express my dismay and to strongly object to Park Hill losing its status as Local Green Space.

Park Hill is very important to the local community, providing a tranquil area with great views over the town - just 5 minutes from the town centre.

Having grown up on Raikes Road, I spent my childhood exploring Park Hill and have walked the route over the top of the hill to town countless times - as I'm sure have many other residents of Skipton. Now as an adult I have chosen to move back to Skipton, partly because of the open and green nature of the town - something that would certainly be lost, were Park Hill to be developed. In fact I now live on Park Street and enjoy looking out onto the hill every morning as I leave the house and regularly using the footpaths that cross it.

I am also concerned about the impact that any development might have on the wildlife in neighbouring Skipton Wood.

Park Hill meets the requirements of Local Green Space Designation, so I can see no good reason why it should be removed from the Local Plan. Our green spaces are rapidly disappearing and must be protected for the good of the community. I am so disappointed that this important space is not receiving the protection it deserves.

Please reconsider the decision to remove Park Hill from the plan.

Yours Faithfully,
Catherine Mercer

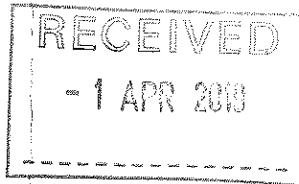
[REDACTED]

[REDACTED]
[REDACTED]
Sian Watson

Spatial Planning Manager

1 Belle Vue Square,

Broughton Rd, BD23 1FJ



Dear Sian,

Re: the removal of Local Green Space Designation for Park Hill

I am appalled that Park Hill has had its Local Green Space Designation Removed and I would like you to do all you can to reinstate this.

We overlook this area and often walk across it and through the Castle Woods, and I feel it is an area worth saving from development.

I feel it is of vital importance not only as a green space which is a wonderful place to walk and enjoy but it is also of great historic value as the site of the battle during the civil war.

Please do all you can to have this decision revoked.

With regards

[REDACTED]
M.A. MILLS.

From: Councillor Chris Moorby
Sent: 26 March 2019 11:38
To: Local Dev. Framework
Subject: Response Hellifield Green Space
Attachments: Response 26,03,2019.pdf

Please find attached response

Local Plan

District Councillor
Chris Moorby



26/03/2019

I write to respond regarding the proposed local green space at the Hellifield Flashes, consultation closes 1st April 2019.

I serve on Craven District Council and I am Ward Member for Long Preston and Hellifield, a position I have held for the last seven years.

I was brought up at Long Preston and have lived there nearly all my life and I have enjoyed playing in the area as a child and then living and working in the area as an adult.

The area originally put forward by CDC was for all the area around the Flashes with exception to the area where extant planning permission is granted and even though the inspector has refused this, even following two site visits which, in all honesty is not enough to see what happens on this site.

I am of the opinion that all this land should still stand for the following reasons.

This area is very important to the people of both Hellifield and Long Preston as there are footpaths that cross the land and this puts people in touch with the enormity of the wildlife that is in this area. People can come straight out of their houses and be in amongst the wildlife.

The pupils of Hellifield School, which lies adjacent to the area, can use this land for extensive nature studies.

In the case of Long Preston people this requires a bit of walking, but saying that it is still used as an area of peace and tranquility.

Therefore this land passes the tests as it is an area of beauty, tranquility and richness of wildlife.

Before the playing fields were put in place on Station Road the children from the adjacent houses used to use these fields to play in. I have been told that Gallaber Flash used to be used for ice skating, in fact a lady told me that her grandfather who was the local joiner made ice skates for the people.

This area has also been identified as having historical significance as can be seen in a report from the NYCC Archaeologist which was in the officers report for the Special Planning Meeting, 25th March 2019, application number 42/2016/17496. By the way this was refused planning permission.

The report from NYCC states:

“The submitted archaeological desk-based assessment has identified several areas of archaeological interest including a ring ditch associated with prehistoric burial that could contain significant deposits including human remains. The area also has potential for presence of an iron age or Roman homestead with an associated field system although its significance cannot be established from available results although may be a high status site.”

This passes the test for historical significance.

This area was very close to being lost for the people. I think the reasons I have given justify this land as Local Green Space even though the inspector classed it as an extensive tract of land.

I have been informed that another council has got an area larger in size than the Hellifield site passed.

I trust you will give these comments due consideration.

Yours sincerely

Chris Moorby (District Councillor)

CDC Local Plan
Belle View Mills
Broughton Road
Skipton
BD23 1FJ

Green Spaces Hellifield Flashes

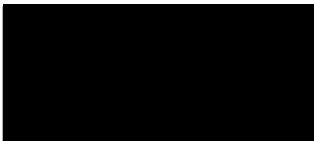
I am writing in relation to the originally proposed HE-LGS1 green space in Hellifield.

Ideally I would prefer that the whole of this proposal was accepted by the inspector and included in the final Local Plan. However, accepting that the inspector will not consider this despite representation I would ask that the three smaller areas HE-LGS1 Gallaber Pond, HE-LGS8 Dunbar Flash and HE-LGS9 Little Dunbar Flash all be designated as green space.

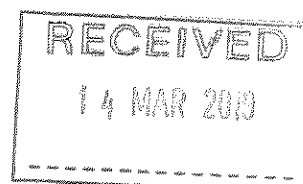
I would argue that all three meet the criteria being; close to the village backing onto properties in the village; are of significant value in terms of wildlife, recreational value and creating an attractive approach to the village; are local in character and do not constitute an extensive tract of land.

The whole of the area in which these green space proposals are found forms an essential feature of the Hellifield Community.

Yours,



Bob Moore





Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). Please fill in a separate form for each representation you wish to make.

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mr
First Name:	Bradlee
Last Name:	Murdoch
Job Title (where relevant):	N/A
Organisation (where relevant):	N/A
Address 1:	[REDACTED]
Address 2:	[REDACTED]
Address 3:	[REDACTED]
Address 4:	
Postcode:	[REDACTED]
Telephone:	[REDACTED]
Email:	[REDACTED]

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	N/A
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Bradlee Murdoch
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: Equality	
Insufficient level of equality assessment conducted on site G2/4 gargrave (off Walton close/Marton Road).	

Section 4: Legal Compliance & Duty to Cooperate

Do you consider that this modification of the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. In Compliance with the Duty to Cooperate	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.
If you wish to support the legal compliance or soundness of this Main Modification to the Local

Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

Key issues which needs to be addressed and remediated.

Safe accessibility to village for all ages groups and abilities
 Site location doesn't treat everyone with the same level of accessibility
 Gradient of hill makes it difficult for people with disability to access site
 Road safety of paramount importance
 Poor lighting and visibility needs to be significantly mitigated against
 Lack of suitable footpaths or limited footpaths
 Distance from site to nearest bus stop in village centre 800m
 Rural infrastructure needs significant investment
 Site does not contribute to sustainable development due to the distance of site and the nearest bus stop 800m away.
 Site extends the village boundary and is a green field site extending the village form further out.
 No recreation facilities on this side of the village. To use recreational facilities from G2/4 it will require a car.
 Site sustainability being car orientated which goes against the aims and objectives of national and local travel.

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

G2/4 – Gargrave, (Walton close, off Marton Road) requires a full equality assessment to be conducted with remediating actions put in place.
 Or choose an alternative suitable site, which will not have a detrimental impact on a minority group which are not being catered for or considered.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)

Yes, I do wish to be notified	Please notify me
-------------------------------	-------------------------

No, I do not wish to be notified	
----------------------------------	--

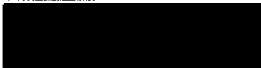
Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)

Yes, I do wish to be notified	Please notify me
-------------------------------	-------------------------

No, I do not wish to be notified	
----------------------------------	--

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	27.03.19



Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). Please fill in a separate form for each representation you wish to make.

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	MR
First Name:	PHILIP
Last Name:	MARGATROUD
Job Title (where relevant):	RETIRED
Organisation (where relevant):	
Address 1:	[REDACTED]
Address 2:	
Postcode:	[REDACTED]
Telephone:	[REDACTED]
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	N/A
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

If you wish your personal details to be treated in confidence and not published please tick the box below:	
Please explain below, why you have made this request:	

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: Equality	
Insufficient level of equality assessment conducted on site G2/4 gargrave (off Walton close/Marton Road).	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

<p>Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.</p> <p>If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.</p>

DANGEROUS ROADS
 NO FOOTPATHS
 DARK

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

- Significant investment made to infrastructure
- Equality assessment to be conducted with remediating actions put in place
- Or alternative suitable site which will cater for all disadvantaged groups

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.


Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	28.3.19

From: Projectmail - National Grid [REDACTED]
Sent: 22 March 2019 08:53
To: Local Dev. Framework
Subject: Craven District Council: Main Modifications Consultation
Attachments: Main Modifications REP 21.03.19.pdf

Dear Sir/Madam,

Please find the attached response on behalf of National Grid.

Kind regards

Wood on behalf of National Grid

Planning & Design| E&I UK
Wood Plc
Gables House, Kenilworth Road, Leamington Spa, CV32 6JX
Tel [REDACTED]
[REDACTED]

Planning Policy Team
Craven District Council
Council Offices
Belle Vue Square
Broughton Road
Skipton
North Yorkshire
BD23 1FJ

Lucy Bartley
Consultant Town Planner

Tel: [REDACTED]

Sent by email to:
localplan@cravenc.gov.uk

21 March 2019

Dear Sir / Madam

**Craven District Council: Main Modifications Consultation
SUBMISSION ON BEHALF OF NATIONAL GRID**

National Grid has appointed Wood to review and respond to development plan consultations on its behalf.

We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.

Further Advice

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. We would be grateful if you could add our details shown below to your consultation database:

Lucy Bartley
Consultant Town Planner

Spencer Jefferies
Development Liaison Officer, National Grid

[REDACTED]
Wood E&I Solutions UK Ltd
Nicholls House
Homer Close
Leamington Spa
Warwickshire
CV34 6TT

[REDACTED]
National Grid House
Warwick Technology Park
Gallows Hill
Warwick
Warwickshire
CV34 6DA

Yours faithfully

[via email]

Lucy Bartley
Consultant Town Planner

cc. Spencer Jefferies, National Grid

From: Ash, Merlin [REDACTED]
Sent: 29 March 2019 18:02
To: Local Dev. Framework
Subject: RE: Public Consultation on the Proposed Main Modifications to the Publication Draft Craven Local Plan: 19/02/19 - 01/04/19
Attachments: 274004 Natural England Response.pdf

Dear Planning Policy Team,

Thank you for consulting Natural England on the proposed Main Modifications to the Publication Draft Craven Local Plan. Please find attached our response.

Yours faithfully,

Merlin

Merlin Ash
Lead Adviser
Yorkshire and Northern Lincolnshire Team
Natural England
Foss House, 1-2 Peasholme Green, York, YO1 7PX
Tel: [REDACTED]

www.gov.uk/natural-england

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

Natural England offers two chargeable services – The Discretionary Advice Service ([DAS](#)) provides pre-application, pre-determination and post-consent advice on proposals to developers and consultants as well as pre-licensing species advice and pre-assent and consent advice. The Pre-submission Screening Service ([PSS](#)) provides advice for protected species mitigation licence applications.

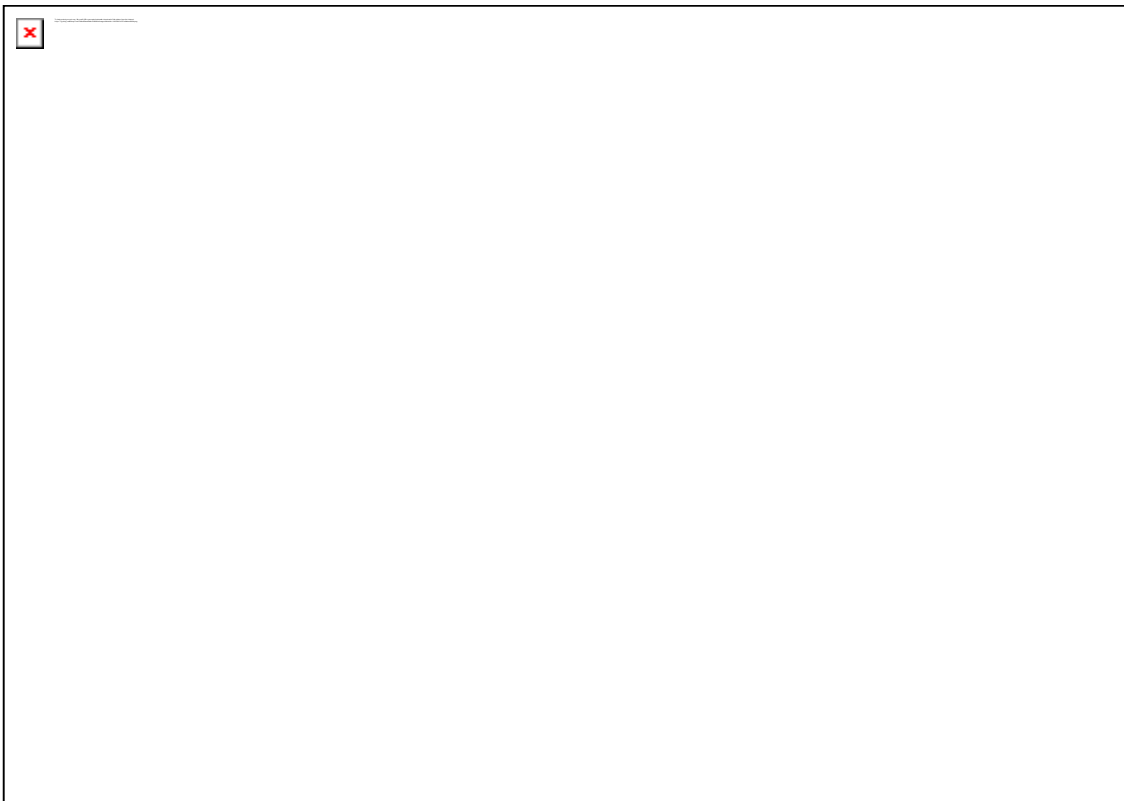
These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, reduce the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

From: Craven District Council, Planning Policy [<mailto:localplan@cravendc.gov.uk>]
Sent: 18 February 2019 11:10
To: SM-Defra-Consultations (NE) [REDACTED]
Subject: Public Consultation on the Proposed Main Modifications to the Publication Draft Craven Local Plan: 19/02/19 - 01/04/19

[View this email in your browser](#)

[View this email in your browser](#)



Dear Sir/Madam,

**Public Consultation on the Proposed Main Modifications
to the Publication Draft Craven Local Plan
Tuesday 19th February – Monday 1st April 2019**

I am writing to inform you that Craven District Council will be inviting representations on the Main Modifications to the Publication Draft Local Plan (the Local Plan), submitted for examination on the 27th March 2018. Public consultation runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019. All representations must be received no later than Monday 1st April 2019.

The proposed Main Modifications are considered necessary following the examination hearings, held during October 2018, to make the Local Plan sound. The Main Modifications put forward within this consultation are made without prejudice to the Inspector's final conclusions on the Local Plan.

The Local Plan sets out the broad spatial planning, policy framework and vision for Craven District (outside the Yorkshire Dales National Park) i.e. the plan area, up to 2032, as well as the necessary development sites and infrastructure to support this growth. The Local Plan will also be used to make decisions on future planning

applications.

The following updated supporting documents have been produced to accompany the main modifications and are also available as part of this consultation:

- Sustainability Appraisal
- Habitat Regulation Assessment

In addition the following documents have been produced for information purposes only and are not included in the consultation exercise, but are published for completeness:

- A Schedule of Additional Modifications, which sets out minor changes to the Local Plan that do not materially affect the operation and meaning of policies in the plan.
- A Schedule of Policy Map Changes which details where modifications to the Local Plan have resulted in consequential changes to the policies maps, or where corrections need to be made, for example where a site has been deleted.

At this stage of the examination process:

- **Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal and Habitat Regulation Assessment.**
- **This is not the opportunity to make comments on other aspects of the Local Plan.**
- **If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications proposed to the Local Plan will not be considered by the Inspector.**

For details of how to submit representations on the Main Modifications, please see the Statement of Representation Procedure and the Council's Representation

Form Guidance Notes, which can be downloaded from Tuesday 19th February 2019, at www.cravendc.gov.uk/planningpolicyconsultations
Copies of the Representation Form will also be available via this link. Paper copies of the documents listed above will be available from libraries within the plan area and from the Craven District Council office reception desk during the consultation period.

All representations that relate to the Main Modifications, the updated Sustainability Appraisal and Habitat Regulation Assessment will be considered by the Inspector who will decide whether any further examination hearings are required. At the end of the examination process he will present his final conclusions in a report to the Council. If the Inspector concludes that the Local Plan is 'sound' subject to Main Modifications, the Council can move forward to adopt the Local Plan, subject to making the modifications recommended by the Inspector.

You are receiving this letter because you have submitted representations on previous drafts of the Local Plan, your contact details are held on the council's Local Plan consultation database and/or you have submitted representations on the Publication Draft Craven Local Plan. If you no longer wish to be contacted with regard to the Craven Local Plan and/or the contact details are incorrect, please use the 'unsubscribe from this list' and 'update subscription preferences' links included at the bottom of the Council's Mailchimp emails to unsubscribe or update contact details, securely and in accordance with the General Data Protection Regulation (GDPR).

If you require any further information or assistance please do not hesitate to contact the Planning Policy Team at localplan@cravendc.gov.uk or 01756 706472.

Yours faithfully
Planning Policy Team

Copyright © 2019 Craven District Council, All rights reserved.

You are receiving this email because you are a statutory consultee to the planning process.

Our mailing address is:

Craven District Council
Craven District Council
1 Belle Vue Square, Broughton Road
Skipton, North Yorkshire BD23 1FJ

United Kingdom

[Add us to your address book](#)

[unsubscribe from this list](#) [update subscription preferences](#)



Facebook



Twitter



Website

This email and any attachments is intended for the named recipient only. If you have received it in error you have no authority to use, disclose, store or copy any of its contents and you should destroy it and inform the sender. Whilst this email and associated attachments will have been checked for known viruses whilst within the Natural England systems, we can accept no responsibility once it has left our systems. Communications on Natural England systems may be monitored and/or recorded to secure the effective operation of the system and for other lawful purposes.

Date: 29 March 2019
Our ref: 274004



Planning Policy Team
Craven District Council
1 Belle Vue Square, Broughton Road
Skipton, North Yorkshire BD23 1FJ
United Kingdom
localplan@cravendc.gov.uk

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

BY EMAIL ONLY

T [REDACTED]

Dear Planning Policy Team

Planning consultation: Public Consultation on the Proposed Main Modifications to the Publication Draft Craven Local Plan and accompanying updated Sustainability Appraisal, Habitats Regulations Assessment and Policy Map Changes

Thank you for your consultation on the above dated 18 February 2019.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England has commented previously on the Craven District Local Plan, this letter represents our comments on the main modifications and updated assessments (dated February 2019) only.

Natural England notes and welcomes the following modifications which set out the requirements for mitigating for recreational disturbance in line with the recommendations of the Habitats Regulations Assessment:

- MM11
- MM17
- MM19
- MM20
- MM21
- MM23
- MM30
- MM31
- MM32
- MM35
- MM39
- MM49
- MM52
- MM58

We note also the update to the policy and policy text for policy ENV4 Biodiversity in MM78 and MM79 regarding recreational disturbance and internationally designated sites and welcome these modifications more broadly.

Natural England notes the modifications to policies EC4A and EC4B regarding tourism related development at Bolton Abbey and Hellified in modifications MM101, MM102, MM103, MM104, MM105, MM107 and MM108 but have no specific comments to make.

Natural England notes the updates to SG064 in modification MM39. As stated previously in our letter dated 13 February 2018 (our ref 234760) Natural England has an outstanding objection on a planning application coming forward on this site (your ref 62/2017/18064) in addition we advised that the Sustainability Appraisal should set out the overriding sustainability for selecting this site and include an assessment of alternative sites and why this is the most sustainable site. We are unclear whether this has been addressed.

Finally Natural England advised in our response dated 13 February 2018 (our ref 234760) that the policy requirements for sites GA009, IN010, IN022, IN028, IN029 and IN035 should include a requirement for a Landscape and Visual Impact Assessment (LVIA) at the project stage in order to avoid impacts on nationally protected landscapes. We note the references to landscape buffering in some of the modifications regarding this sites but disappointed to note that the following modifications make no reference to the requirement for LVIA:

- MM56
- MM57
- MM58
- MM60
- MM63

Notwithstanding the above comments Natural England has no further comments to make regarding the Sustainability Appraisal and welcomes the updated Habitats Regulations Assessment.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter please contact Merlin Ash on [REDACTED] or at [REDACTED]. For any new consultations, or to provide further information on this consultation please send your correspondences to [REDACTED].

Yours faithfully

Merlin Ash
Yorkshire and Northern Lincolnshire Team
Natural England

From: Chris Naylor [REDACTED]
Sent: 12 March 2019 16:44
To: Tony Blackburn
Cc: Sian Watson; Councillor John Dawson
Subject: Park Hill- Local Green Space Designation

Please find attached a submission that I have made by post to Craven Planning Dept. regarding Park Hill- Local Green Space Designation, which I would also like you to be aware of and consider

Regards

Chris Naylor

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk


For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). Please fill in a separate form for each representation you wish to make.

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mr
First Name:	Chris
Last Name:	Naylor
Job Title (where relevant):	Retired
Organisation (where relevant):	
Address 1:	

Postcode:	██████████
Telephone:	██████████
Email:	████████████████████

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	N/A
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Chris Naylor
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: 87	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravencd.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

I wish to challenge the soundness of MM87 based on its removal of green space designation from SK-LGS64. SK-LGS64 describes the land to the north of Skipton, bounded to the north by the Skipton bypass, to the east by Embsay Road and The Bailey, and to the west by Grassington Road.

Specifically, this removal of green space designation is unsound because it is not justified. It is unjustified because little attempt has been made to break up the tract of land, despite its complex and multi-functional nature. The complexity of SK-LGS64 is already marked by its field boundaries and its combination of woodland, pasture and hillside. But no provision has been made for these complexities, manifested in conflicts in the proposed amendment. For instance, though green space designation has been maintained for Skipton Woods, there is another portion of woodland adjacent to Grassington Road which has been downgraded.

The summit of Park Hill is a precious site for locals which is close to the town centre whilst offering panoramic views of Skipton. It also provides an important recreational space for ramblers, dog-walkers and local children, especially in snowfall. There is, however, a part of SK-LGS64 between the A59 and Short Lee Lane which is unused by locals and has been used exclusively for grazing livestock. The removal of green space designation is unjustified because it makes no effort to discriminate between different areas of the tract of land. If a tract of land is deemed too extensive to warrant green space designation, surely attempts should first be made to break down the land into smaller and specific areas, rather than to downgrade the tract totally and without nuance.

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

In order to improve the soundness of MM87, green space designation should be maintained for, if not all, at least the parts of SK-LGS64 which benefit the surrounding community. In particular, green space designation should be preserved for the woodland adjacent to Grassington Road and both sides of Park Hill.

The area around the top of Grassington Road, Raikes Road and Tarn Moor Crescent has already experienced substantial change over the past year with a new and continuing development of houses adjacent to the A59. Rather than heap more possible changes onto these residents, there is no shortage of available land north of the A59, which has already seen infrastructural developments for flood defences. If there is a push for development, it should be arranged around the communal area of SK-LGS64, rather than be facilitated at the expense of this precious communal space.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)

Yes, I do wish to be notified

No, I do not wish to be notified

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)

Yes, I do wish to be notified

No, I do not wish to be notified

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	11-03-19

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ |
www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk

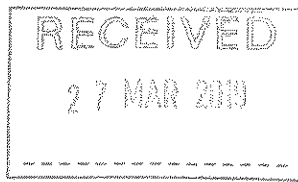


INVESTOR IN PEOPLE



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

Craven Local Plan Examination



Tel: [Redacted]



26 March 2019

Mr Sian Watson
Spatial Planning Manager
Craven District Council
1 Belle Vue Square Broughton Road
SKIPTON
BD23 1FJ

Dear Mr Watson

I am writing to you about Park Hill in Skipton, in the belief that, if it is not given the status of a protected green space, there might be a threat of housing development on it or part of it.

One of the features of Skipton of which I have been aware since childhood is the impact of landscape as part of the streetscape. The town's geographical position in a confined valley as it meets the broader valley of the Aire means that one is constantly aware of the surrounding hills.. The view along a large number of streets is closed by rising ground – Skipton Moor, Pinhaw Beacon, Sharphaw, Roughaw, Crookrise, Embsay Crag – the town of six hills, as I've always thought of it. In my view, these friendly eminences are as much a part of the town's character as, say, the Stray is in Harrogate.

In showing friends round Skipton, I stress the visual impact of this mixture of urban and rural.. Skipton has long been a centre for widespread agriculture based mainly on sheep. Hence its name. A sheep's fleece features on the town's coat of arms, a central street is called Sheep Street, and several hostelryes have names reflecting the importance to the town of the image of the sheep.

When walking through Skipton, a pleasant surprise awaits the visitor, the sudden appearance of nearby Park Hill into the streetscape. Stand, for example, in front of the Town Hall and look at the top of the High Street as it widens, funnel-wise, as Pevsner says, to embrace the Castle Gateway, Holy Trinity Church, and the War Memorial, and then suddenly a green finger of agricultural countryside thrusts through a gap, revealing sheep grazing within yards of the town centre. This is not a contrived picture. It is a natural part of

the town's development. Such a juxtaposition of town and countryside must be a rare feature matched by few towns in the country. In my opinion, to destroy it would be to lose a fine piece of townscape.

Yours sincerely



Brian Nelson

From: Lynne and Hugh
Sent: 28 March 2019 16:47
To: Tony Blackburn
Subject: Modification to Craven District Local Plan

Dear Mr Blackburn,
Please find attached an amended version of the document Main Modifications Consultation Representation which I sent to you earlier today. In Section 3, the main modification is now MM87 154 Policy ENV10 Local Green Space.

I trust you will be able to accept this amended copy.

Yours sincerely,
Hugh Nicholas

[Redacted signature]

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mr
First Name:	Hugh
Last Name:	Nicholas
Job Title (where relevant):	Retired
Organisation (where relevant):	N/A
Address 1:	██████████
Address 2:	
Address 3:	██████

Address 4:	██████████
Postcode:	██████
Telephone:	██████████
Email:	██████████████████

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	N/A
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Craven District Council
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: 87 154 Policy ENV10 Local Green Space	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravencd.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

In the draft Craven Local Plan, MM87 154 Policy ENV10 Local Green Space, the site below was originally designated as Local Green Space:

SK-LGS64 Land to north of Skipton, bounded to the north by Skipton Bypass, to the east by Embsay Road & The Bailey; and to the west by Grassington Road, Skipton.

This Local Green Space designation has now been removed. I consider that this modification is **unsound** and I would like to register my strong objection to this removal of status.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what change(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

1. The draft Craven Local Plan MM75 122 Policy ENV2 Heritage states

a) Paying particular attention to the conservation of those elements which contribute most to the District's distinctive character and sense of place. These include:-

v) Skipton Castle, the castle grounds and the castle's extensive landscape setting, including the medieval hunting park, Skipton Woods and Civil War Battery.

2. Two documents, **National Planning Policy Framework 2012 and 2019**, each make the same recommendations about the role of a designated green space in promoting healthy communities. This clearly recognises the need for such green spaces.

In recognition of these recommendations, I would like to make the following points as to why the area should be a Local Green Space:

- a. This area, known locally as Park Hill, is clearly close to the community it serves.
- b. Park Hill is special to Skipton for the following reasons:
 - its historical significance – shown by the archaeological remains of the battery which was used to bombard Skipton Castle in the Civil War;
 - its recreational value – it is used all year round by walkers of all ages and abilities as an accessible route in and out of Skipton Woods, whilst two major long distance footpaths cross the area; it is also used for sledging in winter;
 - there is wildlife aplenty – an abundance of bird life including Curlew, now an endangered species and on the conservation red list, who nest on the field to the north side of Short Lee Lane and feed on the damp lower fields to the south of the lane, as well as Owls; deer use the fields to gain access to Skipton Woods;
 - this area is a beautiful setting for the ancient Skipton Woods, which would be affected badly by any future possible change of use here.
- The final point made in the two documents above states **“where the green area is local in character and not an extensive tract of land”**. The definition of ‘extensive’ is obviously subjective but I do not accept that this applies here. The area is bounded by Skipton Bypass, Grassington Road, Chapel Hill and Skipton Woods and thus has its fixed limits. It is on the

doorstep of urban Skipton, thereby providing a green space for healthy enjoyment and appreciation. Although it is not a large area, the extent of the land is just sufficient for use by wild life, and any future diminution in extent would certainly cause the wild life, especially the Curlew, to abandon it.

In conclusion, I feel very strongly that the area needs to be protected by the status of a Local Green Space and strongly that it be redesignated as such in the draft Craven Local Plan.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.


Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	Yes
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	Yes
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	28 March 2019

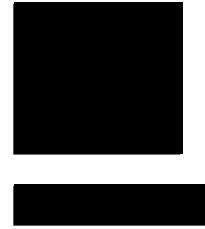
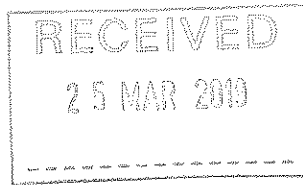
Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



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

Craven Local Plan Examination



21 March 2019

Sian Watson
Spatial Planning Manager
Craven District Council

Dear Ms Watson Removal of Local Green Space Designation for Park Hill

With reference to the above, and as a response to the public consultation, we hereby totally support the re-instatement of Park Hill as a Local Green Space. We are residents of Chapel Hill, and our bungalow is adjacent to Park Hill on the Raikes Road side.

Park Hill is a valuable green space very near to our historic castle, and is of importance in preserving Skipton as such a popular and attractive place in which to live and to visit. Its location close to the town centre, very much adds to Skipton's charm and character. As we live within close proximity to the two long distance footpaths, we are often asked by visitors for guidance as to where to commence the walks, which are becoming ever more popular. As regular walkers ourselves over the hill, we know just how much visitors and residents alike, enjoy the majestic views from the top over our town and the surrounding countryside, and how they show so much interest in Park Hill's historic significance dating back to the Civil War and the siege of Skipton Castle.

Park Hill as a whole and the walk over it, very much complement the improvements carried out by the Woodland Trust within Skipton Woods. The walks within the woods and the invigorating climb over Park Hill provide great recreational value for us all. In winter, if there is snow, local children regularly can be seen sledging on our side of the hill, and this must be good for their health and appreciation of open spaces. With regard to wildlife, deer are often seen by ourselves and others in the field above our house.

Protecting our green spaces is so important, and we therefore strongly oppose the deletion of protection for this important and historic part of Skipton. If protection is not re-instated now, there must be substantial concern over the possibility of future irreversible development being attempted.

Yours sincerely

Two solid black rectangular redaction marks covering the signature area.

John and Wendy Nixon

From: Paul Norman [REDACTED]
Sent: 30 March 2019 17:30
To: Local Dev. Framework; Sian Watson; Tony Blackburn
Subject: Local Green Space Designation
Attachments: NormanP-re-Local-Plan-29-03-2019.pdf

Hi folks
Please find attached my comments about the Local Plan.
Any queries, please shout.
Best wishes
Paul

Paul Norman
[REDACTED]

~~~~~  
Dr Paul Norman, School of Geography, University of Leeds  
Programme Leader MSc GIS  
<https://sites.google.com/site/pdgnorman/journal-articles>

~~~~~  
><((((((e>
><((((((e>

Dr Paul Norman



29th March 2019

To whom it may concern re: change to the Craven District Council Local Plan

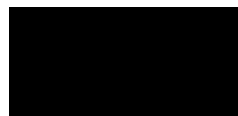
On the local plan the area is referenced in Table MM-87 as SK-LGS64 “land to north of Skipton, bounded to the north by Skipton Bypass, to the east by Embsay Road and The Bailey and to the west by Grassington Road, Skipton.” I understand that local green space designation has been removed for this area.

I believe that this change is not in line with the government guidelines for Local Green Space Designation since the area of green space is: a) in close proximity to the community it serves; b) demonstrably special to the local community with local significance, beauty, historical significance, recreational value, tranquillity and richness of wildlife; and c) it is local in character and is not extensive.

With regard to these guidelines, I therefore object to the removal of local green space designation for this location for the following reasons.

- This green space is readily accessible from the town such that residents and visitors can be in open space within a few minutes from the High Street and many residential areas. There is an amazing panoramic view from the stile on Park Hill.
- Park Hill with a scheduled ancient monument¹ and Storems Laithe as part of Skipton Castle's hunting grounds, along with the Castle itself, are of historical significance.
- There is a right-of-way across Park Hill which is also the route of two long distance footpaths, 'Lady Anne's Way' and the 'Dales Highway'. If this area was no longer green space, the experience of people using the footpaths would be detrimentally affected.
- The existing green space is adjacent to Skipton Woods and if this was changed to another land-use it would be detrimental to the ecology of the area itself, particularly for birdlife, and of the woods and peoples' enjoyment there.
- These areas of green space are catchment areas for Sougha Gill and Eller Beck. The Environment Agency have monitoring stations in Eller Beck since there is flood risk from the fast rising water². All of the areas in SK-LGS64 soak up rainfall and hold back run-off. Nevertheless, during periods of heavy rainfall, water flows down Grassington Road, Raikes Road, Chapel Hill and the Bailey. If the green space was lost to development there would be increased risk of flooding in the area in the map overleaf.
- This is not a large site but extremely lovely and of great amenity value to the local community and visitors. Not being green space would be a tragic loss.

Best wishes

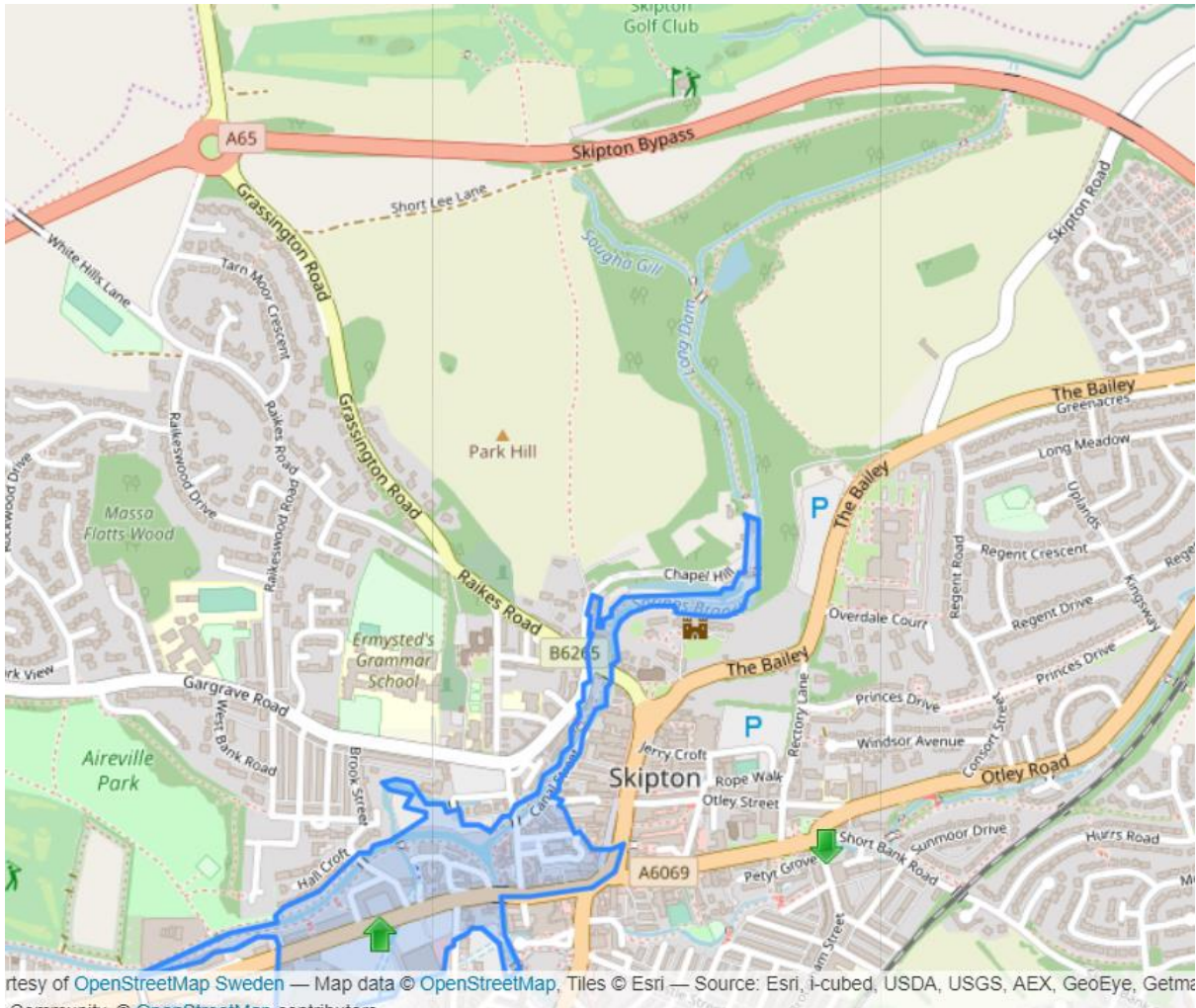


Paul Norman

¹ <https://historicengland.org.uk/listing/the-list/list-entry/1004878>

² <https://riverlevels.uk/flood-warning-eller-beck-at-central-skipton#.XJ4jPj7SMp>

Map from Environment Agency website; URL above



From: Mark Rushworth [REDACTED]
Sent: 01 April 2019 08:39
To: Local Dev. Framework
Subject: Craven Local Plan - Main Modifications Consultation
Attachments: Craven LP Main Mods - NYCC response - March 2019.pdf

Please find attached the response from North Yorkshire County Council.

Regards,

Mark Rushworth
Senior Policy Officer

Growth, Planning & Trading Standards | Business & Environmental Services |
North Yorkshire County Council | County Hall | Racecourse Lane |
Northallerton | North Yorkshire | DL7 8AD

Tel: [REDACTED]
Mobile: [REDACTED]
www.northyorks.gov.uk



North Yorkshire
County Council

Planning Policy
Craven District Council
1 Belle Vue Square
Broughton Road
SKIPTON
BD23 1FJ

localplan@cravencd.gov.uk

Contact: Mark Rushworth

Date: 29 March 2019

Strategic Policy & Economic Growth
County Hall
Racecourse Lane
NORTHALLERTON
DL7 8AD

Tel: [REDACTED]

Email: [REDACTED]

Web: www.northyorks.gov.uk

Dear Sir,

Proposed Main Modifications to the Publication Draft Craven Local Plan

Thank you for consulting North Yorkshire County Council on the proposed Main Modifications.

Officers from across our service areas have reviewed the proposed amendments and have not identified any issues of strategic significance to the County Council. Therefore, we have no comments.

Please advise us when the recommendations of the Craven Local Plan Inspector have been published and subsequently when the plan is adopted.

Yours faithfully,

[REDACTED]

Mark Rushworth

Senior Policy Officer

Growth, Planning & Trading Standards | County Hall | Racecourse Lane | Northallerton | North Yorkshire | DL7 8AD

From: Pete & Linda Riley Palmer [REDACTED]
Sent: 21 March 2019 11:58
To: Sian Watson
Subject: Removal of Park Hill Skipton as a protected green space.

Dear Sian Watson,

I believe you are a member of the Craven District Council Planning department and as such I wish to voice my concern about the proposed removal of Park Hill from Protected Green Space Designation.

Whilst I fully appreciate that towns will grow, and Skipton is certainly no exception to this inevitable trend, I do think it very important that historic & hence sensitive areas are protected from urban sprawl.

The fact that two very popular walks pass over this hill area and provide fantastic views over Skipton as you approach the town is special and should not be underestimated. The first impressions as you arrive are of a very old and quaint town with the Church, Castle and Corn Mill all the first buildings encountered.

It is my understanding that Park Hill qualifies for protection under Government guidelines for Local Green

Space Designation in all three areas and hence cannot understand why it would not be considered as important to the locality. It would be totally inappropriate to build there.

Please take this communication as strong opposition to such a move and keep its status unchanged.

Linda Palmer

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

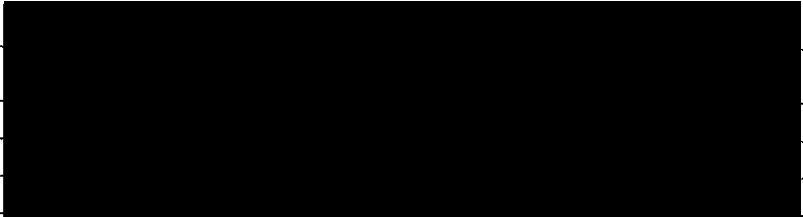
For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). Please fill in a separate form for each representation you wish to make.

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	
First Name:	HELEN
Last Name:	PAULGER
Job Title (where relevant):	N/A
Organisation (where relevant):	N/A
Address 1:	
Address 2:	
Postcode:	
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	N/A
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

--

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

- Significant investment made to infrastructure
- Equality assessment to be conducted with remediating actions put in place
- Or alternative suitable site which will cater for all disadvantaged groups

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

If you wish your personal details to be treated in confidence and not published please tick the box below:	
Please explain below, why you have made this request:	

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: Equality	
Insufficient level of equality assessment conducted on site G2/4 gargrave (off Walton close/Marton Road).	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

<p>Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.</p> <p>If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.</p>

It is acknowledged that the most successful communities are inclusive communities, a diverse mix of housing and population.

In Gargrave, however, the proposal is to place the social housing on the village periphery, on the outskirts. Separate from village life. Low income residents, the disabled, the less mobile, the most vulnerable, would be isolated. Difficult access to shops, transport, and village services.

Good pedestrian links between proposed site and village facilities do not exist.

We need inclusive communities. The new residents would be "outsiders". People in most need who would be unable to have access to village facilities. Would not benefit from village life. Local services and activities not easily available to them.

And the address/post code would not be a "good" one. Residents would suffer poor credit ratings, and applications for loans, insurance etc refused. }

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

- Significant investment made to infrastructure
- Equality assessment to be conducted with remediating actions put in place
- Or alternative suitable site which will cater for all disadvantaged groups

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.


Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me ✓
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me ✓
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	28 March 2019

From: kathryn hall [REDACTED]
Sent: 21 February 2019 12:21
To: Local Dev. Framework
Subject: Proposed Main Modifications to the Publication Draft Craven Local Plan
Attachments: cdc-mods-rep-form-2019-final_KPayne_21_Feb_2019.docx

Dear Sirs,

Please find attached representation form in relation to the consultation to amend the Local Plan and remove Green Space categorisation for land known as Park Hill (bounded by Grassington Road, Short Lees Lane, Skipton Woods, and Chapel Hill).

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk


For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mrs
First Name:	Kathryn
Last Name:	Payne
Job Title (where relevant):	
Organisation (where relevant):	
Address 1:	
Address 2:	
Address 3:	

Address 4:	██████████
Postcode:	██████████
Telephone:	██████████
Email:	██

Section 2: Agent Details

Plasesupplythename,address,telephonenumberande-mailofanyplanningagencyouhave working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: 87 Regarding the proposed deletion of Local Green Space SKLGS64 (Land to north of Skipton, bounded to the north by Skipton Bypass, to the east by Embsay Road & The Bailey; and to the west by Grassington Road, Skipton) under Policy ENV10 Local Green Space.	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

The proposal to remove the designation of local green space contradicts many of the Objectives set out in Sustainability Appraisal (SA) in relation to the preferred Option (E – balanced hierarchy of development growth).

Whilst recognising the need for controlled growth to reflect the growing, and ageing, population of Craven, the proposal to remove the designated green space of the area of land known as Park Hill appears contrary to several of the key objectives set out in the spatial objectives and referred to in the SA Policies. For example:

SO12: To conserve and enhance the historic environment and heritage asset. The proximity of the land to Skipton Woods (to support the protection of a key habitat), the historical associations with the Castle, and its inclusion of historic walking paths are important to this objective.

SO13: To protect biodiversity, protected habitats and species: Its proximity to Skipton Woods as noted above is important to protect and preserve a precious environment.

SO14: To protect and enhance the open countryside and landscape character

SO5: To promote physical, mental and social wellbeing: the green space prominently stands over the town and is clearly visible to the town, promoting a feeling of wellbeing and beauty, appreciated by locals and visitors – important for the local economy

SO16: Minimise air, noise and light pollution: Development of the land would absolutely affect the environment given its prominence, height and proximity to the town

SO11: Ensure the prudent use of land resources:

SO10: To protect the natural and agricultural conditions to maintain soil quality and grow food: the quality of the land appears prime agricultural and grazing land to support the local agriculture and economy.

This parcel of land is central to the fabric and charm of the town and the loss of its green character would be absolutely detrimental from historical, wellbeing and economic perspectives.

I understand that national planning policy guidance reflects that Local Green Space is *reasonably close to the community, demonstrably special to the community, holds a particular local significance, local in character and not an extensive tract of land.* I would strongly argue that this piece of land absolutely fits those criteria.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what change(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

Reinstatement of the proposed area as Local Green Space.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.


Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	✓
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	✓
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	21_02_2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ
www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



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

Craven Local Plan Examination

From: Richard Pearson [REDACTED]
Sent: 30 March 2019 18:31
To: Local Dev. Framework
Subject: Objection
Attachments: Objection to Main Modification 30.3.2019.pdf

Dear Planning

Please find attached my objection form to a proposed Main Modification to the draft under consideration.

Please acknowledge receipt.

With regards

Richard Pearson
Conservation Architect
James Hartley and Son
Pinder Bridge House
Cross Street
SKIPTON
North Yorkshire
BD23 2AH

Tel [REDACTED]
e-mail [REDACTED]

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mr
First Name:	Richard
Last Name:	Pearson RIBA CA
Job Title (where relevant):	Architect
Organisation (where relevant):	James Hartley and Son
Address 1:	Pinder Bridge House
Address 2:	Cross Street
Address 3:	Skipton

Address 4:	North Yorkshire
Postcode:	BD23 2AH
Telephone:	██████████
Email:	██

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Craven District Council
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: 87 as Policy ENV10 – removal of modification related to land SK-LGS64 north of Skipton between Skipton by-pass, to the east defined by Embsay Road and The Bailey, and by Grassington Road to the west,	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravencd.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

This representation is against the decision of the Inspector to remove Local Green Space Designation for the whole of SK-LGS64 and particularly the area known as Park Hill under MM87. I personally was delighted when this appeared as Local Green Space designation in the draft LP and I am now appalled at this Modification.

I consider this an unsound decision likely to have a detrimental effect on the town because-

- It runs contrary to the considered opinions of the District Council whose draft Local Plan has gone through many years of gestation and public consultation to arrive at this Designation, and is consistent with National Policy. This original designation as Local Green Space was the right decision and needs preserving in perpetuity.
- The original Designation was justified when considered against reasonable alternatives. There is available land elsewhere as already put forward in the Plan.
- MM87 is set against a subjective and arbitrary decision by the Inspector that is going to have pronounced adverse consequences on the character and appearance of the town and its surroundings both from the centre and its approaches.
- As against paragraph 100 of the NPP Framework it does meet Local Green Space designation.
 1. It is more than reasonably in close proximity to the community it serves. There are not many towns where agricultural heritage of our locality comes so close to the centre of the town, where you can walk straight from the centre into the countryside, see livestock so close to our centre, and see the close relationship of Park Hill to the town, Skipton Castle and Woods, and walks around it.
 2. It is demonstrably special to the local community.

There is particular historical significance related to the town and castle, and the summit of Park Hill otherwise known as The Battery for good reason with a Scheduled Monument status attached. The whole context of the Castle to its surroundings and the significance and relationship to the Scheduled Monument will be lost if this land is left vulnerable to built development. There is a well used Public Right of Way up and over Park Hill connecting not only the town to the paths entering the Dales but also a part of a circular walk from the Woods, and the wider round town walk. As a walker, the elevated view point across the town and Aire valley from the Battery is significant and attractive, but it is a full view as well towards the east and Dales.

It has a significant relationship to the Skipton Castle Woods with views from the wood at the north west end across the fields and the survival and tranquillity of this woodland area is now threatened by this Modification.
 3. It is local in character. Much is said of Skipton's green approaches. The area of land forming SK-LGS64 is significant as it is an extension of the Gateway to the Dales right into the town centre, and is as much a part of the town as its built form. The green top of Park Hill stands above the town and reinforces this image, and is part of its perceived beauty as a tourist destination. As acknowledged in National Environmental Policy, green space is as equally valid and important within the urban setting. The LPA recognised this in their draft. It is easy to assess a Local Plan against an unnatural boundary formed by a by-pass, but to lose important green space that has a significant bearing on the character of a town that cannot be restored once lost.
- I can find no interpretation under NNP Framework of what forms an 'extensive tract of land' and it seems to me to be purely subjective. The specific area west of Skipton Castle Woods is a well defined field system setting with boundaries and bisected from other fields north by the by-pass, but still is useful agricultural land. I can see no overriding reason other than subjective opinion why the original designation should be overturned when the decision will

the character and setting of the town.

- This elevated land and the pasture beyond on the north side is a natural sump of rainwater and with Skipton already on a flood alleviation system both east and north of the town, including the beck this land drains to, and with the Aire Valley annually flooded, the loss of this sump to potential hard surface will be significant and undermine recent alleviation.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

In order to make the Main Modification sound in this current Local Plan period my preference is to remove the Main Modification and uphold the original and correct designation made by the District Council.

If this is not possible then a compromise position would be to define what is the essence of the Green Space specific to the town and its surroundings and approaches and divide the area of land SK-LGS64 into portions and also limited partial non-designation where of low impact. In my opinion land retained designated as Local Green Space would include-

- Park Hill and its approaches off Chapel Hill so that the Battery summit and green hill are left as open space elevated above the town and the Right of Way across retained as a green route.
- A significant open space barrier from Skipton Castle Woods west boundary to the boundary of Grassington Road including the copse adjoining the road but not the land north of Short Lee Lane.

To lose any land in narrow linear form along Grassington Road from Short Lee Lane to the copse would destroy one the green approaches to Skipton that are being eroded steadily and we must not lose another.

I would urge the Inspector to reconsider this Main Modification and significantly amend the decision and retain as much of this particular local green space as possible. Those who live here and see this local space daily, and walk across it, will understand the special significance to this town. It is an asset to be retained.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.


Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	✓
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	✓
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	20.3.2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ |

www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



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

Craven Local Plan Examination

From: Matthew Collins [REDACTED]
Sent: 28 March 2019 12:13
To: Sian Watson
Cc: Local Dev. Framework
Subject: Craven Local Plan, Proposed modifications Consultation
Attachments: 280319 craven proposed mods resp.pdf

Dear Sian,

I hope you are well. Further to the above consultation, please find attached a response from Pendle Council for your records.

Feel free to come back to me if you have any queries or would like to discuss.

Kind regards

Matthew

Matthew Collins
BA (Hons), MA, MRTPI
Senior Planning Policy Officer
Pendle Borough Council

Strategic Services, Planning, Building Control & Licensing,
Town Hall, Market Street, Nelson, BB9 7LG

T: [REDACTED] E: [REDACTED]

On Thursday 2 May elections will be held to elect borough, parish and town councillors. To vote in person you'll need to show an approved form of photo ID - www.pendle.gov.uk/voterID



Saving 20% of the energy you use not only reduces your bills; it will also help in combating climate change. Click the link to see what YOU can do to help.

<http://www.energysavingtrust.org.uk/Take-action/Money-saving-tips>

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager.

This footnote also confirms that this email message has been swept by Mimecast for the presence of computer viruses.

Pendle Borough Council
<http://www.pendle.gov.uk>

Sian Watson
Spatial Planning Manager
Craven District Council
1 Belle Vue Square
Broughton Road
SKIPTON
North Yorkshire
BD23 1FJ

Telephone: [REDACTED]
Website: www.pendle.gov.uk

Date: Thursday, 28 March 2019

Our ref:

Your ref:

Ask for: Matthew Collins

Direct line: [REDACTED]

Email: [REDACTED]

Service Head: Neil Watson

Dear Sian,

Consultation on the Proposed Modifications to the Draft Craven Local Plan

Thank you for your email informing Pendle Council about the above public consultation, and invitation to make representations on the proposed modifications to the Craven local plan.

Section 33A of the Planning & Compulsory Purchase Act 2004 (as amended by the Localism Act 2011) places a legal duty on local planning authorities “to engage constructively, actively and on an ongoing basis” with other local authorities in the preparation of their Local Plan. Furthermore the National Planning Policy Framework 2018 refers at paragraph 25 that “Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans” and at paragraph 26 “Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy”.

I write to confirm that officers of Craven District Council have actively engaged with, and formally consulted, Pendle Borough Council throughout the preparation and examination of their Local Plan. In this respect, we feel that the requirements placed on Craven District Council by the Duty to Co-operate have been met.

Pendle Council is pleased to note that the proposed modifications to the Craven Local Plan do not adversely affect or undermine the cross boundary strategic planning issues already identified in the Craven local plan. Pendle Borough Council therefore supports the proposed modifications to the Craven local plan and has no further comments to make in that regard.

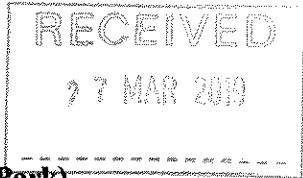
I trust that this information is satisfactory for your requirements. Should you require a more detailed statement regarding the local plan and Duty to Cooperate, please contact John Halton, Principal Planning Officer.

Yours sincerely,

Matthew Collins
BA (Hons), MA, MRTPI
Senior Planning Policy Officer



Liberata



**Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)
Main Modifications Consultation Representation Form**

Public consultation on the Main Modifications to the
Publication draft Craven Local Plan runs from Tuesday 19th
February 2019, for a six week period until Monday 1st April
2019.

**Representations must be received no later than Monday
1st April 2019.** Please note that late representations cannot
be accepted.

Please return completed forms (Parts A & B) to:
Planning Policy, Craven District Council, 1 Belle Vue Mills,
Broughton Road, Skipton, North Yorkshire, BD23 1FJ
Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning
~~Policy Team via email at the address set out above or~~
telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B
for your representation(s). **Please fill in a separate form for
each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title : MRS

First Name: LESLEY

Last Name: PERKINS

Job Title (where relevant):

Organisation (where
relevant):

Address 1:

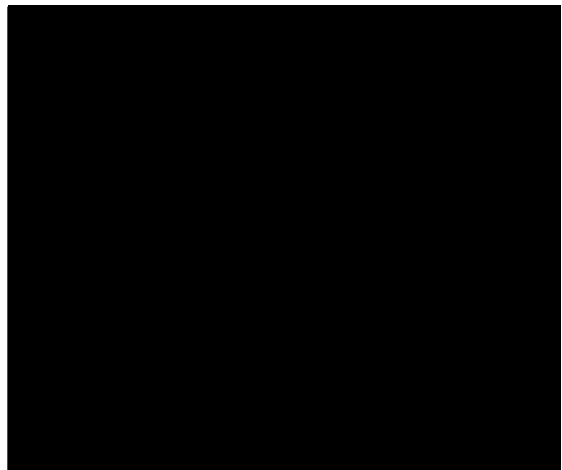
Address 2:

Address 3:

Address 4:

Postcode:

Telephone:



Email:

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:

Address:

Telephone number:

Email:

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

If you wish your personal details to be treated in confidence and not published please tick the box below:

I wish to request that the personal details submitted with this representation are treated in confidence and not published. ✓

Please explain below, why you have made this request:

My personal details are not relevant to the consultation.

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January

2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:

LESLEY PERKINS

To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MMI etc.)

MM: 87

Section 4: Legal Compliance & Duty to Cooperate

Do you consider that this modification of the Local Plan is: (tick as appropriate)

- | | Yes | No |
|---|-----|-------------------------------------|
| 1. Legally Compliant | | <input checked="" type="checkbox"/> |
| 2. Sound | | <input checked="" type="checkbox"/> |
| 3. In Compliance with the Duty to Cooperate | | <input checked="" type="checkbox"/> |

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

The removal of SK-LAS64 is unacceptable for several reasons. It is not compliant with the government guidelines for local green space designation. The space is local to Skipton town centre, especially the castle, which is fundamental to the character of Skipton. The space is used by local people and tourists for walking and offers a spectacular view of the town. The space is adjacent

CONT.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified

to Skipton Woods, used extensively for recreation.
Removal of this green space would change
the whole character of the town centre.

in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

Green Space SK-LS64 should be reinstated. It is in close proximity to Skipton, is of great local significance and is not an extensive tract of land.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)

Yes, I do wish to be notified

No, I do not wish to be notified

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)

Yes, I do wish to be notified

No, I do not wish to be notified

Section 9: Signature & Date of Representation

Please sign and date below:

Signature



Date

26/03/19

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ |

www.cravenc.gov.uk

Planning Policy Team | [01756 706472](tel:01756706472) | localplan@cravenc.gov.uk

From: Gill Petrucci [REDACTED]
Sent: 15 March 2019 13:58
To: Local Dev. Framework
Subject: Hellifield Flashes

Dear Sir / Madam,

I am e mailing to show my support for the preservation of Hellifield Flashes as a wildlife area.
Also to lodge my protest against the development of this area as a holiday park.

Yours sincerely,
Gill Petrucci

Sent from my iPhone



Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). Please fill in a separate form for each representation you wish to make.

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	MISS
First Name:	JULIE ANN
Last Name:	PICKLES
Job Title (where relevant):	N/A
Organisation (where relevant):	N/A
Address 1:	[REDACTED]
Address 2:	[REDACTED]
Postcode:	[REDACTED]
Telephone:	[REDACTED]
Email:	[REDACTED]

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	N/A
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

If you wish your personal details to be treated in confidence and not published please tick the box below:

Please explain below, why you have made this request:

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: Equality	
Insufficient level of equality assessment conducted on site G2/4 gargrave (off Walton close/Marton Road).	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

→ CONTINUE! WITHOUT SIGNIFICANT ACCESSABILITY ADJUSTMENTS, YOU WILL BE EXCLUDING A WHOLE GROUP OF SOCIETY THEIR RIGHT TO MUCH NEEDED SOCIAL HOUSING. AS THE MAJORITY OF DISABLED PEOPLE NOW LIVE IN POVERTY, ACCESSABLE LOW COST HOUSING IS IN DEMAND, ANOTHE SITE MUST BE FOUND - THIS ONE IS ENTIRELY INAPPROPRIATE.

ANY DEVELOPMENT ON THIS SITE, I BELIEVE, WOULD BE DISCRIMINATORY AGAINST PEOPLE WITH PHYSICAL DISABILITIES/REDUCED OR LIMITED MOBILITY. ANY INDIVIDUALS WITH SUCH LIMITATIONS WOULD BE DEPRIVED OF THEIR FUNDIMENTAL RIGHT TO ACCESS SOCIAL OR AFFORDABLE HOUSING. DUE TO THE ACCESSABILITY ISSUES, IT WOULD BE DENYING THEIR RIGHT TO LIVE INDEPENDENTLY. IF ACCESS ADJUSTMENTS FOLLOWING AN IMPACT ASSESSMENT CANNOT BE IMPLIMENTED THIS WOULD BE A BREACH OF THE EQUALITY ACT 2010.

I AM A DISABLED PERSON, ALREADY LIVING ON WALTON CLOSE AND I AM ALREADY UNABLE TO LIVE INDEPENDENTLY. TO ACCESS THE VILLAGE AMENITIES USING A MOTORISED MOBILITY AID IS NOT POSSIBLE. THERE ARE NO PAVEMENTS WIDE ENOUGH TILL AFTER THE RIVER BRIDGE. NO PAVEMENTS AT ALL ON THE HILL OF MARTON ROAD WITH CARS PARKED I WOULD HAVE TO GO ROUND IN THE MIDDLE OF THE ROAD. WITH FAST MOVING TRAFFIC / FARM VEHICLES, IT IS LIFE THREATENING →

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

- Significant investment made to infrastructure
- Equality assessment to be conducted with remediating actions put in place
- Or alternative suitable site which will cater for all disadvantaged groups

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

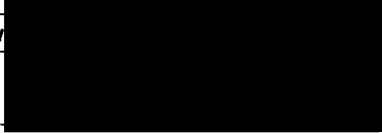
Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below	
Signature	
Date 28/3/2019	

From: Sam - Clare Potter [REDACTED]
Sent: 28 March 2019 20:40
Subject: Please can you try to protect Park Hill - Skipton
Importance: High

I am writing to you in the hope that you will be able to speak up for Skipton and try to protect Park Hill. I regularly run over Park Hill and my family walk and enjoy the beautiful views over Skipton and further afield.

I live in Skipton, in my grandparents' house and have over 40 years of memories of enjoying this beautiful spot - including sledging, picnics and a beautiful walks. I actually had no idea that that this area was not a local green space – I always assumed this was the case but I understand that it was only protected last year.

If you are able to influence the decision to keep this a local green space for Skipton, a beautiful town that I love, please try. I moved away from Skipton when I went to university but in my mid-thirties I moved back – choosing this wonderful historic market town as the place to raise my family; it is a decision I have never regretted.

I love where we live and I do hope that Park Hill can be protected forever from any future development. As the world seems to be in chaos, making ridiculous decisions I really hope that common sense prevails and that we are able to protect this spot for everyone to continue to enjoy.

Thank you – I hope you share this view.

Clare Potter

-----Original Message-----

From: Vera Preston [REDACTED]
Sent: 17 February 2019 22:13
To: Tony Blackburn; David Sykes

Subject: Site Sk-LGS64 Park Hill

Dear sir,

I am writing to ask for the removal of Site Sk-LGS64 land north of Skipton from the Local Plan.

This land is special to our community for its historical, recreational and visual amenity.

As a resident born in Skipton I have a special regard for Park Hill as do my children and grandchildren, all born in Skipton.

Yours faithfully

Vera Preston
[REDACTED]

Sent from my iPad

From: Lynne and Hugh
Sent: 28 March 2019 16:42
To: Tony Blackburn
Subject: Craven District Local Plan

Dear Mr Blackburn,

I would like you to accept the attached Modification form in place of the one I sent earlier today. There is one change: in Section 3 the Main Modification should be MM 87 154 Policy Env10 Local Government Space, and not MM75. I hope this will be acceptable.

Yours sincerely,
Lynne Primmer



Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravendc.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Ms
First Name:	Lynne
Last Name:	Primmer
Job Title (where relevant):	Retired
Organisation (where relevant):	N/A
Address 1:	██████████
Address 2:	
Address 3:	██████

Address 4:	██████████
Postcode:	██████
Telephone:	██████████
Email:	██████████

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	N/A
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Craven District Council
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: 87 154 Policy ENV10 Local Green Space	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravencd.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

In the draft Craven Local Plan, MM87 154 Policy ENV10 Local Green Space, the site below was originally designated as Local Green Space:

SK-LGS64 Land to north of Skipton, bounded to the north by Skipton Bypass, to the east by Embsay Road & The Bailey; and to the west by Grassington Road, Skipton.

This Local Green Space designation has now been removed. I consider that this modification is **unsound** and I would like to register my strong objection to this removal of status.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what change(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

1. The draft Craven Local Plan MM75 122 Policy ENV2 Heritage states

a) Paying particular attention to the conservation of those elements which contribute most to the District's distinctive character and sense of place. These include:-

v) Skipton Castle, the castle grounds and the castle's extensive landscape setting, including the medieval hunting park, Skipton Woods and Civil War Battery.

2. Two documents, **National Planning Policy Framework 2012 and 2019**, each make the same recommendations about the role of a designated green space in promoting healthy communities. This clearly recognises the need for such green spaces.

In recognition of these recommendations, I would like to make the following points as to why the area should be a Local Green Space:

- a. This area, known locally as Park Hill, is clearly close to the community it serves.
- b. Park Hill is special to Skipton for the following reasons:
 - its historical significance – shown by the archaeological remains of the battery which was used to bombard Skipton Castle in the Civil War;
 - its recreational value – it is used all year round by walkers of all ages and abilities as an accessible route in and out of Skipton Woods, whilst two major long distance footpaths cross the area; it is also used for sledging in winter;
 - there is wildlife aplenty – an abundance of bird life including Curlew, now an endangered species and on the conservation red list, who nest on the field to the north side of Short Lee Lane and feed on the damp lower fields to the south of the lane, as well as Owls; deer use the fields to gain access to Skipton Woods;
 - this area is a beautiful setting for the ancient Skipton Woods, which would be affected badly by any future possible change of use here.
- The final point made in the two documents above states **“where the green area is local in character and not an extensive tract of land”**. The definition of ‘extensive’ is obviously subjective but I do not accept that this applies here. The area is bounded by Skipton Bypass, Grassington Road, Chapel Hill and Skipton Woods and thus has its fixed limits. It is on the

doorstep of urban Skipton, thereby providing a green space for healthy enjoyment and appreciation. Although it is not a large area, the extent of the land is just sufficient for use by wild life, and any future diminution in extent would certainly cause the wild life, especially the Curlew, to abandon it.

In conclusion, I feel very strongly that the area needs to be protected by the status of a Local Green Space and strongly that it be redesignated as such in the draft Craven Local Plan.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)

Yes, I do wish to be notified	Yes
No, I do not wish to be notified	


Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)

Yes, I do wish to be notified	Yes
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:

Signature	
Date	28 March 2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



INVESTOR IN PEOPLE



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

Craven Local Plan Examination

From: Richard Pringle [REDACTED]
Sent: 26 March 2019 08:48
To: Local Dev. Framework
Subject: Ack e-mail sent by DF on 26.03.2019; REPRESENTATION EL6.002. Date 26/3/19.

Follow Up Flag: Follow up
Flag Status: Completed

REPRESENTATION EL6.002

PART A

PERSONAL DETAILS

Mr Richard Pringle Bsc
[REDACTED]

AGENT DETAILS

Not applicable.

PART B

Dear CDC/Inspector,

SECTION 3 MAIN MODIFICATION

Main modification number 7 pages 44 to 48 of the original re Supporting text to SP 4 etc. Now covered on pages 8 to 12 of the "Draft schedule of main modifications".

SECTION 4 LEGAL COMPLIANCE/SOUNDNESS

If the following changes are allowed to be made in the manner proposed at this late stage the plan will in my opinion become both unsound and not legally compliant.

Moreover I believe that making these changes now could breach the Councils duty to cooperate.

SECTION 5 DETAILS OF REPRESENTATION

I have only studied certain sections of the housing portion of the local plan, but CDC are proposing what appear to be a small number of minor word changes that would have a major impact on the local plan. To the best of my knowledge these were not suggested by the Inspector or even brought up by the Council at the hearing. The thought that they would try to get away with what are basically massive policy changes at this late stage is worrying. **The emphasis goes from building on "allocated sites and brownfield sites in settlements"(which is entirely reasonable) to basically "building anywhere" (with no definition of what anywhere is).** If the whole plan is littered with such a scant disregard for the plan production process then its soundness as a whole must be seriously in question.

On page 9 of the new proposed draft for adoption under 4.47 a major change is now proposed by CDC which was not suggested by the Inspector nor mentioned by the spatial team at the hearing. The previous drafts basically said that development would be favoured on 'allocated land and previously developed land in tiers 1 to 5'.

I believe that there may have been some direct interaction between the Inspector and the Council that we are not party to, but I doubt very much that this change is one that the Inspector will think is acceptable.

We now see the addition of the words "OR OTHER APPROPRIATE LAND". Not only is that ambiguous (no definition of what "appropriate " means), but more importantly it drastically widens the scope of the draft that was presented to the public and the Inspector at the hearing.

This section of the plan was sound before. No one said at the hearing that the scope of land would be increased from "brownfield " to " brownfield plus any other appropriate land". If this happens then all the drafts and consultations become meaningless. Effectively the Council are being allowed to make massive and ambiguous policy changes after the hearing. That cannot be sound, legally compliant or in accordance with the duty to consult.

My suggestion is to remove the words "or other appropriate land" and revert to what was put before the public during consultation and the public and inspector at the hearing.

Similarly most of the changes in 4.49 were not suggested by the Inspector or mentioned by the Council at the hearing. In particular the addition of the words "on land outside a settlements main built up area in addition to the plans land allocations in tier 1-4 settlements" should not be allowed. It represents a massive swing in policy. We have gone from "building on allocated sites and previously developed land within the main built up areas" to effectively 'building anywhere that the developers and or Council want'. Again, not only is the new wording ambiguous, but also the implications for policy are massive. It cannot be sound or in compliance with the duty to consult if CDC make massive policy changes after the hearing that were not even mentioned at it by themselves or the inspector. The same applies to the bit that crosses out the word "within" and replaces it with the words "on land adjoining". The original draft was sound and made sense in planning terms. But if this unnecessary modification is allowed we go from preserving our countryside by developing within our settlements to building absolutely anywhere. It's not only ambiguous but also totally contrary to what planning policy should be. And nothing to do with the discussions that went on at the hearing.

The only bit of the changes in 4.49 that can be justified is the bit that has been added saying "The Council will assess, on a regular basis, usually quarterly, the performance of each relevant settlement in meeting its planned growth levels." That is a modification that responds directly to the Inspector's specific request to have figures updated more frequently than the Council were previously proposing.

My suggestion is that the Council and then the Inspector look very carefully at the wording in 4.49 as the small changes proposed would lead to both ambiguity and massive policy changes. If in doubt, reverted to the version that was put to the Inspector at the hearing. He and nobody else found fault with it. Apart from his request to have regular reviews of numbers as outlined above. To change things now under the pretence of making changes to make the plan sound would make a mockery of the whole process and be unsound and wholly against the consultation protocol given that at least one objection has been raised now. The original draft was not unsound. The new draft certainly is.

The wording in sections 4.50 and 4.51 has also been amended despite no one challenging the previous version. However, the implications of the changes are less far reaching than the wholesale policy changes that will come about if the proposed modifications to 4.47 and 4.49 are allowed.

On page 12 the words "previously developed" have been crossed out. So we have gone from building on brownfield land to building on any land albeit within settlements. Again to the best of my knowledge this was not talked about at the hearing so I question the soundness of making a clear policy change which was not discussed or requested. The original wording was sound.

Throughout these sections I am at a loss to see why various sections about traffic have been deleted and question how it can be sound to ignore highways and safety issues.

SECTION 6. PROPOSED MODIFICATION TO THE LOCAL PLAN

As set out in 5 above. Basically revert to the wording that was put to the Inspector and the public at the hearing.

SECTIONS 7 and 8. REQUEST TO BE NOTIFIED

Yes please

SECTION 9

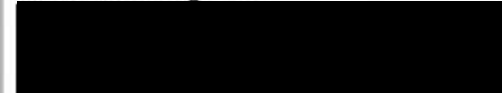
Signed Richard Pringle and sent electronically

Date 26/3/19.

PART A

PERSONAL DETAILS

Mr Richard Pringle Bsc



AGENT DETAILS

Not applicable.

PART B

Dear CDC/Inspector,

SECTION 3 MAIN MODIFICATION

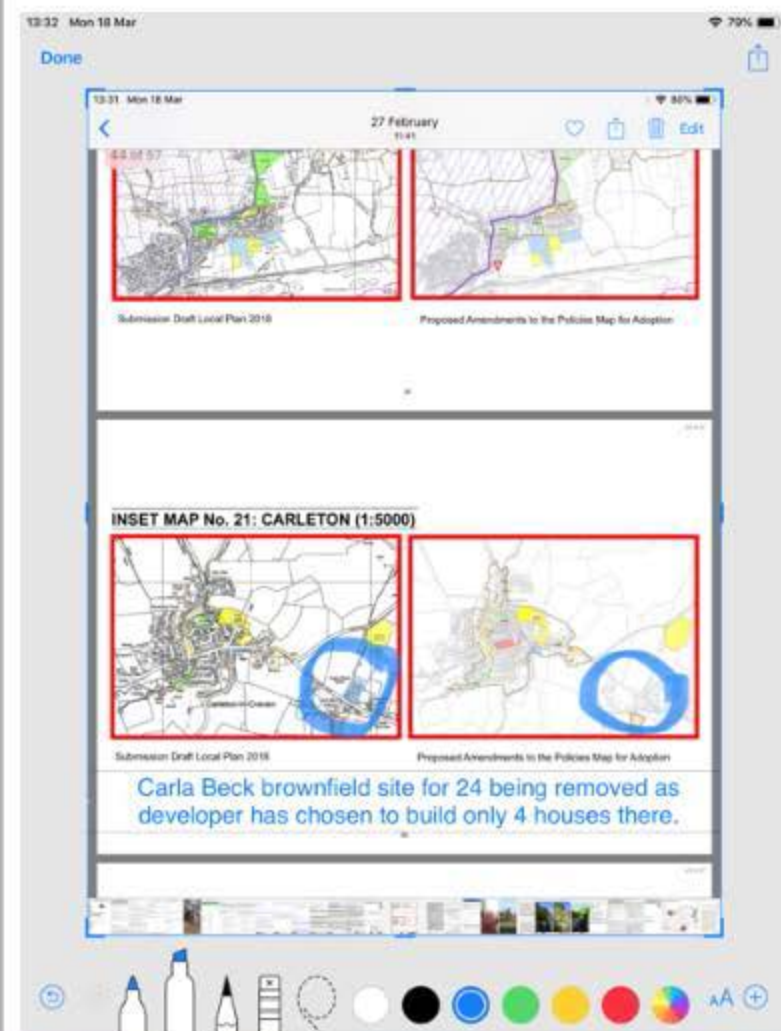
MAIN MODIFICATION MM8 AND IT'S INTERACTION WITH SCHEDULE OF PROPOSED POLICY MAP CHANGES

SECTION 4 LEGAL COMPLIANCE ETC

Sadly the latest version of the 'emerging local plan' cannot be anything other than "unsound," because changes are now proposed in one part of the document (the 'Policies' map) which are not reflected in the the corresponding part of the plan (the tables showing housing need going forward, on page 16 of the 'Draft Schedule of Main Modifications'). As a result, nor is it legally compliant.

SECTION 5 DETAILS OF REPRESENTATION

SCHEDULE OF POLICY MAP CHANGES 19/2/19



In short the Council are at the point where they want to remove the "brownfield" Carla Beck site from the plan (because the developer has chosen to build only 4 houses there instead of the originally allocated 24). Given that the Inspector asked the Council to update housing need and numbers as regularly as every 3 months, this change to the plan makes sense.

However, as a direct consequence, "housing need numbers" in the corresponding table taken from the "Draft Schedule of Main Modifications" (shown below) for the tier 4 village of Carleton need to be reduced by 20 (from 55 to 35) in order to keep the plan "sound". CDC cannot change one part of the "emerging plan," without making the necessary corresponding changes in other parts of the document, and expect it to remain "sound".

Presumably corresponding increases need to be made in the numbers needed in the tier 2 villages of Settle and Bentham, in line with the policies in the plan, as explained to the Inspector both at the Hearing and prior to it. Without these changes the plan is clearly unsound. The Council cannot tell the Inspector one thing and do the opposite !! If they want to build the 20 houses lost on the "brownfield" site at Carla Beck elsewhere in the village of Carleton then the policies in the plan are "unsound" and what they told the Inspector prior to the Hearing, in writing, was clearly untrue. In short, they said the lost plots would be built in tier 2 settlements not elsewhere in Carleton.

DRAFT SCHEDULE OF MAIN MODIFICATIONS 19/2/19 to 1/4/19.

16:34 Mon 25 Mar

80%

18 March
13:39

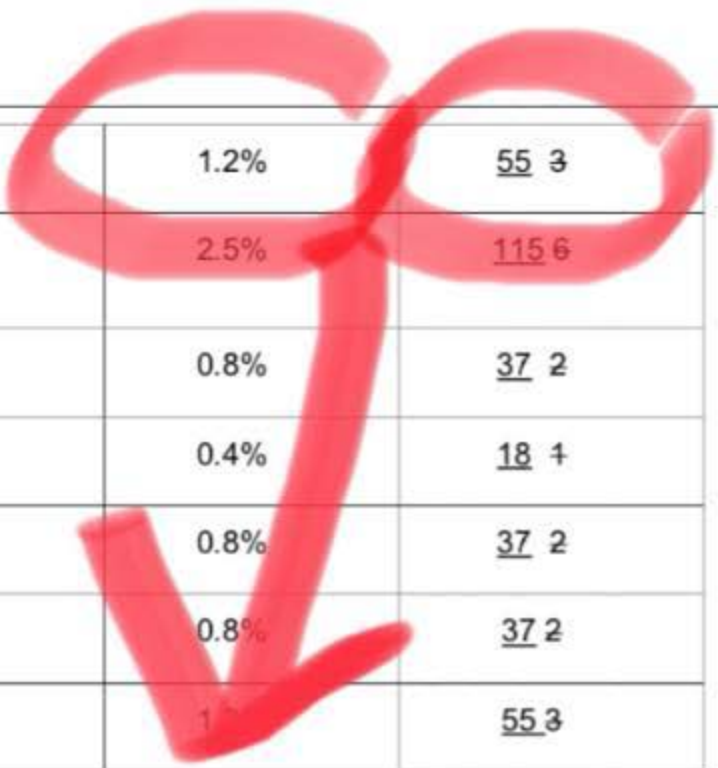


Edit

2	Settle (Key Service Centre for mid sub area)	10.9%	501 25
2	Low and High Bentham (Key Service Centre for north sub area)	10.9%	501 25
3	Glusburn/Crosshills (Local Service Centre)	3.5%	160 8
3	Ingleton (Local Service Centre)	3.5%	160 8
3	Gargrave (Local Service Centre)	3.5%	160 8
Tier	Settlement	Proportion of housing growth (%) at 230 net dwellings pa	Housing Provision (Approx number of NET dwellings pa)
4a	Villages with Basic Services		
4a	Ingleton (Ingleton scale)	0.4%	18 4

Corresponding change needs to be made to numbers required in tier 2 settlements as stressed to Inspector in CDC's pre hearing questions and answers documents.

4a	Carleton	1.2%	<u>55</u> 3
4a	Cononley	2.5%	<u>115</u> 6
4a	Cowling	0.8%	<u>37</u> 2
4a	Farnhill and Kildwick	0.4%	<u>18</u> 4
4a	Hellifield	0.8%	<u>37</u> 2
4a	Low Bradley	0.8%	<u>37</u> 2
4a	Sutton in Craven	1.2%	<u>55</u> 3
4b	Villages with Basic Services that are bisected by the National Park boundary		
4b	Bolton Abbey	0%	0
4b	Clapham	0.8%	<u>37</u> 2
4b	Embsay	2%	<u>92</u> 6
4b	Giggleswick	0.8%	<u>37</u> 2
4b	Long Preston	0%	0
<u>5</u>	<u>Villages and hamlets</u>		



Housing numbers in Carleton need to drop by 20 from 55 to 35 to reflect developers choice to build only 4 houses at Carla Beck - not the 24 that were added into the "bespoke approach."

THE HEARING

The Inspector will no doubt recall discussions under Matter 4 of the Hearing itself, where by repeated questioning he eventually got out of the Council the fact that tier 4 settlements had been given "bespoke or site led" numbers of houses, depending on what sites existed. It was discussed that villages like Cononley (and Carleton) got higher percentages of growth due to the existence of good brownfield opportunities at the Mill (and Carla Beck farm respectively). After extensive discussions the Inspector confirmed that "he had been unclear about the policy underlying the numbers and percentages in tier 4 settlements before, but now he understood it".

Whilst the Council did not tape or minute the meeting, the Inspector will also presumably recall that I asked the Council to confirm that "if and when the Council decided that 20 houses would infact be considered to be lost at Carla beck, they would confirm that they would not be built on greenfield sites elsewhere in Carleton". The Inspector will further recall that the Councils barrister intervened at that point and said that I had "asked a very pointed question that had no relevance to that part of the hearing." The Inspector himself said that he 'would clarify that point later'. Sadly, that didn't happen during the hearing, but certainly needs clarification now as without it the plan is definitely "unsound". The maps and numbers in the corresponding tables need to be changed in unison. You cannot change one without changing the other.

Having listened to the Inspector quizzing various Spatial Planners on how the various tier numbers were arrived at, it seemed both obvious and logical to me that tier 2 settlements of Bentham and Settle had flexible percentages and were there 'to soak up numbers not built out elsewhere'. Indeed the Council told the Inspector that the numbers in the tier 2 villages had already gone up slightly when growth potential was "lost" in Rathmell, because it lost its primary school (and thus dropped a tier).

PRE HEARING QUESTIONS AND ANSWERS

WITH HINDSIGHT, I NOW REALISE THAT THE COUNCIL HAD INFAC T ALREADY CLARIFIED THIS VERY POINT (AS TO WHERE UNDERDEVELOPMENT IN A TIER 4 SETTLEMENT WOULD BE BUILT). THIS, IN ANSWERING THE INSPECTORS PRE HEARING QUESTION ON EXACTLY THIS POINT, SETTLE AND BENTHAM HAD FLEXIBLE NUMBERS WHICH WOULD INCREASE DUE TO CHANGNG CIRCUMSTANCES INTIER 4 SETTLEMENTS INCLUDING THE "LACK OF AVAILABILITY OF A SITE OR SITES".

COUNCILS RESPONSE TO INSPECTOR'S PRE HEARING QUESTION

08:34 Fri 11 Mar crowdc.gov.uk 100%

the SHLAA

Q6. What is the justification for the very prescriptive levels of housing growth between Tiers 2-4? For example, why is each of the [Key] Service Centres attributed 10.9% growth and Local Service Centres 3.5%?

Council's Response

1. The levels of housing growth between Tiers 2-4 are guidelines for the distribution of housing growth as stated in Policy SP4. The chosen spatial strategy option in the sustainability appraisal (Sp001) provided some preliminary growth figures for each settlement.
2. In the spatial strategy option chosen, the Tier 2 settlements of Settle and Bentham were attributed 10.5% and 10.2% of the plan area's development growth respectively. Their percentages of growth have altered slightly over time mostly in response to changing circumstances in Tiers 3 and 4 settlements, such as, for example, the lack of availability of a site(s).
3. The Tier 3 settlements consist of Glusburn and Crosshills, Ingleton and Gargrave, with preliminary housing growth of 5.1%, 3.1% and 2% respectively. Equal distribution of percentage growth in the Tier 3 settlements was reached because of a number of reasons. Gargrave was able to accommodate a higher percentage, due to the availability of suitable land for the provision of Extra Care accommodation. Ingleton has two large available and suitable sites which meant that it can accommodate a slightly higher percentage. Glusburn and Crosshills is situated relatively close to the South Pennine Moors SPA (Phase 2) and SAC. To reduce recreational pressure on the SPA and SAC, and particularly considering the expected large residential growth of the neighbouring Bradford Core Strategy, the percentage of growth attributed to Glusburn and Crosshills was reduced. Each Tier 3 settlement had then an equal percentage of 3.5%.
4. The availability of a large brownfield site in a Tier 4 settlement with relatively good public transport links may ensure it receives a slightly higher percentage growth than other Tier 4 settlements. An example of such is the village of Cononley. Other Tier 4 settlements may have received lower percentages based on the lack of suitable sites put forward.
5. Overall, the quantum of growth to be distributed (230 dpa) has to be distributed in whole numbers (so 25 dwellings not 25.5 dwellings), and is also distributed on an iterative basis, in the light of what is to be distributed elsewhere, so the precise allocation percentages are an output of this process, because they are the arithmetic result of a given level of growth.

6

Whilst it is obvious that the Council have made a mistake in saying that growth that doesn't take place in tier 3 villages will be moved elsewhere, the same cannot be said of tier 4 villages. Tier 3 got a fixed 3.5%. It wasn't a bespoke approach. If a site is lost in a tier 3 village, it follows that another will need to be found in that settlement. Not true of tier 4 where a "bespoke/site led" approach was taken and so the logical conclusion is that if for any reason a site does not come forward (because, for example, the developer doesn't want to build a housing estate opposite his own house) the lost plots will be built in the tier 2 settlements.

SECTION 6 PROPOSED MODIFICATION TO THE LOCAL PLAN

ON PAGE 16 OF THE DRAFT SCHEDULE OF MAIN MODIFICATION'S THE FIGURES FOR CARLETON NEED AMENDING FROM 1.2% AND 55 TO .8% AND 35. AT THE SAME TIME THE FIGURES FOR BOTH BENTHAM AND SETTLE NEED CHANGING FROM 10.9% AND 501 TO 11.1% AND 511.

IF CDC HAVE NOT SIMPLY MADE A MISTAKE AND ARE IN FACT REFUSING TO IMPLEMENT THIS CHANGE, PLEASE CAN I RESPECTFULLY REQUEST THAT THE INSPECTOR SEES THAT THIS MODIFICATION IS MADE BEFORE THE PLAN IS ADOPTED IN THE INTEREST OF KEEPING THE DOCUMENT "SOUND" AND "LAWFUL".

SECTION 7 AND 8 REQUEST'S TO BE NOTIFIED

Yes please

SECTION 9 SIGNED AND DATED

Richard Pringle.

Sent electronically on 26/3/19.

MANY THANKS.

From: Fiona Protheroe (Home) [REDACTED]

Sent: 19 March 2019 16:22

To: Tony Blackburn

Subject: Park Hill

I am emailing as I'm very concerned about the decision of a government inspector to remove the protected Local Green Space Designation of Park Hill in Skipton.

As a child I had many a walk through the woods or town, and up Park Hill, I thought I'd conquered a mountain, given how high above town we were, the wonderful views and how far I could see.

I now live at [REDACTED], and my own children were shocked and disappointed to hear that their "sledging hill" might be lost to them. We walk this way into the woods on a weekend, it's an accessible and close walk, that even teenagers can be dragged on!

It has been wonderful over the last few weeks to see visitors admiring the view of the hill, and watching the starlings fly over it.

I frequently run around the woods, and past Park Hill, I appreciate how lucky I am to have green space to breathe clean air as I'm running in a lunch break from work. I see a lot of visitors including it on a loop – woods and then back to town (it probably needs better signage, I know they are visitors as I'm often asked for directions). The Green space in Skipton was one of the reasons I moved out of an over developed town in the South East. I'm sure I'm not the only resident to move to Skipton for its closeness to the Dales, and also its attractiveness as a town.

Park Hill is area of natural Green Space, that is very close to Skipton Town Centre, and within walking distance of the majority of Skipton residents. It has been enjoyed my family, and others for generations, it's a much valued part of the community.

Park Hill links the town to Skipton Woods, it provides a break from the developments that are surrounding Skipton, and provides a green and rural aspect to visitors entering Skipton from Grassington road.

The benefits of Green spaces in towns and urban areas are welcome documented, facilitating physical activity and relaxation, and form a refuge from noise. As well as physical benefits to health, Green spaces

also are important to mental health. Having access to green spaces can reduce health inequalities and improve mental well-being. Given that the Public Health profile for Craven includes priorities of reducing childhood and adult obesity, it seem to make sense to keep this easy to walk to green space.

I feel the loss of Park Hill as a green space, would be a huge loss to the town, and the area should remain protected in its entirety.

Yours sincerely,

Fiona Protheroe (on behalf of Mike, James, Elspeth and Patrick Protheroe)

From: Enid Pyrah [REDACTED]
Sent: 14 March 2019 14:04
To: Tony Blackburn; Sian Watson; Councillor John Dawson
Subject: Park Hill

To whom it may concern:

Re: Park Hill

We have lived in the Raikes area of Skipton for fifty years, and during this time have taken a keen interest in the development plans for this area.

As you must be aware, plans for development on the fields adjoining Grassington Road were proposed some years ago, and correctly rejected at that time since this is a green and visually attractive entrance to our Town from the north.

This reason is now even more important, since considerable large scale building has taken place on so many green field sites close to all the roads leading into the Town. Park Hill is one of the last remaining areas to be threatened by this indiscriminate development.

Park Hill is a significant recreational open space which is historically important. Two long distance paths run over the hill, and the area is in constant use by walkers on their way through Skipton Woods, owned by The Woodland Trust.

We are disgusted and very concerned that the Local Green Space status of such a significant area should be removed for possible financial gain by the landowner, and trust that Craven District Council will resist such pressure and restore its protected status.

Drs Roger and Enid Pyrah, [REDACTED]

Copies to:-

Tony Blackburn

Sian Watson

Cllr. John Dawson

From: Jeff Halden [REDACTED]
Sent: 28 March 2019 15:28
To: Tony Blackburn; Sian Watson
Subject: Removal of Local Green Space Designation for Park Hill

At its Committee meeting on Tuesday, 26th March, the Craven Group of the Ramblers' Association discussed the proposed removal of a Local Green Space Designation for Park Hill, and asked me to forward its objections to this proposal on the following grounds:

- Removal of its protected status opens the way for its future sale for development
- Of particular significance to the Ramblers Association is the fact that two long distance footpaths run over the top of Park Hill - 'The Dales Highway' and 'Lady Annes's Highway' - with long distance views over Skipton to the Dales beyond. Any diversion or closure of these footpaths because of development would, in the Committee's view, be unacceptable. In particular, 'Lady Anne's Highway' starts on Park Hill and we would not want the ambience of the beginning of this superb long-distance walk destroyed by urban development.
- Park Hill is important to the locality, and fully meets Government guidelines on Local Green Space Designation. Its removal would be a serious blow to local people and visitors alike.

Jeff Halden

Secretary, Craven Ramblers (RA)

[REDACTED]

10 March 2019

Dear Sir,

PARK HILL.

Overlooking Park Hill as I do, I am most concerned that this historically very important LOCAL GREEN SPACE is to lose its status on the local plan.

Skipton derives its name from SHEEPTOWN and whilst sheep are no longer to be seen on the High St., they can still be seen on Park Hill from many parts of the town. This area of green space overlooks the Castle and forms a backcloth to this very important historical building. During the Civil War, the Roundheads chose this hill upon which to site their battery during the siege of the castle. The site is still discernible and must be preserved.

Not only is the Hill of historical and visual significance to Skipton - the Gateway to the Dales- it gives direct pedestrian access from the centre of the town to the Dales National Park to the North. The view from the stile at the top of the hill is one to be enjoyed by all and must be preserved.

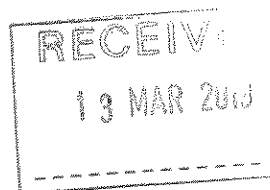
I cannot see any good reason for this area of land to lose its status as a LOCAL GREEN SPACE. The town has and is losing many adjacent green fields to housing and Park Hill, along with James Park adjacent to Shortbank Rd., are the only large green spaces in the CENTRE of Skipton still remaining. Surely these areas should be preserved for ever as part of what is essentially a rural town, not eventually ending up as potential building sites.

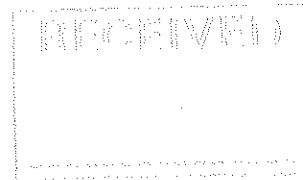
Yours faithfully,

[REDACTED]

Barry Rawson

[REDACTED]





Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). Please fill in a separate form for each representation you wish to make.

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	
First Name:	Maureen
Last Name:	Reynolds
Job Title (where relevant):	Retired
Organisation (where relevant):	
Address 1:	[Redacted]
Address 2:	
Postcode:	[Redacted]
Telephone:	[Redacted]
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	N/A
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

If you wish your personal details to be treated in confidence and not published please tick the box below:



Please explain below, why you have made this request:

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: Equality	
Insufficient level of equality assessment conducted on site G2/4 gargrave (off Walton close/Marton Road).	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravencdc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

I am retired, I have lived here 20 years. I enjoy walking my dogs to the village green there are no footpaths on Marton road and it is extremely dangerous. When the houses are built there will be more traffic and I don't feel it will be safe. Plus there is planning permission at Dodgson's farm further down Marton Road, ^{for an animal incinerator} this will increase the volume of farm traffic such as tractors and wagons and a very unpleasant smell.

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

- Significant investment made to infrastructure
- Equality assessment to be conducted with remediating actions put in place
- Or alternative suitable site which will cater for all disadvantaged groups

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.


Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

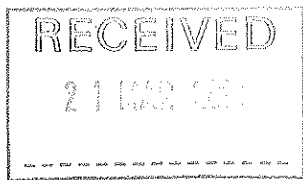
Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	27/3/19



Dear Sir

The Melli^{field} Flashes
both Gallagher & Dumber area
is definitely special to our
community, the footpath is in
use constantly, by residents of
Melli^{field}, as well as visitors, and
walking clubs.

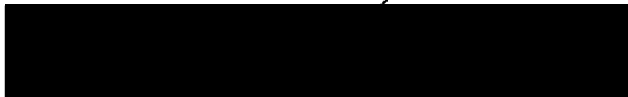
It would be a major advantage
if all the Flashes were to be
designated "green space" as a protection
for the richness of wildlife.

Protection of such places, will
save such beauty for the

future generations to come.

The heavy rainfall recently has increased the amount of standing water, which has attracted more wildlife, its a lovely natural area, Surely something should be left to nature.

yours faithfully



From: Ian Roberts [REDACTED]
Sent: 14 March 2019 17:15
To: Local Dev. Framework
Subject: response to hellifeld green plan
Attachments: Hellifield green plan response 14-3-2019.doc

14-3-2019

[REDACTED]

My Response to the Local Green Space Plan for the village of Hellifield

I feel that the Flashes green space area is very much an integral part of the village. It provides recreational value as a walking area which is on reasonably level land and accessible to even senior citizens. It is peaceful and this gently rolling surface and wide uninterrupted views, with the star attraction, of a large variety of bird life it are very beneficial to the village

The 'Big Sky' feeling is a prominent emotional experience I have when walking across the fields of grazing sheep towards Hellifield Flashes. The rise and fall of the birds over the waterlogged area and the three lakes (Flashes) is a very pleasing and calming experience.

This area can be rather bleak and windswept. It is said of Hellifield Station that it is "the draughtiest of all Yorkshire Railway Stations!" However the wild life thrives here and so do the many residents who enjoy this bracing climate. This area does not have the overbearing clutter of built-up areas. It is wide, wild and refreshing. It is an escapists delight. Almost like climbing the bleak hill tops but still accessible to you as you get older because it is reasonably flat. It helps your moods and lifts your spirits.

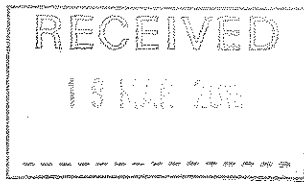
I do really hope that the whole area of the Flashes is designated Green Space. To reduce it to a smaller area will ruin it. The three flashes and associated wet areas function as a whole unit and I fear that if some is taken away they will all be degraded. Birds need wide areas to fly over as well as to feed in.

We are being encouraged to increase bio-diversity in our farming and in the countryside in general. As part of this push wildlife specialists in universities are asking people to put ponds in their gardens because small creatures often begin their lives in water. The Flashes are a ready established wet area and as such are an important nursery for many forms of invertebrates and other creatures. Why destroy this area which is so rich in wild life? Making the Flashes Green Space would save and add to the push to get more bio-diversity into countryside. This area may seem too big but it is the way it formed. It is our local green wildlife reserve we must keep it not get rid of it. It is not just a bit of land!

Yours with feelings,

Mr Ian G Roberts

Acknowledgement
letter sent
Scanned
Saved by DF
22/03/2019



re Park Hill.

Dear Sean Watson,

I was horrified to discover that Park Hill had lost its Green Space status.

This part of Skipton is unique & beautiful & has historical & cultural significance - Apart from its beauty, Park Hill is a glorious place for walking just 5 mins from the very, very busy Grassington Rd. & is a huge attraction for both locals & tourists.

If this area were to be used for housing etc. I'm sure the local council would find the infrastructure(s) ^{ie} etc: access roads, sewage-disposal, energy supplies doctors' surgeries & increase in

local traffic liable to
overrun the High St. & neighbouring
roads, totally overwhelming.

Yours sincerely

[REDACTED]

I hope this recent change to
this area could be reversed.

From: Paul Cochrane [REDACTED]
Sent: 31 March 2019 21:16
To: Local Dev. Framework
Subject: Main Modifications Consultation Representation Forms: ROOTS
Attachments: ROOTS_Submission_M39.pdf; ROOTS_Submission_M87.pdf

From Paul Cochrane, [REDACTED] on behalf of ROOTS (Respect Our Old Trees in Settle)

**Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)
Main Modifications Consultation Representation Form**

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s).

Please fill in a separate form for each representation you wish to make.

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mr
First Name:	Paul
Last Name:	Cochrane
Job Title (where relevant):	Not applicable
Organisation (where relevant):	ROOTS (Respect Our Old Trees in Settle)
Address 1:	██████████
Address 2:	██████████
Address 3:	██████
Address 4:	██████████
Postcode:	██████████

Telephone:	██████████
Email:	████████████████████

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

If you wish your personal details to be treated in confidence and not published please tick the box below:

I wish to request that the personal details submitted with this representation are treated in confidence and not published.	<input type="checkbox"/>
---	--------------------------

Please explain below, why you have made this request:

--

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	ROOTS (Respect Our Old Trees in Settle)
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM39	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

As a tree protection group, ROOTS is particularly concerned that the existing trees in this area will be lost under this plan, even those with TPOs. This has happened with the recent development of neighbouring land south of Ingfield Lane. Only one of the original trees here remain, but it has been severely thinned and lopped. Urban trees make a valuable contribution to public health, take-up ground water (reducing the need for man-made surface water drainage solutions), and give their new their new urban settings character and year-round interest. Tree need due protection or they will be disregarded.

The zoning on the draft plan respects the nature of the land with the lower, wetter area - the outfall of Lodge Gill - being designated as either *Existing Green Infrastructure Commitment* or Housing Allocation respecting ENV2, ENV3, ENV4, ENV5, ENV6, ENV7, ENV8, ENV9, ENV10, ENV11, ENV12, H2, H4, INF1, INF3, INF4, INF6. It may be desirable to simplify the zoning but this is unrealistic. The land is what it is, and there is a risk that without the protection of *all* the relevant environmental policies any development here would be substandard. Some of the houses built on (drier) land nearer Ingfield Lane have on-going drainage issues to this day.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

The re-designation of this area as *Green Infrastructure Provision on Housing Allocation* actually threatens the loss of the existing green infrastructure. It allows the justification for potentially inconsiderate and inappropriate development with little regard to environmental realities of the land. The modification should be rejected.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	Yes
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	Yes
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	██████████, for the ROOTS Group
Date	31 st March 2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ |

www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



INVESTOR IN PEOPLE



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

Craven Local Plan Examination

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mr
First Name:	Paul
Last Name:	Cochrane
Job Title (where relevant):	Not applicable
Organisation (where relevant):	ROOTS (Respect Our Old Trees in Settle)
Address 1:	██████████
Address 2:	██████████████████
Address 3:	██████████

Address 4:	██████████
Postcode:	██████████
Telephone:	██████████
Email:	████████████████████

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	ROOTS (Respect Our Old Trees in Settle)
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM87 & MM105	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

If the environmental policies driving the local plan are meant to be more than consolatory greenwash, it should be obvious that this site is a rare wetland environment of regional importance that supports the biodiversity that our ecology depends upon. These ponds cannot be recreated somewhere else, where as a 'rural environmental centre' and hotel could be. The pre-existing planning permission was a shameful decision and is not indicative of the site's appropriate use.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what change(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

The Flashes has a high amenity value exactly as it is, is treasured by the local community and draws tourists to the area already. The designation of land as *Tourist Development Commitment* is only appropriate on the sites *surrounding* the Flashes, the redundant railway sidings and Gallaber Park. The Flashes itself should be preserved as a Local Green Space.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	Yes
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	Yes
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	██████████, for the ROOTS Group
Date	31 st March 2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ | www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



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

From: Christine Rose (via Google Docs) [REDACTED]
Sent: 29 March 2019 16:24
To: Local Dev. Framework
Subject: cdc-mods-rep-form-2019-final (1)
Attachments: cdc-mods-rep-form-2019-final (1).pdf

[Christine Rose](#) has attached the following document:



cdc-mods-rep-form-2019-final (1)



I do hope that this is sufficient !

Many thanks.
Councillor Rose.

Google Docs: Create and edit documents online.

Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA

You have received this email because someone shared a document with you from Google Docs.



Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Councillor
First Name:	Christine
Last Name:	Rose
Job Title (where relevant):	
Organisation (where relevant):	
Address 1:	██████████
Address 2:	██████
Address 3:	████████████████

Address 4:	
Postcode:	██████
Telephone:	██████████
Email:	██████████████████

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM:87 ENV10:Local Green Space SK-LGS64	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

I do not consider this section of the Local Plan to be sound ,I consider the area SK-LGS64 to be,beyond all reasonable doubt,a designated Local Green Space.

- 1.The area SK-LGS64 ,is in reasonably close proximity to the community it serves.
- 2.The green area is demonstrably special to the local community and holds a particular local significance,because of its historic significance ,beauty and tranquillity.
- 3.The area is ,without doubt,local in character and not a significant tract of land.

I consider these points demonstrate an inconsistency with the NPPF with respect to sustainable development.There are many reasons for preserving this particular tract of land ,it is an invaluable

addition to the unique mixture of urban and rural character of the town of Skipton.

There are long distance footpaths which cross Park Hill,The Dales Highway and Lady Anne's Way.

The historical significance is extensive Ref:MM75.

This particular tract of land adds to the special aspect of Skipton ,in that from the 'top' of the busy high street it is possible to take a walk up Chapel Hill,take the footpath up onto park Hill from which there is a stunning view of the town and its environs.This is an area of peace and tranquility which can be enjoyed by all ,a contribution to general health and well being .

It is also an area for wildlife - again -something special so close to a town centre.

There can not be many towns which have such a unique addition to the town's character.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

In order to make this particular Main Modification sound,I consider it necessary to designate - in perpetuity - the area SK-LGS64 - Local Green Space.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.


Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	*
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	*
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	March 29 2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ |
www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



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

Craven Local Plan Examination

From: Matthew Capper [REDACTED]
Sent: 04 March 2019 17:16
To: Local Dev. Framework
Cc: David Hunt
Subject: Public Consultation on the Proposed Main Modifications to the Publication Draft Craven Local Plan: 19/02/19 - 01/04/19
Attachments: Craven DC Local Plan Modifications response - March 2019.docx

Hi there

Please see attached, a response to the above consultation from the Royal Society for the Protection of Birds

As indicated in the response, I would be grateful if you could keep me informed of future developments

Regards

Matthew Capper
Area Conservation Manager
(Yorkshire, The Humber, Peak District & Cheshire)

RSPB Northern England Region
Westleigh Mews
Wakefield Road
Denby Dale
Huddersfield
HD8 8QD

Tel: [REDACTED]
Mobile [REDACTED]



rspb.org.uk

Let's give nature a home

The RSPB is the UK's largest nature conservation charity, inspiring everyone to give nature a home. Together with our partners, we protect threatened birds and wildlife so our towns, coast and countryside will teem with life once again. We play a leading role in BirdLife International, a worldwide partnership of nature conservation organisations.

The Royal Society for the Protection of Birds (RSPB) is a registered charity: England and Wales no. 207076, Scotland no. SC037654

This email and any attachments may contain material that is confidential, subject to copyright and intended for the addressee only. If you are not the named recipient you must not use, disclose, reproduce, copy or distribute the contents of this communication. If you have received this in error, please contact the sender and then delete this email from your system. The Royal Society for the Protection of Birds (RSPB) is a registered charity in England and Wales no. 207076 and in Scotland no. SC037654.

The RSPB is committed to maintaining your data privacy. We promise to keep your details safe and will never sell them on to third parties. To find out more about how we use your information please read our [online Privacy Policy](#).

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	MR
First Name:	MATTHEW
Last Name:	CAPPER
Job Title (where relevant):	Area Conservation Manager
Organisation (where relevant):	Royal Society for the Protection of Birds
Address 1:	RSPB Northern England
Address 2:	Westleigh Mews, Wakefield Road
Address 3:	Denby Dale
Address 4:	Huddersfield

Postcode:	HD8 8QD
Telephone:	██████████
Email:	████████████████████

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	RSPB
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM:	HABITATS REGULATION ASSESSMENT

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council’s Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

<p>Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.</p> <p>If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.</p> <p>In our written representation on the Craven District Local Plan, submitted in February 2018 we made the following comment:</p> <p><i>“We note that the local RSPB Group were consulted on whether they held any records of Golden plover in the Skipton area. It should be noted that RSPB Local Groups do not hold bird records and that any mention of species records may be anecdotal, unless a formal survey was completed.”</i></p> <p>Further reference to the RSPB Local Group has been made in the updated <i>Habitats Regulations Assessment (HRA): Appropriate Assessment (AA) Report (Iteration III – February 2019)</i>. There is also mention of surveys conducted by the Group, <i>“The Group Leader consulted with some of the RSPB’s</i></p>
--

relevant members for this query, who do not recall in their surveys having witnessed any Golden Plovers foraging close to the north of Skipton on these sites."

In the first paragraph of *Appendix VIII: Loss of Supporting Feeding Sites to Development*, it is stated that "*Field reports and data have shown that SPA birds do not utilise the site, in the context of the data collected from the local RSPB representatives.*"

We have contacted the relevant RSPB Skipton Group Leader (1st March 2019) who said that no specific golden plover surveys were undertaken by the group. So it would appear that the "surveys" mentioned in the AA were nothing more than casual observations

Golden plovers nest on the moors and blanket bogs of the North Pennine Moors SPA but do most of their feeding on surrounding pastures. They do not nest on the pastures but will sometimes take their chicks up to 2 kilometres (km) to feed on farmland. They occupy the pastures (and the moors) from late February to late July, but **mid-March to June** is when they are used most.

No information has been provided on survey area, methodology, results/data and surveyor information of the mentioned surveys, field reports and data. Based on the lack of information provided and uncertainty whether the appropriate methodology has been used at the correct time of year. So unless bespoke surveys of Golden Plovers have been undertaken during the night from mid-March to late June, as well as during the day for females, it currently cannot be ascertained that golden plover do not utilise the proposed allocation sites highlighted as being potentially suitable for foraging and it cannot be ascertained there will not be an impact on the SPA.

It is also acknowledged that photography of a number of the proposed sites (SK080a, SK081, SK082 and SK108) has been taken to establish whether they are suitable for foraging golden plover. However "*clear evidence of farming disturbance with existing sheep feeding facilities supporting the flock of sheep in these fields*" and "*elements of human and livestock disturbance*" in our opinion should not be taken as reasons why golden plover may not utilise the fields. Golden plover are known to forage in grazed in-bye pastures used by livestock during the breeding season as this habitat can be rich in invertebrates.

It is also stated that with regards to sites SK080a, SK081, SK082 and SK108 that "*it is very unlikely that golden plovers would forage in these fields in any significant numbers, if at all.* We question the relevance of the word significant here. Foraging golden plovers on land that is functionally linked to the SPA do not have to be present in high numbers for the integrity of the SPA to be potentially impacted upon.

The lack of information and clarity on the methodology and timing of the referenced surveys and inaccurate assumptions over the potential suitability of sites to support foraging golden plover is not sufficient in our opinion to base an HRA and AA on.

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

The HRA/AA must be able to ascertain that the Local Plan will not adversely impact upon the qualifying features of the North Pennine Moors Special Protection Area (SPA), which in this instance relate specifically to golden plover.

In order to make the Main Modification (HRA) sound, further information is required on survey area, methodology, results/data, surveyor information of the mentioned surveys, field reports and data. If they have not been, it is recommended that the surveys are conducted on those proposed development sites that have the potential to support any foraging golden plover linked to the SPA.

The surveys will need to be conducted between mid-March to June and include both daytime and nocturnal observations in order for Craven District Council to ascertain that the integrity of the SPA will not be affected.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)

Yes, I do wish to be notified	X
No, I do not wish to be notified	


Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)

Yes, I do wish to be notified	X
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:

Signature	
Date	<i>4 March 2019</i>

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ |
www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



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

Craven Local Plan Examination

From: Wendy Sanderson [REDACTED]
Sent: 09 March 2019 08:21
To: Sian Watson; Tony Blackburn; [REDACTED]
Subject: potential development of Park Hill, Skipton - north ward

Re : Consultation on Changes to the Local Plan inc removal of Park Hill designation as a protected green space

I would like to add my voice to others stating that as a family we are opposed to losing the area of Park Hill as a designated green space in north Skipton. The town has seen an excessive amount of housing development already and to lose such an important walking and viewing area would be very sad. The fields afford an excellent view of Skipton and are easily accessible from the town and are also an important lovely circular walk incorporating Skipton Woods for visitors and locals alike. To take those valuable opportunities away would be a loss to the town. The fields also offer safe access to other walks further afield as well as the Golf Club. The alternative walking route would inevitably involve an increased number of pedestrians on Grassington Road which is not really safe or enjoyable.

Please recognise as a council that you have taken advantage and allowed the building of houses recently on many sites in the town, please do not think that Park Hill is another space suitable for achieving a quick profit. By doing that you will take away this significant landmark and yet more character from the town.

Regards

Wendy Sanderson
[REDACTED]

From: Chris Sharpe [REDACTED]
Sent: 16 March 2019 12:41
To: Local Dev. Framework
Subject: ack email sent 18.3.19 by RP HELLIFIELD FLASHES GREEN SPACE COMMENTS
Attachments: 2 Peel Terrac2.doc TIM SHARPE.docx

Please find attached my concerns for the Green Space status on Hellifield Flashes.

With Regards

Tim Sharpe



16/03/19

**Please see below my concerns for Green Space Refusal on Hellifield
Flashes.HE-LGS**

- Gallaber pond is far from the village yet is the only area given green Space Status.
- 2 other ponds little Dunbars & Large Dunbars are very important and nearest to the houses of our village and footpath – Refused this status. Main breeding area for the Great crested Newt and teaming with birdlife.
- The area is a beautiful asset to a village that is plagued by heavy traffic it is a wildlife haven and enjoyed by all ages and people from all areas. It is One of peace & tranquillity.
- The main submitted Green Space plan was to large a tract of land but revised smaller versions to take in the most important and walked area nearest the village and enclosed by houses has been re submitted and now refused. This hardly makes sense.
- Please consider again the importance this beautiful area is to the village, it fits as I understand all criteria for Green Space and is one of bountiful wildlife, birdlife and beauty.

A very rare thing in these days
Please consider my concerns

Regards
Tim Sharpe
Local resident

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). Please fill in a separate form for each representation you wish to make.

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	
First Name:	HOWARD
Last Name:	SHAW
Job Title (where relevant):	—
Organisation (where relevant):	—
Address 1:	
Address 2:	
Postcode:	
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	N/A
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

If you wish your personal details to be treated in confidence and not published please tick the box below:	
Please explain below, why you have made this request:	

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	HOWARD SHAW
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: Equality	
Insufficient level of equality assessment conducted on site G2/4 gargrave (off Walton close/Marton Road).	

Section 4: Legal Compliance & Duty to Cooperate

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

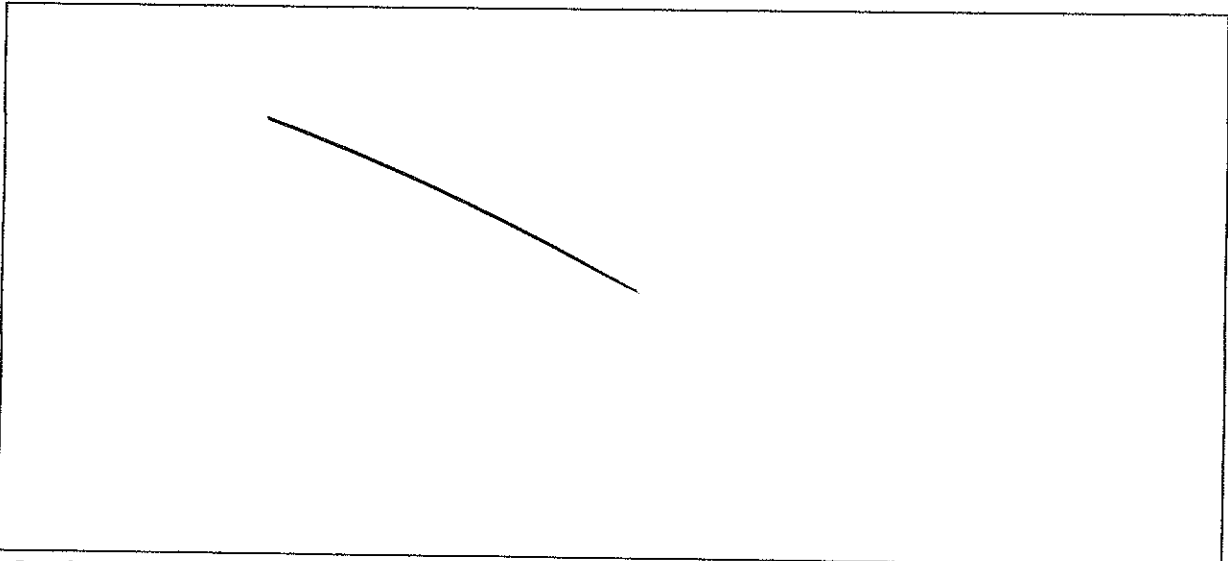
Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.



Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

- Significant investment made to infrastructure
- Equality assessment to be conducted with remediating actions put in place
- Or alternative suitable site which will cater for all disadvantaged groups

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.


Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	28th MARCH 2019

From: Vicky Sharpe [REDACTED]
Sent: 30 March 2019 11:30
To: Local Dev. Framework
Attachments: [REDACTED].docx

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
16-03-19

I am writing in response to the refusal of Green Space Status on Hellifield Flashes. HE-LG

I believe that the area of Gallaber Pond is the only part of the Flashes that has been granted for local Green Space status by the planning inspectorate for the emerging new local plan.

This I find very disappointing and a little hard to understand. I understand a ... Large tract of Land... was in question but smaller Green Space plans have been submitted. But also have been refused.

The area from the village has a footpath This is between the houses of Station Road, Pendle view & Peel Terrace this footpath goes past both little Dunbar & Large Dunbar Flashes which is so important to our village and walked daily by so many. It is easy access and with small Children who I walk with regularly just manageable. There is so much wildlife and birdlife for my Children to see. It is also the main area for the Great crested Newts for breeding. And it is safely away from the notorious A65 which slices through our village.

I have loved the area from being a child and spent much of my childhood identifying the birdlife and enjoying fresh air. It has always been a very special place even to my Great, Great Grandparents.

It is an area loved by the village and a rare bio diverse part of craven. I believe as I understood it fits all criteria for Green Space status apart from being too large.

I feel this needs to be reconsidered and if the area from the footpath towards station road to the Station cannot be included in Green Space which I feel it should be then why just Gallaber Flash and not the other 2 very important Flashes should they not also have the same status? Or the land on the Flashes nearest to our village bordering the local communities taking in the local well worn footpath.

Gallaber pond is detached and further away from the village a lot further for Children and the elderly to reach is this really the criteria for Green Space Status?

I hope you would consider some of the points in my letter.

With Regards

Victoria Shaw & Family



Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). Please fill in a separate form for each representation you wish to make.

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mr.
First Name:	JOSEPH
Last Name:	SIMPSON
Job Title (where relevant):	RETIRED.
Organisation (where relevant):	N/A
Address 1:	[REDACTED]
Address 2:	[REDACTED]
Postcode:	[REDACTED]
Telephone:	[REDACTED]
Email:	[REDACTED]

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	N/A
Address:	[REDACTED]
Telephone number:	[REDACTED]
Email:	[REDACTED]

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

If you wish your personal details to be treated in confidence and not published please tick the box below:

--	--

Please explain below, why you have made this request:

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: Equality	
Insufficient level of equality assessment conducted on site G2/4 gargrave (off Walton close/Marton Road).	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

Areas by proposed site:
 heeds ditch of foot path on north of Market Road
 drainage out road: ditch blocked, highways notified over the
 last 20 years numerous times no action taken.
 Sewage from proposed site will cause problems

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

- Significant investment made to infrastructure
- Equality assessment to be conducted with remediating actions put in place
- Or alternative suitable site which will cater for all disadvantaged groups

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

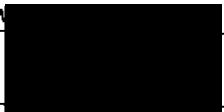
Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me ✓
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	✓ Please notify me
No, I do not wish to be notified	XXXX

Section 9: Signature & Date of Representation

Please sign and date below	
Signature	
Date	28 March, 2019



Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). Please fill in a separate form for each representation you wish to make.

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	MRS
First Name:	SYLVIA
Last Name:	SIMPSON
Job Title (where relevant):	RETIRED
Organisation (where relevant):	
Address 1:	[REDACTED]
Address 2:	[REDACTED]
Postcode:	[REDACTED]
Telephone:	[REDACTED]
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	N/A
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

If you wish your personal details to be treated in confidence and not published please tick the box below:

Please explain below, why you have made this request:

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: Equality	
Insufficient level of equality assessment conducted on site G2/4 gargrave (off Walton close/Marton Road).	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

ROAD. Country road already has speeding traffic from Bank Newton large sewage wagons, straw wagons and no footpath - a danger to walking pedestrians. Over development for our village with lots more cars and access at the corner - Mason's Arms. would be a ^{people} problem. A danger for children walking to school and horse riding. Already have problems with water blocking the drain with water running down the road.

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

- Significant investment made to infrastructure
- Equality assessment to be conducted with remediating actions put in place
- Or alternative suitable site which will cater for all disadvantaged groups

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.


Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me YES
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	<input checked="" type="checkbox"/> Please notify me
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	28 th MARCH 2019

From: Skipton Castle [REDACTED]
Sent: 06 March 2019 14:52
To: Local Dev. Framework
Subject: Local Plan Main Mod, Consultation Rep- Skipton Castle
Attachments: 2019_03_06Skipton Castle Rep Form.pdf; Reduced important green space retained.jpg; The Old Park Map 1757.jpg; Bailey Car Park Plan correction.jpg

Dear Sir/ Madam

Please find attached comments and supporting information.

Kind regards

Sebastian Fattorini
Administrator

Skipton Castle
[REDACTED]

One of the best-preserved and most complete medieval castles in England
Open every day

By car - New Bailey Car Park
BD23 1UA

Tel. [REDACTED]
[REDACTED]
www.skiptoncastle.co.uk



Virus-free. www.avast.com

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

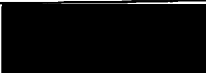

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mr
First Name:	Sebastian
Last Name:	Fattorini
Job Title (where relevant):	Director
Organisation (where relevant):	Skipton Castle
Address 1:	
Address 2:	
Address 3:	

Address 4:	
Postcode:	
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Skipton Castle Estates
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM:87	SK-LGS64 Policy ENV10 Local Green Space

Section 4: Legal Compliance & Duty to Cooperate

Do you consider that this modification of the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant		
2. Sound		<input checked="" type="checkbox"/>
3. In Compliance with the Duty to Cooperate		

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravendc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

- 1. We disagree with the total deletion of SK-LGS64 (Land to the North of Skipton), but would agree to a modification.**

A minimum requirement would be re-designating two important local green spaces on either side of Skipton Castle Woods: one to the West side – known as Park Hill and the other to the East side - known as The Show Field. This would therefore no longer create a blanket designation of open countryside.

With reference to Para. 77 of the National Planning Policy framework, these modified 2 essential green spaces fulfill the criteria of local green spaces because:

They are in close proximity to the community it serves.

They have significant recreational value – the public footpath links straight from Skipton Town Centre into the Yorkshire Dales National Park and into Skipton Castle Woods with fantastic views of Skipton Town below. Important that this also supports tourism.

They are essential in the protection and survival of the rich and unique diversity of wildlife in this area.

These 2 green spaces are of historic importance as they are the 'Old Park' (Park Hill - Hunting Ground with Battery) with views to and from the Castle - and the Show Field shown as 'Storam' and 'Further Storam' (please see Crows Map 1757 enclosed). An ancient field used for corralling deer during medieval times and later known as Craven's Agricultural Show field in Skipton since 1855.

They are significant beautiful views/vistas from within Skipton Castle Woods enhancing the experience of the Woodland Trust's flagship Woods. These vistas are from the public footpath over it - viewing Park Hill and adjacent to it - viewing The Show Field.

They are integral to an essential balance of wellbeing for future generations and compliments sustainable development/build. Both are necessary together in reinforcing a unique blend of town and country.

- 2. Accept the deletion from the area known as the Bailey Car Park of SK – LGS64 - but with modifications to the boundary. Please see amended plan attached. (Plan: Bailey Car Park with Castle Access road).**

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

SK – LGS64/A (Park Hill)

Land to the North of Skipton, West and North of Skipton Castle Woods bounded by the by-pass and Raikes Road

SK – LGS64/B (The Show Field)

Land to the North of Skipton, East of Skipton Castle Woods and to the West of Embsay Road

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	<input checked="" type="checkbox"/>
No, I do not wish to be notified	<input type="checkbox"/>

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	<input checked="" type="checkbox"/>
No, I do not wish to be notified	<input type="checkbox"/>

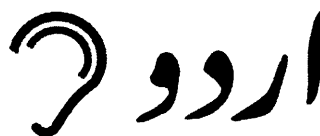
Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	<i>6 MARCH 2019</i>

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

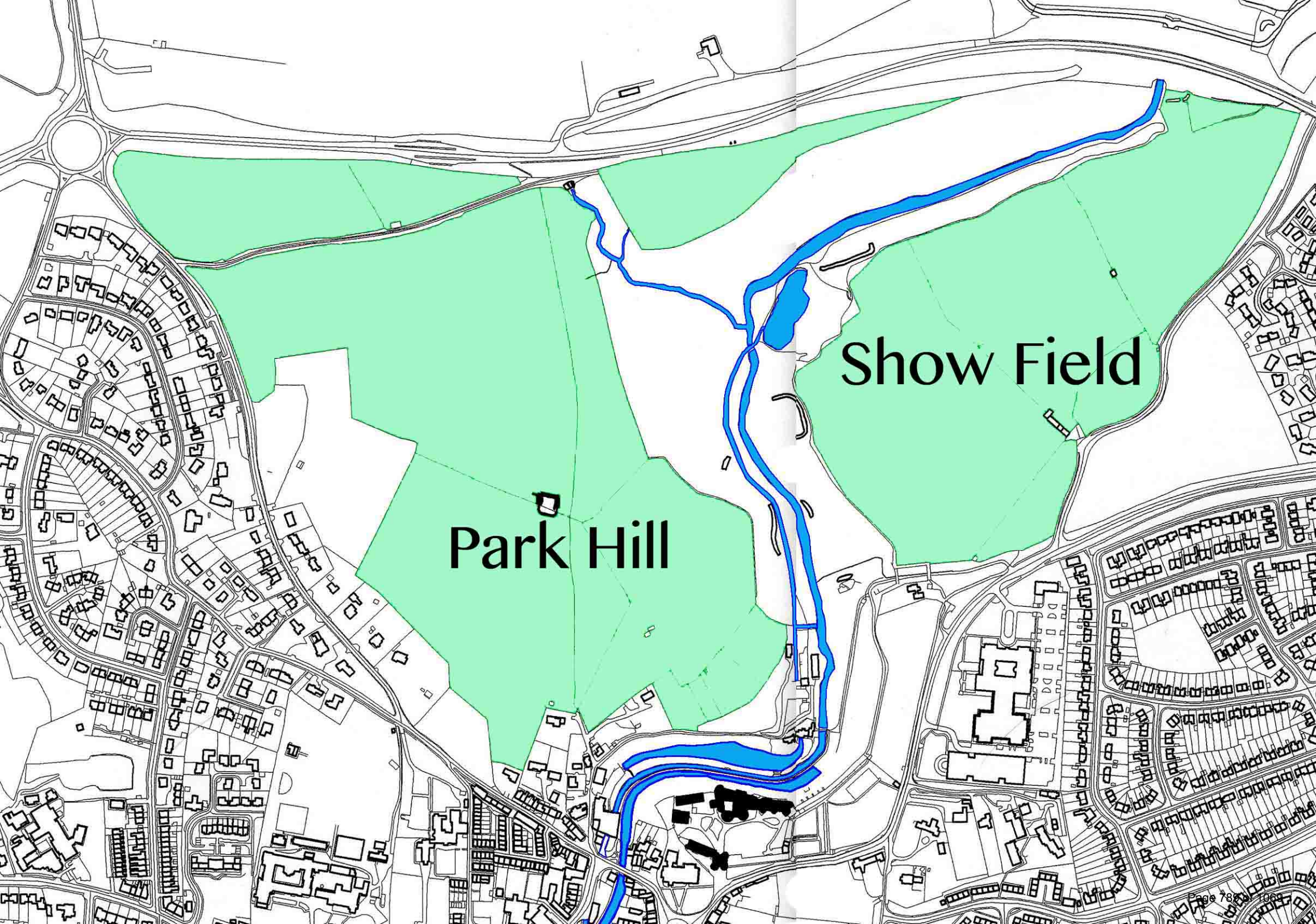
Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ | www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



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

Craven Local Plan Examination



Park Hill

Show Field

Creek

N
O
T
O
N



The Old Park

The Old Park

Wood

Peigh Hill
K 289

Further Storam

A 6

Wood Close
K 287

Storam
A 5

The How Field Meadow

A 12

The Crofts
K 286

The Spring

Storam Close
A 10

Close Meadow
K 75

New Close

K 74

EAST

Kakes Close
B 15

K 282

Wile Blatts

K 281

K 270

K 280

The Close
K 278

K 277

Wentor Platt, Skipton School
S. 3. 12

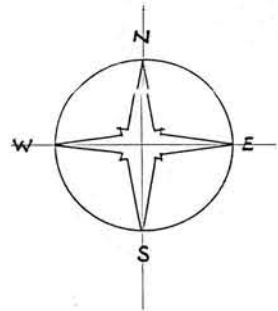
Mill Field
Head
A 11

Jack Close
K 288

Orchard

SKIPTON CASTLE

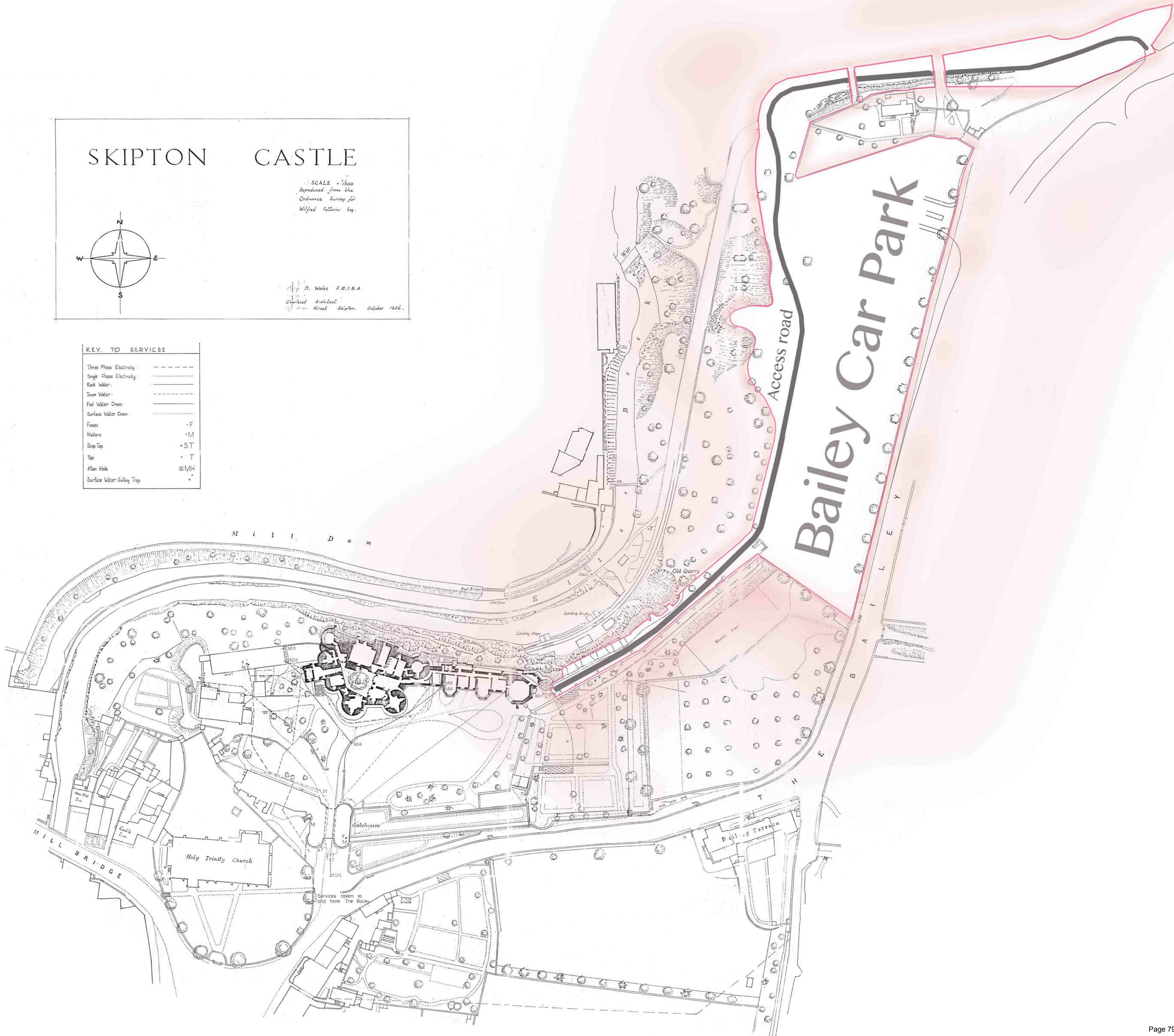
SCALE = 1/500
 Reproduced from the
 Ordnance Survey for
 Wilfred Fothergill Esq.



D. Wales F.R.I.B.A.
 Chartered Architect
 111 Street Skipton, October 1986.

KEY TO SERVICES

Three Phase Electricity	---
Single Phase Electricity	----
Rack Water	—
Town Water	----
Foul Water Drain	----
Surface Water Drain	----
Fuses	·F
Meters	·M
Stop Tap	·ST
Tap	·T
Man Hole	⊠MH
Surface Water Gully Trap	·



From: SkiptonCivicSoc [REDACTED]
Sent: 26 March 2019 21:13
To: Local Dev. Framework
Subject: Main Modifications Consultation Representation Form from Skipton Civic Society
Attachments: cdc-mods-rep-form-2019-final MM87 Park Hill Skipton Civic Society.pdf

Please find attached an electronic copy of the Main Modifications Consultation Representation Form for MM87 from Skipton Civic Society.

You may have already received this document, however an error was reported by our email system so we are re-sending it.

Best regards,

Dean Holdaway

(co-chair)

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	(representing Skipton Civic Society)
First Name:	Dean
Last Name:	Holdaway
Job Title (where relevant):	Co-chair
Organisation (where relevant):	Skipton Civic Society
Address 1:	Room 4
Address 2:	St Andrew's Church Hall
Address 3:	Newmarket Street

Address 4:	Skipton
Postcode:	BD23 2JE
Telephone:	
Email:	[REDACTED]

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	n/a
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Skipton Civic Society
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: 87 (Policy ENV10 Local Green Space – removal of SK-LGS64, Land to north of Skipton, bounded to the north by Skipton Bypass, to the east by Embsay Road & The Bailey; and to the west by Grassington Road, Skipton)	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

The Main Modification Consultation/Representation Form Guidance Notes (EL6.003, Section 3.1) with respect to soundness states that the modification should be:

- **Justified:** the most appropriate strategy when considered against reasonable alternatives, based on proportionate evidence.
- **Consistent with national policy:** The local plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

MM87, i.e. the removal of Local Green Space Designation for the whole of SK-LGS64, is **unjustified** because a reasonable alternative is possible. Part of the area of land defined as SK-LGS64, known locally as Park Hill, **does fulfil** all the criteria for Local Green Space Designation as stated in paragraph 100 of the National Planning Policy Framework (February 2019):

Paragraph 100. The Local Green Space designation should only be used where the green space is:
(a) in reasonably close proximity to the community it serves;
(b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
(c) local in character and is not an extensive tract of land.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

The changes we consider necessary to make the Main Modification MM87 sound and our suggested revised wording

Skipton Civic Society proposes that the area of land defined as SK-LGS64 should be divided and a portion of it returned to Local Green Space Designation. We define this portion, known locally as Park Hill or Battery Hill, as the area of land on the west side of Skipton Woods, bounded by Short Lee Lane to the north, Skipton Woods to the east, Chapel Hill to the south and Grassington Road to the west. In order to protect its character as a country lane and footpath, Short Lee Lane should be included within the proposed Local Green Space (Figure 1).

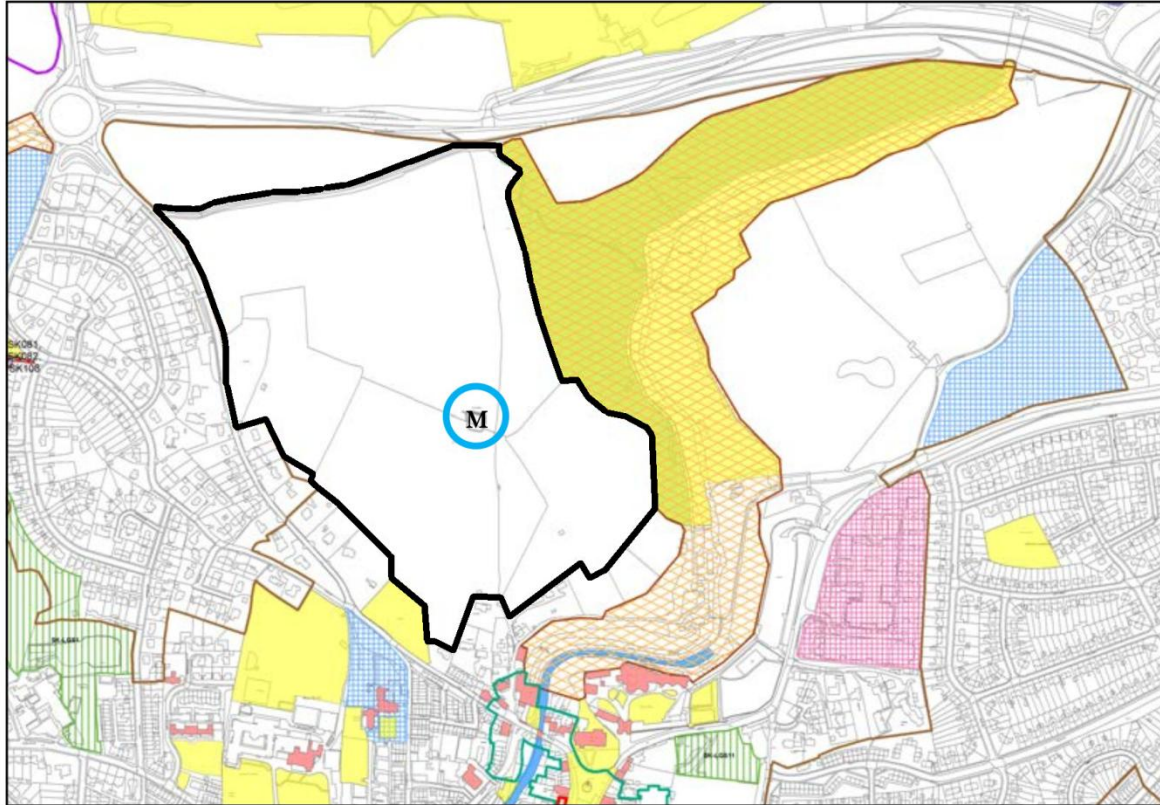


Figure 1: Park Hill Local Green Space (within black line) proposed by Skipton Civic Society

Why these changes will make MM 87 sound

Skipton Civic Society believes that returning Park Hill, as defined in the previous paragraph, to Local Green Space Designation, is justified. The continuation of this landscape as farm pasture and recreational space is the most appropriate use for this part of the town. The society is aware of an enormous interest in Park Hill; members of this society and other groups have expressed their support for our approach.

Returning Park Hill to Local Green Space Designation is consistent with national policy, fulfilling all the criteria outlined in paragraph 100 of the National Planning Policy Framework (February 2019) as follows:

(a) **Park Hill is in close proximity to the community it serves**, adjoining Skipton to the north of the town. Its southern entrance off Chapel Hill/Mill Bridge (the start of 'Lady Anne's Way' and 'A Dales High Way' long distance footpaths) is less than 300m (a 5 minute walk) from the High Street. It is easy walking distance (less than a 15 minute walk) from many residential areas of the town, and a reasonable walking distance (less than 30 minutes) from almost all residential areas of the town. A significant proportion of homes in Skipton have small gardens or no garden at all, so nearby access to green space is advantageous for the reasons outlined in (b) below.

(b) **Park Hill is special to the local community** for several different reasons. It has significant recreational value: a footpath runs up and over Park Hill from Chapel Hill to Short Lee Lane, connecting with footpaths both to the north of the A59 bypass and within Skipton Woods (managed by the Woodland Trust). Short Lee Lane, along the northern edge of Park Hill, is an important component of the footpath network. Walks encompassing both Park Hill and Skipton Woods are particularly attractive due to the contrast between open countryside and the woodland

environment. They are also reasonably short (typically 2-3km) and within the ability range of many people, which is important with respect to health benefits. In fact, the footpath over Park Hill is so close to the town centre that working people can easily access it during their lunch breaks. It is the Government's stated aim to 'help people improve their health and wellbeing by using green spaces including through mental health services' (A Green Future: Our 25 Year Plan to Improve the Environment, 2018, p71). According to this report, 'Spending time in the natural environment – as a resident or a visitor – improves our mental health and feelings of wellbeing. It can reduce stress, fatigue, anxiety and depression. It can help boost immune systems, encourage physical activity and may reduce the risk of chronic diseases such as asthma. It can combat loneliness and bind communities together'. Park Hill provides a beautiful view to uplift the spirit, respite from the traffic fumes of the town centre and a gradient to exercise the heart. Designating it as a Local Green Space would be beneficial to the residents of Skipton and visitors to the town, both physically and mentally.

The 360 degree views from the top of Park Hill are splendid. Not only can one see the town of Skipton below but also Embsay Crag, Sharp Haw, Skipton Moor, the Dales and Pendle Hill further afield. Park Hill, visible from many parts of the town, is also an attractive feature itself. It forms part of the tourist package of the town together with Skipton Castle, Skipton Woods, the High Street, the Leeds and Liverpool Canal and Holy Trinity Church, and is therefore economically beneficial to the town. With uncertainty regarding the future of high streets in their current form, all Skipton's other assets relating to tourism should be safeguarded for the future.

Park Hill has local and national historical significance. Its name refers to part of the hunting park of the Clifford family at Skipton Castle. There is a Scheduled Monument (List Entry Number: 1004878, Historic England) on the crest of the hill, which is the site of a Parliamentary Civil War battery. It is visible as a shallow earthwork enclosure and its heritage significance is widely known. The purpose of the battery was to house the cannon used to bombard Skipton Castle, the last Royalist stronghold in Yorkshire. The site, on a prominent hill with open views in all directions, can still be appreciated today.

Given Park Hill's historical and environmental significance, it could be used as an educational resource for schools and Pupil Referral Units. The Government wants to make it easier for pupils to be taken on trips 'to natural spaces on a regular basis where they can combine learning with feeling healthier and happier' (A Green Future: Our 25 Year Plan to Improve the Environment, 2018, p76). In Skipton, we have such a resource on our doorstep. Park Hill is no more than a 15-20 minute walk away from two secondary schools and three primary schools and, with its views over the town and of the wider landscape, is an ideal location to engage school children and college students with a wide range of topics relating to history, geography, geology, agriculture, natural history and art.

(c) **The local character of Park Hill** comprises pasture for sheep and cattle, a typical farming practice for this part of North Yorkshire. Its character has probably changed little during the last three hundred years; one of the earliest paintings of Skipton by Anthony Devis (1729-1817) shows Park Hill in the foreground as cattle pasture. The painting is held by Craven Museum (presently closed) and may be viewed online at <https://www.bonhams.com/auctions/11961/lot/31/>. Field enclosure boundaries, probably dating from the mid-late 18th century, combining traditional hedge or boundary banks, prominent trees and dry stone walling, can still be seen on Park Hill. This green hill is visible from many areas of the town and is a highly valued component of the local townscape. Together with Skipton Castle, Skipton Woods, the High Street, the Leeds and Liverpool Canal and Holy Trinity Church, the beauty and presence of Park Hill act to strengthen the community's sense of pride in its surroundings.

There is no Government guidance or legal definition of what constitutes ‘an extensive tract of land’, and there is no definition of this term given in the National Planning Policy Framework. The Government's guidance on public rights of way and local green space, open space, sports and recreation facilities (<https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>) states that ‘*there are no hard and fast rules about how big a Local Green Space can be because places are different*’. In the spirit of the Government's guidance, Skipton Civic Society strongly suggests that the area of Park Hill defined by the Society in this representation should not be regarded as extensive. It is a well-defined area of countryside and all parts of it are visible from the stile at the footpath's highest point.

(N.B. Because it is highly valued by the community, Skipton Civic Society’s request for Local Green Space Designation is certainly not a back door way to try to create a new area of Green Belt by another name.)

In the view of Skipton Civic Society, the evidence and information supplied above supports and justifies this representation and our suggested modification to the unsound MM87.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.


Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	✓
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	✓
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	 (Co-chair of Skipton Civic Society)
Date	26/03/2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ |
www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



INVESTOR IN PEOPLE



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

Craven Local Plan Examination



Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472


This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	MRS
First Name:	CLAIRE
Last Name:	NASH
Job Title (where relevant):	
Organisation (where relevant):	SKIPTON CIVIC SOCIETY
Address 1:	ST ANDREW'S CHURCH
Address 2:	NEW MARKET STREET
Address 3:	SKIPTON

Address 4:	
Postcode:	SO23 2FE
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	SKIPTON CIVIC SOCIETY
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: 7	

Section 4: Legal Compliance & Duty to Cooperate

Do you consider that this modification of the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant		✓
2. Sound		✓
3. In Compliance with the Duty to Cooperate		DON'T KNOW

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

It isn't sound to suddenly completely change the whole part of the plan re. housing, which was to encourage sustainable development by using brownfield sites first and to ensure growth is planned.

The changes allow random growth of a settlement giving no direction for where a settlement spreads to.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

Retain as in the draft

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	SKIPTON CIVIC SOCIETY
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM:	

Section 4: Legal Compliance & Duty to Cooperate

Do you consider that this modification of the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant	✓	
2. Sound	DON'T KNOW	
3. In Compliance with the Duty to Cooperate	DON'T KNOW	

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

We wish to support MM3 changes
to revise numbers in accordance
with the current situation.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.


Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	<input type="checkbox"/>
No, I do not wish to be notified	<input type="checkbox"/>

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	<input type="checkbox"/>
No, I do not wish to be notified	<input type="checkbox"/>

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	1/7/2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

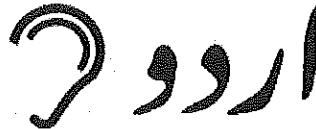
Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ |

www.cravencd.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravencd.gov.uk



INVESTOR IN PEOPLE



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

From: Jay Everett [REDACTED]
Sent: 25 March 2019 16:04
To: Local Dev. Framework
Subject: ack email sent 26.3.19 by RP Representation to CDC Local Plan - Main Modifications Consultation
Attachments: APC Rep for SPL - CDC Main Mods Form 25-03-2019.pdf; APC Rep for SPL Attachment 1 - Rep to Mods 25-03-2019.pdf; APC Rep for SPL Attachment 2 - Skipton Properties v Craven DC 2017.pdf; APC Rep for SPL Attachment 3 - William Davis Ltd v Charnwood BC 2017.pdf

Dear sir/madam,
Please find attached a Representation re the current consultation exercise on the proposed Main Modifications to the Publication Draft Local Plan.
I would be grateful if you would acknowledge receipt.
Kind regards
Jay

Jay Everett – Bsc (Hons) MRTPI
Managing Director
Addison Planning Consultants Ltd



E: - [REDACTED]
M: - [REDACTED]
T: - [REDACTED]
WWW.AddisonPlanning.Com
Floor 3 Calls Landing,
36-38 The Calls, Leeds, LS2 7EW
Registered Company Number: 08945769
VAT Registration: 186373672

This e-mail, including any attachments, is confidential and intended only for the attention and use of the named addressee(s). It may contain information covered by legal, professional or other privilege. If you are not an addressee, please inform the sender immediately and destroy this e-mail. Do not read, copy, use, retain or disclose this e-mail or any part of it. All reasonable precautions have been taken to ensure no viruses are present in this e-mail.

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	
First Name:	
Last Name:	
Job Title (where relevant):	
Organisation (where relevant):	Skipton Properties Ltd
Address 1:	c/o agent
Address 2:	
Address 3:	

Address 4:	
Postcode:	
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	Jay Everett – Addison Planning Consultants Ltd
Address:	Floor 3 Calls Landing 36-38 The Calls Leeds LS2 7EW
Telephone number:	██████████
Email:	████████████████████

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Skipton Properties Ltd
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: 92 and supporting txt	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

See Attachment

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

See Attachment

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	√
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	√
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	[REDACTED]
Date	25 th March 2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ | www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



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

Craven Local Plan Examination

1. Introduction

- 1.1 This representation is submitted on behalf of Skipton Properties Ltd (“SPL”) in relation to the soundness of the *‘Proposed Main Modifications to the Publication Draft Craven Local Plan’* (“Draft Local Plan”).
- 1.2 Craven District Council (“the Council”) published its Main Modifications to the Draft Local Plan for consultation on 19th February 2019. The Council are consulting upon the Main Modifications to the Draft Local Plan until 1st April 2019. The consultation comprises several documents, including: Schedule of Main Modifications (EL6.004), SA Summary Table for Main Modifications (EL6.005a) and Full SA Appraisals* (EL6.005b), HRA Addendum (EL6.006a) and HRA (Full Iteration III) (EL6.006b) and Schedule of Policy Map Changes (EL6.008).

2. Assessment of the Main Modifications to the Draft Local Plan

2.1 Introduction

- 2.1.1 An assessment of the Main Modifications to the Draft Local Plan has been undertaken to establish whether its policies are “sound” regarding the policies relating to Affordable Housing. The Assessment as set out below concludes that the Main Modifications proposed in relation to Affordable Housing (draft Policy H2) do not address the Representations made by SPL to the Publication Draft Local Plan (copy attached) or the concerns raised by the Local Plan Inspector during the Examination Hearings.

- 2.1.2 It is worth recalling at the outset the context of proposed Policy H2. Paragraph 63 of the NPPF sets out that the general default position for the country is that:

*“Provision of affordable housing should **not** be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer)...”* [Emphasis added].

- 2.1.3 This change in policy first arose in November 2014 when Government planning policy changed on the requirements for affordable housing for small sites in England when it announced a number of Section 106 planning obligation changes in order to relieve or remove the pressure on small scale developers and self-build developments. Policy was changed so that inter alia – for residential property development sites of 10 units or less (and with a maximum combined gross floor space of 1000 square metres) affordable housing contributions should not be sought (except in designated rural areas where authorities may choose to implement a lower threshold of 5 units or less). Ultimately this policy was upheld by the Court of Appeal. It would be entirely inconsistent with the main thrust of this policy change if local plan policies could insist upon smaller sites in designated rural areas having to deliver a level of affordable housing where such a level of contribution would make housing delivery unviable. Draft H2 endorsing as it currently does “very exceptional circumstances” as the overarching requirement rather than viability is plainly inconsistent with the thrust of the NPPF.

2.2 Main Modification 92: Paragraph 6.18 and 6.20 Supporting Text to Draft Policy H2:

Paragraph 6.18

- 2.2.1 The proposed Main Modifications to Paragraph 6.18 do not reflect the general discussions with the EIP Inspector during the Hearings which indicated that the inclusion of text requiring 'very exceptional circumstances' for a local planning authority to review the viability of individual sites is unsound. The Modified paragraph maintains the previous approach and effectively sets a higher bar as to the circumstances where the testing of viability will be accepted by the Planning Authority. It is also imprecise because it fails to specify what those circumstances might be. As drafted, it enables the Planning Authority simply to refuse to consider a viability case. This is clearly contrary to Paragraph 57 of the NPPF which states:

"It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. The weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case, including whether the plan and the viability evidence underpinning it is up to date, and any change in site circumstances since the plan was brought into force. All viability assessments, including any undertaken at the plan-making stage, should reflect the recommended approach in national planning guidance, including standardised inputs, and should be made publicly available."

- 2.2.2 Page 170, paragraph 6.18 of the draft Local Plan should be amended by the deletion of the following text:

"In some circumstances, development proposals may seek to include a lower proportion of affordable housing. To comply with this policy these circumstances must be exceptional. For example, unusual and wholly unexpected/unforeseen development costs which affect scheme viability, or where there are clear and overriding reasons to meet other planning objectives, such as the restoration of heritage assets. In these exceptional circumstances developers will be expected to conduct negotiations on a transparent and 'open book' basis⁴⁴. In all cases the Council will look to maximise the provision of affordable housing having regard to the circumstances of individual sites and scheme viability"

and its replacement with:

"In some circumstances, developers may seek to include a lower proportion of affordable housing. Where developers seek to reduce affordable housing requirements, the financial viability of developments should be assessed on a scheme by scheme basis having regard to individual circumstances and planning guidance as set out in the NPPG."

Paragraph 6.20 Financial and Off-Site Contributions

- 2.2.3 The proposed Main Modifications to Paragraph 6.20 of the draft Local Plan do not resolve the previous representations made or adequately respond to the EIP Hearing discussions. It remains **unsound** because it sets out ‘*the basis*’ of a methodology for calculating off-site contributions in lieu of affordable housing being provided on site. The paragraph is describing a broad policy approach and is not a justification for a policy; nor does it set out enough detail of how the calculation might work and be applied in practice. Indeed, this is explicitly acknowledged in the proposed Modification to the last sentence which states: “...and more detail on how financial contributions will be calculated.”
- 2.2.4 The ‘basis’ for the calculation is that the commuted sum is the equivalent of the open market sales value of a theoretical ‘on-site’ affordable dwelling minus the price a Registered Provider (RP) would pay for the affordable dwelling (in CDC’s case a specified transfer value equivalent to £1000/sq. m).
- 2.2.5 The content of paragraph 6.20 is clearly designed to establish strict parameters for a commuted sum calculation by using a ‘transfer value’ as the basis for the calculation. There is no evidence to justify the use of a ‘transfer value’ in such a calculation or indeed what an appropriate ‘transfer value’ might be. The Council has simply carried over a previous ‘policy approach’ as set out in its previous approach” document which was found (in 2017) to be unlawful. (see *Skipton Properties v Craven DC* [2017] EWHC 534 (Admin); [2017] 3 WLUK 467; [2017] J.P.L. 825; [2017] Env. L.R. D5). Any policy methodology of this nature would clearly need to be part of the DPD and not SPD (see para 100 Coda of judgment in *Skipton* and see where the court quashed a supplementary planning document (SPD) that strayed into Development Plan Document (DPD) territory in [William Davis Ltd & Ors v Charnwood Borough Council \[2017\] EWHC 3006 \(Admin\)](#) (23 November 2017)). In the present case the Council is avoiding the scrutiny of the DPD process by seeking to put into SPD that which should be in H2. If the Council had done so the policy approach in its current form could not be found sound.
- 2.2.6 The approach is thoroughly flawed and unsound. For example, a 70 sq. m (2-bedroom) dwelling would have a transfer value of £70,000 and an estimated open market sales value of say £180,000 equals a commuted sum of £110,000. The rather simplistic premise is that the on-site dwellings will be sold on the open market and that the entire profit should then be paid to the Council in lieu of affordable housing on site. This premise is fundamentally flawed because:
- There is no evidence to justify the use of a ‘transfer value’ in such a calculation or indeed what an appropriate ‘transfer value’ might be.
 - The transfer value used in this case is insufficient to cover even the basic construction cost of the unit. Previous evidence submitted by SPL to the EIP suggests the unit construction should be £1134/sq. m – equating in this example to £79,380 (£9,380 more than the transfer value).
 - The Calculation also makes no allowance for the costs of external works, site infrastructure, site abnormal costs, contingency, acquisition and disposal costs.

2.2.7 The Council's basis for a calculation expects the developer to acquire a site, finance the development, assume the developer's risk, build out the equivalent of affordable houses on site, sell them on the open market with no allowance whatsoever for any land value, and pay to the Council the full profit achieved plus a significant element of the cost of construction. The proposed calculation is therefore fundamentally flawed; it's application significantly impacts on land value and acts as a disincentive to land owners to bring forward small sites under the 10-dwelling threshold. The basis for the Calculation Methodology creates an unfair and unreasonable commuted sum requirement and directly conflicts with NPPG and is therefore unsound:

"Does the local planning authority have to justify its requirements for planning obligations?"

In all cases, including where tariff style charges are sought, the local planning authority must ensure that the obligation meets the relevant tests for planning obligations in that they are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind (my emphasis).

Planning obligations should not be sought where they are clearly not necessary to make the development acceptable in planning terms.

Planning obligations must be fully justified and evidenced. Where affordable housing contributions are being sought, planning obligations should not prevent development from going forward.

See related policy: paragraph 204.

Paragraph: 004 Reference ID: 23b-004-20150326

Revision date: 26 03 2015 See previous version"

2.2.8 The calculation is not justified and should therefore be deleted from the Local Plan. In order to address this issue, Paragraph 6.20 should be deleted in its entirety from the Local Plan. Alternatively, the Council should state that commuted sums for off-site contributions will be calculated on a site by site basis subject to viability; or through a methodology that is formulated on evidence, set out in an SPD, and subject to consultation and testing through Examination.

Draft Policy H2: Criterion a) I and II

2.2.9 The proposed Modifications to Criterion a) I and II change the phraseology from a 'minimum requirement' to 'not less than' a 30% affordable requirement on green field sites and a 25% requirement of brown field sites. The Modification does not change the meaning of the Policy which is to apply a minimum requirement for affordable housing provision. This is not reflective of our recollection of the EIP Hearing discussions that the %age requirement should not be expressed in such absolute terms without acknowledging that viability (and individual site circumstances) can impact on the level of affordable housing sought. In fact, the deletion of all reference to Viability in these criteria has made the Modified Policy

worse than the Publication Draft in terms of its soundness and completely contrary to NPPF/NPPG relating to consideration of viability matters.

2.2.10 The Modified Policy in relation to Criterion I and II remains unsound and requires further amendment to comply with the NPPF/NPPG. This could be simply achieved by expressing the %age requirements for affordable housing as targets subject to consideration of viability.

2.2.11 The Modified Policy seeks to address the issue of viability at new Criterion (d). However, the Modified Policy now encapsulates the Publication draft supporting text which seeks to limit the consideration of viability to unspecified 'exceptional circumstances' contrary to NPPF/NPG guidance. The Policy as worded sets a 'higher bar' as the circumstances where viability can be considered in the development management process and can be interpreted by the Local Planning Authority in a way which could restrict the deliverability of development.

"d) Development proposals that seek to provide a lower level of affordable housing contribution, either on or off site, will not be acceptable unless it can be clearly demonstrated that exceptional circumstances exist which justify a reduced affordable housing contribution. In such exceptional circumstances, the local planning authority will look to maximise provision of affordable housing having regard to the circumstances of individual sites and scheme viability. Developers will be expected to conduct negotiations on a transparent and 'open book' basis. The local planning authority will apply vacant building credit in all appropriate circumstances, in accordance with the NPPF and the PPG and will reduce on-site and/or financial contributions accordingly."

2.2.12 The above Modification should be deleted and replaced with wording as follows:

"d) Development proposals that seek to provide a lower level of affordable housing contribution will require testing through consideration of a Financial Viability Assessment. Developers will be expected to conduct negotiations on a transparent and 'open book' basis. The local planning authority will apply vacant building credit in all appropriate circumstances, in accordance with the NPPF and the PPG and will reduce on-site and/or financial contributions accordingly."

2.2.13 Proposed Modification III Criterion g): This criterion is unsound because it is unclear, ineffective and unnecessary. The criterion appears to be designed to retrospectively seek affordable housing on sites where earlier phases may have had a reduction in affordable housing negotiated through a Financial Viability Appraisal. For example, on a phased scheme, a development may incur higher infrastructure costs for the first phase which justifies a reduction in the affordable housing contribution to make the first phase viable. This criterion is designed to enable the Council to try and retrospectively claw back any discount in affordable housing in a first phase of development by adding that level of discount as an

additional requirement (on top of normal policy requirements) on a subsequent phase.

- 2.2.14 The purpose of the criterion has no basis in evidence or national planning policy. In practice, any affordable housing requirement on a phase of a development will be assessed in accordance with the policy requirements and financial viability at the time the application is made. The criterion is therefore unsound and should be deleted from the plan.

Addison Planning Consultants

For Skipton Properties Ltd

25th March 2019

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION
PLANNING COURT IN LEEDS

Leeds Combined Court Centre
1 Oxford Road, Leeds LS1 3BG

Date: 20/03/2017

Before:

MR JUSTICE JAY

Between:

**The Queen on the Application of
SKIPTON PROPERTIES LIMITED**

Claimant

- and -

CRAVEN DISTRICT COUNCIL

Defendant

Gregory Jones QC and Caroline Daly (instructed by Walton & Co) for the Claimant
Michael Bedford QC (instructed by Solicitor to the Council) for the Defendant

Hearing dates: 7th and 8th March 2017

Judgment Approved

MR JUSTICE JAY:

Introduction

1. By this application for judicial review, Skipton Properties Ltd (“the Claimant”) challenges the decision of Craven District Council (“the Defendant”) dated 2nd August 2016 to adopt a document entitled “Negotiating Affordable Housing Contributions August 2016” (“NAHC 2016”).
2. It is the Claimant’s case that, pursuant to the Town and Country Planning (Local Planning) (England) Regulations 2012 [SI 2012 No 767] (“the 2012 Regulations”) the NAHC 2016 was required to be adopted as a development plan document, alternatively as a supplementary planning document; and that the failure to comply with antecedent statutory conditions renders the purported adoption unlawful. Further,

it is contended that the NAHC 2016 was adopted in breach of Directive 2001/42/EC (“the SEA Directive”) and the Environmental Assessment of Plans and Programmes Regulations 2004 [SI 2004 No 1633] (“the SEA Regulations”).

3. Before I examine the issues joined in the pleadings, I propose to set out the Essential Factual Background to this dispute as well as the governing legal framework.

Essential Factual Background

4. The Claimant is described in the Statement of Facts and Grounds as a local landowner and residential property developer. There is disagreement between the parties as to the scale of its operations. According to the witness statement of the Defendant’s planning officer, Ms Sian Watson, dated 2nd February 2017, “since ... [2012] the Claimant’s developments have (with one exception) involved sites of more than 10 dwellings”. She draws my attention to planning applications made for 37 and 65 dwellings in May 2013 and July 2016 respectively. In December 2015 the Claimant sought planning permission for a development of 3 dwellings on a site in Cowling. Mr Brian Verity, the Claimant’s managing director, does not contradict these basic facts, but states as follows:

“The changes made to the NAHC 2016, as compared to previous Council policy documents in respect of affordable housing, are also of direct interest to [the Claimant]. The introduction of vacant building credit and the requirement that off-site affordable housing contributions be provided in schemes of 6-10 dwellings in rural areas are both of relevance to [the Claimant’s] commercial position in the area. Firstly, we are acutely aware of the fact that these two important policy changes will have an impact on the decisions made by all local housing developers in respect of the number, nature and location of sites to bring forward, which could have a profound effect on the housing market in Craven District Council. Secondly, the off-site contributions for 6-10 dwellings may well cause [the Claimant] to consider bringing forward smaller sites in the future.”

5. The Craven District (Outside the Yorkshire Dales National Park) Local Plan was adopted in July 1999. Under the objectives section of the Housing Chapter, one such objective was “to encourage and enable the development of affordable housing for rent and purchase in locations where it is required including rural areas”. Policy H11 (“Affordable Housing on Large/Allocated Sites in District and Local Services Centres”) was deleted in September 2007 (or, put another way, was not expressly saved by the Secretary of State), leaving the Defendant without a policy in its adopted development plan for the provision of affordable housing (save in one very specific respect). I am told by Ms Watson that the Defendant is preparing a new local plan, but that it will not be submitted for independent examination by the Secretary of State until later this year.

6. On 29th May 2012 the Defendant adopted the “Interim Approach to Negotiating Affordable Housing Requirements” (“IANAHR 2012”). It superseded the Affordable Housing Guide 2008 and stated, in so far as is material to this application:

“The Interim approach is to require affordable housing at 40% provision on sites of 5 or more dwellings, subject to site specific financial viability. Strategic Housing will provide guidance to applicants on how this will be delivered, including type, size and tenure issues.

...

Applicants would ... be advised that the failure to make provision for affordable housing may be a reason that is used to refuse planning permission.”

7. The IANAHR 2012 was subsequently updated, altered and expanded. A series of supplements to the original document were published in July 2012, January 2013 and August 2014. The original document and the supplements were then amalgamated into a single document in January 2015. A new version of this document with improved format and content was published in October 2015, entitled “Negotiating Affordable Housing Contributions (October 2015)”. This document was further updated following the publication of the 2015 Strategic Housing Market Assessment, and a new version entitled “Negotiating Affordable Housing Contributions (December 2015)” (“NAHC 2015”) was promulgated on 5th January 2016. It should be noted that none of the post-IANAHR 2012 documents was separately adopted by the Defendant.
8. The NAHC 2015 contained the following statements:

“This document sets out the council’s interim approach to negotiating affordable housing contributions, in connection with planning applications for residential development. The approach (which is not a development plan policy) was adopted for development control purposes by the Council’s Policy Committee on 29th May 2012. Guidance explaining the approach has been updated, improved and expanded over time. This latest version will be used as a stop-gap measure, by planning and housing officers, until an affordable housing policy has been prepared as part of the new local plan.

...

Our approach

In view of the above, the Council will commence negotiations with developers on the basis that, in developments of 5 dwellings or more, 40% of the units to be built on-site shall be affordable housing. On occasion, it may be appropriate to negotiate the payment of a cash-sum contribution, by the developer, in lieu of on-site affordable housing provision. All

contributions will be subject to site-specific financial viability
...

9. The Defendant's "Draft Text, Policies and Policies Map with Sustainability Appraisal, Interim Report and Sustainability Appraisal of Policies Consultation Document", dated 4th April 2016, forming part of the consultation process in respect of the new local plan, stated (in relation to proposed affordable housing guidance):

"The council will publish additional practical guidance on the provision of affordable housing in the form of a supplementary planning document (SPD). This will include guidance on the limited circumstances in which off-site provision or financial contributions will be considered *in lieu* of on-site provision."

10. On 19th July 2016 the Defendant's Policy Committee received a report from the Strategic Manager for Planning and Regeneration which recommended a "revised approach" to negotiating affordable housing contributions in connection with planning applications for residential development. In November 2014 the Government had sought by Ministerial Statement to introduce changes to national policy on requiring affordable housing contributions from small sites. These changes were successfully challenged in judicial review proceedings, but the Government's position prevailed on appeal: see SSCLG v West Berkshire Council [2016] EWCA Civ 441, 11th May 2016. According to the Defendant's draft NAHC 2016 (appended to the July 2016 report):

"3.2 The main effects of national affordable housing policy and guidance are as follows:

- A new national site-size threshold has been introduced. Local Planning Authorities should no longer seek affordable housing contributions from developments of 10 dwellings with a maximum combined floor space of 1,000 sqm or less.
- In designated rural areas ... authorities may choose to implement a lower threshold of 5 dwellings or less, but only cash contributions (as opposed to on-site provision) should be sought from developments of 6-10 dwellings.
- Vacant building credit has been introduced. Authorities should apply the credit where developments include the re-use or re-development of empty buildings, so that affordable housing contributions relate only to net increases in floor space.

3.6 Paragraph 3.2 above, explains that changes to national policy and guidance are intended to lift the burden on small developers. It should be noted, therefore, that replacing the 5 dwelling threshold, adopted in 2012, with a 6 dwelling threshold will represent an improvement for landowners for landowners and developers in designated rural areas ... It is therefore considered that the recommendations of paragraphs

2.1 to 2.3 above, are likely to support the appropriate development of new homes, by small developers, in rural areas.”

I should add that the Defendant has not yet amended its draft local plan (see paragraph 9 above) to reflect the Court of Appeal’s decision. The position adopted in the draft NAHC 2016 (and, indeed, the final version) may not necessarily be reflected in the next draft of the local plan.

11. The principal change between the NAHC 2015 and the NAHC 2016 was explained at paragraph 3.3 of the July 2016 report:

“The revised approach and guidance, contained in the appendix to this report, is based on the December 2015 version, but incorporates new site-size thresholds (page 2), cash-sum contributions (page 7) and vacant building credit (page 8). A contributions flow chart has also been added to help explain how affordable housing contributions are now determined (page 14). The following table appears on page 2 of the appendix and sets out a general approach to affordable housing negotiations.

Proposed development	Affordable housing contribution
More than 10 dwellings	40% of the units to be built on-site should be affordable housing
More than 1,000 sqm	
6-10 dwellings in designated rural area	A cash contribution should be paid, once a reasonable proportion of the units is occupied, in lieu of on-site affordable housing provision
Less than 6 dwellings, but more than 1,000 sqm, in designated rural area	
All contributions will be subject to vacant building credit and site-specific financial viability	

”

12. The rationale for the change was explained at paragraph 3.5 of the July 2016 report:

“Under the council’s current approach, which was adopted on 29th May 2012, on-site provision has been sought from all developments of 5 dwellings or more, with cash contributions only accepted in exceptional circumstances. This approach has worked well and the council has secured on-site provision from six developments of 6-10 dwellings in designated rural areas, delivering approximately four affordable homes per year on average. Though relatively small in number, these homes will have a significant impact on sparsely populated rural areas, helping local people stay living and working in the communities in which they have been brought up. Whilst changes in national policy and PPG mean that the council can no longer require affordable homes to be built on sites of 6-10 dwellings, cash contributions can be required in designated rural areas, which could avoid a disproportionate effect on rural communities ...”

13. On 29th July 2016 the Defendant’s Policy Committee resolved to recommend to Full Council that, owing to significant changes in national planning policy “which necessitated the Council to determine whether affordable housing commuted sums should be sought for developments of 6-10 dwellings (or less than 6 dwellings with a combined floor space of more than 1,000 sqm) in designated rural areas before such sums can be secured from developers”, it was recommended:

“(1) That, the lower threshold for affordable housing contributions in designated rural areas and, in those areas, seek cash contributions from developments of 6-10 dwellings is implemented.

(2) That, there is a requirement that affordable housing contributions are paid in respect of developments of less than 6 dwellings with a combined floor space of more than 1,000 sqm.

(3) That, the approach and guidance set out in the document entitled ‘NAHC (draft July 2016)’ ... is approved.”

14. This recommendation was confirmed, and adopted, by Full Council at its meeting on 2nd August 2016; and published on the Defendant’s website two days later.

The Legal Framework

Primary Legislation

15. The Planning and Compulsory Purchase Act 2004 (“PCPA 2004”) differentiates between “development plan documents” (“DPDs”) and “local development documents” (“LDDs”). The scheme of the PCPA 2004 is that DPDs are a sub-set of LDDs. The latter comprises all the local planning authority’s policies relating to the

development and use of land in its area (section 17(3)), but these do not acquire that status until adopted as such (section 17(8)). By section 38(3)(b), “the development plan consists of the DPDs (taken as a whole) which have been adopted or approved in relation to the area in question”. The effect of section 38(6) is that applications for planning permission must be “made in accordance with the [development] plan unless material considerations indicate otherwise”.

16. The PCPA 2004 does not provide the touchstone for discriminating between DPDs and LDDs. The applicable criteria are determined by secondary legislation. Section 17(7) provides:

“Regulations under this section may prescribe –

- (za) which descriptions of documents are, or if prepared are, to be prepared as LDDs;
- (a) which descriptions of LDDs are DPDs;
- (b) the form and content of the LDDs;
- (c) the time at which any step in the preparation of any such document must be taken.”

Even so, I do not overlook section 37(3) which defines a DPD as a “[LDD] which is specified as a [DPD] in the local development scheme”. An issue arises as to whether a document which may fall within the prescribed description of an LDD (but is not prescribed as a DPD within regulations made under section 17(7)(a)) may still be treated by a local planning authority as a DPD.

17. Under the PCPA 2004, DPDs must be subject to independent examination by the Secretary of State (section 20). LDDs are not so subject. The combined effect of section 17(3) of the PCPA 2004 and section 70(2)(c) of the Town and Country Planning Act 1990 (“the 1990 Act”) is that LDDs are (if they are not also DPDs) material considerations in the determination of planning applications, although they do not carry the weight of the statutory development plan (c.f. section 38(6)).

Secondary Legislation

18. Regulation 2 of the 2012 Regulations defines “local plan” as “any document of the description referred to in regulation 5(1)(a)(i), (ii) or (iv) or 5(2)(a) or (b), and for the purposes of section 17(7)(a) of the Act these documents are prescribed as DPDs” (see also regulation 6). Further, “supplementary plan document” (“SPD”) means “any document of a description referred to in regulation 5 (except an adopted policies map or a statement of community involvement) which is not a local plan”.
19. By regulation 5:

“Local Development Documents

(1) For the purposes of section 17(7)(a) of the Act the documents which are to be prepared as [LDDs] are –

(a) any document prepared by a local planning authority individually or in co-operation with one or more local planning authorities which contains statements regarding one or more of the following -

(i) the development and use of land which the local planning authority wish to encourage during any specified period;

(ii) the allocation of sites for a particular development or use;

(iii) any environmental, social design and economic objectives which are relevant to the attainment of the development and use of land mentioned in paragraph (i); and

(iv) development management and site allocation policies, which are intended to guide the determination of applications for planning permission.

...

(2) For the purposes of section 17(7)(za) of the Act the documents which, if prepared, are to be prepared as local development documents are –

(a) any document which -

...

(iii) contains the local planning authority's policies in relation to the area; ...”

20. Thus, the effect of regulations 2 and 6 is that the local plan (and, therefore, the development plan) comprises documents of the description referred to in regulation 5(1)(a)(i), (ii) or (iv), or 5(2)(a) or (b). Documents which fall within the description referred to in regulation 5(1)(a)(iii) or (1)(b) cannot be DPDs.
21. SPDs are subject to regulations 12 and 13 of the 2012 Regulations, and specific public consultation requirements. DPDs are subject to the different consultation requirements of regulation 18.
22. SPDs, which are not a creature of the PCPA 2004, are defined negatively (see regulation 2(1)) as regulation 5 documents which do not form part of the local plan, i.e. are not DPDs. By the decision of this court in R (RWE Npower Renewables Ltd) v Milton Keynes Borough Council [2013] EWHC 751 (Admin) (Mr John Howell QC sitting as a DHCJ), not all documents which are not DPDs are SPDs. As I have said, SPDs are only those documents which fall within regulation 5(1)(a)(iii) or (1)(b) of

the 2012 Regulations. Documents which are neither DPDs nor fall within any of the provisions of regulation 5(1) are capable of being LDDs but – in order to differentiate them from DPDs and SPDs - are “residual LDDs”. At paragraphs 57-59 of this judgment in RWE, Mr Howell QC made clear that it is not the location of a document within the prescribed categories which is critical; what matters is that the document fulfils the separate criteria of section 17(3) and (8) of the 2004 Act.

23. Thus, there are three discrete categories, namely:

- (1) DPDs: these are LDDs which fall within regulation 5(1)(a)(i), (ii) or (iv). They must be prepared and adopted as a DPD (as per the requirements of Part 6 of the 2012 Regulations). They must be subject to public consultation (regulation 18) and independent examination by the Secretary of State (section 20 of the PCPA 2004). As I have said (see paragraph 16 above), an issue potentially arises as to whether a document which does not fall within these regulatory provisions may nonetheless be a DPD because a local planning authority chooses to adopt it as such.
- (2) SPDs: these are LDDs which are not DPDs and which fall within either regulation 5(1)(a)(iii) or (1)(b). They must be prepared and adopted as SPDs (as per the requirements of Part 5 of the 2012 Regulations). SPDs do not require independent examination but they do require public consultation (regulations 12 and 13).
- (3) Residual LDDs: these are LDDs which are neither DPDs or SPDs. They must satisfy the criteria of section 17(3) and (8) of the PCPA 2004, and must be adopted as LDDs (as per (2) above). There are no public consultation and independent examination requirements: see paragraphs 44-46 of the decision of this Court on R (Miller Homes) v Leeds City Council [2014] EWHC 82 (Admin). At paragraph 17 above, I said that LDDs are material considerations in planning applications although they do not have the status of DPDs. I consider that the same logic should hold that LDDs which are SPDs carry greater weight in such applications than do residual LDDs.

National Policy

24. The National Policy Planning Framework (“NPPF”) provides:

“17. Within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking. These 12 principles are that planning should:

- be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area ...

...

- proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities;

...

50. To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning policies should:

- plan for a mix of housing based on current and future demographic trends ...
- identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand; and
- where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified ...

...

156. Local planning authorities should set out the **strategic priorities** for the area in the Local Plan. These should include strategic policies to deliver:

- * the homes and jobs in the area.

...

174. Local planning authorities should set out the policy on local standards in the Local Plan, including requirements for affordable housing ...

...

Glossary

[I note the definitions of “affordable housing”, “development plan”, “local plan” and “supplementary planning documents”, but in my view these do not merit direct citation]

25. At paragraph 9 above, I mentioned the Defendant’s draft local plan which will go out to consultation in due course. The precise terms on which it will be consulted are unclear. By paragraph 216 of the NPPF, decision-makers may give weight to emerging plans, with the degree of weight dependent on the stage of preparation, the extent to which there are unresolved objections to relevant policies, and the degree of consistency between such plans and the NPPF itself.

Strategic Environmental Assessment

26. Regulation 2(1) of the SEA Regulations defines the “plans or programmes” to which this regime applies as:

“plans and programmes ... which

(a) are subject to preparation or adoption by an authority at ... a local level,

(b) are prepared by an authority for adoption, through a legislative procedure by Parliament or Government; and in either case

(c) are required by legislative, regulatory or administrative provisions ...”

27. By regulation 5:

“(1) Subject to paragraphs (5) and (6) and regulation 7, where –

(a) the first formal preparatory act of a plan or programme is on or after 21st July 2004; and

(b) the plan or programme is of the description set out in either paragraph (2) or paragraph (3)

the responsible authority shall carry out, or secure the carrying out of, an environmental assessment, in accordance with Part 3 of these Regulations, during the preparation of that plan or programme and before its adoption or submission to the legislative procedure.

(2) The description is a plan or programme which -

(a) is prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, and

(b) sets the framework for future development consent of projects listed in Annex I or II of Council Directive 85/337/EEC on the assessment of the effects of certain

public and private projects on the environment, as amended by Council Directive 97/11/EC.

...

(4) Subject to paragraph (5) and regulation 7 -

(a) the first formal preparatory act of a plan or programme, other than a plan or programme of the description set out in paragraph (2) or (3), is on or after 21st July 2004;

(b) the plan or programme sets the framework for future development consent of projects; and

(c) the plan or programme is subject to a determination under regulation 9(1) ... that it is likely to have significant environmental effects,

the responsible authority shall carry out, or secure the carrying out, of an environmental assessment, in accordance with Part 3 of these Regulations, during the preparation of that plan or programme and before its adoption or submission to the legislative procedure.

...

(6) An environmental assessment need not be carried out –

(a) for a plan or programme of the description set out in paragraph (2) or (3) which determines the use of a small area at local level; or

...

unless it has been determined under regulation 9(1) that the plan, programme or modification, as the case may be, is likely to have significant environmental effects, ...”

28. By regulation 9:

“(1) The responsible authority shall determine whether or not a plan, programme ... referred to in –

(a) paragraph (4)(a) and (b) of regulation 5;

(b) paragraph (6)(a) of that regulation;

(c) paragraph (6)(b) of that regulation,

is likely to have environmental effects.

(2) Before making a determination under paragraph (1) the responsible authority shall -

(a) take into account the criteria specified in Schedule 1 to these regulations; and

(b) consult the consultation bodies.

(3) Where the responsible authority determines that the plan, programme ... is unlikely to have significant environmental effects (and, accordingly, does not require an environmental assessment), it shall prepare a statement of its reasons for the determination.”

The NAHC 2016

29. The NAHC 2016 makes clear that it contains the Defendant’s “interim approach” to negotiating affordable housing contributions, which approach was first adopted on 29th May 2012. According to its drafters, it is not in the nature of a development plan policy (the “not” is italicised). Further:

“This current version incorporates a ministerial statement issued in 2014 and related to changes to planning practice guidance. It will be used as a stop-gap measure, by planning and housing officers, whilst an affordable housing policy is being prepared as part of the new local plan.”

30. The NAHC 2016 recognised the conclusion of the Defendant’s Strategic Housing Market Assessment (“the 2015 SHMA”) that there was a high need for affordable housing in Craven. It also recognised that the 2014 Ministerial Statement, upheld by the Court of Appeal in May 2016, allowed local planning authorities in designated rural areas the option of lowering the threshold from 10 dwellings to 5 dwellings/1,000 sqm, with any affordable housing contributions being taken as cash payments.

31. The following provisions of the NAHC 2016 are relevant to the issues which arise:

(i) Paragraph 3: this sets out the general approach, and reflects the table I have included at paragraph 11 above.

(ii) Paragraph 4: this defines “affordable housing” with reference to the definition in the glossary section of the NPPF.

(iii) Paragraph 6: as regards the “size and tenure of affordable housing units”, the general approach to securing the local housing needs as set out in the 2015 SHMA is to prioritise small affordable homes for “forming and growing households”. There should also be an affordable housing mix of about 75% affordable rented and 25% intermediate housing for sale.

- (iv) Paragraph 7: affordable housing units should, as a general rule, be spread through developments rather than concentrated in particular areas.
- (v) Paragraph 8: the design requirements should be as laid down by the HCA and in the Defendant's own document, "Design Guidance for Affordable Housing Providers". Paragraph 8 also specifies minimum space standards.
- (vi) Paragraphs 10-12 deal with the detail of housing transfer prices, cash-sum contributions and vacant building credit.

32. I set out the salient parts of paragraph 16 of the NAHC 2016 separately:

“Planning Applications

Anyone proposing a development of 6 or more dwellings, or more than 1,000 sqm, should discuss affordable housing requirements with the council's housing development team at a pre-application meeting.

...

If an applicant believes that affordable housing requirements are not financially viable, he/she should submit a financial viability appraisal before submitting a planning application ...

...

Applicants are urged to take the opportunities offered to engage in pre-application discussions, as insufficient attention to affordable housing requirements is likely to result in a refusal of planning permission.”

The Issues

33. The parties are agreed that the following five issues arise for my consideration:

- (1) Did the Defendant act unlawfully in failing to adopt the NAHC 2016 as a DPD in accordance with regulation 5(1)(a)(i) or (iv) of the 2012 Regulations? (Ground 1)
- (2) Did the Defendant act unlawfully in failing to adopt the NAHC 2016 as an SPD in accordance with Regulation 5(1)(a)(iii) of the Town and Country Planning (Local Planning) (England) Regulations 2012? (Ground 2)
- (3) If the answer to (1) or (2) is yes, did the Defendant breach the SEA Directive and Regulations in failing to carry out an environmental assessment? (Ground 3)
- (4) What is the proper scope of this claim?
- (5) Does s. 31(2A) of the Senior Courts Act 1981 apply to this Claim?

The Rival Contentions

The Claimant's Case

Issue 1

34. Mr Gregory Jones QC for the Claimant submitted that the NAHC 2016 contains statements which fulfil all the requirements of regulation 5(1)(a)(i). The NAHC 2016 is intended to be the Defendant's interim policy in relation to affordable housing, implemented in direct response to paragraph 50 of the NPPF, and to the option accorded to local planning authorities in the Ministerial Statement of 2014, pending the preparation and finalisation of the new local plan. Specifically, the NAHC 2016 was promulgated in response to a clearly perceived need for affordable housing, and, accordingly, encourages it. The various components of the policy document, including references to size and tenure, distribution of housing units, and design, relate to or are regarding "development and use of land": the link between the statements on the one hand and their target on the other ("the development and use of land") need not be particularly tight. Further, these are matters which the Defendant wishes to encourage "during any specified period", being an admittedly indeterminate period of time which will end once the new local plan has been adopted.

35. In his skeleton argument, Mr Jones encapsulated his submission in this manner:

"The logical implication of this ... viewed in the round, it is clear that the NAHC does contain statements that seek to encourage residential development in a form that accords with the requirements of the NAHC 2016 until such time as a new local plan is adopted."

When, during oral argument, I pointed out that this formulation rather tended to circularity, Mr Jones recast his headline submission slightly. His principal submission was that the NAHC 2016, properly construed and seen in context, encourages residential development of a particular type: namely, affordable housing. In the alternative, Mr Jones submitted that the NAHC 2016 encourages residential development more generally, because the fixing of the percentage allocation of affordable housing to market housing has a direct impact on the latter, and on the commercial attractiveness of residential development generally.

36. In the alternative, Mr Jones submitted that the NAHC 2016 contains statements that regulate the development or use of land more generally, and that it therefore falls within regulation 5(1)(a)(iv). The document sets forth the conditions which must be satisfied in order for planning permission to be granted: if these are not fulfilled, it is probable that permission will be refused. The NAHC 2016 applies in respect of all residential development in the Defendant's administrative area and can therefore be envisaged as a general development management policy.

37. Mr Jones accepted that the NAHC 2016 contains no statements regarding site allocation policies, but he submitted that the conjunction "and" in regulation 5(1)(a)(iv) is disjunctive rather than conjunctive – in the sense that, in order to be caught by the provision, it is unnecessary for both elements to be satisfied.

38. If the NAHC 2016 falls within either regulation 5(1)(a)(i) or (iv), Mr Jones submitted that it is a DPD which ought to have been made the subject of consultation under regulation 18 of the 2012 Regulations, and have been submitted to the Secretary of State for independent examination of its soundness under regulation 20.

Issue 2

39. Mr Jones' primary case is that the NAHC 2016 is a DPD, but he submitted in the alternative that it is an SPD because it clearly contains objectives which the Defendant seeks to attain in relation to the provision of affordable housing: these are the financial conditions, and the size and tenure, design, and spatial objectives I have previously mentioned.
40. Mr Jones observes that the Defendant's skeleton argument raises for the first time the objection that there is no or insufficient nexus between any statements in the NAHC 2016 which might *prima facie* fall within regulation 5(1)(a)(iii) and any saved policies in the 1999 Local Plan. His riposte to this objection was two-fold: first, that the NAHC 2016 contains statements which pertain to saved policy H12; secondly, that it contains statements which qualify one or more of the more general aspects of the Housing Chapter of the 1999 Local Plan.
41. If the NAHC 2016 falls within regulation 5(1)(a)(iii), Mr Jones submitted that it is an SPD which ought to have been made the subject of consultation under regulations 12 and 13 of the 2012 Regulations.

Issue 3

42. It is common ground that, if the Claimant succeeds on Ground/Issue 1, the Defendant should have undertaken an SEA.
43. In the event that the Claimant succeeds on Ground/Issue 2 (having, by definition, failed on Ground/Issue 1), Mr Jones submitted that the NAHC 2016 *qua* SPD falls within the ambit of regulation 5(2) of the SEA Regulations because it is a "plan or programme" that is "prepared for town and country planning or land use", and it "sets the framework for future development consent of [urban development projects]". That being the case, it was incumbent on the Defendant to carry out, or secure the carrying out, of an environmental assessment under regulation 5(1).
44. The rubric "plan or programme" applies only to documents "required by legislative, regulatory or administrative provisions" (see article 2(a) of the SEA Directive). Mr Jones relied on the decision of the CJEU in Inter-Environnement Bruxelles ASBL v Région de Bruxelles-Capitale [2012] Env L.R. 30 in support of the proposition that the statutory preconditions for the adoption of an SPD satisfied the criterion of "required" notwithstanding that the SPD itself was not a mandatory document. In the alternative, Mr Jones submitted that the NAHC 2016 is a plan required by "administrative provisions", namely provisions in the NPPF.
45. As for the separate rubric, "sets the framework for future development consent of [urban development projects]", Mr Jones submitted, in reliance on the decision of the Supreme Court in R (Buckinghamshire County Council) v Transport Secretary [2014] UKSC 3, that the NAHC 2016 satisfies this test because it constrains subsequent consideration of applications for planning permission within the terms of Lord Carnwath JSC's analysis.

Issue 4

46. As I have pointed out at paragraph 11 above, when a comparison is made between the NAHC 2015 and the NAHC 2016, it is clear that the main substantive difference relates to paragraph 3 and the approach to cash-sum contributions *in lieu* of on-site provision in certain specified circumstances. There are also minor consequential changes. Whereas the NAHC 2015 was published, but not adopted, by the Defendant, the NAHC 2016 was adopted and then published two days later.
47. Mr Jones submitted that in these circumstances it is open to the Claimant to seek to challenge the entirety of the NAHC 2016, and not just those portions which were new. Given the procedures adopted by the Defendant in August 2016, and that the NAHC 2015 was impliedly abrogated the instant after the NAHC 2016 came into effect, there was nothing to preclude a challenge to the entirety of the later document. The fact, which is not accepted, that the Claimant's real grievance might relate not to the new parts is nothing to the point.

Issue 5

48. Mr Jones submitted that, had the Defendant not acted unlawfully, it was not "highly likely" that the outcome would not have been substantially different (see the familiar wording of section 31(2A) of the Senior Courts Act 1981). If I were to find in his favour on Ground 1 (and, therefore, on Ground 3 too), it would follow that the Defendant was in breach of the various regulatory requirements by failing to consult on the NAHC 2016, in failing to carry out an SEA, and in failing to submit the document for independent assessment by the Secretary of State. In such circumstances, the court simply cannot speculate as what the outcome would or might have been had these omissions not occurred. Mr Jones submitted that the analysis should be the same were he to succeed only on Ground 2, with or without Ground 3; although he would have to accept that the point would not be as powerful.
49. In terms of the comparative exercise predicated by section 31(2A), Mr Jones submitted that I should examine the outcome with reference to what would have obtained had the unlawfulness not occurred rather than on the basis of any comparison between the NAHC 2016 and the NAHC 2015.

The Defendant's Case

Issue 1

50. Mr Michael Bedford QC for the Defendant submitted, by way of introductory observation, that the distinction between DPDs, SPDs and residual LDDs "is, at times, opaque". He also submitted that Mr Jones' approach to regulation 5(1)(a)(i) was so broad that it left little space for SPDs (within (iii)) and for residual LDDs, which are outside the frame of these regulations altogether.

51. His first submission was that regulation 5(1)(a) is concerned, in essence, with *policies*, and that the NAHC 2016 is not intended to be such a document: it lays down an interim approach, and must therefore be treated as no more than a material consideration for planning purposes, rather than as generating a statutory presumption pursuant to section 38(6) of the 2004 Act. Given that the Defendant is not intending to circumvent the statutory scheme, and is developing its local plan in line with the substantive and procedural requirements which the 2004 Act and national policy has prescribed, there can be no sound reason in principle why, pending this plan coming to fruition, the Defendant cannot adopt, promulgate and adhere to guidance of this nature as a form of stop-gap measure. On my understanding, Mr Bedford deployed this submission in relation to both Grounds 1 and 2; but, as it features as a preliminary point, I raise it at this stage.
52. Secondly, Mr Bedford submitted that the NAHC 2016, as its introductory section makes clear, addresses the Defendant’s “interim approach to negotiating affordable housing contributions, in connection with planning applications for residential development”. The focus is on the contributions rather than on residential development. For the purposes of regulation 5(1)(a)(i), residential development is not being encouraged. The premise upon which the NAHC 2016 proceeds is that a developer may propose a particular development (this is treated as a given), and then the Defendant will address the issue of affordable housing, in particular cash-sum contributions. Thus, in no relevant sense is residential development being encouraged or promoted: the developer has already decided to apply for permission to undertake such development. Although the “development and use of land” within this part of the regulation covers residential development (see Use Class C3, for individual dwellings), it does not embrace affordable housing. This is not the development and use of land; rather, it is concerned only with the terms and tenure for the occupation of residential development.
53. In answer to Mr Jones’ alternative argument on regulation 5(1)(a)(iv), Mr Bedford’s submissions passed along the following tracks:
- (1) on the assumptions that (a) the “and” in this sub-paragraph should be read disjunctively, and (b) paragraphs 75-76 of the judgment of Mr Howell QC in RWE are correct, it cannot be said that the NAHC 2016 is a policy guiding applications for planning permission *generally*. It is concerned only with the issue of affordable housing provision, which amounts to a specific policy not dissimilar from the sort of policy under scrutiny in RWE itself.
 - (2) In the alternative, the “and” in this paragraph should be read conjunctively, which is its more natural and ordinary meaning. This chimes with the more sensible, purposive construction of the provision inasmuch as a disjunctive interpretation lends no separate life to the second limb of regulation 5(1)(a)(iv): this is because all site allocation policies will already be DPDs on account of the wording of paragraph 5(1)(a)(ii), there being no material difference in the regulatory language. Recognising that this alternative analysis is inconsistent with paragraphs 193-197 of RWE (on the basis that development management policies *simpliciter* would be outside the regulatory scheme, because they could not be DPDs), Mr Bedford did not shrink from submitting that Mr Howell QC was wrong, and should not be followed. This is the issue I mentioned at paragraph 16 above. Regulation 5(1)(a) does not establish an exhaustive code. Not merely are

there residual LDDs, local planning authorities may decide that particular documents should form part of the local plan, and be processed as such. Section 37(3) is wide enough to enable this to happen.

Issue 2

54. Mr Bedford accepted in principle that the NAHC 2016 contained statements regarding social, design and economic objectives (see the wording of regulation 5(1)(a)(iii)). Indeed, he deployed this in support of his construction of paragraph (i): a case which is apt, at least in principle, to be accommodated within one provision must (at the very least) be less apt to be accommodated within another (it being impossible for the case to fall within both provisions). His submission, however, was that these various objectives are not relevant to “the attainment of the development and use of land mentioned in paragraph (i)”, which must be a reference to a specific DPD to which the putative SPD is subordinate. Given that there is no saved affordable housing policy in the 1999 Local Plan, it must follow that there is nothing to which this putative SPD can be supplementary. The very general statements in the saved local plan cannot be recruited for this purpose, nor can policy H12 which relates very specifically to rural exception sites and 100% affordable housing.

Issue 3

55. On the footing that the NHC 2016 is an SPD, Mr Bedford remarked that it was not readily apparent how and why the provision of affordable housing could have likely environmental effects; it was neutral in this regard.
56. Mr Bedford advanced two submissions on the language of regulation 5(2) of the SEA Regulations, as interpreted by relevant European and domestic jurisprudence. First, he submitted that the NAHC 2016 was a voluntary plan which was not “required by legislative, regulatory or administrative provisions”. Secondly, he submitted that it did not “set the framework for future development consent”. All environmental effects would be fully and properly considered under the rubric of separate assessment under the EIA Regulations, where appropriate.

Issue 4

57. Mr Bedford submitted that those parts of the NAHC 2016 which differed from the NAHC 2015, and could properly be regarded as “new”, were limited in scope (see paragraph 11 above). The Claimant did not challenge the NAHC 2015, and is now far too late to do so. The NAHC 2015 must therefore be regarded as a valid document. In substance, albeit perhaps not in form, the majority of the NAHC 2015 has been carried through into the NAHC 2016; and should be seen as immune from challenge.

Issue 5

58. Mr Bedford submitted that the “outcome” for the Claimant “if the conduct complained of had not occurred” would have been substantially the same. This is because: (i) the correct comparison for these purposes is between the NAHC 2016 and the NAHC 2015 (had the former not been adopted, the latter would have remained in place), (ii) the Claimant has no interest in the smaller sites covered by the changes to paragraph 3 of the NAHC 2016, and/or (iii) any knock-on effects on the housing market brought about by the policy under current scrutiny are wholly contingent on the 2014 Ministerial Statement, which has not been challenged. Further, and in relation only to Ground 3, Mr Bedford submitted that, even were an SEA to be required, no likely environmental effects could stem from the provision of affordable housing.
59. Both Counsel referred me to authority in support of the submissions they made. I will address relevant authority during the course of the next section of this judgment.

Analysis and Conclusions

Introduction

60. Although he formulated the point slightly differently, I agree with Mr Bedford that the quest for the true construction and meaning of regulation 5(1)(a) is unnecessarily challenging. Frankly, those responsible for these regulations should consider redrafting them.
61. Were the 2012 Regulations primary legislation, the interpretative exercise would have to proceed on the assumption that Parliament is all-knowing and infallible, and that they can only be viewed as an entirely coherent entity without any internal inconsistencies. No doubt secondary legislation aspires to like standards, but in my view the same assumption does not have to be made. Inconsistencies and anomalies may exist. It is often a question of the lesser of two evils.
62. Regulation 5(1)(a) has been subjected to close analysis by Mr Howell QC in RWE, but interpretative problems remain. Despite all the difficulties, and the weight and breadth of submission brought to bear on the issues, I have been able to come to the clear conclusion that the NAHC 2016 is a DPD because it falls within regulation 5(1)(a)(i). The robustness of this conclusion may not relieve me entirely of the need to touch on other provisions, but the pressure is less great.
63. It is common ground, and in any event correct, that the allocation of the NAHC 2016 to its correct legal category raises a question of law rather than of planning judgment: see R (oao Wakil) v Hammersmith and Fulham LBC [2012] EWHC 1411 (QB), paragraphs 81 and 82. The NAHC states in terms that it is not a DPD, possibly protesting too much; but, in any event, the decision is for me, not for the Defendant.
64. I reject Mr Bedford’s submission that the NAHC 2016 is an “interim approach” and not a policy. It obviously is a policy, as it was in the 1999 Local Plan (H11, now deleted), and will be in the Defendant’s new local plan. It goes without saying that the content of the policy has changed, and will change, over time; but in terms of category or concept we are talking about policies and not about anything else.

65. Mr Bedford did not submit in the alternative that, if the NAHC 2016 is a policy, it is a residual LDD. However, that must be the logic of his case, and I proceed on that basis.

Issue 4

66. I note the ordering of the issues as agreed by the parties, but it is convenient to begin with Issue 4, the scope of the claim. If Mr Bedford's submission were correct, the Claimant may only seek to challenge that which is "new" or different in the NAHC 2016, when it is placed against the NAHC 2015. However, his submission is incorrect. The Defendant decided to adopt the NAHC 2016 as a fresh document. It was probably right to do so, but that is neither here nor there. I asked Mr Bedford for assistance as to the status of the NAHC 2015 once the NAHC 2016 had been adopted. He accepted that the earlier document had been impliedly abrogated. In my view, the position could not be otherwise.
67. Mr Bedford relied on the following passage in paragraph 67 of Mr Howell QC's judgment in RWE:

"... But in my judgment regulation 5(1) is not concerned with documents containing statements that merely repeat the policies already contained in the adopted local plan or in another [LDD] by way of background or for the sake of clarity."

I entirely agree. However, in the instant case the NAHC 2016 did not merely repeat earlier statements of policy by way of background or for the sake of clarity. In RWE, the earlier statements retained their legal vigour; in the instant case, they no longer exist. Mr Bedford's riposte that this is to elevate form over substance would have appeal were it not for the fact that his clients decided to take this particular course.

68. The Claimant is therefore entitled to challenge the whole of the NAHC 2016. The Defendant does not dispute its standing to do so. The fact that the Claimant may not be particularly interested in the so-called "new" elements of the Defendant's policy is irrelevant because (a) the whole document falls under scrutiny, (b) an ordinary member of the public within the Defendant's area would have sufficient interest to bring this challenge, and the Claimant has commercial corporate interests of a general nature, and (c) the Claimant may have an indirect commercial interest in so far as the NAHC impacts on residential development generally. This last point will be developed below.

Issue 1

69. Regulation 5(1)(a) has been addressed in two decisions of this court.
70. In RWE, the challenge was to the Defendant's "Wind Turbines Supplementary Planning Document and Emerging Policy" ("Wind SPD"). RWE's main arguments

were that this document was not an SPD, but a DPD; and that it conflicted with Milton Keynes' adopted DPD.

71. The following paragraphs in Mr Howell QC's judgment are relevant to Issue 1:

- (1) A putative LDD which does not fall within the descriptions of documents referred to in regulation 5 may still be an LDD, because of the combined effect of section 17(3) and (8) of the 2004 Act. These are the "residual LDDs" discussed at paragraph 22 above (paragraphs 59-60).
- (2) By contrast, the class of possible DPDs is limited to those prescribed in regulation 5 (paragraphs 193-197).
- (3) "what all [LDDs] ... contain are "policies" relating to the use and development of land. What regulation 5(1)(a) is thus concerned with are statements that contain policies, which are described in sub-paragraphs (i) to (iv)" (paragraph 67).
- (4) In order to ascertain whether a document encourages the development and use of land, regard must be had to the type of statements a document contains, not on what the effect of such statements may be in practice (paragraph 70).
- (5) The Wind SPD was not a DPD within regulation 5(1)(a)(i) because, on the facts of that case, any statements of encouragement merely repeated the statements in Milton Keynes' adopted DPD (paragraph 69).
- (6) The Wind SPD was not a DPD within regulation 5(1)(a)(iv) because the new parts of the Emerging Policy were all connected with a particular form of development that Milton Keynes' adopted DPD already sought to encourage, namely proposals to develop wind turbines; they were not connected with regulating the development or use of land generally (paragraph 76). Specifically (at paragraph 75):

"In my judgment the difference, between (a) documents containing statements regarding matters referred to in sub-paragraphs (i) to (iii) of regulation 5(1)(a) of the 2012 Regulations and (b) a document containing statements regarding a development management policy which is intended to guide the determination of applications for planning permission, is that the former are all connected with particular developments or uses of land which a local planning authority is promoting whereas the latter is concerned with regulating the development or use of land generally."

Mr Howell QC's reason for this conclusion was that any different construction of regulation 5(1)(a)(iv) would render (i), (ii) and (iii) effectively otiose (paragraph 74).

- (7) Mr Howell QC endorsed what was common ground before him, namely that the "and" in regulation 5(1)(a)(iv) should be read disjunctively – "were it otherwise a document containing a simple development control policy ... could not form part

of the local plan for the purpose of the 2012 Regulations and become part of the development plan” (paragraph 72).

72. In Miller, the challenge was to an interim policy which constituted a departure from Leeds City Council’s adopted Policy N34, which served to safeguard some non-Green Belt land. Miller contended that the interim policy was a DPD, alternatively an SPD, relying on all the various categories in regulation 5(1)(a) and (2)(b).
73. The following paragraphs in Stewart J’s judgment are relevant to Issue 1:
- (1) “regarding” (in the stem of regulation 5(1)(a)) signifies a relatively loose relationship between the “document” and the matters contained in (i)-(iv) (paragraph 23).
 - (2) The Interim Policy did not encourage the development and use of land. Specifically (at paragraph 26):

“... The court must look at the substance as to whether the LPA wishes to encourage the development and use of land; the court must also have regard to the subjective element in the verb ‘wish’. There will be situations where an LPA wishes to encourage the development and use of land, for example to regenerate an area. The Interim Policy is very different. It sets out criteria which are an attempt by the LPA to comply with the NPPF. These criteria encourage and discourage development, albeit that the overall net effect is to release further land. Nor does the fact that there is reference in subparagraph (v)(a) of the Interim Policy to regeneration change the character of the document as a whole.”
 - (3) The Interim Policy did not fall within regulation 5(1)(a)(iv) because Policy N34 was not a development management policy: it was a safeguarding policy, rather than a policy which *regulated* the development or use of land. Thus, statements in the Interim Policy were not regulating a development management policy (paragraphs 36-37).
 - (4) It was unnecessary to decide whether the “and” in regulation 5(1)(a)(iv) was conjunctive or disjunctive. Even if disjunctive, Miller’s case could not succeed (paragraph 38).
 - (5) It was common ground that Policy N34 was not restricted to a particular land use (paragraph 36). By implication, therefore, Stewart J was proceeding on the basis of Mr Howell QC’s distinction between particular and general policies.
 - (6) “The material word [in regulation 5(1)(a)(iv)] is “regulating”. Regulating land may include a number of features for example density of housing, housing mix etc.” (paragraph 37). I agree with Mr Bedford that this was *obiter*.
74. Having set out relevant authority on this topic, I begin with a number of observations of a general nature.

75. First, if the document at issue contains statements which fall within any of (i), (ii) or (iv) of regulation 5(1)(a), it is a DPD. This is so even if it contains statements which, taken individually, would constitute it an SPD or a residual LDD. This conclusion flows from the wording “one or more of the following”, notwithstanding the conjunction “and” between (iii) and (iv).
76. Secondly, I agree with Stewart J that “regarding” imports a material nexus between the statements and the matters listed in (i)-(iv). Stewart J referred to “document” rather than to “statements”, but this makes no difference. There is no material distinction between “regarding” and other similar adjectival terms such as “relating to”, “in respect of” etc.
77. Thirdly, I agree with Mr Howell QC that there may be a degree of overlap between one or more of the (i)-(iv) categories, although (as I have already said) a document which must be a DPD (because it falls within any of (i), (ii) and/or (iv)) cannot simultaneously be an SPD. This last conclusion may well flow as a matter of language from the true construction of regulation 5(1)(a)(iii), but it certainly flows from the straightforward application of regulations 2(1) and 6.
78. Fourthly, it would have been preferable had regulation 5(1)(a)(iii) followed (iv) rather than preceded it. However, the sequence does not alter the sense of the provision as a whole. Nor do I think that much turns on the relative order of (i) and (iv).
79. Fifthly, I note the view of Mr Howell QC that regulation 5(1)(a) pertains to statements which contain policies. This reflects section 17(3) of the 2004 Act – LDDs must set out the local planning authority’s policies relating to the development and use of land in its area. I would add that section 17(5) makes clear, as must be obvious, that an LDD may also contain statements and information, although any conflict between these and policies must be resolved in favour of the latter. Regulation 5(1)(a) fixes on “statements” and not on policies. However, in my judgment, the noun “statements” can include “policies” as a matter of ordinary language, and any LDD properly so called must contain policies. It follows that any document falling within (i)-(iv) must contain statements which constitute policies and may contain other statements, of a subordinate or explanatory nature, which are not policies.
80. Sixthly, the difference in wording between regulation 5(1)(a)(i) and (iv) featured in the argument in Miller but not on my understanding in the argument in RWE. For the purposes of (i), the statements regarding the development and use of land etc. *are* the policies, or at the very least include the policies. On a strict reading of (iv), the statements at issue are “regarding ... development management and site management policies”. In other words, the statements are not the policies: they pertain to policies which exist in some other place. I will need to examine whether this strict reading is correct.
81. Seventhly, given that we are in the realm of policy, “however expressed”, it seems to me that by definition we are dealing with statements of a general nature. A statement which can only apply to a single case cannot be a policy. To my mind, the difference between a policy which applies to particular types of development and one which applies to all developments is one of degree not of kind. The distinction which Mr Howell QC drew in RWE (see paragraph 75 of his judgment, and paragraph 69(6) above) is nowhere to be found in the language of the regulation, save to the limited

and specific extent that regulation 5(1)(a)(ii) uses the adjective “particular”. Looking at regulation 5(1)(a)(i), I think that this could not be a clearer case of a policy of general application (“development and use of land”), subject only to the qualification of the development being that which the authority wishes to encourage.

82. Eighthly, regulation 5(1)(a) must be viewed against the overall backdrop of the 2004 Act introducing a “plan-led” system. Local planning authorities owe statutory duties to keep their local development schemes and their LDDs under review: see, for example, section 17(6) of the 2004 Act.
83. Does the NAHC 2016 fall within regulation 5(1)(a)(i)? Mr Bedford draws a distinction between affordable housing and residential development. On his approach, affordable housing is a concept which is adjunctive to that which is “development” within these regulations or the 2004 Act; and, moreover, the NAHC 2016 predicates a pre-existing wish or intention to carry out residential development. I would agree that if the focus were just on the epithet “affordable”, there might be some force in the point that it is possible to decouple the NAHC 2016 from the scope of regulation 5(1)(a)(i), which is concerned only with “development”.
84. I was initially quite attracted by Mr Bedford’s submissions, and the attraction did not lie simply in their deft and effective manner of presentation. On reflection, I am completely satisfied that they are incorrect, for the following cumulative reasons.
85. First, the Defendant wishes to promote affordable housing throughout its area in the light of market conditions. It no longer has an affordable housing policy in its adopted local plan, but there is such a policy (differently worded) in its emerging local plan. In the meantime, the Defendant wishes to promote affordable housing in conformity with the overarching policy direction of paragraphs 17 and 50 of the NPPF and the 2014 Ministerial Statement. Indeed, the language of the NPPF is reflected in the NAHC 2016 itself. Affordable housing policies are ordinarily located in local plans because they relate to the development and use of land.
86. Secondly, affordable housing forms a sub-set of residential development. The latter may be envisaged as the genus, the former as the species. It is artificial to attempt to separate out “affordable housing” from “residential development”. This entails an excessive and unrealistic focus on narrow aspects of tenure. As Mr Jones convincingly pointed out, the NAHC 2016 ranges well beyond tenure (which is simply another way of expressing what affordable housing is) into matters such as size of dwelling, distribution of types of housing across developments etc.
87. Thirdly, the correct analysis is that the NAHC 2016 promotes residential development which includes affordable housing. The latter is expressed as a percentage of the former. The setting of that percentage will inevitably have an impact on the economics of all residential development projects, because it impinges directly on developers’ margins. Setting the percentage too high would kill the goose laying these eggs. Setting the percentage too low would lead to insufficient quantities of the affordable housing the Defendant wishes to encourage. The common sense of this is largely self-evident, and is reflected both in the language of paragraph 50 of the NPPF and paragraph 2 of the NAHC 2016 itself – “[s]uch policies should be sufficiently flexible to take account of changing market conditions over time”.

88. Fourthly, it is incorrect to proceed on the basis that (in accordance with Mr Bedford's primary submission) residential development should be taken as a given, with the affordable housing elements envisaged as a series of restrictions and constraints. Arguably, some support for this approach may be drawn from paragraph 26 of Miller, although that case turned on its own facts. This approach ignores the commercial realities as well as what the NAHC 2016 specifically says about the need for pre-application discussions, with insufficient attention to affordable housing requirements likely leading to the refusal of an application. In my judgment, all elements of a housing package which includes affordable housing are inextricably bound.
89. Fifthly, the language of regulation 5(1)(a)(i) mirrors section 17(3) of the 2004 Act, "development and use of land". These terms are not defined in the 2004 Act. "Development" is defined in section 55 of the Town and Country Planning Act 1990 and includes "material change of use". "Use" is not defined, although such uses which cannot amount to a material change are. Mr Bedford submitted that regulation 5(1)(a)(i) is tethered to section 55; Mr Jones submitted that the concept is broader. In my judgment, even on the assumption that section 17(3) of the 2004 Act should be read in conjunction with section 55 of the 1990 Act, nothing is to be gained for Mr Bedford's purposes by examining the latter. "Use" is not defined for present purposes, still less is it defined restrictively. I would construe section 17(3) as meaning "development and/or use of land". If residential development includes affordable housing, which in my view it does, there is nothing in section 55 of the 1990 Act which impels me to a different conclusion.
90. I mentioned in argument that there may be force in the point that the NAHC 2016 sets out social and economic objectives relating to residential development, and that this might lend support to the contention that the more natural habitat for an affordable housing policy is regulation 5(1)(a)(iii) rather than (i). On reflection, however, there is no force in this point. There is nothing to prevent a local planning authority including all its affordable housing policies in one DPD. Elements of these policies may relate to social and economic objectives. However, these elements do not notionally remove the policy from (i) and locate it within (iii). The purpose of regulation 5(1)(a)(iii) is to make clear that a local planning authority may introduce policies which are supplementary to a DPD subject only to these policies fulfilling the regulatory criteria. The Defendant has made clear that it may introduce an SPD, supplementary to its new local plan, which sets out *additional* guidance in relation to affordable housing.
91. In any event, on the particular facts of this case it is clear that the NAHC 2016 could not be an SPD even if I am wrong about it being a DPD. This is because there is nothing in the saved policies of the 1999 Local Plan to which the NAHC is supplementary, despite Mr Jones' attempts to persuade me otherwise. This is hardly surprising, because the whole point of the NAHC 2016 is to fill a gap; it cannot logically supplement a black hole. That it fills a gap is, of course, one of the reasons I have already identified in support of the analysis that the NAHC 2016 is a DPD.
92. In my judgment, the correct analysis is that the NAHC 2016 contains statements in the nature of policies which pertain to the development and use of land which the Defendant wishes to encourage, pending its adoption of a new local plan which will include an affordable housing policy. The development and use of land is either "residential development including affordable housing" or "affordable housing". It is

an interim policy in the nature of a DPD. It should have been consulted on; an SEA should have been carried out; it should have been submitted to the Secretary of State for independent examination.

93. Strictly speaking, it is unnecessary for me to address regulation 5(1)(a)(iv). However, in deference to the full argument I heard on this provision, I should set out my conclusions as follows:

(1) despite the textual difficulties which arise (see paragraph 78 above), and notwithstanding the analysis in Miller (which addressed the claimant's formulation of its case), I cannot accept that it is necessary to identify a development management policy which is separate from the statements at issue. As I have already pointed out, the whole purpose of regulation 5 is to define LDDs *qua* policies, by reference to statements which amount to or include policies. A sensible, purposive construction of regulation 5(1)(a)(iv) leads to the clear conclusion that the NAHC 2016 could fall within (iv) if it contains development management policies (subject to the below).

(2) I would construe the "and" in regulation 5(1)(a)(iv) disjunctively. This is in line with regulation 5(1)(a)(iii) (see the first "and", before "economic") and the overall purpose of the provision. As Mr Howell QC has rightly observed, a conjunctive construction would lead to absurdity. It would have been better had the draftsman broken down (iv) into two paragraphs ("development management policies which ..."; "site allocation policies which ...") but the upshot is the same.

(3) I agree with Mr Howell QC, for the reasons he has given, that it is possible to have LDDs which are outside regulation 5 but that it is impossible to have DPDs which are outside the regulation. This is another reason for supporting a disjunctive construction.

(4) I disagree with Mr Howell QC that regulation 5(1)(a)(i) and (iii) applies to particular developments or uses of land, whereas (iv) is general (see paragraph 79 above).

(5) The real question which therefore arises is whether the NAHC 2016 contains development management policies which guide or regulate applications for planning permission. It may be seen that the issue here is not the same as it was in relation to regulation 5(1)(a)(i) because there is no need to find any encouragement; this provision is neutral.

(6) I would hold that the NAHC 2016 clearly contains statements, in the form of development management policies, which regulate applications for planning permission. I therefore agree with Stewart J's *obiter* observations at paragraph 37 of Miller.

94. There is force in Mr Bedford's objection that a disjunctive reading of regulation 5(1)(a)(iv) leaves little or no space for (ii) and site allocation policies, given the definition of the latter in regulation 2(1). However, this is an anomaly which, with respect, is the fault of the draftsman; it cannot affect the correct approach to regulation 5(1)(a)(iv). There is more limited force in paragraph 74 of the judgment of Mr Howell QC in RWE, but I would make the same point. Regulation 5(1)(a)(i) and

(iv) do not precisely overlap (see paragraph 93(5) above); (iii) is in any event separate because it only applies in relation to statements of policy objectives which are supplemental to a specific DPD. Further, anomalies pop up, like the heads of Hydra, however these regulations are construed. These, amongst others, are good reasons why the 2012 Regulations should be revised.

Issue 3

95. It is unnecessary for me to address Issue 3 on the alternative premise that the NAHC 2016 is an SPD rather than a DPD. I am satisfied that it is not.

Issue 5

96. Mr Bedford submitted that I should refuse relief in this case because, if the NAHC 2016 quashed, the Defendant will revert to the NAHC 2015. On his submission, the correct approach to section 31(2A) of the Senior Courts Act 1981 is that I should proceed on the premise that the NAHC 2016 was never adopted.
97. In my judgment, this submission cannot be accepted. I am required to refuse relief, namely a quashing order, if “it appears to the court to be highly likely that the outcome for the applicant would not have been substantially different if the conduct complained of had not occurred”. This is a backward-looking provision. However, and contrary to Mr Bedford’s argument, the “conduct complained of” here is the various omissions I have listed (the failure to consult, assess and submit for examination), not the decision to adopt. “The conduct complained of” can only be a reference to the legal errors (in the Anisminic sense) which have given rise to the claim.
98. Had the Defendant not perpetrated these errors, by omission, I simply could not say what the outcome would have been, still less that it would highly likely have been the same.

Disposal

99. I grant an order under section 31(1)(a) of the Senior Courts Act 1981 quashing the NAHC 2016.

Coda

100. Like Stewart J, I am not oblivious to the practical difficulties facing local planning authorities assailed by constant changes in the legislative regime and national policy. However, a local planning authority is required to keep its local plans under review. The correct course is to press on with the timeous preparation of up-to-date local

plans, and in the interregnum between draft and adoption, deploy these as material considerations for the purpose of the rights and duties conferred by the 2004 Act.

ORDER

UPON HEARING Counsel for the Claimant and Counsel for the Defendant

IT IS HEREBY ORDERED THAT:

1. The claim is allowed.
2. The Defendant's interim policy document entitled "Negotiating Affordable Housing Contributions 2016" is quashed.
3. The Defendant do pay the Claimant's costs to be assessed if not agreed and limited to £35,000.
4. The Defendant do pay the Claimant's reasonably incurred costs in preparation of its evidence in response to the witness statement and exhibits of Ms Sian Watson, to be assessed if not agreed.

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION
ADMINISTRATIVE COURT

Birmingham Civil Justice Centre
Priory Courts
33 Bull Street
Birmingham
B4 6DS

Date: 23/11/2017

Before :

MR JUSTICE GILBART

Between :

WILLIAM DAVIS LTD
BLOOR HOMES LTD
JELSON HOMES LTD
DAVIDSONS HOMES LTD
BARWOOD HOMES LTD

Claimants

- and -

CHARNWOOD BOROUGH COUNCIL

Defendant

Gwion Lewis and Matthew Fraser (instructed by **Bird, Wilford and Sale, Loughborough**) for the **Claimants**
Paul Stinchombe QC (instructed by **Kathryn Harrison, Legal Services, Charnwood Borough Council**) for the **Defendant**

Hearing dates: 25th October 2017

Judgment Approved

GILBART J :

1. I shall refer to a number of statutes, regulations, documents and policies in this judgement, by the following acronyms

Statutes and Regulations

<i>TCPA 1990</i>	Town and Country Planning Act 1990
<i>PCPA 2004</i>	Planning and Compulsory Purchase Act 2004
<i>LP Regs 2012</i>	Town and Country Planning (Local Planning) (England) Regulations 2012

Types of statutory document (defined in *PCPA 2004* and *LP Regs 2012*)

LDD	Local Development Document
-----	----------------------------

DPD	Development Plan Document
SPD	Supplementary Planning Document

Secretary of State's Guidance and Policy

NPPF	National Planning Policy Framework (2012)
NPPG	National Planning Practice Guidance (policy advice of the SSCLG, published on the internet and revised from time to time)

Charnwood Borough Council Documents

CLPCS	Charnwood Local Plan 2011-2028 Core Strategy
HSPD	Housing Supplementary Planning Document

Other

CBC	Charnwood Borough Council
LPA	Local Planning Authority
SSCLG	Secretary of State for Communities and Local Government

2. This application for judicial review, made by five housing developers active in the East Midlands, relates to the publication by CBC of a policy document entitled "Housing Supplementary Planning Document" (HSPD) in May 2017. Permission to make the application was granted by Singh J on 25th July 2017.
3. The Claimants argue that policy HSPD 9 within the document should have been issued in the form of a DPD and not in the form of an SPD. As I shall come to, those descriptions are precisely defined in the *Planning and Compulsory Purchase Act 2004* and related Regulations. DPDs must, if objection is taken to them, be subject to independent examination by the Secretary of State for Communities and Local Government, whereas SPDs are not.
4. I shall address the issues as follows:
 - i) the terms of the CLPCS and HSPD;
 - ii) the development plan in the context of the Planning Code;
 - iii) identifying the development plan;
 - iv) procedures for adoption/approval;
 - v) cases for the Claimants and Defendant;
 - vi) discussion and conclusions.

(i) *The terms of the CLPCS and HSPD*

5. CBC adopted its CLPCS in November 2015. It is part of the development plan for the purposes of the Planning Acts, and contains the strategic policies for the period 2011-2028. The document contains policies, which are set out in bold text in boxes, and supporting text, which appears in numbered paragraphs. That distinction is of importance- see the observations of Richards LJ in *R (Cherkley Campaign Ltd) v Mole Valley District Council & Anor* [2014] EWCA Civ 567 at [21]- [23]. The CLPCS was the subject of the procedures defined in *PCPA 2004* and Part 6 of the *LP Regs 2012*.
6. Policy CS1 of the Development Strategy Chapter stated that CBC would make provision for at least 13,940 new homes between 2011 and 2028. The priority location for growth was the Leicester Principal Urban Area, where housing provision would be made for at least 5500 new homes. The majority of the remaining growth was to be at Loughborough and Shepshed, where there were to be at least 5000 new homes, with 3000 homes west of Loughborough, of which 2440 were to be delivered by 2028, and approximately 1200 homes within and adjoining Shepshed. Another 3000 homes were to be provided in 7 “Service Centres” (in fact small towns and larger villages), and at least 500 homes on sites within other settlements.
7. The Housing Chapter contained both policies and supporting text. One of the matters addressed was that of the types and sizes of homes needed. The text [5.3] referred to the growing need for small households, due to greater longevity, and to the fact that more couples bore children when older. It anticipated increases in the numbers of people over 56 years in age, and particularly so of those aged over 85 [5.4]. It then assessed the profile of the housing stock in the Borough, and considered that the current numbers of 2 bedroom homes should be increased, which required that 30-35% of the housing as delivered should consist of smaller homes of two bedrooms [5.6]. But there was also a need to increase the number of smaller and medium sized homes, preferably provided in houses rather than flats or apartments [5.7]. However, some medium and large family homes would also be required.
8. At [5.8] the document stated

“We expect new housing development to take account of local housing needs and the current mix of homes available in the local area. We will work with our partners to identify the mix of homes required from new developments. This will be done through masterplanning on strategic sites, Neighbourhood Plans for our existing communities and by using evidence from the Strategic Housing Market Assessment, local housing needs surveys and household projections when considering planning applications.”
9. The document then turned to the question of affordable housing, and then at [5.13] stated that the evidence it had obtained showed that 180 houses per annum were required to meet outstanding and newly arising needs. It wanted to see an increase in the amount of affordable homes being delivered [5.14], and stated that it would make sure that new developments should fund an element of

housing without comprising the viability of the housing scheme in question. It stated that CBC had considered the types of housing development to be expected, and the impact which land values would have on viability [5.14]. It went on to say that Policy CS3 identified the size of development where CBC would require the inclusion of affordable housing, and the proportion of affordable homes which CBC would seek [5.14]. At [5.15] it did not want the level of affordable housing it sought to be such as prevent sustainable development from happening, and stated that if a developer considered that the requirement for affordable housing would deprive the scheme of viability financially, then a viability appraisal would be required [5.15].

10. Policy CS 3 reads as follows

“Strategic Housing Needs

We will manage the delivery of at least 13,940 new homes between 2011 and 2028 to balance our housing stock and meet our community’s housing needs

We will do this by:

- Seeking the following targets for affordable homes within housing developments, having regard to market conditions, economic viability and other infrastructure requirements:
 - 30% affordable housing within the sustainable urban extensions north east of Leicester and west of Loughborough and the direction of growth north of Birstall;
 - On sites of 10 dwellings or more in the following urban areas and service centres

Location	Target
Thurmaston Shepshed	25%
Birstall Loughborough Anstey Barrow upon Soar Mountsorrel Silsby Syston	30%
Quorn Rothley	30%

- On sites of 5 dwellings or more in the following rural locations

East Goscote Thurcaston	30%
(list of 26 settlements)	40%

- Seeking an appropriate mix of types, tenures and sizes of homes, having regard to identified housing needs and the character of the area;
-
- Securing the delivery of affordable homes on-site and integrated with market housing unless there are exceptional circumstances which contribute to the creation of mixed communities
-
- Monitoring the delivery of affordable homes through our Annual Monitoring Report.”

11. The policies were the subject of the Examination of the Core Strategy by an inspector of the SSCLG, and found to be sound (for the procedure see s 20 *PCPA 2004* and Part 6 “Local Plans” of the *LP Regs 2012*, both considered *below*.)
12. In January 2017 CBC issued a draft HSPD for consultation. It contained policies and supporting text on the topics of, inter alia, “Affordable Housing” and “Housing Mix.” The Housing Mix text again explored the topic of sizes, types and tenures of housing. It included reference to a 2017 “Housing and Economic Development Needs Assessment.” At [3.7] of the final version, it stated that that needs assessment had assessed the optimum mix of property sizes to meet housing needs over the next 25 years. At HSPD 9 it included a policy entitled “Housing Mix,” which read

“in accordance with Core Strategy Policy CS3 the following broad proportions will be used in order to deliver an appropriate mix of sizes of homes:

Size	Affordable	Market
1 bed	60-70%	0-10%
2 bed		30-35%
3 bed	25-30%	45-55%
4+ bed	5-10%	10-20%

Where development proposes (sic) a significantly different mix to that identified in the table it must be justified through evidence of identified housing needs and character of the area in accordance with Policy CS3 taking into account;

- evidence of housing need including reference to the housing register;
- existing mix and turnover of properties;
- nature of the development site;
- character of the wider area the site is located within;
- detailed design considerations; and
- economic viability.”

13. CBC has stated in its pre-action response that no viability assessment was carried out in respect of policy HSPD 9. It contended that it would be assessed on a case by case basis.
 14. The HSPD was the subject of procedures under Part 5 of the *LP Regs 2012* (of which more below). The housebuilders objected to the proposed policy. As well as pursuing objections based on matters of planning judgement and the merits, arguing that the policies were too prescriptive, specific arguments were made that this was not an appropriate topic for an SPD, and that such a policy could not be made via an SPD, but could only be made within a DPD.
- (ii) *The Development Plan in the context of the Planning Code*
15. *TCPA 1990* (the principal Act) and related legislation comprise the Planning Acts. This is not an area which readily admits the application of precepts from private law. I refer to the well known words of Lord Scarman in *Pioneer*

Aggregates (UK) Ltd v The Secretary of State for the Environment [1985] 1 AC 132 HL at 140. As he made clear, it is a comprehensive code. The issue before the House of Lords was whether it was possible for a planning permission to be abandoned by conduct. Lord Scarman (with whom the other members of the Appellate Committee agreed) held that there was no such general principle of abandonment in planning law, but in doing so he addressed the wider question of how one treats issues dealt with by the Planning Code. At page 140 Lord Scarman said this:

"Planning control is the creature of statute. It is an imposition in the public interest of restrictions upon private rights of ownership of land. The public character of the law relating to planning control has been recognised by the House in *Newbury District Council v. Secretary of State for the Environment* [1981] AC 578. It is a field of law in which the courts should not introduce principles or rules derived from private law unless it be expressly authorised by Parliament or necessary in order to give effect to the purpose of the legislation. The planning law, though a comprehensive code imposed in the public interest, is, of course, based on the land law. Where the code is silent or ambiguous, resort to the principles of the private law (especially property and contract law) may be necessary so that the courts may resolve difficulties by application of common law or equitable principles. But such cases will be exceptional. And, if the statute law covers the situation, it will be an impermissible exercise of the judicial function to go beyond the statutory provision by applying such principles merely because they may appear to achieve a fairer solution to the problem being considered. As ever in the field of statute law it is the duty of the courts to give effect to the intention of Parliament as evinced by the statute, or statutory code, considered as a whole."

16. A central feature of the Planning Code is the development plan; see s 70(2) *TCPA 1990* and s 38(6) *PCPA 2004*. By s 70(2) *TCPA 2004*, which deals with the consideration of applications for planning permission, regard must be had to the development plan, and by s 38(6) *PCPA 2004*

"If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise."

17. The effect of those provisions is important; the existence of a policy in a properly adopted development plan is not a mere material consideration. An up to date development plan policy will, in the normal course of events, attract significant weight, as s 38 *PCPA 2004* shows. While the weight it attracts in any given case is for the decision maker, it cannot be disregarded. That decision maker will be the local planning authority at first instance, and then the SSCLG, on a called in application under s 77 *TCPA 1990* or by him or one of his Inspectors on appeal under s 78 *TCPA 1990*.

18. The law on decision making in the Planning Code is now well settled (perhaps save only whether there is a duty to give reasons for the grant of a planning permission. This matter does not raise that issue). The significance of the

development plan is readily apparent from the relevant principles. In determining a planning application, the LPA or SSCLG must act as follows. (In the case of LPAs, while reasons to grant permission are generally not given, the principles also apply to the deliberations by which it reached its conclusion; typically, the reasoning will be in the officer's report, and/or in the Minutes of the relevant committee). The decision maker must

- i) have regard to the statutory development plan (see s 70(2) *TCPA 1990*);
- ii) have regard to material considerations (s 70(2) *TCPA 1990*);
- iii) determine the proposal in accordance with the development plan unless material considerations indicate otherwise (s 38(6) *PCPA 2004*);
- iv) apply national policy unless he gives reasons for not doing so- see Nolan LJ in *Horsham District Council v Secretary of State for the Environment and Margram Plc* [1993] 1 PLR 81 following Woolf J in *E. C. Gransden & Co. Ltd. v. Secretary of State for the Environment* [1987] 54 P & CR 86 and see Lindblom J in *Cala Homes (South) Ltd v Secretary of State for Communities & Local Government* [2011] EWHC 97 (Admin), [2011] JPL 887 at [50];
- v) consider the nature and extent of any conflict with the development plan: *Tesco Stores Ltd v Dundee City Council* [2012] UKSC 13 at [22] per Lord Reed;
- vi) consider whether the development accords with the development plan, looking at it as a whole- see *R(Milne) v Rochdale MBC (No 2)* [2000] EWHC 650 (Admin), [2001] JPL 470, [2001] Env LR 22, (2001) 81 P & CR 27 per Sullivan J at [46]- [48]. There may be some points in the plan which support the proposal but there may be some considerations pointing in the opposite direction. It must assess all of these and then decide whether in the light of the whole plan the proposal does or does not accord with it; per Lord Clyde in *City of Edinburgh Council v. the Secretary of State for Scotland* [1997] UKHL 38, [1997] 1 WLR 1447, 1998 SC (HL) 33 cited by Sullivan J in *R(Milne) v Rochdale MBC (No 2)* at [48].

19. The interpretation of policy is for the Court, but its application to the context of a particular proposal is for the decision maker.

20. It has always been the case since the original *TCPA 1947* that the policies of a proposed development plan should be the subject of consultation, and where objection is made, independent examination. *PCPA 2004* and the related *LP Regs 2012* made considerable changes to the mechanics of the system for bringing forward policies, whether those which have the status of development plan policies for the purposes of the legislative code, or have a less significant role.

21. Albeit that the procedures for the adoption of a development plan have altered over the years, it is still a fundamental feature of the system that policies which form part of the development plan must be subjected to proper scrutiny, including independent scrutiny.

22. As will be apparent from the above, the SSCLG sits at the apex of the system of planning control. As well as determining appeals and called in applications, he also has the role of issuing policy, and of exercising general supervision. The *PCPA 2004* includes, for example, default powers for him to intervene if an LPA fail or omit to do anything necessary for it to do in connection with the preparation of a DPD (s 27) or, if he considers that a LDD is unsatisfactory (s 21), or of direction with regard to the revision of LDDs (s 26).
23. In drawing up DPDs or LPDs, LPAs must have regard to national policies and advice issued by the SSCLG (s 19(2)) and such other matters as he prescribes (s 19(2)(j)). Every DPD must be submitted to the SSCLG for independent examination (s 20(1)) by a person appointed by the SSCLG (s 20(4)) to whom he may issue directions to take or not take any step, or to require that person to consider any specified matters, or to give an opportunity (or further opportunity) to be heard, or to take any specified procedural step (s 20(6A)). There is also a specific statutory requirement that anyone exercising a function in relation to LDDs must do so with the objective of contributing to sustainable development (s 39(2)) and must have regard to national policies and advice issued by the SSCLG (s 39(3)).
24. National policy for the purposes of s 19 (2) and s 39(3) includes that given in NPPF (National Planning Policy Framework) and in NPPG, which resides on the Department of Communities and Local Government website. The effect of the provisions relating to the SSCLG and national policy is to seek to ensure that policies in DPDs reflect national policy, albeit as applied to local circumstances. In that context, it is relevant to note what national policy (in the form of NPPF) says about the preparation of local plans, and issue of the mix and type of housing.
25. Before turning to later passages in NPPF it is to be noted that it emphasises the importance of what it calls “Achieving Sustainable Development” at paragraphs [5]-[17]. Paragraph [14], which is of critical importance within NPPF, tells LPAs that the presumption in favour of sustainable development means in the case of plan making that;
- i) LPAs should positively seek opportunities to meet the development needs of their area;
 - ii) Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless
 - a) any adverse impacts would significantly and demonstrably outweigh the benefits, when assessed against the policies in NPPF as a whole, or
 - b) specific NPPF policies indicate that development should be restricted.
26. NPPF [150]- [182] deal with the making of Local Plans. Housing is addressed at [159], whereby LPAs should have a clear understanding of housing needs in their area, and should prepare a Strategic Housing Market Assessment, which should identify the scale and mix of housing and the range of tenures likely to be needed

by the local population over the plan period, which among other matters addresses the need for all types of housing, including affordable housing and the needs of different groups in the community, and caters for housing demand and the scale of housing supply necessary to meet it. The examination of Local Plans is dealt with at [182]. It sets out policy that the plan should be “positively prepared”– i.e. that it is based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, and that it is consistent with national policy, which is said to require that the plan should enable sustainable development in accordance with policies in NPPF.

27. The policies on housing appear at section 6 of the NPPF at [47]-[55]. It is important in the context of this matter to note the words of [47], whereby in order to “boost significantly the supply of housing” LPAs should

“use their evidence base to ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing in the housing market areas, as far as is consistent with the policies set out in (NPPF).....”

28. Paragraph [50] states that, with the purpose of delivering a wide choice of high quality homes, widening opportunities for home ownership and creating sustainable, inclusive and mixed communities, LPAs should

- i) plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community,
- ii) identify the size type, tenure and range of housing that is required in particular locations, reflecting local demand, and
- iii) where they have identified that affordable housing is needed, “set policies for meeting this need on site..... Such policies should be sufficiently flexible to take account of changing market conditions over time.”

29. I have spent a few paragraphs on the terms of NPPF, because of the relevance of national policy to plan making by the LPA. Is it the case that the effect of NPPF is that issues over the type and mix of housing should be addressed via Local Plans, or can it await an SPD? I shall return to that topic in my conclusions.

(iii) *Identifying the Development Plan*

30. By s 38(1) and (3) of the *PCPA 2004* a development plan is defined, for the purposes of the issues at play here, as consisting of

- i) The regional strategy (if any), and
- ii) The development plan documents (taken as a whole) which have been adopted or approved.

31. A DPD is defined in s 37 *PCPA 2004* as

“a local development document which is specified as a development plan document in the local development scheme.”

32. By s 17(7) PCPA 2004, regulations may prescribe which descriptions of documents are to be prepared as local development documents ((17) (7) (za)). A document can only be a local development document if adopted as such by an LPA, or approved by the SSCLG under sections 21 or 22.

33. Under the *LP Regs 2012* Regulation 5 and 6:

“ Local development documents

5. (1) For the purposes of section 17(7)(za)(1) of the Act the documents which are to be prepared as local development documents are—

(a) any document prepared by a local planning authority individually or in cooperation with one or more other local planning authorities, which contains statements regarding one or more of the following—

- (i) the development and use of land which the local planning authority wish to encourage during any specified period;
- (ii) the allocation of sites for a particular type of development or use;
- (iii) any environmental, social, design and economic objectives which are relevant to the attainment of the development and use of land mentioned in paragraph (i); and
- (iv) development management and site allocation policies, which are intended to guide the determination of applications for planning permission;

(b)

(2) For the purposes of section 17(7)(za) of the Act the documents which, if prepared, are to be prepared as local development documents are—

(a) any document which—

- (i) relates only to part of the area of the local planning authority;
- (ii) identifies that area as an area of significant change or special conservation; and
- (iii) contains the local planning authority’s policies in relation to the area; and

(b) any other document which includes a site allocation policy.

Local plans

6. Any document of the description referred to in regulation 5(1)(a)(i), (ii) or (iv) or 5(2)(a) or (b) is a local plan.”

34. By regulation 8(1), a “local plan or a supplementary planning document” (the use of the alternative conjunction will be noted) “must..... indicate whether the document is a local plan or a supplementary planning document.”

35. Policies in an SPD must not conflict with the adopted development plan (Reg 8(3)) whereas those in a local plan must be consistent with it (8(4)), but while it may contain a policy which supersedes one in the development plan, if it does so, it must state that fact and identify the superseded policy (8(4) and (5)).

(iv) *Procedures for adoption/approval*

36. I have referred above to s 20 *PCPA 2004*, which requires that every development plan document is referred to the SSCLG for “independent examination... by a person appointed by the (SSCLG)” (s 20(2) and (4)). That process involves giving to those who have made representations seeking change in a development plan document the right to appear before that person and be heard (s 20(6)). That independent person, if he concludes that relevant requirements are met and the plan is sound, must recommend adoption with reasons (s 20(7)) or if he does not, must recommend non-adoption with reasons (s 20(7A)). He can recommend modifications to the LPA (s 20(7B and C)). The recommendations and reasons must be published. The SSCLG may intervene (s 21 and s 27).

37. The critical parts of the *LP Regs 2012* relating to approval and adoption appear at Parts 5 (SPDs) and 6 (“Local Plans”). An SPD must be made the subject of public participation (Regs 12 and 13) but consideration of any objections is for the LPA itself, by means of an adoption statement (Regs 11 and 12).

By contrast, the adoption of a “local plan” requires steps to carry out the obligations in s 20 *PCPA 2004*. They include notification of the proposed preparation of a local plan. That is addressed in Regulation 18, whereby

“18. (1) A local planning authority must—

- a) notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan which the local planning authority propose to prepare, and
- b) invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain.

(2) The bodies or persons referred to in paragraph (1) are—

- a) such of the specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed local plan;¹
 - b) such of the general consultation bodies as the local planning authority consider appropriate;² and
 - c) such residents or other persons carrying on business in the local planning authority's area from which the local planning authority consider it appropriate to invite representations.
- (3) In preparing the local plan, the local planning authority must take into account any representation made to them in response to invitations under paragraph (1).

38. Anyone may make representations by a date specified (Reg 20). The principal Act (*PCPA 2004*) requires at s 20 that every development plan document (DPD) is submitted to the SSCLG for independent examination. The procedures are set out at Regs (17) to (31).

39. It follows that if a document is to be treated as a "local plan" it must go through the statutory procedures which apply.

(v) *Cases for the Claimants and Defendant*

40. The Claimants' case relied heavily on the decision of Jay J in (*R (Skipton Properties Ltd) v Craven District Council* [2017] EWHC 534, where he addressed an interim policy, not part of the development plan, on the proportions of affordable housing to be sought when planning permissions for housing were granted. Jay J there interpreted Regulation 5(1)(a)(i) and (iv) of the *LP Regs 2012* as applying to the level of contributions to affordable housing. The same principles apply to a policy on the mix of dwelling types.

41. This is a policy which falls squarely within Regulation 5(1)(a)(i), and Regulation 5(1)(a)(iv).

42. The Claimants seek to distinguish the decision of a deputy judge, Mr John Howell QC, in *R (RWE Npower Renewables Ltd) v Milton Keynes BC* [2013] EWHC 751 on his interpretation of that regulation, and Regulation 5(1)(a)(iv), which he interpreted narrowly, on the basis of avoiding overlap between it and the sub-paragraphs (i)-(iii) of Regulation 5(1).

¹ "Specific consultation bodies" are those defined as such in Reg (2), being the usual range of statutory consultees, whereas

² "general consultation bodies," includes voluntary bodies and community groups, but also bodies representing the interests of those carrying on business in the area (*ibidem*).

43. On Ground 1 Mr Lewis contended that HSPD 9 was expressed in imperative terms (the prescribed percentages “will be used”). That went beyond what Policy 3 of the CLPCS 3 said. Further, the HSPD misquoted the CLPCS as broadly seeking that a third of the new housing would consist of 2 bedroom units. CS 3 said no such thing. It appeared in the text, and not in the policy: reliance was placed on the distinction emphasised in the *Cherkley Campaign* case (supra) at [21] per Richards LJ.
44. In fact HSPD 9 sought to prescribe different percentages for all house sizes, and as between market and affordable housing. It related to “the development and use of land which the local planning authority wish to encourage during any specified period” and therefore fell within Reg 5(1)(a)(i). But it also contained “development management and site allocation policies, which are intended to guide the determination of applications for planning permission” and therefore also engaged Reg 5(1)(a)(iv). On that basis it could only be promoted by way of a local plan as defined. Jay J was right in *Skipton* at [90] to hold that the fact of a policy’s overlap with sub-paragraph (iii) did not negate the effect of it falling within (i) or (iv).
45. The Claimants relied on NPPF [158]-[159], and the references to “Local Plan” and “plan period” as showing that NPPF expected issues of housing mix to be addressed in the local plan, and therefore not in an SPD.
46. Objection was taken on this ground by two housebuilding objectors directly, and by others by implication.
47. On Ground 2, Mr Lewis argued that the viability of development was patently a material consideration. The Council, in seeking to argue that viability would be assessed at the application stage, was conflating two different issues
 - i) The viability of a particular scheme;
 - ii) The effects on all schemes of such a policy.
48. This, said the Claimants, amounted to a basic public law error.
49. On the issue of relief, the Claimant argues that the whole of the HSPD should be quashed, because it contains policies that should have been included in a DPD.
50. The case for the Defendant was as follows. Its central point was that if the HSPD fell exactly within the description given in Reg 5(1)(a)(iii), then it did not have to be treated as a Local Plan, whether or not there was overlap with the other categories. Mr Stinchombe QC relied on the approach of Mr John Howell QC in *RWE Npower* at [65]- [83]. That approach is as follows
 - i) if a policy in a document simply repeats what is in the adopted local plan or in another Local Development Document, it does not then fall within Reg 5(1) at all ([68]-[69]);
 - ii) the reference to “development management” in sub-paragraph (iv) cannot extend to all matters of development management or development control, since that would mean that there could never be SPDs ([74]);

- iii) sub-paragraph (iv) differs from (i) – (iii) because it deals with regulating the use of development generally, while the latter deal with particular developments or uses of land which the LPA is promoting (75)];
 - iv) the policy in question was seeking to encourage the granting of permission to wind turbines, so that sub-paragraph (iv) did not apply.
51. *RWE Npower* was to be preferred to *Skipton* on the interpretation of the Regulations. It was not necessary for Jay J to have decided on another interpretation because in the *Skipton* case there was no saved LP policy to which the policy in issue could be supplementary (see [94])
 52. The SPD here does not seek to control the mix of ratios, but merely sets out the CBC preference or starting point. The fact that there is to be a mix of units is in the *CLPCS* with approximately one third being said to be 2 bedroom units. HSPD 9 is simply giving detail to supplement the Core Strategy (*CLPCS* [5.6]).
 53. The policy does not fall within sub-paragraph (iv) as that does not extend to a policy relevant to the determination of a planning application (*RWE Npower* at [74])
 54. The mix of housing is the pursuit of a social objective, which therefore puts it within sub-paragraph (iii).
 55. The *CLPCS* has been adopted after passing through the process, including being found to be “sound.” The objectives of policy CS3 to encourage housing in stated numbers and an appropriate mix of the same having regard to identified housing needs and character of the area. It is sensible for CBC to set out a more detailed specification of the needs and the mix so as to attain those objectives. It is sensible to do that by an SPD which can be updated following consultation.
 56. On Ground 2 it is argued that the importance of economic viability was recognised, by the addition of it as a bullet point in the “Housing Mix guidance box” to acknowledge the relationship mix has with viability. Viability has therefore been addressed. The mix in HSPD 9 is therefore the Council’s starting point as a reflection of the latest evidence base.
 57. If relief is granted, only HSPD9 should be quashed. The rest of the SPD is severable.
- (vi) *Discussion and conclusions*
58. As is readily apparent from the submissions made to me, the central issue is whether the policies in HSPD 9 were such that they ought to have been in a DPD as a “Local Plan.”
 59. The relevant provisions were analysed with characteristic thoroughness by Jay J in *R (Skipton Properties Ltd) v Craven District Council* [2017] EWHC 534, where he considered whether a policy on affordable housing contributions was required by the *LP Regs 2012* to be adopted as a development plan document, or alternatively as a supplementary planning document. The relevant LPA contended that it was not a development plan document. At [18] ff he described the effect of the *LP Regs 2012*

“18 Regulation 2 of the 2012 Regulations defines "local plan" as "any document of the description referred to in regulation 5(1)(a)(i), (ii) or (iv) or 5(2)(a) or (b), and for the purposes of section 17(7)(a) of the Act these documents are prescribed as DPDs" (see also regulation 6). Further, "supplementary plan document" ("SPD") means "any document of a description referred to in regulation 5 (except an adopted policies map or a statement of community involvement) which is not a local plan".

19 By regulation 5:

"Local Development Documents

(1) For the purposes of section 17(7)(a) of the Act the documents which are to be prepared as [LDDs] are –

(a) any document prepared by a local planning authority individually or in co-operation with one or more local planning authorities which contains statements regarding one or more of the following -

(i) the development and use of land which the local planning authority wish to encourage during any specified period;

(ii) the allocation of sites for a particular development or use;

(iii) any environmental, social design and economic objectives which are relevant to the attainment of the development and use of land mentioned in paragraph (i); and

(iv) development management and site allocation policies, which are intended to guide the determination of applications for planning permission.

...

(2) For the purposes of section 17(7)(za) of the Act the documents which, if prepared, are to be prepared as local development documents are –

(a) any document which -

...
(iii) contains the local planning authority's policies in relation to the area;
..."

20 Thus, the effect of regulations 2 and 6 is that the local plan (and, therefore, the development plan) comprises documents of the description referred to in regulation 5(1)(a)(i), (ii) or (iv), or 5(2)(a) or (b). Documents which fall within the description referred to in regulation 5(1)(a)(iii) or (1)(b) cannot be DPDs.

21 SPDs are subject to regulations 12 and 13 of the 2012 Regulations, and specific public consultation requirements. DPDs are subject to the different consultation requirements of regulation 18.

22 SPDs, which are not a creature of the PCPA 2004, are defined negatively (see regulation 2(1)) as regulation 5 documents which do not form part of the local plan, i.e. are not DPDs. By the decision of this court in R (RWE Npower Renewables Ltd) v Milton Keynes Borough Council [2013] EWHC 751 (Admin) (Mr John Howell QC sitting as a DHCJ), not all documents which are not DPDs are SPDs. As I have said, SPDs are only those documents which fall within regulation 5(1)(a)(iii) or (1)(b) of the 2012 Regulations. Documents which are neither DPDs nor fall within any of the provisions of regulation 5(1) are capable of being LDDs but – in order to differentiate them from DPDs and SPDs - are "residual LDDs". At paragraphs 57-59 of this judgment in RWE, Mr Howell QC made clear that it is not the location of a document within the prescribed

categories which is critical; what matters is that the document fulfils the separate criteria of section 17(3) and (8) of the 2004 Act.

23 Thus, there are three discrete categories, namely:

(1) DPDs: these are LDDs which fall within regulation 5(1)(a)(i), (ii) or (iv). They must be prepared and adopted as a DPD (as per the requirements of Part 6 of the 2012 Regulations). They must be subject to public consultation (regulation 18) and independent examination by the Secretary of State (section 20 of the PCPA 2004). As I have said (see paragraph 16 above), an issue potentially arises as to whether a document which does not fall within these regulatory provisions may nonetheless be a DPD because a local planning authority chooses to adopt it as such.

(2) SPDs: these are LDDs which are not DPDs and which fall within either regulation 5(1)(a)(iii) or (1)(b). They must be prepared and adopted as SPDs (as per the requirements of Part 5 of the 2012 Regulations). SPDs do not require independent examination but they do require public consultation (regulations 12 and 13).

(3) Residual LDDs: these are LDDs which are neither DPDs or SPDs. They must satisfy the criteria of section 17(3) and (8) of the PCPA 2004, and must be adopted as LDDs (as per (2) above). There are no public consultation and independent examination requirements: see paragraphs 44-46 of the decision of this Court on [R \(Miller Homes\) v Leeds City Council \[2014\] EWHC 82 \(Admin\)](#). At paragraph 17 above, I said that LDDs are material considerations in planning applications although they do not have the status of DPDs. I consider that the same logic should hold that LDDs which are SPDs carry greater weight in such applications than do residual LDDs.”

60. I entirely agree with that analysis, which seems to me to be unassailable. After addressing the arguments of the parties, the following passage (paragraphs [75]- [94]) appears where Jay J considers the effect of the regulations on the type of policy document that should be deployed to deal with issues relating to affordable housing:

“75 First, if the document at issue contains statements which fall within any of (i), (ii) or (iv) of regulation 5(1)(a), it is a DPD. This is so even if it contains statements which, taken individually, would constitute it an SPD or a residual LDD. This conclusion flows from the wording "one or more of the following", notwithstanding the conjunction "and" between (iii) and (iv).

76 Secondly, I agree with Stewart J” (in *Miller*) “that "regarding" imports a material nexus between the statements and the matters listed in (i)-(iv). Stewart J referred to "document" rather than to "statements", but this makes no difference. There is no material distinction between "regarding" and other similar adjectival terms such as "relating to", "in respect of" etc.

77 Thirdly, I agree with Mr Howell QC” (in *RWE Npower*) “that there may be a degree of overlap between one or more of the (i)-(iv) categories, although (as I have already said) a document which must be a DPD (because it falls within any

of (i), (ii) and/or (iv)) cannot simultaneously be an SPD. This last conclusion may well flow as a matter of language from the true construction of regulation 5(1)(a)(iii), but it certainly flows from the straightforward application of regulations 2(1) and 6.

78 Fourthly, it would have been preferable had regulation 5(1)(a)(iii) followed (iv) rather than preceded it. However, the sequence does not alter the sense of the provision as a whole. Nor do I think that much turns on the relative order of (i) and (iv).

79 Fifthly, I note the view of Mr Howell QC that regulation 5(1)(a) pertains to statements which contain policies. This reflects section 17(3) of the 2004 Act – LDDs must set out the local planning authority's policies relating to the development and use of land in its area. I would add that section 17(5) makes clear, as must be obvious, that an LDD may also contain statements and information, although any conflict between these and policies must be resolved in favour of the latter. Regulation 5(1)(a) fixes on "statements" and not on policies. However, in my judgment, the noun "statements" can include "policies" as a matter of ordinary language, and any LDD properly so called must contain policies. It follows that any document falling within (i)-(iv) must contain statements which constitute policies and may contain other statements, of a subordinate or explanatory nature, which are not policies.

80 Sixthly, the difference in wording between regulation 5(1)(a)(i) and (iv) featured in the argument in *Miller* but not on my understanding in the argument in *RWE*. For the purposes of (i), the statements regarding the development and use of land etc. *are* the policies, or at the very least include the policies. On a strict reading of (iv), the statements at issue are "regarding ... development management and site management policies". In other words, the statements are not the policies: they pertain to policies which exist in some other place. I will need to examine whether this strict reading is correct.

81 Seventhly, given that we are in the realm of policy, "however expressed", it seems to me that by definition we are dealing with statements of a general nature. A statement which can only apply to a single case cannot be a policy. To my mind, the difference between a policy which applies to particular types of development and one which applies to all developments is one of degree not of kind. The distinction which Mr Howell QC drew in *RWE* (see paragraph 75 of his judgment, and paragraph 69(6) above) is nowhere to be found in the language of the regulation, save to the limited and specific extent that regulation 5(1)(a)(ii) uses the adjective "particular". Looking at regulation 5(1)(a)(i), I think that this could not be a clearer case of a policy of general application ("development and use of land"), subject only to the qualification of the development being that which the authority wishes to encourage.

82 Eighthly, regulation 5(1)(a) must be viewed against the overall backdrop of the 2004 Act introducing a "plan-led" system. Local planning authorities owe statutory duties to keep their local development schemes and their LDDs under review: see, for example, section 17(6) of the 2004 Act.

83 Does the NAHC 2016 fall within regulation 5(1)(a)(i)? Mr Bedford draws a distinction between affordable housing and residential development. On his approach, affordable housing is a concept which is adjunctive to that which is "development" within these regulations or the 2004 Act; and, moreover, the NAHC 2016 predicates a pre-existing wish or intention to carry out residential development. I would agree that if the focus were just on the epithet "affordable", there might be some force in the point that it is possible to decouple the NAHC 2016 from the scope of regulation 5(1)(a)(i), which is concerned only with "development".

84 I was initially quite attracted by Mr Bedford's submissions, and the attraction did not lie simply in their deft and effective manner of presentation. On reflection, I am completely satisfied that they are incorrect, for the following cumulative reasons.

85 First, the Defendant wishes to promote affordable housing throughout its area in the light of market conditions. It no longer has an affordable housing policy in its adopted local plan, but there is such a policy (differently worded) in its emerging local plan. In the meantime, the Defendant wishes to promote affordable housing in conformity with the overarching policy direction of paragraphs 17 and 50 of the NPPF and the 2014 Ministerial Statement. Indeed, the language of the NPPF is reflected in the NAHC 2016 itself. Affordable housing policies are ordinarily located in local plans because they relate to the development and use of land.

86 Secondly, affordable housing forms a sub-set of residential development. The latter may be envisaged as the genus, the former as the species. It is artificial to attempt to separate out "affordable housing" from "residential development". This entails an excessive and unrealistic focus on narrow aspects of tenure. As Mr Jones convincingly pointed out, the NAHC 2016 ranges well beyond tenure (which is simply another way of expressing what affordable housing is) into matters such as size of dwelling, distribution of types of housing across developments etc.

87 Thirdly, the correct analysis is that the NAHC 2016 promotes residential development which includes affordable housing. The latter is expressed as a percentage of the former. The setting of that percentage will inevitably have an impact on the economics of all residential development projects, because it impinges directly on developers' margins. Setting the percentage too high would kill the goose laying these eggs. Setting the percentage too low would lead to insufficient quantities of the affordable housing the Defendant wishes to encourage. The common sense of this is largely self-evident, and is reflected both in the language of paragraph 50 of the NPPF and paragraph 2 of the NAHC 2016 itself – "[s]uch policies should be sufficiently flexible to take account of changing market conditions over time".

88 Fourthly, it is incorrect to proceed on the basis that (in accordance with Mr Bedford's primary submission) residential development should be taken as a given, with the affordable housing elements envisaged as a series of restrictions and constraints. Arguably, some support for this approach may be drawn from paragraph 26 of *Miller*, although that case turned on its own facts. This approach

ignores the commercial realities as well as what the NAHC 2016 specifically says about the need for pre-application discussions, with insufficient attention to affordable housing requirements likely leading to the refusal of an application. In my judgment, all elements of a housing package which includes affordable housing are inextricably bound.

89 Fifthly, the language of regulation 5(1)(a)(i) mirrors section 17(3) of the 2004 Act, "development and use of land". These terms are not defined in the 2004 Act. "Development" is defined in section 55 of the Town and Country Planning Act 1990 and includes "material change of use". "Use" is not defined, although such uses which cannot amount to a material change are. Mr Bedford submitted that regulation 5(1)(a)(i) is tethered to section 55; Mr Jones submitted that the concept is broader. In my judgment, even on the assumption that section 17(3) of the 2004 Act should be read in conjunction with section 55 of the 1990 Act, nothing is to be gained for Mr Bedford's purposes by examining the latter. "Use" is not defined for present purposes, still less is it defined restrictively. I would construe section 17(3) as meaning "development and/or use of land". If residential development includes affordable housing, which in my view it does, there is nothing in section 55 of the 1990 Act which impels me to a different conclusion.

90 I mentioned in argument that there may be force in the point that the NAHC 2016 sets out social and economic objectives relating to residential development, and that this might lend support to the contention that the more natural habitat for an affordable housing policy is regulation 5(1)(a)(iii) rather than (i). On reflection, however, there is no force in this point. There is nothing to prevent a local planning authority including all its affordable housing policies in one DPD. Elements of these policies may relate to social and economic objectives. However, these elements do not notionally remove the policy from (i) and locate it within (iii). The purpose of regulation 5(1)(a)(iii) is to make clear that a local planning authority may introduce policies which are supplementary to a DPD subject only to these policies fulfilling the regulatory criteria. The Defendant has made clear that it may introduce an SPD, supplementary to its new local plan, which sets out *additional* guidance in relation to affordable housing.

91 In any event, on the particular facts of this case it is clear that the NAHC 2016 could not be an SPD even if I am wrong about it being a DPD. This is because there is nothing in the saved policies of the 1999 Local Plan to which the NAHC is supplementary, despite Mr Jones' attempts to persuade me otherwise. This is hardly surprising, because the whole point of the NAHC 2016 is to fill a gap; it cannot logically supplement a black hole. That it fills a gap is, of course, one of the reasons I have already identified in support of the analysis that the NAHC 2016 is a DPD.

92 In my judgment, the correct analysis is that the NAHC 2016 contains statements in the nature of policies which pertain to the development and use of land which the Defendant wishes to encourage, pending its adoption of a new local plan which will include an affordable housing policy. The development and use of land is either "residential development including affordable housing" or "affordable housing". It is an interim policy in the nature of a DPD. It should have been consulted on; an SEA should have been carried out; it should have been submitted to the Secretary of State for independent examination.

93 Strictly speaking, it is unnecessary for me to address regulation 5(1)(a)(iv). However, in deference to the full argument I heard on this provision, I should set out my conclusions as follows:

(1) despite the textual difficulties which arise (see paragraph 78 above), and notwithstanding the analysis in *Miller* (which addressed the claimant's formulation of its case), I cannot accept that it is necessary to identify a development management policy which is separate from the statements at issue. As I have already pointed out, the whole purpose of regulation 5 is to define LDDs *qua* policies, by reference to statements which amount to or include policies. A sensible, purposive construction of regulation 5(1)(a)(iv) leads to the clear conclusion that the NAHC 2016 could fall within (iv) if it contains development management policies (subject to the below).

(2) I would construe the "and" in regulation 5(1)(a)(iv) disjunctively. This is in line with regulation 5(1)(a)(iii) (see the first "and", before "economic") and the overall purpose of the provision. As Mr Howell QC has rightly observed, a conjunctive construction would lead to absurdity. It would have been better had the draftsman broken down (iv) into two paragraphs ("development management policies which ..."; "site allocation policies which ...") but the upshot is the same.

(3) I agree with Mr Howell QC, for the reasons he has given, that it is possible to have LDDs which are outside regulation 5 but that it is impossible to have DPDs which are outside the regulation. This is another reason for supporting a disjunctive construction.

(4) I disagree with Mr Howell QC that regulation 5(1)(a)(i) and (iii) applies to particular developments or uses of land, whereas (iv) is general (see paragraph 79 above).

(5) The real question which therefore arises is whether the NAHC 2016 contains development management policies which guide or regulate applications for planning permission. It may be seen that the issue here is not the same as it was in relation to regulation 5(1)(a)(i) because there is no need to find any encouragement; this provision is neutral.

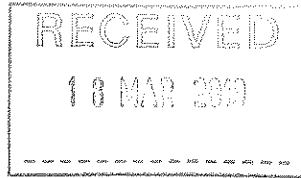
(6) I would hold that the NAHC 2016 clearly contains statements, in the form of development management policies, which regulate applications for planning permission. I therefore agree with Stewart J's *obiter* observations at paragraph 37 of *Miller*.

94 There is force in Mr Bedford's objection that a disjunctive reading of regulation 5(1)(a)(iv) leaves little or no space for (ii) and site allocation policies, given the definition of the latter in regulation 2(1). However, this is an anomaly which, with respect, is the fault of the draftsman; it cannot affect the correct approach to regulation 5(1)(a)(iv). There is more limited force in paragraph 74 of the judgment of Mr Howell QC in RWE, but I would make the same point. Regulation 5(1)(a)(i) and (iv) do not precisely overlap (see paragraph 93(5) above); (iii) is in any event separate because it only applies in relation to statements of policy objectives which are supplemental to a specific DPD.

Further, anomalies pop up, like the heads of Hydra, however these regulations are construed. These, amongst others, are good reasons why the 2012 Regulations should be revised.”

61. I agree with that analysis. Insofar as it differs from that of Mr John Howell QC in *RWE*, I prefer that of Jay J, which in my judgement reflects the basic underlying policy of the legislation and of the code, namely that the development plan is the place in which to address policies regulating development. That is what this policy undoubtedly did, albeit that CBC describe it as a starting point. As Mr Lewis pointed out, the policy in HSPD 9 undoubtedly requires the applicant for permission to show that the mix set out in the policy is not the one to use.
62. Mr Stinchcombe’s first argument – i.e. that the policy relates only to matters falling within sub-paragraph (iii) - is unsustainable. The mix of housing proposed in an application could lead to a refusal on the grounds that it is unacceptable, or on an outline application could lead to the imposition of a condition applying a particular mix. In either case, the way in which that land would be developed is affected. A housing mix policy is thus “a statement regarding... the development of land” and falls within sub-paragraph (i). It also falls within the scope of development management and probably within the scope of site allocation. It will undoubtedly be used “in the determination of planning applications.” It thus falls within sub-paragraph (iv) as well.
63. That being so, it is unnecessary to interpret (iii). There is nothing in the Regulations which require the interpretation of the sub-paragraphs in an exclusive manner. I agree with Jay J that the drafting of these Regulations is very poor, and can lead to confusion, or to lengthy arguments on interpretation with not much regard being had to the realities of development control. It is in that context that I refer to the concept of the Planning Code, and within it to the role of the development plan, and to the importance given by the code to proper examination of the development plan, and to the fair consideration by an independent person of objections and representations made. From the point of view of all types of participant in the planning process, the process of development plan approval and adoption is important. Individual planning applications, appeals and inquiries will, save in unusual cases, be focussed on the effect of developing the site in question. Development plan processes, including the independent examination, also look at issues relating the wider pattern of development, and at policies which apply across the Local Plan Area, as well as the site specific issues relating to sites where there is objection to their inclusion or omission. The Code, including that in its current form, maintains that principle.
64. If the CBC arguments were to prevail, then arguments on the overall mix of housing across the LP area, and across differing sites, would have as their “starting point” or “preference” as Mr Stinchcombe put it, or a “presumption” as Mr Lewis put it, a particular mix of housing which the LPA would want to see achieved. Whatever the choice of noun, that is a policy which could, and if my interpretation of the Regulations is correct, should have been open for debate within the Local Plan context. Although the text of the *CLPCS* referred to a mix, it was, no doubt quite deliberately, omitted from the policy, CBC then accepting that it should not figure within it. While I accept that subsequent evidence has come forward from a strategic housing assessment, that cannot be a reason for using an SPD as the vehicle for making an alteration.

65. I have not referred to the guidance in *NPPF* as an aid to interpreting the legislation. If my interpretation and that of Jay J is in error, *NPPF* cannot be relied on to argue for a different approach. But it is appropriate to note as a postscript that the terms of *NPPF*, cited above, make it plain that this should have been the subject of a DPD in accordance with Regulations 5 and 6. I refer in particular to the terms of paragraphs [14], [47], [50] [159] and [182]. The Claimants, while mentioning the role of statutory guidance, have pinned their colours to the interpretation issue. But it is worth noting that if CBC is correct, then the topic of housing mix can and probably should be omitted from any Local Plan policy, even though it must form part of the strategic housing assessment which informs such a policy. That will amount to a significant departure from the policies in *NPPF*.
66. As to Ground 2 this is really another argument in favour of the first ground. The economic arguments are important both at the stage of policy formulation, and at the application stage. If an overall policy sets a particular percentage contribution then it must assume some role within determination of an application, and of any arguments (including viability) advanced in support of that application.
67. On the other hand, economic viability as an issue gets more broad brush once one leaves a particular site and seeks to argue the issue more generally. But as *NPPF* shows, issues such as demand, market conditions and sustainability are all relevant to Local Plan preparation. It is otiose to set housing targets, or seek to encourage the housebuilding industry to provide homes, without addressing whether the policies one seeks to put in place would frustrate those objectives.
68. CBC concedes that it will always consider the economics of development, but also concedes that there was no such assessment before the policy was issued. I consider that this ground is made out.
69. As to relief, the only arguments which I heard of any substance related to HSPD 9. I am not willing to strike down other policies whose provenance was not contested before me. I shall therefore limit the relief granted to the quashing of that policy.



16th March 2019

Sian Watson (Spatial Planning Manager)
Craven District Council
1 Belle Vue Square,
Broughton Road
Skipton BD23 1FJ

Dear Ms Watson

PARK HILL SKIPTON

I am absolutely horrified to hear that Park Hill and area should possibly lose its status as a Local Green Space.

It is a part of Skipton's history and heritage and such an asset to have so close to the town centre and castle and so beautiful towering above the castle and town

As a local, I think of it as one the great assets of the town and have ever walked over there and onto Golf Links Lane and on up towards Sharphaw, or on through to the woods or vica versa.

From a geographical point, it affords the most fantastic view over the whole of the town and a 360 panorama of the whole area. It is a wonderful open space so accessible to inhabitants and visitors alike – a well used and loved walk and a way through to the woods or on out into the countryside.

How could it ever be conceived that this area should ever be built on or used for anything other than pasture land. I and many others in Skipton to whom I have spoken would be devastated to think it might be developed in the future.

I would therefore ask that **Park Hill be reinstated to be a Local Green Space in the town local plan**

Yours sincerely

From: Helen & Jonathan [REDACTED]
Sent: 29 March 2019 12:07
To: Local Dev. Framework
Subject: Green Space Hellifield Flashes

Dear Sirs,

I strongly believe that the added protection of green space designation for the area around Hellifield Flashes is important.

I walk regularly in the area and enjoy the tranquility and unique wildlife, particularly wet land birds. There are no areas nearby that are accessible to view such bird life.

In addition my wife works at Hellifield school and the area provides walks for the children to enjoy the peace and again the unique bird life. It is part of their education and upbringing.

Jonathan Smith
Long Preston Resident for 20 years.

From: Roger Haffield [REDACTED]
Sent: 29 March 2019 14:41
To: Local Dev. Framework
Subject: Main Modification comments
Attachments: SOCC Response to LP Main Modifications.doc

Please find attached comments document for the local plan Main Modification consultation.

Regards

Roger Haffield. on behalf of Save Our Craven Countryside



Please Redact Address details before publication

29.03.2019

**Craven Local Plan 2012-2032
Response to Main Modifications**

This response is to Main Modifications MM 101 , MM 105 and MM 107.

Submitted by Save Our Craven Countryside following Community Meetings
In Hellifield and Long Preston.

Whilst we understand the concerns the inspector has in considering the previously submitted Green space proposals, due to the Extensive Tract of Land criteria in section 77 of the NPPF . We believe that Section 76 of the NPPF gives some weight to the alternative suggested options submitted by Craven District Council and those submitted on behalf of the community.

Section 76 of the NPPF (2012), is clear in that Communities should be able to identify areas for green space designation, which are of particular importance to them.

The communities of Hellifield and Long Preston have attended community meetings during this final consultation period, in large numbers, resulting in overwhelming community support for sections of the Flashes area to be designated Green Space . Whilst the inspector has indicated that the Gallaber Flash may be acceptable as Green space , the feeling of both communities is that, whilst they appreciate that the Gallaber Flash could potentially be accepted as green space, the Gallaber Flash would in someway feel slightly disconnected from the Hellifield community.

Points also raised at the community meetings are concerns that the Gallaber flash is slowly being obscured by the, creeping, planting of hedgerows and trees , which are being allowed to grow unchecked, particularly on the Waterside Lane boundary Area. Contrary to the conditions and reasons for conditions of extant permission 42/2005/5082. (condition 8) and the Environmental management plan required under condition 12. Received by CDC In September 2007. The Pest control section being relevant.

Fears were expressed that it may become a Green space hidden away , unable to be appreciated by the communities and visitors and less attractive to its wildlife.

The Communities were supportive and encouraged by the proposed Main Modification Policy EN4B (MM105) but generally confused that the Tourism Development Commitment, illustrated on the new EC4B diagram (MM107), did

seem to potentially conflict with the policy, and possibly be exploited by potential developers in the future ,threatening the capability of the Craven local plan to endure beyond the plan period.

Reference was made to the current saved local plan (1999) under the justification notes for saved policy EMP11 Which refer to the original Tourist Development Opportunity Sites.

Paragraph 11.1 describes the identification of TDOS sites, however, does not confirm that TDOS sites were specifically Allocated.

As the original reasons for the TDOS identification on the Flashes site are no longer deliverable (Long Preston / Hellifield Bypass and Railway Heritage centre) it was questioned why areas not subject to built elements of an extant permission needed to be identified as Tourist development commitment .

The importance of the site for biodiversity, its setting in the open landscape and amenity value, demonstrated this week by the comprehensive refusal, and reasons for refusal, of a destructive planning application on the site, reflect the strong community value of the site and the value placed on this area by Craven District Council

The New Craven Local Plan has the importance of communities and their special places at its heart.

We do of course understand that the inspector has the responsibility to ensure the plan is sound and compliant with the NPPF . but do ask on behalf of the communities of Hellifield And Long Preston that further consideration is given to the suggestions for Green Space Areas as previously submitted , 3 smaller areas submitted by Craven District Council or the area abutting the Railway embankment of the Flashes site suggested by residents.

Hellifield in particular, has been blighted for the last 2 and half years by an inappropriate destructive planning application. An allocation of further Green Space or spaces would be an important addition to the requirements of MM105, Policy EN4B, adding further clarity to communities, planners and developers exactly what is acceptable. and perhaps avoid lengthy, and expensive planning time, benefiting both under resourced councils and developers.

Regards.

Save our Craven Countryside.

Christine Sharpe (Chair)
Sally Gregory (Hon Secretary)
Arabella Dawson
Roger Haffield
Jill Wilson
Jacky Wilson
David Gooch

From: Councillor Andrew Solloway
Sent: 27 February 2019 11:56
To: Local Dev. Framework
Subject: ack email sent RC 27.2.19: SKLGS64

To whom it may concern.

I would like to state the following :-

This green space is very close to the community it serves.

This green space is special to the local community for the following reasons:-

It is crossed by several public rights of way.

It is very much part of a bio-diverse landscape that provides recreational facilities .

It has a rich diversity of wildlife . In fact it is currently the subject of regional media attention due to it being the location of a large starling murmuration.

I would like this area to continue to be designated as it is in the Local Plan

Yours

Cllr Andy Solloway
CDC Skipton South Ward
NYCC Skipton West Division

Councillor Andrew Solloway
Craven District Council Member Skipton South Ward

█
Please consider the environment before printing this e-mail.

From: Angela Soper [REDACTED]
Sent: 28 March 2019 14:41
To: Local Dev. Framework
Subject: Hellifield flashes green space

We wish to register our support for the designation of the area known as Hellifield Flashes as Green Space.

It is a great asset to the local community and to all lovers of nature, particularly because of its ecological diversity and its peaceful atmosphere. Although it is located between a busy main road (A65) and the Settle-Carlisle railway, it is a haven for numerous birds (including endangered species) and other wildlife, and is rich in flora as well as fauna.

There are many photographs on the internet to illustrate this.

We hope Hellifield Flashes will be given the added protection of being a Green Space.

Dr. A M Soper & Dr. N J Soper

From: Graeme Southam [REDACTED]
Sent: 27 March 2019 10:05
To: Local Dev. Framework
Subject: Craven Local Plan 2012-2032
Attachments: cdc-Main Modification Cons GS.pdf; cdc-Main Modification Cons PS.pdf

Good morning,

Please find attached two Consultation Representation forms. From me and my wife concerning the Gargrave Neighbourhood Plan.

Kind regards

Graeme
Graeme Southam
High Road Training Ltd
Mobile [REDACTED]



High Road Training Ltd Registered in England No 3262404. This email (including any of its attachments) is intended for the recipient(s) named above. It may contain confidential information and should not be read, copied or otherwise used by any other person. If you are not the named recipient, please contact the sender and delete the email from your system.

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mr
First Name:	Graeme
Last Name:	Southam
Job Title (where relevant):	N/A
Organisation (where relevant):	N/A
Address 1:	██████████
Address 2:	██████████
Address 3:	██████████

Address 4:	
Postcode:	██████████
Telephone:	██████████
Email:	██

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	N/A
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Graeme Southam
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: Equality	
Insufficient equality assessment on site G2/4 Gargrave (off Walton Close/Marton Road)	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

<p>Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.</p> <p>If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.</p>

Craven Local Plan - Public consultation to main modifications.

The equality legislation should be considered irrespective of timing and any other comments seen to be out of time or late.

Everyone deserves the right to be treated fairly. Government housing policies are impacting rural locations by insufficient infrastructure being available. Building in rural locations causes intense local impacts.

The Secretary of State, Rt Hon James Brokenshire has recently communicated with us and notes that Craven District Council does not have a CIL in place. CIL was established on the principle that those responsible and benefiting from new development can and should make a contribution to the additional infrastructure to fund the provision of improvement, replacement and additional infrastructure.

At an early stage in the plan making process, strategic policy making authorities need to work alongside infrastructure providers to identify infrastructure deficits and requirements and look for opportunities to address them. The letter received from Rt Hon James Brokenshire encourages us to discuss our specific issues with this site with our local authorities to see how they intend to address the issue. We have already done this a number of times however to no resolution. This site was adopted from Gargrave Parish Council Neighbourhood Plan by Craven District Councils Local Plan.

Road closures on the A59 and A65 are common. In the past two weeks the A65 bridge at Conniston Cold has been closed twice and the traffic has been diverted through Marton Road, Gargrave. Marton Road is frequently grid locked, dangerous and the lack of footpaths makes it hazardous day and night. Local Councillors at Craven District Council will validate that this is a correct and accurate statement. Farm traffic also cause issues as two tractors moving in opposite directions cannot pass each other without mounting the grass verges.

Dog walkers frequently have issues with speeding traffic on Marton Road. Since 2015 the speed of vehicles using Marton Road has been regularly discussed at Gargrave Parish Council Meetings and are recorded.

I would like to provide you with my objections/considerations to the Local Plan and the fundamental factors that have not been taken into account and need to be addressed.

Article 14 No discrimination

There have not been sufficient equality assessments made on the suitability of site G2/4 Gargrave (Walton Close, Marton Road).

- **Disability - person is being treated less favourably than others in the same situation.** Site G2/4 - currently there is a lack of safe access to Gargrave village centre for able bodied parishioners, due to insufficient pavement provision in place already on Marton Road. Where existing pavements are in place on Marton Road and Church Street they do not meet the minimum legal standard (extreme circumstances) for wheelchair width. This cannot be remediated by the builder due to the road width in some areas of Marton Road as it is too narrow to create proper footpath provision. This is a recognised safety issue that needs to be addressed. Wheel chair users already experience road safety issues travelling on Marton Road. Inclusive design is important to us as we have a higher than average disability ratio on this part of the village which includes people with mental health, long term sickness (cancer) wheel chair users and children who have hidden disabilities.
- Marton Road is poorly lit and I urge that a night time inspection is carried out. This will show how it currently unacceptable, dangerous and is not suitable for parishioners with disabilities, preventing equal participation. These are common problems that exist preventing people from accessing public amenities e.g. shops, bus stops etc. There are social implications of wheelchair use not being addressed sufficiently within the local plan for Gargrave.
- To enter the village from Marton Road, you have to travel along Church Street over a grade 2 listed bridge which already exposes parishioners to a great risk of harm and injury. Two narrow paths run along either side of it. Parents with Prams struggle when crossing the bridge as well as people crossing from opposite directions where they have to walk in the road.
- Disabled parishioners (young and old) already struggle with safely travelling into Gargrave from Marton Road. Demographically we have an ageing population in Gargrave especially on the Marton Road side of the village. Accessibility is poor on foot or by wheel chair, parents pushing prams, and children running into the road, issues are known but no resolution is being made to rectify this.
- North Yorkshire County Council have been contacted and have offered solutions for wheelchair access over

the Grade 2 listed bridge. However, there are no funds available to remediate this issue which severely compromise the safety of individuals. This is the only access into Gargrave village centre. Spatial Committee are already in receipt of this documentation.

- Gargrave Train Station (access via Church Street) - north bound does not have disabled access off the platform. There is no provision made in any budget for Gargrave station to be remediated. Northern Railways have confirmed that the money is to be spent elsewhere. Spatial committee are already in receipt of this documentation.
- Rt Hon Julian Smith MP has been contacted and is going to pass on our concerns to the Secretary of State for Transport with regards to north bound disability access and the inaccessibility of funding to upgrade this.
- Currently if a disabled person needs to get to Gargrave they cannot do this via train as the station is not accessible for people with disabilities.
- **Fails to treat people differently when they are in significant different situations.** G2/4 does not allow for minority groups to be catered for.
- Accessibility to village
- Gradient of hill makes it difficult for people with disability
- Road safety
- Poor lighting and visibility (people have to carry torches at night)
- lack of suitable footpaths or no footpaths
- Distance from site to nearest bus stop in village centre 800m.
- Due to the demand for rural housing to be built Craven District Council are building houses in locations that they know that are not suitable and have insufficient infrastructure to support them. Craven District Council should have a duty of care to impose uplifts of infrastructure deficiencies to builders to ensure that houses are built in accessible locations and treat everyone with the same level of accessibility. The Spatial Committee have already confirmed that the road is not wide enough for a pavement on some parts of Marton Road.
- **Applying policies that have a disproportion impact on individuals or groups.** G2/4 It is already known that there are severe infrastructure issues. Failure to meet policies will be due to the inherent existing features of rural infrastructure at this site.
- **Unequal treatment** - cause direct discrimination by policies being applied to building in rural locations by not discriminating on the face of it, discriminating in practise against minority groups. Unable bodied people will severely be impacted by the distance, highways safety, highways lighting and steep gradient of hill to the proposed site. CDC and GPC are aware of the key factors and impacts however, propose sites that are unsuitable for development. The nearest bus stop is 800m away from this site.

Additionally I would like to conclude with the following:

- Sites that are not protected by EU Birds and Habitats Directives should still have consideration when endangered species reside at them. Site visits in Jan & Mar 2016 is insufficient to assess the endangered species that reside there, this site has not been sufficiently impact assessed. This information has been in the public domain since 2015 by parishioners of Gargrave of endangered species that reside there.
- Green spaces being utilised ineffectively, where more suitable sites are available and more accessible. Open landscape is an integral part of the village and attracts visitors.
- Designated heritage assets - G2/4 runs along the side of the Pennine Way footpath. Ramblers etc use the route down Mosber Lane onto Marton Road in winter as the Pennine Way route is water logged.
- Grade 2 listed building adjacent to G2/4 not considered.
- Areas of outstanding beauty - driving/walking/cycling/horse riding coming into the village from Bank Newton up Marton Road see natural beauty and rambling hills.
- National cycle route.
- Detracts and extends too far out the existing building boundary/building line profile of existing properties.
- Not an infill of existing building settlement.
- Existing issues reside with sewers overflowing into residents houses on Marton Road and into the drains which feed into the river.
- Extensive flooding
- Not sustainable as transport is required.

- Low priority road in winter.
- Increase in the volume of traffic
- Great crested newt is internationally important. Breeding sites and resting places are protected by the law. Both CDC and GPC are aware from residents feedback during consultations process for a number of years now. However the desktop assessment and two site visits out of season seem to suffice basic audit governance. Requests made to CDC and GPC for Biodiversity assessments to be made. None have been made.
- Bats and their roosts are protected by law. Bats nest in the trees on and around this site. Bats hibernate from Oct-Mar/Apr. What assessment/bat surveys have been made that covers habitat of this species.
- Oyster Catchers nest yearly at this site. Protected by the wildlife and countryside act 1981. What assessment has been made?
- There are lots of other animals and birds that reside at this site which need to be considered and assessed owls, wood peckers, deer etc.
- G2/4 does not contribute to sustainable development due to the distance of site and the nearest bus stop 800m away. G2/4 will be via car access.
- G2/4 This extends the village boundary and is a green field site extending the village form further out.
- Policy G11 promoting and enhancing location recreational facilities. There are no recreation facilities this side of the village. All facilities are the far extreme of the other side of the village. To use recreational facilities from G2/4 it will require a car.
- Site sustainability being car orientated which goes against the aims and objectives of national and local travel.
- Landscapes such as the G2/4 are worthy of long term preservation and kept for scenic and environmental value. Marton Road is going to be one of the "village safe walks". this walk is an initiative that is being introduced next year into the village where people will be walking up by the Anchor Inn, along the canal to the aqua-duct then onto Marton Road back into the village. Additional volumes of traffic and existing infrastructure issues will impact highway safety for walker

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

G2/4 – Gargrave, requires a full equality assessment to be conducted.
 G2/4 – Gargrave , requires a full biodiversity assessment to be conducted.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)

Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below	
Signature	
Date	26th March 2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ |
www.cravendc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravendc.gov.uk



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

Craven Local Plan Examination

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mrs
First Name:	Pamela
Last Name:	Southam
Job Title (where relevant):	N/A
Organisation (where relevant):	N/A
Address 1:	██████████
Address 2:	██████████
Address 3:	██████████

Address 4:	
Postcode:	██████████
Telephone:	██████████
Email:	██

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	N/A
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Pamela Southam
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: Equality	
Insufficient equality assessment on site G2/4 Gargrave (off Walton Close/Marton Road)	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

Craven Local Plan - Public consultation to main modifications.

The equality legislation should be considered irrespective of timing and any other comments seen to be out of time or late.

Everyone deserves the right to be treated fairly. Government housing policies are impacting rural locations by insufficient infrastructure being available. Building in rural locations causes intense local impacts.

The Secretary of State, Rt Hon James Brokenshire has recently communicated with us and notes that Craven District Council does not have a CIL in place. CIL was established on the principle that those responsible and benefiting from new development can and should make a contribution to the additional infrastructure to fund the provision of improvement, replacement and additional infrastructure.

At an early stage in the plan making process, strategic policy making authorities need to work alongside infrastructure providers to identify infrastructure deficits and requirements and look for opportunities to address them. The letter received from Rt Hon James Brokenshire encourages us to discuss our specific issues with this site with our local authorities to see how they intend to address the issue. We have already done this a number of times however to no resolution. This site was adopted from Gargrave Parish Council Neighbourhood Plan by Craven District Councils Local Plan.

Road closures on the A59 and A65 are common. In the past two weeks the A65 bridge at Conniston Cold has been closed twice and the traffic has been diverted through Marton Road, Gargrave. Marton Road is frequently grid locked, dangerous and the lack of footpaths makes it hazardous day and night. Local Councillors at Craven District Council will validate that this is a correct and accurate statement. Farm traffic also cause issues as two tractors moving in opposite directions cannot pass each other without mounting the grass verges.

Dog walkers frequently have issues with speeding traffic on Marton Road. Since 2015 the speed of vehicles using Marton Road has been regularly discussed at Gargrave Parish Council Meetings and are recorded.

I would like to provide you with my objections/considerations to the Local Plan and the fundamental factors that have not been taken into account and need to be addressed.

Article 14 No discrimination

There have not been sufficient equality assessments made on the suitability of site G2/4 Gargrave (Walton Close, Marton Road).

- **Disability - person is being treated less favourably than others in the same situation.** Site G2/4 - currently there is a lack of safe access to Gargrave village centre for able bodied parishioners, due to insufficient pavement provision in place already on Marton Road. Where existing pavements are in place on Marton Road and Church Street they do not meet the minimum legal standard (extreme circumstances) for wheelchair width. This cannot be remediated by the builder due to the road width in some areas of Marton Road as it is too narrow to create proper footpath provision. This is a recognised safety issue that needs to be addressed. Wheel chair users already experience road safety issues travelling on Marton Road. Inclusive design is important to us as we have a higher than average disability ratio on this part of the village which includes people with mental health, long term sickness (cancer) wheel chair users and children who have hidden disabilities.
- Marton Road is poorly lit and I urge that a night time inspection is carried out. This will show how it currently unacceptable, dangerous and is not suitable for parishioners with disabilities, preventing equal participation. These are common problems that exist preventing people from accessing public amenities e.g. shops, bus stops etc. There are social implications of wheelchair use not being addressed sufficiently within the local plan for Gargrave.
- To enter the village from Marton Road, you have to travel along Church Street over a grade 2 listed bridge which already exposes parishioners to a great risk of harm and injury. Two narrow paths run along either side of it. Parents with Prams struggle when crossing the bridge as well as people crossing from opposite directions where they have to walk in the road.
- Disabled parishioners (young and old) already struggle with safely travelling into Gargrave from Marton Road. Demographically we have an ageing population in Gargrave especially on the Marton Road side of the village. Accessibility is poor on foot or by wheel chair, parents pushing prams, and children running into the road, issues are known but no resolution is being made to rectify this.
- North Yorkshire County Council have been contacted and have offered solutions for wheelchair access over

the Grade 2 listed bridge. However, there are no funds available to remediate this issue which severely compromise the safety of individuals. This is the only access into Gargrave village centre. Spatial Committee are already in receipt of this documentation.

- Gargrave Train Station (access via Church Street) - north bound does not have disabled access off the platform. There is no provision made in any budget for Gargrave station to be remediated. Northern Railways have confirmed that the money is to be spent elsewhere. Spatial committee are already in receipt of this documentation.
- Rt Hon Julian Smith MP has been contacted and is going to pass on our concerns to the Secretary of State for Transport with regards to north bound disability access and the inaccessibility of funding to upgrade this.
- Currently if a disabled person needs to get to Gargrave they cannot do this via train as the station is not accessible for people with disabilities.
- **Fails to treat people differently when they are in significant different situations.** G2/4 does not allow for minority groups to be catered for.
- Accessibility to village
- Gradient of hill makes it difficult for people with disability
- Road safety
- Poor lighting and visibility (people have to carry torches at night)
- lack of suitable footpaths or no footpaths
- Distance from site to nearest bus stop in village centre 800m.
- Due to the demand for rural housing to be built Craven District Council are building houses in locations that they know that are not suitable and have insufficient infrastructure to support them. Craven District Council should have a duty of care to impose uplifts of infrastructure deficiencies to builders to ensure that houses are built in accessible locations and treat everyone with the same level of accessibility. The Spatial Committee have already confirmed that the road is not wide enough for a pavement on some parts of Marton Road.
- **Applying policies that have a disproportion impact on individuals or groups.** G2/4 It is already known that there are severe infrastructure issues. Failure to meet policies will be due to the inherent existing features of rural infrastructure at this site.
- **Unequal treatment** - cause direct discrimination by policies being applied to building in rural locations by not discriminating on the face of it, discriminating in practise against minority groups. Unable bodied people will severely be impacted by the distance, highways safety, highways lighting and steep gradient of hill to the proposed site. CDC and GPC are aware of the key factors and impacts however, propose sites that are unsuitable for development. The nearest bus stop is 800m away from this site.

Additionally I would like to conclude with the following:

- Sites that are not protected by EU Birds and Habitats Directives should still have consideration when endangered species reside at them. Site visits in Jan & Mar 2016 is insufficient to assess the endangered species that reside there, this site has not been sufficiently impact assessed. This information has been in the public domain since 2015 by parishioners of Gargrave of endangered species that reside there.
- Green spaces being utilised ineffectively, where more suitable sites are available and more accessible. Open landscape is an integral part of the village and attracts visitors.
- Designated heritage assets - G2/4 runs along the side of the Pennine Way footpath. Ramblers etc use the route down Mosber Lane onto Marton Road in winter as the Pennine Way route is water logged.
- Grade 2 listed building adjacent to G2/4 not considered.
- Areas of outstanding beauty - driving/walking/cycling/horse riding coming into the village from Bank Newton up Marton Road see natural beauty and rambling hills.
- National cycle route.
- Detracts and extends too far out the existing building boundary/building line profile of existing properties.
- Not an infill of existing building settlement.
- Existing issues reside with sewers overflowing into residents houses on Marton Road and into the drains which feed into the river.
- Extensive flooding
- Not sustainable as transport is required.

- Low priority road in winter.
- Increase in the volume of traffic
- Great crested newt is internationally important. Breeding sites and resting places are protected by the law. Both CDC and GPC are aware from residents feedback during consultations process for a number of years now. However the desktop assessment and two site visits out of season seem to suffice basic audit governance. Requests made to CDC and GPC for Biodiversity assessments to be made. None have been made.
- Bats and their roosts are protected by law. Bats nest in the trees on and around this site. Bats hibernate from Oct-Mar/Apr. What assessment/bat surveys have been made that covers habitat of this species.
- Oyster Catchers nest yearly at this site. Protected by the wildlife and countryside act 1981. What assessment has been made?
- There are lots of other animals and birds that reside at this site which need to be considered and assessed owls, wood peckers, deer etc.
- G2/4 does not contribute to sustainable development due to the distance of site and the nearest bus stop 800m away. G2/4 will be via car access.
- G2/4 This extends the village boundary and is a green field site extending the village form further out.
- Policy G11 promoting and enhancing location recreational facilities. There are no recreation facilities this side of the village. All facilities are the far extreme of the other side of the village. To use recreational facilities from G2/4 it will require a car.
- Site sustainability being car orientated which goes against the aims and objectives of national and local travel.
- Landscapes such as the G2/4 are worthy of long term preservation and kept for scenic and environmental value. Marton Road is going to be one of the "village safe walks". this walk is an initiative that is being introduced next year into the village where people will be walking up by the Anchor Inn, along the canal to the aqua-duct then onto Marton Road back into the village. Additional volumes of traffic and existing infrastructure issues will impact highway safety for walker

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

G2/4 – Gargrave, requires a full equality assessment to be conducted.
 G2/4 – Gargrave , requires a full biodiversity assessment to be conducted.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)

Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below	
Signature	[Redacted]
Date	26 th March 2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ |
www.cravencdc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravencdc.gov.uk



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

Craven Local Plan Examination

Sian Watson
Spatial Planning Manager
Craven District Council
1 Belle Vue Square
Broughton Road
Skipton,
BD23 1FJ

[REDACTED]
21/03/19

RECEIVED
22 MAR 2019

Copies to : Councillor John Dawson, Councillor Paul Whitaker, Julian Smith MP, Claire Nash - Green Party and Civic Society, Sebastian Fattorini - Skipton Castle, Tony Blackburn - Independent Programme Officer

Dear Sian,

I am writing to you about Park Hill in Skipton, to urge you to do all you can to re-instate it as a protected local green space on our local plan.

Park Hill is very important to the locality. It can be seen from various points in the town centre. It gives Skipton a feeling of "not being hemmed in". It is a natural green hill.

I have lived in my house in [REDACTED] central Skipton for 35 years. In my early years, I walked up and down Park Hill many times. I became disabled at the age of 42 and since then I have enjoyed my view of Park Hill. Due to my illness, sometimes I am housebound for several weeks at a time. I can see this lovely green hill and the trees around it from our bathroom window. We purposely have a plain glass (not frosted) window and have a blind only on the lower half of the window.

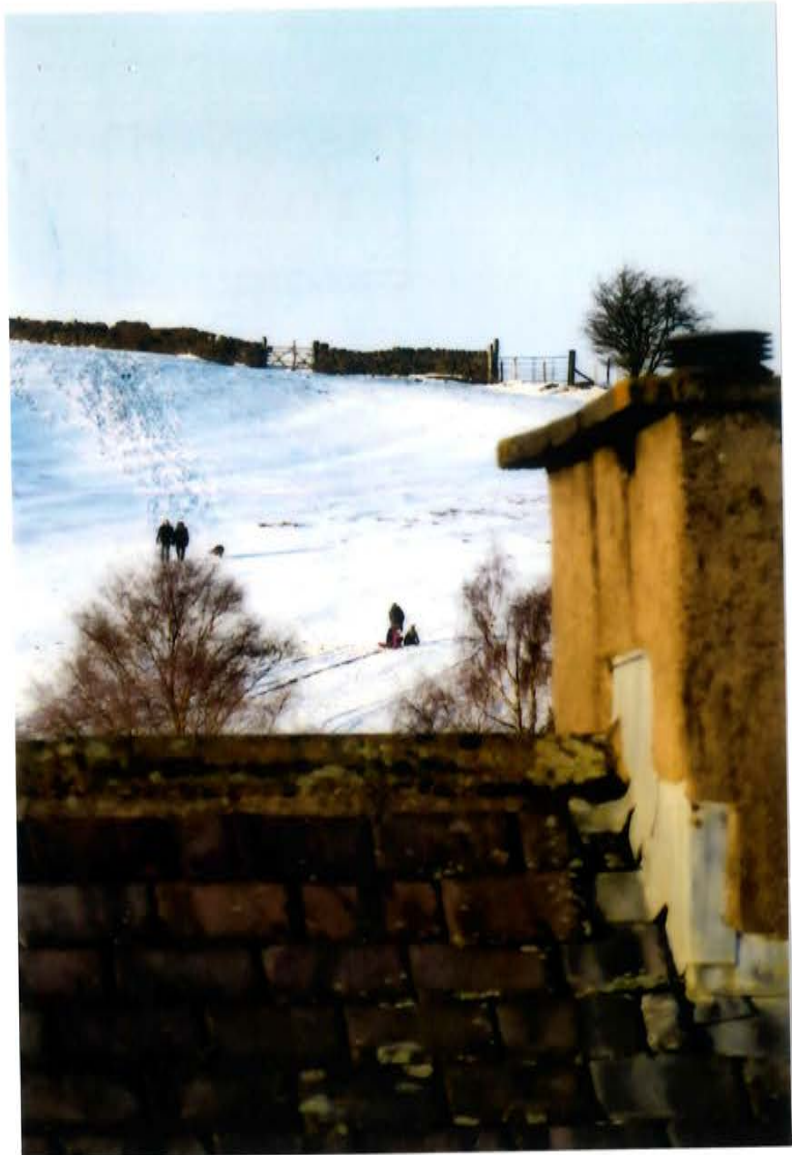
I look at that view every day. I see people walking, sometimes sheep or cattle grazing, sometimes children sledging and rarely I cannot see it at all in mist/fog! It is not a large tract of land, but it is a jewel in the town of Skipton for locals and visitors alike.

I have enclosed a photograph taken from my bathroom window (over the rooftops of Hallams Yard) of Park Hill which I hope is a good illustration of it's value - people sledging and walking. I will end by quoting these words "I will lift up mine eyes unto the hills whence cometh my help".

Yours sincerely,

[REDACTED]

Mandy Spencer



RECEIVED

22 MAR 2013

PARK Hill

From: Spracklen, Karl [REDACTED]
Sent: 20 February 2019 09:13
To: Local Dev. Framework
Subject: Local Plan - Comment on Park Hill
Attachments: cdc-mods-rep-form-2019-Spracklen.docx

Hello

Please find attached a response to the initial decision on the Local Plan.

All the best

Karl

Karl Spracklen, PhD, AcSS
Professor of Sociology of Leisure and Culture, DoR Social Policy
Leeds School of Social Sciences

Leeds Beckett University, 920 Calverley,
Citr Campus, Leeds LS1 3HE, UK

Email: [REDACTED]

Tel: [REDACTED]



To view the terms under which this email is distributed, please go to:-
<http://leedsbeckett.ac.uk/disclaimer/email/>

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Professor
First Name:	Karl
Last Name:	Spracklen
Job Title (where relevant):	
Organisation (where relevant):	
Address 1:	████████████████████
Address 2:	██████
Address 3:	

Address 4:	
Postcode:	██████
Telephone:	
Email:	██

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal and Habitats Regulation Assessment that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal and Habitats Regulation Assessment will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM:	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

Park Hill must be protected by defining it in the Plan as Local Green Space, as the Council originally suggested. This is the best and only way to ensure it is not built on. As a Professor of Sociology of Leisure and Culture I can tell you that there is clear evidence that green spaces improve social and psychological wellbeing. Building on Park Hill would be a scandal for town that depends on people visiting it as an unspoilt town on the edge of the countryside. Building on it would ruin the wellbeing of local residents.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.


Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	<input type="checkbox"/>
No, I do not wish to be notified	<input type="checkbox"/>

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	<input type="checkbox"/>
No, I do not wish to be notified	<input type="checkbox"/>

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	20 February 2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ | www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



INVESTOR IN PEOPLE



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

Craven Local Plan Examination

From: David Statt [REDACTED]
Sent: 17 March 2019 14:06
To: Local Dev. Framework
Subject: ack email sent 18.3.19 by RP Hellifield Flashes Green Space

Dear Sir,

I am a Hellifield resident and support all of the flashes, as proposed by CDC, bring included as a green space in the emerging local plan.

It borders the houses on Midland Terrace / Kendal Rd. and is an area of land that I and my family have enjoyed for over 40 years. We have used it for sledging, walking and have had great pleasure in watching the wildlife.

Please consider leaving the whole of this land as a Green Space

Yours faithfully

David Statt

From: Mark Stead [REDACTED]
Sent: 03 March 2019 16:34
To: Local Dev. Framework
Subject: Main Modifications Consultation Representation Form
Attachments: cdc-mods-rep-form-2019-final.docx

To whom it may concern:

Please find attached a representation form. Please note that it is unclear what information one should include under "Name or Organisation" under Section 3. Given the importance of this document, it would have been expected that Craven District Council would have put a little more effort into this form to collate resident opinions.

Best wishes

Dr Mark Stead

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Dr
First Name:	Mark
Last Name:	Stead
Job Title (where relevant):	
Organisation (where relevant):	
Address 1:	██████████
Address 2:	██████
Address 3:	

Address 4:	
Postcode:	██████
Telephone:	██████████
Email:	████████████████████

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Mark Stead
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: MM87 The deletion of Local Green Space SKLGS64 under Policy ENV10 Local Green Space.	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

This deletion does not comply with national planning policy.

- This area of land is **extremely** close to the community which it serves and provides a spectacular panorama for Skipton, particularly given its situation next to Skipton Castle. The fact that this has been removed as local green space is absurd.
- The residents of Skipton have long since regarded this area as a prime area for recreational activity and is considered by the residents of Skipton as a special place.
- Given the proximity to Skipton Castle, and being adjacent to the “Gateway to the Yorkshire Dales”, this area is of huge local significance.
- Such areas are even more important today than ever, with the need for people to have the benefit of outdoor space for both mental a physical wellbeing. It is hypocritic that the government is promoting healthy lifestyle, but at the same time removing the means by which the residents of this country are able to partake in outdoor recreation. The lack of open spaces is directly responsible for the massive drain the NHS, particularly mental health services.
- There is little other **accessible** greenspace is on offer for the resident and visitors of Skipton.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

This area should be maintained as a designated green space in the local plan.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	X
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	X
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



INVESTOR IN PEOPLE



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

Craven Local Plan Examination

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). Please fill in a separate form for each representation you wish to make.

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	MR.
First Name:	ALVIN
Last Name:	STEELE
Job Title (where relevant):	
Organisation (where relevant):	
Address 1:	[REDACTED]
Address 2:	[REDACTED]
Postcode:	[REDACTED]
Telephone:	[REDACTED]
Email:	N/A

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	N/A
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

If you wish your personal details to be treated in confidence and not published please tick the box below:	
Please explain below, why you have made this request:	

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: Equality	
Insufficient level of equality assessment conducted on site G2/4 gargrave (off Walton close/Marton Road).	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

MARTON ROAD HAS NO PEDESTRIAN OR WHEELCHAIR PAVEMENT SO WITH VEHICLES PARKED ON THE ROAD BRINGING MORE TRAFFIC TO THE AREA WILL CREATE (IN MY OPINION) A DANGER TO THE PUBLIC. THE SEWER IS NOT ADEQUATE FOR THE AREA AS IT IS SO BUILDING MORE PROPERTIES WILL CREATE MAJOR PROBLEMS. THE PAVEMENT DOWN MARTON ROAD TOO NARROW FOR WHEELCHAIR ACCESS AND WITH CARS PARKED OUTSIDE PROPERTIES SO THEY HAVE TO GO TO CENTRE OF ROAD. A LARGE VARIETY OF WILDLIFE FREQUENT THE AREA

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

- Significant investment made to infrastructure
- Equality assessment to be conducted with remediating actions put in place
- Or alternative suitable site which will cater for all disadvantaged groups

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.


Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date <i>REB</i>	28-3-19

From: Susan Stuttard [REDACTED]
Sent: 29 March 2019 15:18
To: Local Dev. Framework
Subject: Craven Local Plan 2012-2032 Main Modifications
Attachments: Craven District council modifications.docx

Dear Sir or Madam

Please find attached Main Modifications Consultation Representation Form.

Yours faithfully

Richard Stuttard

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mr
First Name:	Richard
Last Name:	Stuttard
Job Title (where relevant):	Retired
Organisation (where relevant):	
Address 1:	██████████
Address 2:	██████
Address 3:	██████████

Address 4:	
Postcode:	██████
Telephone:	██████████
Email:	████████████████████

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM:	

Section 4: Legal Compliance & Duty to Cooperate

Do you consider that this modification of the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant		
2. Sound		
3. In Compliance with the Duty to Cooperate		<input type="checkbox"/>

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

MM10 SK 081 SK 082 SK 108 States that the number of proposed houses has changed from 324 to 339, an increase of 15 extra houses. This will probably create 15 more cars, travelling on Rockwood Drive, both in the morning rush hour and in the evening rush hour. This road is already congested with parked cars on the mainly eastern side of the road, but cars also park on the western side, making long stretches of single way traffic, for cars going either up or down.

MM17 SK081 SK082 SK108 States "If the safeguarded area is no longer required for a primary school-additional residential development will be acceptable in principle."

If additional residential development is built on this land it will create even worse traffic problems on the road mentioned above for the same reasons. If a new primary school is built, traffic bringing children up Rockwood Drive in the morning will also increase the traffic problem, perhaps even worse as parents bringing children up Rockwood Drive will be meeting the rush hour traffic from the increased house number driving down towards Gargrave Road.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

(MM10)

To address the traffic problems raised in my objections the number houses built needs to be reduced back to 324 at the very least, from 339 and I would respectfully request that the Inspector comes up with a solution to the increased traffic volume which will be caused by either the building of a new primary school or the building of even more houses in its place.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.


Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	<input checked="" type="checkbox"/>
No, I do not wish to be notified	<input type="checkbox"/>

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	<input checked="" type="checkbox"/>
No, I do not wish to be notified	<input type="checkbox"/>

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	29/03/2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



INVESTOR IN PEOPLE



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

Craven Local Plan Examination

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). Please fill in a separate form for each representation you wish to make.

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	
First Name:	Jonathan Douglas
Last Name:	Tattersall
Job Title (where relevant):	
Organisation (where relevant):	
Address 1:	
Address 2:	
Postcode:	
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	N/A
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

site not easily accessible for people with disabilities. very little pavements and discludes minority groups. This deprives individuals with disabilities their chance to be independant. Significant access amendments will need to be made. The road is dark, dangerous, and high speeding farm traffic, A65 + A59 Diversions are causing

this site and surrounding area.

Section 6: Proposed Modifications to the local plan major issues for

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

- Significant investment made to infrastructure
- Equality assessment to be conducted with remediating actions put in place
- Or alternative suitable site which will cater for all disadvantaged groups

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.


Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	28 - March 19

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

If you wish your personal details to be treated in confidence and not published please tick the box below:	
Please explain below, why you have made this request:	

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: Equality	
Insufficient level of equality assessment conducted on site G2/4 gargrave (off Walton close/Marton Road).	

Section 4: Legal Compliance & Duty to Cooperate

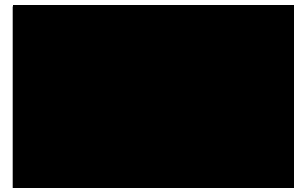
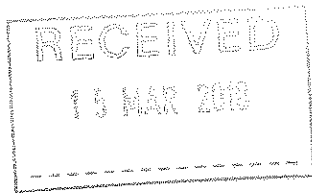
Do you consider that this modification of the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant		No
2. Sound		No
3. In Compliance with the Duty to Cooperate		No

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

<p>Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.</p> <p>If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.</p>



11 March 2019

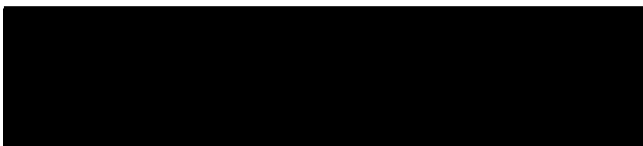
Dear Councillors and Planning Managers

We are writing to support the local efforts to re-instate the green fields of Park Hill near Skipton as a protected 'Local Green Space'. We believe it is important that this area next to Skipton Woods should remain as open country, and we oppose any future plans to develop the area for housing or for business and industry.

Park Hill is part of the ancient woodland that once belonged to Skipton Castle which was built in 1090. The local councillors have recently enhanced the remaining woodland by improving paths and adding areas of interest which both local people and visitors have enjoyed. It has been done with great sensitivity. We need the adjacent open space in order to access and appreciate the woodland. It would not be the same if the woods were surrounded on all sides by buildings. Local people like us frequently walk along the track, which is a public footpath, to get to the woods in order to appreciate the beauty of the area, to admire the woodland flowers and plants and to feel part of Skipton's history. We feel lucky to live in an area which has such a significant past and we think it is important to have space around ancient monuments in order get to them and to appreciate them.

Of course there is always pressure to build new homes for people. However, in the last three years there have been new developments at Corner Fields, Higher Raikes, Hawbank Field, Elsey Croft, Knaresborough Road, Granville Street, Providence Quarter and the Bailey. This means that a lot of green space in and around the town has already been built on. We believe that it is only right that the Park Hill area should be preserved for our families, the large number of visitors that are attracted to the town, and to the future generations.

Yours faithfully



Laura and Andy Taylor

From: Susan Teale [REDACTED]
Sent: 08 March 2019 14:26
To: Sian Watson
Subject: Park Hill

Dear Ms Watson

I write with concern about the news that Park Hill has been removed from the Local Plan. I do not understand why this has happened as it fulfills all the criteria needed for it to be protected.

I moved to Skipton just under a year ago. I chose Skipton and my particular location, due to the 'country' feel and the outstanding beautiful countryside around.

I know I am lucky to live here, but all day I see people walking past my house who also want to enjoy the woods and surrounding area. Many of these people come from other areas and travel here to enjoy what Skipton has to offer, bringing much needed business to local shops etc.

Sadly it would appear that this beauty is gradually being destroyed. Park Hill adds to the character of Skipton, providing wonderful views that should be enjoyed by all, it helps to extend the enjoyment of the Woods and the wildlife, it would be devastating if it is not protected.

Please can you help to protect this area. If it is lost, and then building happens, in years to come people will question why this was allowed to happen but it will then be too late.

Thank you

Kind regards

Susan Teale

[REDACTED]

From: Melanie Lindsley [REDACTED]
Sent: 25 March 2019 15:19
To: Local Dev. Framework
Subject: RE: [External] Public Consultation on the Proposed Main Modifications to the Publication Draft Craven Local Plan: 19/02/19 - 01/04/19
Attachments: Craven Main Modification Form.docx

Dear Sir/Madam

Please find attached the comments of the Coal Authority, on the completed response form, in respect of the Main Modifications proposed.

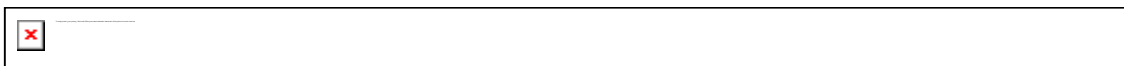
Kind regards

Melanie

From: Craven District Council, Planning Policy [mailto:localplan@cravenc.gov.uk]
Sent: 18 February 2019 11:10
To: The Coal Authority-Planning
Subject: [External] Public Consultation on the Proposed Main Modifications to the Publication Draft Craven Local Plan: 19/02/19 - 01/04/19

[View this email in your browser](#)

[View this email in your browser](#)



Dear Sir/Madam,

**Public Consultation on the Proposed Main Modifications
to the Publication Draft Craven Local Plan
Tuesday 19th February – Monday 1st April 2019**

I am writing to inform you that Craven District Council will be inviting representations on the Main Modifications to the Publication Draft Local Plan (the Local Plan), submitted for examination on the 27th March 2018. Public consultation runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019. All representations must be received no later than Monday 1st April 2019.

The proposed Main Modifications are considered necessary following the examination hearings, held during October 2018, to make the Local Plan sound. The Main Modifications put forward within this consultation are made without prejudice to the Inspector's final conclusions on the Local Plan.

The Local Plan sets out the broad spatial planning, policy framework and vision for Craven District (outside the Yorkshire Dales National Park) i.e. the plan area, up to 2032, as well as the necessary development sites and infrastructure to support this growth. The Local Plan will also be used to make decisions on future planning applications.

The following updated supporting documents have been produced to accompany the main modifications and are also available as part of this consultation:

- Sustainability Appraisal
- Habitat Regulation Assessment

In addition the following documents have been produced for information purposes only and are not included in the consultation exercise, but are published for completeness:

- A Schedule of Additional Modifications, which sets out minor changes to the Local Plan that do not materially affect the operation and meaning of policies in the plan.
- A Schedule of Policy Map Changes which details where modifications to the Local Plan have resulted in consequential changes to the policies maps, or where corrections need to be made, for example where a site has been deleted.

At this stage of the examination process:

- **Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal and Habitat Regulation Assessment.**
- **This is not the opportunity to make comments on other aspects of the Local Plan.**
- **If you submitted representations during consultation on the**

Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications proposed to the Local Plan will not be considered by the Inspector.

For details of how to submit representations on the Main Modifications, please see the Statement of Representation Procedure and the Council's Representation Form Guidance Notes, which can be downloaded from Tuesday 19th February 2019, at www.cravencd.gov.uk/planningpolicyconsultations. Copies of the Representation Form will also be available via this link. Paper copies of the documents listed above will be available from libraries within the plan area and from the Craven District Council office reception desk during the consultation period.

All representations that relate to the Main Modifications, the updated Sustainability Appraisal and Habitat Regulation Assessment will be considered by the Inspector who will decide whether any further examination hearings are required. At the end of the examination process he will present his final conclusions in a report to the Council. If the Inspector concludes that the Local Plan is 'sound' subject to Main Modifications, the Council can move forward to adopt the Local Plan, subject to making the modifications recommended by the Inspector.

You are receiving this letter because you have submitted representations on previous drafts of the Local Plan, your contact details are held on the council's Local Plan consultation database and/or you have submitted representations on the Publication Draft Craven Local Plan. If you no longer wish to be contacted with regard to the Craven Local Plan and/or the contact details are incorrect, please use the 'unsubscribe from this list' and 'update subscription preferences' links included at the bottom of the Council's Mailchimp emails to unsubscribe or update contact details, securely and in accordance with the General Data Protection Regulation (GDPR).

If you require any further information or assistance please do not hesitate to contact the Planning Policy Team at localplan@cravencd.gov.uk or 01756 706472.

Yours faithfully
Planning Policy Team

Copyright © 2019 Craven District Council, All rights reserved.

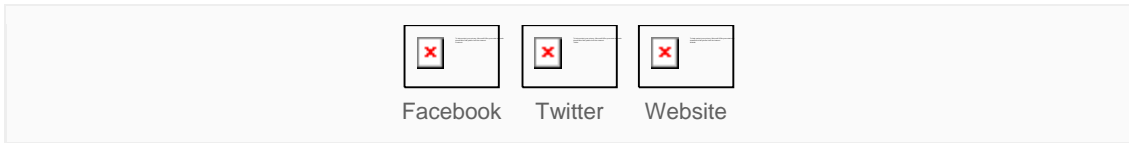
You are receiving this email because you are a statutory consultee to the planning process.

Our mailing address is:

Craven District Council
Craven District Council
1 Belle Vue Square, Broughton Road
Skipton, North Yorkshire BD23 1FJ
United Kingdom

[Add us to your address book](#)

[unsubscribe from this list](#) [update subscription preferences](#)



This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

Resolving the impacts of mining. Like us on [Facebook](#) or follow us on [Twitter](#) and [LinkedIn](#).
Resolving the impacts of mining. Like us on [Facebook](#) or follow us on [Twitter](#) and [LinkedIn](#).

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mrs
First Name:	Melanie
Last Name:	Lindsley
Job Title (where relevant):	Development Team Leader
Organisation (where relevant):	The Coal Authority
Address 1:	200 Lichfield Lane
Address 2:	Mansfield
Address 3:	Nottinghamshire

Address 4:	
Postcode:	NG18 4RG
Telephone:	██████████
Email:	██

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal and Habitats Regulation Assessment that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal and Habitats Regulation Assessment will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM:	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

The Coal Authority has no specific comments to make in respect of the Main Modifications proposed.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.


Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	X
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	X
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	25 March 2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ
www.cravencd.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravencd.gov.uk



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

From: Tim Thompson [REDACTED]
Sent: 31 March 2019 14:27
To: Local Dev. Framework
Subject: Local Plan - Submission
Attachments: cdc-mods-rep-form-2019-final.pdf

Hi - please find attached a completed Main Modifications Consultation Representation Form as part of the consultation on the local plan.

If you need any further information from me please do not hesitate to contact me.

Thanks

Tim

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mr
First Name:	Tim
Last Name:	Thompson
Job Title (where relevant):	
Organisation (where relevant):	
Address 1:	██████████
Address 2:	██████
Address 3:	

Address 4:	
Postcode:	██████
Telephone:	██████████
Email:	██████████████████████████████

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

If you wish your personal details to be treated in confidence and not published please tick the box below:	
I wish to request that the personal details submitted with this representation are treated in confidence and not published.	Yes
Please explain below, why you have made this request: I am happy for my name to be published but would appreciate that my personal contact details remain confidential as I don't wish unsolicited contact from 3rd parties. If the council or planning office would like to contact me then I am happy with this but would prefer my address, e-mail, or phone number are not published to protect my privacy.	

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Tim Thompson
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: 87 Policy Env 10 Local Green Space and specifically SK-LGS64	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

The plan in relation to SK-LGS64 does not appear to meet the tests for deselection as a Local Green Space (LGS).

When taken as a whole - the changes to LGS proposed by the plan - remove to a significant nature the available LGS for residents of Skipton.

The following details why this conclusion has been reached.

Test 1 - Is the site reasonably close to the community they serve?

Site SK-LGS64 adjoins the community it serves. It is the only agricultural and natural green space which can simply and easily be reached from the town centre without the need for a car or need to cross a busy transport link.

Test 2 - Is the site local in character and not an extensive tract of land?

The land is the last remaining agricultural land in the immediate vicinity of Skipton which can easily be accessed by foot. Skipton was and to some extent still is a farming community and this site is the last remaining area which represents the traditional way of life in Skipton.

There appears to be no definition of an "extensive tract of land" in the planning rules. While SK-LGS64 is the largest green area identified in the plan, when considered in relation to the area of green land which has recently, or has now, been given over to housing, this site cannot be considered extensive given it is smaller than the total area now given over to housing.

Taken holistically, both in relation to the total area already built on, or which has now been designated for housing, it can be argued that SK-LGS64 is not extensive.

If SK-LGS64 is removed from the plan there will be no LGS in close proximity to the local area which can be accessed directly by the local community.

The land does not appear to have planning permission based on the plan or have been allocated for housing. As such this means that under Test 2 this land could be allocated as LGS.

Test 3a - Can the site be shown to be demonstrably special to the local community?

This site meets all of the criteria under test 3a. There is widespread concern in the community at the potential loss of this site evidenced by Facebook activity on the local forum and a recent petition which is now being signed by the local community.

While a view has been expressed that the site is not demonstrably special to the local community this is regrettably not correct. There has been some surprise locally about the change to site SK-LG64 as noted above. As an example - the following letter in the local newspaper demonstrates that there appears to be a lack of knowledge locally about the change, and now that this has been publicized local residents are concerned about the potential change:

<https://www.cravenherald.co.uk/news/17449000.letter-park-hill-in-skipton-must-have-special-protection/>.

Based on the stipulated criteria - SK-LGS64 meets the criteria laid out under test 3a:

Beauty: This area is one of the few places where a view of Skipton town, the castle, church, woods, and surrounding area can be viewed easily and without the need to use a car. The view across to Barden and Embsay Crag is particularly beautiful.

This is the only and last remaining piece of open and unspoilt land which can be easily accessed by a public footpath from the centre of Skipton town and without the need for a car.

SK-LGS64 can also be accessed from Skipton Woods and is a popular circular walk for visitors and locals. A circular walk of Skipton Woods and SK-LGS64 gives in a single short walk the varied and diverse history of Skipton. A castle town with ancient forest, and then on to the ancient hunting ground, agricultural heritage, civil war battlement, and finally back to the town. All through an area of recognised beauty.

Historic Significance: Park Hill holds specific historical significance. It is part of the ancient hunting grounds of Skipton castle. The site contains, and provides unspoilt access to a scheduled historic monument (1004878).

This site was significant during the civil war - used as a gun battery - resulting in the fall of Skipton Castle on 21st December 1645. It is particularly unique as being one of the final royalist strongholds. Protection of this land for the local community - as well as to visitors to the area - will protect this historic site for future generations.

Recreational Value: The footpath over Park Hill provides significant recreational value to the area. The circular walk through the woods and back over Park Hill is a popular and regularly used recreational facility. It provides a full snapshot of the area covering the ancient woods, agricultural past, civil war connections, and beauty of the area.

The lane from Grassington Road is a popular walking area for locals and visitors - with unspoilt views of Park Hill, the woods, and Embsay Crag. While the local park is appreciated - it is parkland with the amenities expected of a park. This recreational area differs in that it is open agricultural land and provides a significantly different experience.

Tranquility: A casual visit to Park Hill will show this is a tranquil area. 10 minutes from the town centre and the hustle and bustle of the high street, the visitor can find a place of absolute calm.

It is not uncommon to find people sitting on the wall enjoying the peace and quiet and views of the area. As the final easily accessible agricultural land it is the last remaining place to hear and watch sheep grazing. If lost - the only way to access an area of this type will be either by transport, or crossing a busy transport link.

Richness of Wildlife

This area is well known for wildlife - all of which require a mixed requirement of wooded and open agricultural land. The unique nature of site SK-LGS64 provides specific support to local wildlife which would be lost if the area is not protected.

A number of priority species named in the local Biodiversity Action Plan utilise this area and given this is the last remaining area of open farm land in Skipton there is a high risk that these species will be lost to the area, with wildlife forced out of the immediate town area.

The area supports a diverse range of wildlife including: bats, owls, deer, and native UK bird species including Woodpeckers, Jays, and Rooks. Loss of this open space would marginalize these species and in some cases remove the habitat entirely.

By way of example:

- The recent Starling murmuration could often be seen landing on Park Hill in large numbers immediately prior to the murmuration starting.
- Bats are a common site in the area - particularly on the lane leading from Grassington Road.
- Barn owls can regularly be heard in Little Wood and use the open area of Park Hill to hunt.
- Other priority species can also be seen using the area of Park Hill.

Loss of this site would result in the loss of the richness of the wildlife in this area. Maximum protection would help protect this area which is rich in wildlife.

Does the site hold particular local significance for any other reason?

The site is significant for the following additional reasons:

- It contains two long distance paths with extensive views of the countryside.
- It is the final area of open agricultural land which can be accessed by foot from the town.
- It is regularly used by the local community for recreation and leisure.

Test 3b - Evidence of local support

There is now widespread concern in the local community that this site may be lost as a LGS. A petition has been organised and is now gaining support. Facebook and letters to the Craven Herald all demonstrate that this is an area of significance for the local community.

While test 3a will take precedence and demonstrates why this area should be included as LGS - this is an area of Skipton which is valued by the local community.

There do not appear to be other recognised protections on this land which would protect this special and unique area of Skipton. LGS is therefore the best approach to ensuring it is preserved for future generations and that the character and uniqueness of the Skipton landscape is protected.

Conclusion

The site was originally intended to be protected as an LGS as evidenced by the plan produced by the council. This led locals to believe that this area would be protected.

It is clear from the original submission that this area meets the tests of an LGS and it's conclusion in the original plan shows not only the local desire to protect this valuable area but the reasons why.

These have been extended and expanded above - but by way of conclusion - the wording of the original plan clearly spell out why the local community would like to see this area protected for both current and future generations - the key paragraphs are quoted below:

- 1) These unique spaces are of historical importance and beauty. This area is the remnants of the Old Park / Hunting Grounds dating back to the 1300's, which ran from the Castle to Rylstone in the North and Bolton Abbey in the East.
- 2) It would protect and safeguard a green wooded corridor connecting the heart of the town through to the woods and countryside beyond.
- 3) It would ensure footpaths from the centre of Skipton would remain an inspiring countryside walk rather than a bustling urban walk. It would relieve the recreational pressure put on the existing woods if development occurred in this area (note: following the recent development of the wood the number of people now using Park Hill as a circular walk has increased). It could also potentially allow for the expansion of the existing woods.

- 4) It would protect the impressive green wooded backdrop to the town of Skipton and preserve the unique views from inside the ancient castle and inside the ancient woods, which are both visited by many thousands of people a year - from locals to visitors from all over the world. If not protected now, we would erode or at worst lose these historic and inspiring spaces forever, changing this beautiful landscape drastically along with Skipton's core identity and the reason why so many people love Skipton.

The 2008 Skipton Conservation Area Appraisal specifically identifies this site as one that enhances the environment and character of the conservation area, providing key vistas and views over the town.

The appraisal specifically identifies the view from Park Hill a significant view into the town and identifies this proposed LGS as an existing open and green space that enhances the environment and character of the conservation area (Map 6). The 2008 appraisal specifically mentions the following open/green spaces that enhance the environment and character of the Conservation Area:

- Skipton Woods containing Eller Beck and Springs Canal. The woods were part of a medieval hunting park.
- Grounds of Skipton Castle
- **Park Hill, with earthworks and Civil War battery**
- Old Cemetery, Raikes Road, containing Kipling Gravestone.

Information obtained from the Ecological Data Centre indicates that this site is rich in wildlife. PROWs run through the site, including through Skipton Woods, providing opportunities for recreation. This site is designated as an existing recreation/ amenity space within Skipton. It is considered that given the existing features on the site, including the SINC, existing designations of protected road approach, existing recreation / amenity space and the Skipton Conservation Area, and that it provides links from the town centre, through a wooded area into the wider countryside, it is significant in terms of its beauty.

CPRE Tranquillity maps identify areas in red as having the lowest tranquillity scores and areas in green the highest. This site is identified as orange. It is considered that area of the site i.e., close to existing roads cannot be classed as tranquil, however the majority of the site including the area of Skipton Woods provide a tranquil space adjoining the busy town of Skipton. Evidence of support from the community / landowners has been provided during consultation on the draft Craven Local Plan.

- 5) Yes - site meets criteria relating to historic significance, richness of wildlife, recreation, beauty and tranquillity.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

The proposed modification is for SK-LGS64 to be reinstated into the plan. This will ensure that the plan is sound given SK-LGS64 meets the test for inclusion as an LGS.

It will also offer protection for this historic and valuable area for future generations and while allowing the town of Skipton to grow - will protect and preserve a valuable local asset.

The proposed revised wording is to include the the text with strikethrough on page 103 specifically relating to SK-LGS64 is included as part of the plan.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)

Yes, I do wish to be notified	Yes
No, I do not wish to be notified	


Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)

Yes, I do wish to be notified	Yes
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

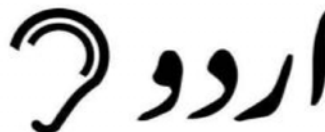
Please sign and date below:

Signature	
Date	31/03/19

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ |
www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



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

Craven Local Plan Examination

From: Kay Thompson [REDACTED]
Sent: 18 March 2019 10:17
To: Tony Blackburn
Subject: Craven District Council Consultation on Local Plan - Park Hill

Dear Mr Blackburn

In response to Craven District Council's public consultation on changes to the Local Plan I wish to express my concern about the removal of Park Hill in Skipton as a protected green space.

As a local resident, my family (2 adults and 3 children) and I use Park Hill recreationally for walking and jogging almost daily. It is an important green space within the close proximity of our own home and neighbours in the Grassington Road, Tarn Moor and Raikes community). Park Hill is frequently used and enjoyed by local residents and tourists alike who use it as part of the circular walk linking the top end of Skipton Woods back to Skipton, or as a section of the long distance footpaths out of Skipton. It is an incredibly important area for recreational access for local residents and tourists.

In addition, the views across to Park Hill, with Skipton Woods beyond, hold particular significance for their beauty for residents and visitors to the area. This is not an extensive tract of land and forms part of the local character of Skipton, being the 'gateway to the Dales', on a main route in and out of Skipton.

I request my objection to removing Park Hill as a projected green space to be formally recognised as part of the current consultation.

Kind regards
Kay Thompson-Barker

[REDACTED]

From: Iain Toms [REDACTED]
Sent: 01 April 2019 22:58
To: Local Dev. Framework
Subject: Hellifield Flashes: Green Space Comments
Attachments: LocalPlanObjn1.docx

Dear Sir/Madam,

Attached are my comments for the Hellifield Green Space section for the Local Plan.

Yestrday, I had technical problems with the PC, which have been resolved today - except that the computer clock hasnt gone back! I hope you are still able to consider my comments

Sincerely,

Iain P Toms,
[REDACTED]

[REDACTED]
[REDACTED]
1st April 2019

Dear Sir,

The Site Bounded by Waterside lane, A65, Midland Terrace and Railway

I believe that the area of the above area should be designated as a Green Space.

- The large pond/lake, Gallaber pond had particular merits in that ia a rare and valuable ecosystem, an “Ephemeral Pond”. To complement that, it an exceptional site which more than merits its being designated a SSSI. It would be politically, socially, and environmentally unwise not to assure that it is conserved and maintained as it is, respecting its role on a nature corridor in transition zone between the Dales and Trough of Bowland. The RSPB is quite wrong in believing that any of its role can displaced to another site. Settle, and preserves it from becoming linked with Long Preston
- The whole site is a valuable adjunct to the village of Hellifield, and assures this “cinderella” village of its right to have access to green space comparable with those in and around Gargrave and Long Preston.
- Having lives on Kendal Road, I regularly went out to watch the sun setting from the track behind Midland Terrace. The unspoiled view is part of the hidden benefits of living in Hellifield. Nothing should be allowed to marr that view.
- The two other ponds (Little Dunbars & Large Dunbars) are very important and much nearer to the houses of our village and footpath – Refused this status. Main breeding area for the Great crested Newt and teaming with birdlife.
- The area is a beautiful asset to a village which is plagued by heavy traffic. It is also a wildlife haven and enjoyed by all ages and people from all areas. It is One of peace & tranquillity. In winter, it offers our children our own form of winter sports.
- The main submitted Green Space plan was for a large a tract of land, but this was revised to become smaller versions to take in the most important and walked area nearest the village and enclosed by houses - this has been re submitted and now refused. This hardly makes sense.
- Please consider again the importance this beautiful area is to the village, it fits as I understand all criteria for Green Space and is one of bountiful wildlife, birdlife and beauty, ans sunsets beyond description.
- The whole site compensates for the charm which was that taken away by its former railway industry and auction mart.

Late as they are, I ask that my comments be considered.

Sincerely,

Iain P Toms

From: jacqueline towers [REDACTED]
Sent: 25 March 2019 11:53
To: Sian Watson
Subject: Park Hill Skipton Local Green Space Designation

Dear Ms Watson,

Please find attached a letter expressing my deep concern that the area known as Park Hill (or Battery Hill) in Skipton has had its designation as a Local Green Space removed from the latest version of the Local Plan for Craven.

Please reinstate Park Hill as a Local Green Space for Skipton.

I would be very grateful if you would acknowledge receipt of this letter. Many thanks.

Best regards,
Jacqueline Towers



25th March 2019

Dear Ms Watson,

I am writing to express my deep concern that the area known as Park Hill (or Battery Hill) in Skipton has had its designation as a Local Green Space removed from the latest version of Craven Local Plan.

In my opinion, Park Hill is the most attractive location in Skipton, both as an integral part of the townscape – these green fields can be seen from various locations within the town – and as a place to admire a marvellous 360° view of the wider landscape. It is a joy to sit on the stile at the top gazing at the wonderful open views over the town and across to Pendle Hill, the Dales, Embsay Crag and the Aire Valley. The footpaths over Park Hill, along Short Lee Lane and within Skipton Woods provide a delightful network of routes for walkers of all levels of fitness. I particularly enjoy the circular walk combining the woodland environment of Skipton Woods and the open landscape of Park Hill. For more serious walkers, what an uplifting way to leave Skipton on the first day of the long distance footpaths 'Lady Anne's Way' and 'A Dales High Way'.

There is no reason at all why Park Hill cannot be designated as a Local Green Space. It fulfils all the criteria set out by the government in the National Planning Policy Framework (so much so that one might think that the NPPF criteria had been written with Park Hill in mind). It is close to the town, has historic significance (the Civil War battery) and recreational value (with accompanying health benefits), is a highly attractive space and is local in character. Furthermore, Park Hill (i.e. the fields lying between Short Lee Lane, Skipton Woods, Chapel Hill and Grassington Road) is a well-defined area of land and cannot reasonably be regarded as an "extensive tract of land", given that this term has no governmental or legal definition. According to Government guidelines, there are no rules determining the size of a Local Green Space due to the diverse nature of places.

Park Hill in its present form as a recreational green space is a highly valuable resource not only for the wellbeing and enjoyment of the residents of Skipton but also as an integral component of Skipton's tourist package. Not every town has such a wonderful asset within its boundaries; I fail to understand why Craven District Council would not do its utmost to protect Park Hill for future generations to enjoy. Every asset is precious, surely, particularly when the future of high streets is so uncertain.

I am a member of Skipton Civic Society and I support its formal response to the removal of Local Green Space Designation for Park Hill, which will be submitted during the public consultation on the Main Modifications to the publication draft of Craven Local Plan. It would be such a tragedy if we were to lose this special place. **Please reinstate Park Hill as a Local Green Space for Skipton.**

Yours sincerely,

Jacqueline Towers

From: Planning [REDACTED]
Sent: 01 April 2019 16:37
To: Local Dev. Framework
Subject: Craven Local Plan - Main Modifications Consultation
Attachments: Craven Local Plan - Main Modifications representation form - TRCPR.docx; Viewpoint analysis - Site SK081, SK082 and SK108 (inc. SK080a).pdf

Dear Sirs,

Please see attached consultation representation form and supporting information, submitted on behalf of our client, the Trustees for Roman Catholic Purposes Registered (TRCPR).

Kind regards,

Richard Morgan MRTPI
Senior Planning Consultant



Direct Dial: [REDACTED] | Mob: [REDACTED]

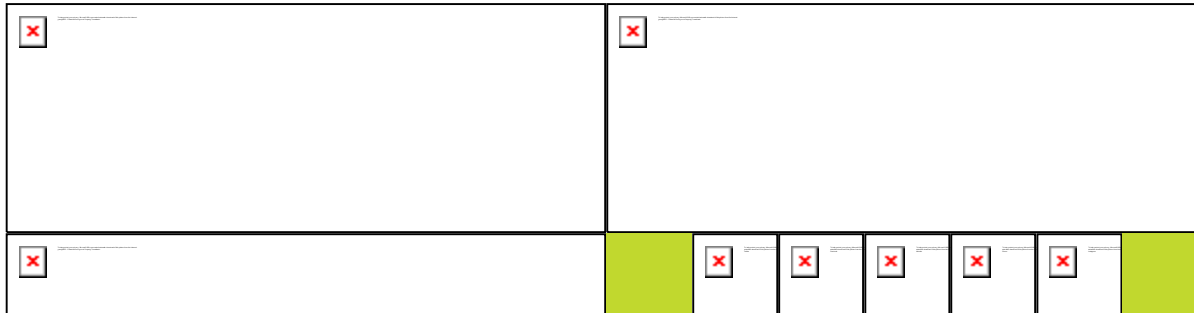
Priestpopple, Hexham, Northumberland, NE46 1PS
Residential | Rural | Commercial | Planning

www.youngsrps.com

Connect with us...



VCID:f058e495-7e1d-4a90-90d6-8a54546b1727.



Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A


Section 1: Personal Details

Title :	
First Name:	
Last Name:	
Job Title (where relevant):	
Organisation (where relevant):	TRCPR
Address 1:	c/o YoungsRPS
Address 2:	
Address 3:	

Address 4:	
Postcode:	
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	YoungsRPS
Address:	Priestpopple Hexham Northumberland NE46 1PS
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	TRCPR
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: 17 & 79	

Section 4: Legal Compliance & Duty to Cooperate

Do you consider that this modification of the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. In Compliance with the Duty to Cooperate	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

In respect of the proposed housing allocation 'Site SK081, SK082 and SK108 (incorporating SK080a)' we support the Council's modification of the Policies Map to remove the defined boundaries for Green Infrastructure. However, we would question the need to add a blanket Green Infrastructure designation across the housing allocation, when the requirement for Green Infrastructure will already be set out in the development principles under Policy SP5. We also object the locational references in the development principles for this site, specifically the references to the north and western boundary of the site. The north and western area of the site is in the ownership of our client, and there is no evidence in the supporting assessment documents to the Draft Local Plan that indicates that the north and western boundary of the site is the most appropriate location for Green Infrastructure. Therefore, to write this into policy is entirely unjustified and as such makes the draft Local Plan unsound.

In the Inspector's Matters, Issues and Questions, under Matter 5, Issue 2, Question 19, the Council was asked, "*What is the justification for including an area of green infrastructure running along the north and western site boundary?*"

In the Council's response, it is stated that "*the evidence for the identification of this area of green infrastructure is provided in the Landscape and Visual Impact Assessment (October 2017)*". However, the Council had decided the boundary for Green Infrastructure long before the date of this assessment, with the boundary set exactly to the split of ownership between our client and the Council, and no other tangible evidence apparent.

The Council's response goes on to suggest that this area of Green Infrastructure is provided "*to mitigate against and reduce the identified visual impacts*" ... and "*to mitigation against landscape impact on the Yorkshire Dales National Park (YDNP), which is located to the north west of the site.*"

However, the LVIA 2017 in fact demonstrates that this area would have the least visual impact if developed. We have also undertaken our own viewpoint analysis (see attached) which further highlights that the north and west area of the site is in fact the least visible from the YDNP and the most developable, being flat and well contained. With regard to the impact on the Conservation Area, the majority of the north and western area of the site is completely screened from the Conservation Area by the Computershare Building and the Local Green Space designation adjacent to Gargrave Road.

The Council also suggests that there needs to be a buffer to the Site of Importance for Nature Conservation (SINC) in the interests of biodiversity. Yet the Sustainability Appraisal (March 2018) specifically states in regard to this site that "*Development is likely to have a low impact on biodiversity value*".

It should also be noted that for the High Raikes development to the east of White Hill Lane that is currently under construction, there was no requirement for a 'buffer' to the SINC.

Enhancements to biodiversity can be addressed through Green Infrastructure provision across this site and it does not need to be limited to the north and western boundary.

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

The suggestion in the development principles for Policy SP5 - Site SK081, SK082 and SK108 (incorporating SK080a), that the Green Infrastructure requirement for this site should be along the north and western boundary is entirely unjustified and as such makes the draft Local Plan unsound.

The objective of the proposed Green Infrastructure is *to provide landscape mitigation for the Yorkshire Dales National Park, and the SINC and the adjoining Skipton Conservation Area*. There is no evidence in the supporting assessment documents to the Draft Local Plan that indicates that the north and western boundary of the site is the most appropriate location for Green Infrastructure. As set out in our response under Section 5 and highlighted in our viewpoint analysis (attached), it is apparent that the north and west of the site would in fact have the least visual impact if developed.

Accordingly, for housing allocation SK081, SK082 and SK108 (incorporating SK080a) in Policy SP5, all references in the development principles to the location of the proposed Green Infrastructure should be removed, allowing the most appropriate location for Green Infrastructure to be determined through a comprehensive masterplanning exercise, including a LVIA and Biodiversity Appraisal, both of which are already stated as a requirement in the development principles.

The proposed modification 'MM17' should be revised as below:

...This is a greenfield site in a prominent position on the edge of Skipton, in relatively close proximity to the Yorkshire Dales National Park and a SINC. Development proposals for this site will incorporate a Green Infrastructure ~~corridor measuring approximately 3.5ha along the north and western boundary of the site~~ to provide landscape mitigation for the Yorkshire Dales National Park, the SINC and the adjoining Skipton Conservation Area. It will also provide new PROW connections with the existing residential area at Rockwood, Aireville Park and the Railway Station beyond to deliver recreational walking opportunities aimed at relieving pressure on the North Pennines Special Protection Area (SPA) & Special Area of Conservation (SAC).

...The Masterplan will define areas of green infrastructure based on the ~~second development principle set out above~~ the conclusions of the LVIA and Biodiversity Appraisal; show land safeguarded for a new primary school, if required; demonstrate connectivity of the site with the surrounding area and PROW network and will demonstrate how all the development principles for this site are to be addressed

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.


Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	<input checked="" type="checkbox"/>
No, I do not wish to be notified	<input type="checkbox"/>

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	<input checked="" type="checkbox"/>
No, I do not wish to be notified	<input type="checkbox"/>

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	1 st April 2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ
 | www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



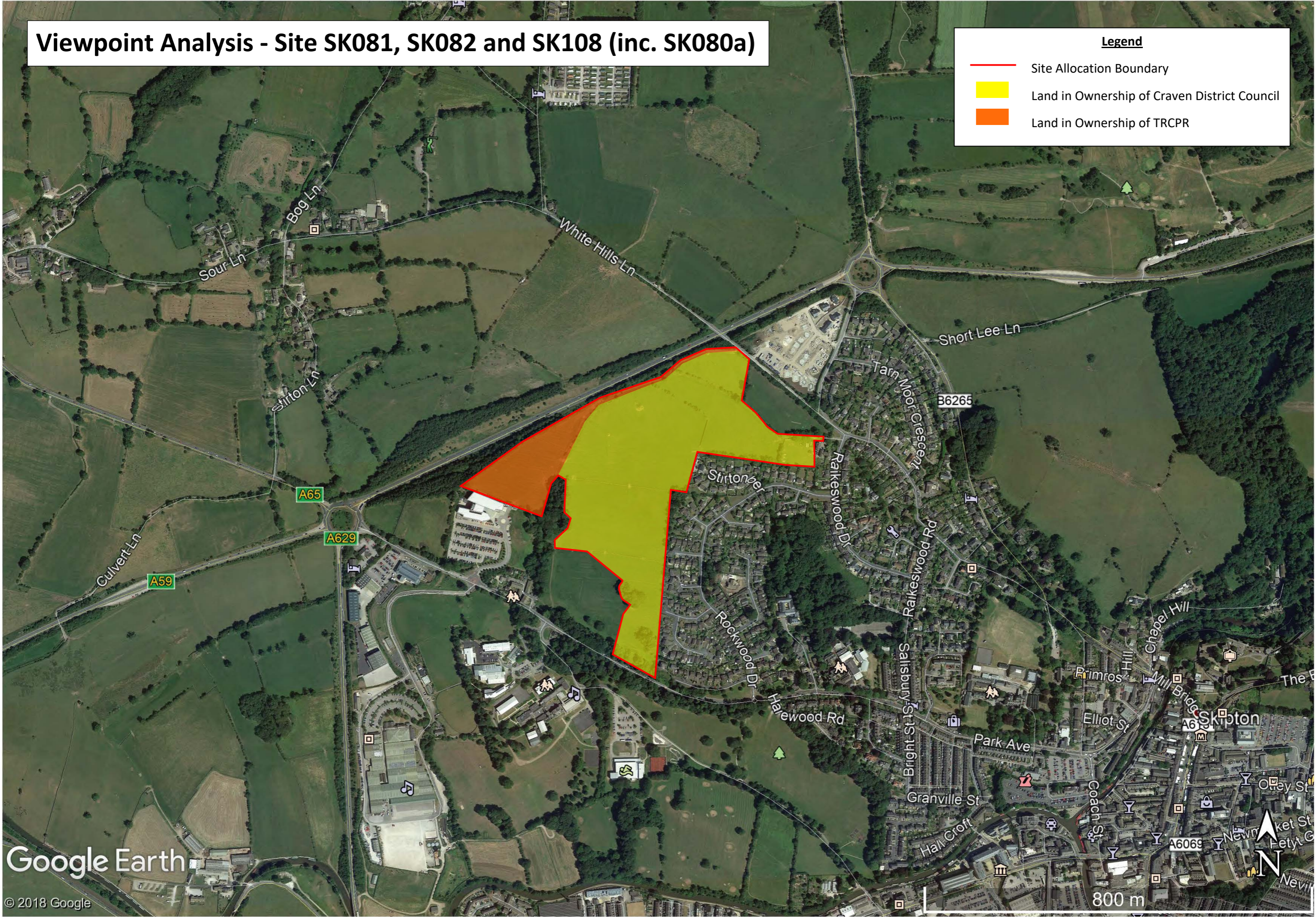
If you would like to have this information in a way that's better for you, please telephone 01756 700600.

Craven Local Plan Examination

Viewpoint Analysis - Site SK081, SK082 and SK108 (inc. SK080a)

Legend

- Site Allocation Boundary
- Land in Ownership of Craven District Council
- Land in Ownership of TRCPR



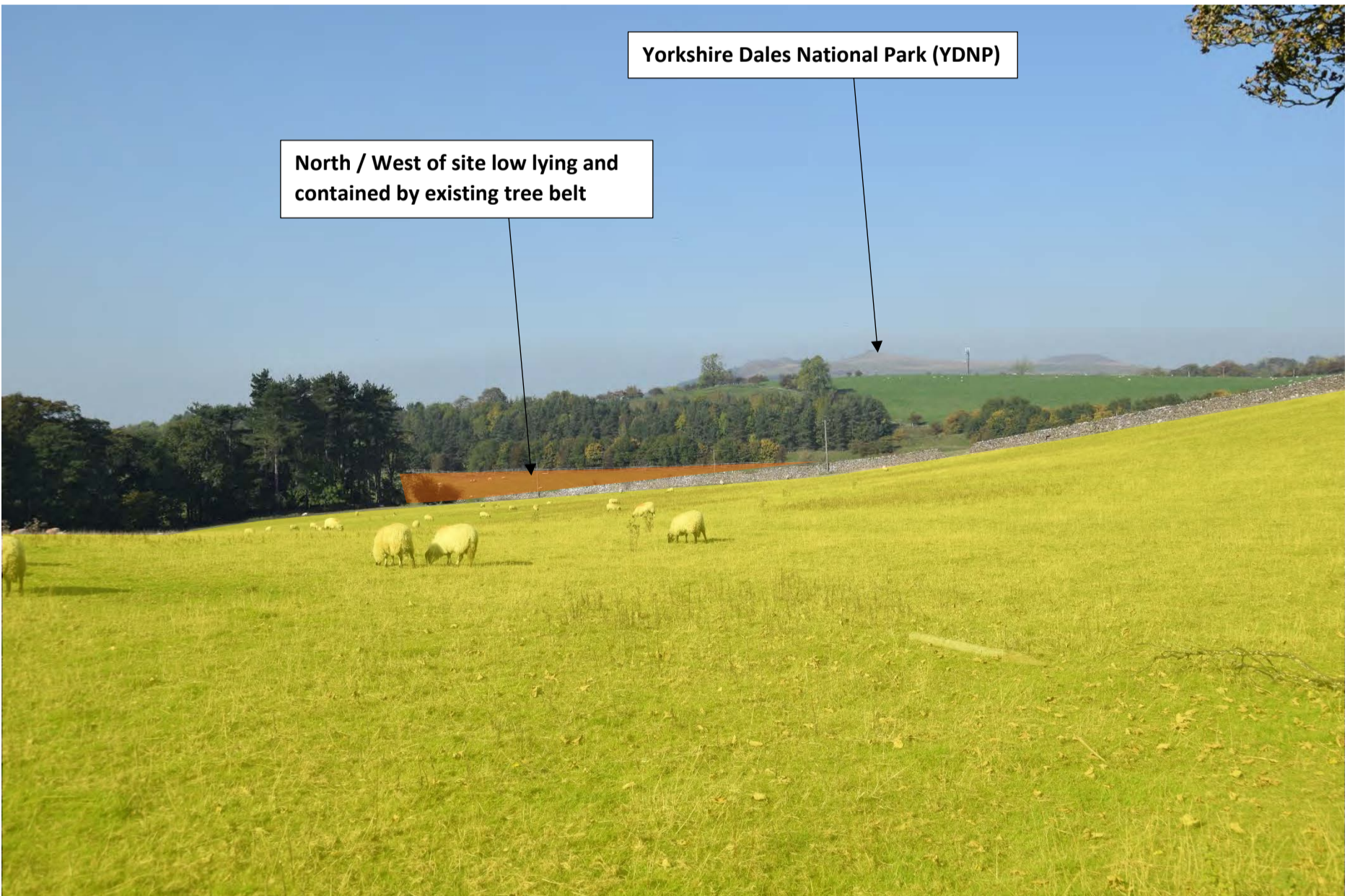
1. View looking north east from Computershare building



2. View looking south west from northern site boundary



3. View looking south east from Public Right of Way at White Hills



4. View looking south east from YDNP



5. View looking south west from YDNP



6. View looking south east from Public Right of Way at White Hills



7. View looking south west from Public Right of Way at White Hills



From: Steve & Jaq [REDACTED]
Sent: 30 March 2019 12:22
To: Local Dev. Framework
Subject: Hellifield Flashes green space designation - Local plan

Dear Sirs,

We understand that the main flash (Gallaber pond) is to be designated as a Local Green space but that the rest of the Hellifield Flashes area is not to be so protected. We would ask you to reconsider this decision.

As we are sure you know "..the UK is currently failing on 14 out of 19 global targets on biodiversity". Local plan diagram EC4B acknowledges that the area in question does have biodiversity value so it would seem to be our national duty to protect the biodiversity we already have.

The main reason we ask for this extended Local Green space designation is for the people of Hellifield. We used to visit the Flashes before we moved to Hellifield as we enjoy birdwatching. Now that we live here we feel very lucky to be able to walk to the Flashes and see a good variety of birds when ever we want. We would hate to see the number of visiting birds reduced or even wiped out.

Please help us to look after our biodiversity,one of the biggest assets of Hellifield and our country.

Many thanks

Yours sincerely

S & J Turner
[REDACTED]



Virus-free. www.avast.com

From: Gaskell, Gemma [REDACTED]
Sent: 29 March 2019 16:28
To: Local Dev. Framework
Subject: RE: Craven Local Plan - Main Modifications Consultation

Dear Sir / Madam,

CRAVEN LOCAL PLAN – MAIN MODIFICATIONS CONSULTATION

Thank you for consulting United Utilities on the above consultation. We have reviewed the modifications to the plan and have the following comments to make.

United Utilities are pleased to see the addition of the following wording in relation to Policy SP12 Infrastructure Strategy and Development Delivery: *'proposals for the necessary maintenance, upgrading and expansion of utilities infrastructure will be supported in principle'*. This will enable United Utilities to carry out necessary works to operational infrastructure to ensure that the growth, development aspirations of the district can be met, and will enable United Utilities to respond to changing environmental agendas in accordance with our obligations.

With reference to our previous comments regarding concerns we have in relation to the development of sites with sensitive uses within close proximity to our existing operational Wastewater Treatment Works (which can be a source of noise and odour), United Utilities are happy with the change to Policy ENV3 Good Design Part f) which states that *'development proposals should be able to demonstrate that they will secure a good standard of amenity for all existing and future occupants of land and buildings'*.

With respect to site references SG035 (32 dwellings), HB011 (70 extra care dwellings), HB024 (27 dwellings), HB038 (19 dwellings) and LB012 (18 dwellings), we are still very disappointed to see no reference to SuDS within the Development Principles. The national ministerial statement on Sustainable Drainage is clear that major development sites such as these should include sustainable drainage. Even on brownfield and town centre sites, the inclusion of innovative approaches to sustainable drainage should be considered by the developer and encouraged by the local planning authority. At the very least we recommend that the development principles for each of the above-mentioned sites outline the need to consider sustainable surface water management in accordance with the principles of sustainable drainage within national planning practice guidance. This should include consideration of how site landscaping can contribute to a reduction in surface water flows and a reduction in flood risk. We request that this change is made to each of the respective Development Principles.

We wish to re-iterate that United Utilities will be able to better understand the impact of development on our network as more information becomes available on development proposals, such as the approach to surface water drainage, the chosen points of connection, and the timing for the delivery of development. On receipt of more information it may be that we can provide more detailed comments regarding the sites which are being promoted as draft allocations. The assessment of capacity in our infrastructure is an ongoing process as a range of details become available.

Additional information in respect of development sites is often only available at the planning application stage. With this information, we will be able to better understand the potential impacts of development on infrastructure and, as a result, it may be necessary to coordinate the delivery of development with the timing for delivery of infrastructure improvements.

We would therefore ask the Council and/or future developer(s) to contact United Utilities as early as possible to discuss water and wastewater infrastructure requirements for specific sites, to ensure that the delivery of development can be co-ordinated with the delivery of infrastructure.

United Utilities currently offers a free pre-development enquiry service available for developers to discuss options on potential development land. We would encourage this to take place at the earliest opportunity. Please provide our contact details below:

Developer Services - Wastewater

Tel: [REDACTED]

Email: [REDACTED]

Website: <http://www.unitedutilities.com/builder-developer-planning.aspx>

Developer Services – Water

Tel: [REDACTED]

Email: [REDACTED]

Website: <http://www.unitedutilities.com/newwatersupply.aspx>

We encourage consideration of the availability of alternatives to the public sewerage system for surface water discharges. For example, sites with land drains or near to watercourses are a more sustainable alternative to using the public sewer. Applicants wishing to discharge to the public sewer will need to submit clear evidence demonstrating why alternative options are not available. Surface water discharge to a combined sewer would be the last resort, and is strongly discouraged.

Drainage proposals for sites will be expected to minimise reliance on pumped drainage solutions as this is not in the interest of delivery of sustainable development. Applications for developments on sites which are part of wider development plan allocations will be expected to demonstrate how the drainage proposal for the site relate to a wider holistic drainage strategy for the entire site. Any drainage in early phases of development should have regard to future interconnecting development phases. Schemes will be expected to be supplemented by appropriate maintenance and management regimes for the lifetime of any surface water drainage schemes.

I would be grateful if you could advise landowners/developers of this in your initial discussions regarding site development.

On sites in fragmented ownership, the Council needs to establish how the landowners intend to work together to ensure the co-ordinated delivery of infrastructure in the most sustainable fashion.

Moving forward, we would be grateful if you could continue to consult with United Utilities on all future planning documents. We are keen to continue working in partnership with the Council to ensure that all new growth can be delivered sustainably, and with the necessary infrastructure available, in line with the Council's delivery targets. Please don't hesitate to contact me if you would like to discuss anything further.

I'd be grateful if you could please confirm receipt of our comments.

Kind regards,
Gemma

Gemma Gaskell

Town Planner

Developer Services & Metering

Network Delivery

United Utilities

[REDACTED] ([REDACTED])

unitedutilities.com



If you have received great service or if you have an idea on how we can make our service better, please let us know.
Visit: unitedutilities.com/WOW

EMGateway3.uuplc.co.uk made the following annotations

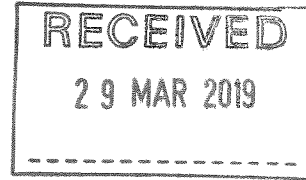
The information contained in this e-mail is intended only for the individual to whom it is addressed. It may contain legally privileged or confidential information or otherwise be exempt from disclosure. If you have received this Message in error or there are any problems, please notify the sender immediately and delete the message from your computer. You must not use, disclose, copy or alter this message for any unauthorised purpose. Neither United Utilities Group PLC nor any of its subsidiaries will be liable for any direct, special, indirect or consequential damages as a result of any virus being passed on, or arising from the alteration of the contents of this message by a third party.

United Utilities Group PLC, Haweswater House, Lingley Mere Business Park, Lingley Green Avenue, Great Sankey, Warrington, WA5 3LP
Registered in England and Wales. Registered No 6559020

www.unitedutilities.com
www.unitedutilities.com/subsidiaries

27-3-19

Planning Policy Team
Craven District Council
Council Offices
Belle Vue Square
Broughton Road
Skipton
BD23 1FJ



Dear Planning Policy Team,

I wish to make a representation about a proposed Main Modification to the Draft Craven Local Plan which I believe does not satisfy the "soundness requirement". The Modification prevents Park Hill, Skipton, being designated ~~as~~ as Local Green Space as the plan suggested.

I can accept that the entire proposed area (which includes Skipton Woods and an area on the far side of Skipton Woods as well as Park Hill) might be seen as an extensive tract of land, too large to designate as Green Space. However, this should not prevent Park Hill being designated as Green Space. I submit that the area bounded by Grassington Road to the west, Skipton Woods to the east, and the Skipton bypass to the

north, should be designated as Green Space. This area is unique in a number of ways and is very special to the local community. This open green area, crossed by public footpaths including the track from Grassington Road to the woods, and the footpaths (including Lady Anne's Way) from the track, over the Battery (a site of historical significance) and emerging very close to the town centre, are very well used by local people for leisure, recreation and exercise. I walk there most days and see many walkers, runners, dog-walkers, family groups and birdwatchers there. The closeness of this important green space is part of what keeps Skipton special and stops it being ordinary. It is possible to walk from the busy Main Street into this wonderful green space and enjoy the views from the hillside in just minutes. In many towns there is nothing like this, and it really makes a difference to the town.

The Park Hill area is an excellent venue for birdwatching. Curlews (an iconic bird of this area) use Park Hill every spring. Many bird species (goldfinch, blue tit, great tit, wren, blackbird, dunmock and others) can be observed at Park Hill. People benefit from their use of this green space, whether to watch the birds, take exercise, or have a relaxing walk, or stand and watch the amazing immolation of starlings Skipton has experienced recently. The tranquility of Park Hill, its biodiversity, and its historic significance make it important to many people both residents and visitors to the town. Tourism is important to Skipton and this green space is part of what keeps Skipton attractive and special to visitors. As additional housing developments nearby (such as at the top of Rakes Road and in the "pig field") become settled by new families and residents, there will be more people within a

few minutes' walk of Park Hill who need green spaces to enjoy. Parts of Skipton, including these new estates, are quite high density housing and their occupants deserve open green spaces near to home where they can experience a sense of space and tranquility, and enjoy quiet recreation. It's so important to have a green space such as Park Hill within walking distance of people's homes, which can be enjoyed daily, without putting traffic on the roads. Please protect Park Hill and recognise the significance to the community of this important place in our town by making it a designated Green Space.

Yours faithfully



MS. G. VERNON

From: christine walton [REDACTED]
Sent: 01 April 2019 12:27
To: Tony Blackburn
Cc: Sian Watson
Subject: Park Hill and the Local Plan for Skipton

From: Christine Walton [REDACTED]
To: Tony Blackburn 15 Ottawa Close Blackburn BB2 7EB
To: Sian Watson Craven District Council 1 Belle Vue Square Broughton Road Skipton BD23 1FJ

Dear Mr Blackburn and Ms Watson

I am writing to you both to express my concern about the removal from the Local Plan of Park Hill's status as a Local Green Space.

This space is very close to the centre of town and can be accessed in less than 10 minutes from many parts of Skipton including the High Street. It is an integral part of the town as much as the High Street, Holy Trinity Church, Aireville Park or the castle.

It is visible from many areas of Skipton. The planning of any town affects the well being of its residents and the sight of a open green space has a beneficial calming effect on people reducing their stress. The fact that from many places one can look up and see, so close by, Park Hill linking directly the town to the peace of the countryside is one of the special attributes of Skipton for both residents and visitors.

I love taking visitors up to the top of Park Hill either as part of a walk or just for the outstanding views over the town and down the Aire Valley. Two long distance footpaths run over the top of Park Hill, a historic site with its Civil War battery connections. These footpaths are used constantly not just by local people but also by visitors to Skipton and Craven.

The footpaths tie in with short walks from Skipton woods. A very popular circular walk is to go through Skipton woods, a unique Woodland Trust town wood, and back over Park Hill. This enables runners and walkers to get exercise in the open air and in lovely surroundings without having to leave town. Many people, finding that things are getting on top of them, will take a break, head for the woods and Park Hill. Without Park Hill this walk would be much diminished. The area is used for other recreational purpose as well - for "kicking a ball around" by local children on the flatter part and for tobogganing if there is enough snow

There are many parcels of land within the boundaries of Skipton which can, and are, being developed. Building on them will affect Skipton but will not adversely affect the unique charm and character of Skipton. Building on Park Hill would have a detrimental affect on the landscape of the town and the well being of its residents. As Skipton grows and changes it becomes more and more important that Park Hill remains a green space, the green heart of Skipton.

I do hope that you will be working to see Park Hill re-instated as a Local Green Space.

Yours sincerely

Christine Walton

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). Please fill in a separate form for each representation you wish to make.

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	
First Name:	WATTAM ADELE
Last Name:	WATTAM
Job Title (where relevant):	SENIOR HEALTH WORKER
Organisation (where relevant):	AIREDALE GENERAL HOSPITAL
Address 1:	
Address 2:	
Postcode:	
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	N/A
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

If you wish your personal details to be treated in confidence and not published please tick the box below:	
Please explain below, why you have made this request:	

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: Equality	
Insufficient level of equality assessment conducted on site G2/4 gargrave (off Walton close/Marton Road).	

Section 4: Legal Compliance & Duty to Cooperate

Do you consider that this modification of the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant		No <input checked="" type="checkbox"/>
2. Sound		No <input checked="" type="checkbox"/>
3. In Compliance with the Duty to Cooperate		No <input checked="" type="checkbox"/>

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

<p>Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.</p> <p>If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.</p>

MARTEON RD IS A VERY BADLY LIT RD WITH VERY FEW STREET LIGHTS. THERE ARE ALSO NO PAVEMENTS, SO IT IS VERY DANGEROUS WHEN WALKING. I WALK DOWN TO WORK IN THE MASONS ARMS & ALWAYS TAKE A TORCH WITH ME, TO LET ONCOMING CARS KNOW THAT I AM ON THE ROAD. I HAVE BEEN CLOSE TO BEING HIT BY A CAR ON 2 OCCASSIONS. AS YOU HAVE TO WALK IN THE ROAD. THERE ARE CARS PARKED ON THE ROAD, THAT YOU HAVE TO WALK AROUND, THEREFORE, WALKING FURTHER INTO THE MIDDLE OF THE ROAD.

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

- Significant investment made to infrastructure
- Equality assessment to be conducted with remediating actions put in place
- Or alternative suitable site which will cater for all disadvantaged groups

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.


Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	28.3.19.

From: daniel webb [REDACTED]
Sent: 11 March 2019 19:39
To: Sian Watson
Subject: Park Hill

Dear Ms Watson,

We are writing to ask you to reconsider the proposed removal of Park Hill as a Local Green Space from the Local Plan for Skipton.

We live on Raikes Road and can see the hill from our house: it is an ever-changing view that offers so much throughout the year, from livestock in the summer to children sledging in the winter, to say nothing of the beautiful trees and the startling murmurations that are currently delighting spectators each evening. We often walk along the footpaths that run over and alongside Park Hill, connecting the top end of Skipton to the woods and giving us access to these special, wildlife-rich places. Driving home from work we pass the hill every night; it provides such an attractive approach to the town for both residents and tourists alike. On a more practical note, living as we do in an area at high risk to surface flooding, Park Hill acts as a vital porous surface that helps prevent rainfall causing worse flooding to our street than that which we already experience in bad weather.

Please consider local residents' views as well as our local wildlife and preserve Park Hill's status as a Local Green Space.

Yours sincerely,

Daniel Webb and Stephen Lennon

[REDACTED]

[REDACTED]

[REDACTED]

From: Frankie Wells [REDACTED]
Sent: 27 March 2019 17:26
To: Local Dev. Framework
Subject: Hellifield Flashes

To the Planning Inspector,

I am writing in support of designating The Hellifield Flashes area as a Local Green Space, a place where generations of children from both Hellifield and Long Preston have learned to not only appreciate but to love the the abundant wildlife and the ability to run and play, safe from the ever increasing road dangers. Those children have, in their turn, become parents and teachers, communicating their love of the Flashes to generation after generation, whilst the adults enjoy the amazing beauty and tranquility of this very special place.

The area also includes several sites important to archaeologists [Long Preston is recorded in the Domesday Book], is HOME to a great variety of animals and, famously, a crucial rest and feeding place for exhausted migrant birds.

Hellifield Flashes is a vital green space to all who live here, villagers and wild creatures alike.

F Wells,
Long Preston.

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). Please fill in a separate form for each representation you wish to make.

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mr and Mrs
First Name:	Russel and Alice
Last Name:	Whelan-Smith
Job Title (where relevant):	
Organisation (where relevant):	
Address 1:	██████████
Address 2:	██████████
Address 3:	



Address 4:	
Postcode:	██████
Telephone:	
Email:	████████████████████

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

If you wish your personal details to be treated in confidence and not published please tick the box below:	
I wish to request that the personal details submitted with this representation are treated in confidence and not published.	<input checked="" type="checkbox"/>
Please explain below, why you have made this request:	
We request confidentiality in accordance with our ^{our} rights under the Data Protection Act. As individuals, we do not wish our personal information to be disclosed to third parties.	

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Mr and Mrs Whelan-Smith
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: MM87 – Deletion of SK-LGS64 - SK-LGS64 Land to north of Skipton, bounded to the north by Skipton Bypass, to the east by Embsay Road & The Bailey; and to the west by Grassington Road, Skipton.	

Section 4: Legal Compliance & Duty to Cooperate

Do you consider that this modification of the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. In Compliance with the Duty to Cooperate	<input type="checkbox"/>	<input type="checkbox"/>

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

We are writing, as local Skipton residents, to express our concern regarding the removal of the Local Green Space (LGS) designation from Park Hill in Skipton by the Planning Inspector. We do not believe that this is legally compliant or sound.

Park Hill is of historical significance, cultural significance and is important to local fauna given its proximity to Skipton Castle Woods. We disagree with the Inspector's conclusion that SK-LGS64 is an extensive tract of land and, as such, cannot be designated as a LGS. The guidance from government clearly states that *"there are no hard and fast rules"* with respect to the size of the area as *"places are different and a degree of judgement will inevitably be needed"*.

Park Hill is bounded by the woods, the bypass, Mill Lane/Chapel Hill, Grassington Road and Raikes Road. The designation would in no way be inappropriate as it is not a way of creating *"green belt by the back door"*. Much of this land has other protections in place but the designation would ensure that the area is preserved as a whole and would remove the danger of inappropriate use of *any* of the land resulting in detriment to the whole community and landscape.

The Hill dominates the Castle end of the town which is why it was chosen as the location for a battery in the Civil War. The entrance to Park Hill is roughly 280m from the top of the High Street. It is a distinctive feature of Skipton and should be preserved as such. Park Hill is visible from many parts of Skipton, used by local residents and visitors, is crucial for local wildlife, part of a Conservation Area, and of historic importance.

Skipton prides itself on being the *"Gateway to the Yorkshire Dales"* and is a magnet for walkers and tourists. Park Hill is the starting point for Lady Anne's Way and is also a stopping off point for the Dales High Way route. Walking and tourism and consequently the business it generates for local shops, restaurants, hotels and b&bs is crucial to keeping the unique character of Skipton. Without the retention of such unique features, we will become yet another identikit town.

This is not a case of nimbyism, it is about protecting the very nature and character of our beautiful town.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what change(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

SK-LGS64 needs to be reinstated in the local plan as an LGS so that it is fully protected. The Inspector and Craven District Council should reconsider and take note of the government guidance. The whole character of Skipton is at risk if the designation remains deleted and the soundness of the plan will be jeopardised.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	✓
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	✓
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	[Redacted]
Date	27/3/19 27/03/19

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ | www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



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

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). Please fill in a separate form for each representation you wish to make.

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	
First Name:	ANNE
Last Name:	WHITE
Job Title (where relevant):	
Organisation (where relevant):	
Address 1:	
Address 2:	
Postcode:	
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	N/A
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

If you wish your personal details to be treated in confidence and not published please tick the box below:	
Please explain below, why you have made this request:	

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: Equality	
Insufficient level of equality assessment conducted on site G2/4 gargrave (off Walton close/Marton Road).	

Section 4: Legal Compliance & Duty to Cooperate

Do you consider that this modification of the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant		No <input checked="" type="checkbox"/>
2. Sound		No <input checked="" type="checkbox"/>
3. In Compliance with the Duty to Cooperate		No <input checked="" type="checkbox"/>

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravencdc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

Marton Rd is a road that requires extreme care either walking or driving. There are no pavements above Marton Rd + very dark. Traffic has difficulty seeing ~~pedestrians~~ walkers at night. Speed limits are ignored + parked cars don't help. The pavement, passed Marton Rd is so narrow you can only walk on it in single file.

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

- Significant investment made to infrastructure
- Equality assessment to be conducted with remediating actions put in place
- Or alternative suitable site which will cater for all disadvantaged groups

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

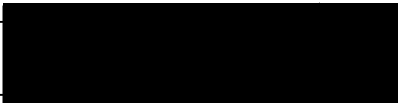
Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

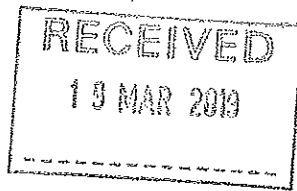
Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me <input checked="" type="checkbox"/>
No, I do not wish to be notified	<input type="checkbox"/>

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me <input checked="" type="checkbox"/>
No, I do not wish to be notified	<input type="checkbox"/>

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	27/3/19



12th March 2019.

Dear Sir,

I am standing at our window looking out at the wonderful expanse of green, which is known as the Hellifield flashes. The rain has increased the amount of water and consequently encouraged a further increase in wildlife - a wonderful sight.

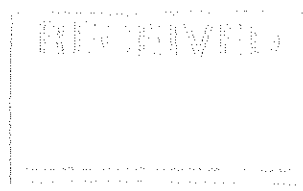
The area is definitely special to our community. The footpath is constantly in use, both by residents and visitors alike. The flashes are recognised as a natural phenomena (Ref: wikipedia) which have always attracted a richness of wildlife, including deer.

It would be a major advantage if all the flashes were to be designated 'green space' - a protection for wildlife and a tranquil place for visitors - a respite in our busy life.

If footpaths were improved, it would also make it accessible for the disabled - enabling all to enjoy the area. Protection of such places will save such beauty for the next generation - Showing that we did not destroy all their heritage!

Yours faithfully





Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). Please fill in a separate form for each representation you wish to make.

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	
First Name:	MARESA
Last Name:	WHITWELL
Job Title (where relevant):	N/A.
Organisation (where relevant):	N/A.
Address 1:	[REDACTED]
Address 2:	
Postcode:	[REDACTED]
Telephone:	[REDACTED]
Email:	[REDACTED]

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	N/A
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

If you wish your personal details to be treated in confidence and not published please tick the box below:	
	<input checked="" type="checkbox"/>
Please explain below, why you have made this request: I wish my details to remain private.	

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: Equality	
Insufficient level of equality assessment conducted on site G2/4 gargrave (off Walton close/Marton Road).	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

<p>Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.</p> <p>If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.</p>

Under the Equalities Act - as I understand it, consideration must be given to the following impacting on people

• Parking. Unless the development is obliged to provide parking for 2 vehicles for each residence, vehicles will be parked on Marton Road. This will make movement difficult for all members of the public - able bodied, disabled, parents with children, drivers.

• Sewage & drainage. These are already a known problem. Further development, requiring sewage services will overload an already existing system. Hard surfaces will increase rain run off. It cannot be acceptable to have rain & sewage running into houses in the locality.

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

- Significant investment made to infrastructure
- Equality assessment to be conducted with remediating actions put in place
- Or alternative suitable site which will cater for all disadvantaged groups

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.


Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified <input checked="" type="checkbox"/>	Please notify me
No, I do not wish to be notified <input type="checkbox"/>	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified <input checked="" type="checkbox"/>	Please notify me
No, I do not wish to be notified <input type="checkbox"/>	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	27/3/2019



Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravendc.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). Please fill in a separate form for each representation you wish to make.

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	MR
First Name:	DAVID
Last Name:	WHITWELL
Job Title (where relevant):	
Organisation (where relevant):	
Address 1:	[REDACTED]
Address 2:	[REDACTED]
Postcode:	[REDACTED]
Telephone:	[REDACTED]
Email:	[REDACTED]

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	N/A
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

If you wish your personal details to be treated in confidence and not published please tick the box below:

Please explain below, why you have made this request:

I want my personal details to be kept private.

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: Equality	
Insufficient level of equality assessment conducted on site G2/4 gargrave (off Walton close/Marton Road).	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

- Traffic increase on a narrow road already used by a significant amount of traffic, including large agricultural vehicles. Consequently increase in risk of accidents, and injury to road users including pedestrians, cyclists, wheelchair users etc.
- If development goes ahead there should be a requirement to include 2 parking spaces at each residence to avoid overspill parking on Marton Road. This would reduce visibility & further increase risk of accidents & injury
- Any overspill parking near Marton House residential home would create a safety issue in the vicinity as visitors to Milton House already park on road because of insufficient parking spaces

Section 6: Proposed Modifications to the local plan
 Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

- Significant investment made to infrastructure
- Equality assessment to be conducted with remediating actions put in place
- Or alternative suitable site which will cater for all disadvantaged groups

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below	
Signature	[Redacted Signature]
Date	27/03/2019

From: [REDACTED]
Sent: 26 March 2019 11:29
To: Local Dev. Framework
Subject: Hellifield Flashes

In response to the current 6 week consultation on the proposed main modifications to the green space on Hellifield Flashes, I would like to state that in my opinion, as a resident of Hellifield, the green space designation on the Flashes should be extended from just the lake area on the basis that:

- The proposed green space is used by and wholly relevant to enhancing the lives of residents close by in the village of Hellifield,
- The proposed green space offers unique wild life experience in the local area and has been an area of natural beauty where one can find tranquillity from the busy and stressful world we live in, and
- The area has been a special place to the residents of Hellifield for many years and it would be a travesty if that did not continue for future generations.

Regards

Mark Wilcock

[REDACTED]

From: Ian Wilcock [REDACTED]
Sent: 31 March 2019 18:12
To: Tony Blackburn
Cc: Sian Watson; [REDACTED]
Subject: Fwd: Park Hill Skipton : Green Space Designation

Sorry, letter attached

Best Regards

Ian and Julie Wilcock

Sent from my iPad

Begin forwarded message:

From: Ian Wilcock [REDACTED]
Date: 31 March 2019 at 18:02:39 BST
To: ABlackburn@cravenc.gov.uk
Cc: swatson@cravenc.gov.uk, [REDACTED]
Subject: **Park Hill Skipton : Green Space Designation**

Please see attached a letter giving our comments on the subject consultation along with some supporting documentation.

Best Regards

<image1.png>

<image1.png>

Ian and Julie Wilcock

Sent from my iPad

Ian and Julie Wilcock



30th March 2019

REF : Park Hill -Skipton Green Space Designation

Dear sirs,

We are writing with reference to the removal of the Local Green Space Designation for Park Hill Skipton, and would urge those responsible for such a preposterous proposal to re think it.

Park Hill and its surrounding fields provide very important green, natural, recreational, and aesthetic qualities to Skipton which are enjoyed by both local residents and our important visitors alike, and which if left unprotected would inevitably be the subject of property development.

Whilst we understand the need for additional development in Skipton, we feel that to lose such an important piece of land to it would be extremely disappointing to all but the property developers.

Park Hill unquestionably meets all of the Government guidelines for Local Green Space Designation and we fail to see how anyone can misinterpret this.

In addition to our own views on the subject, we have spoken with many others who concur, we are attaching several sheets with the names and signatures of some of these people in case they didn't get the opportunity to write to you directly.

We look forward to your response.

Yours



Ian and Julie Wilcock (residents of Skipton for 32 years)

We the undersigned strongly oppose the recent removal of the Local Green Space Designation for land known as Park Hill Skipton (see Schedule of Policy Map Changes EL6.008 page 10, www.cravenc.gov.uk/planning/planning-policy/planning-policy-communications/planning-policy-consultations). We also strongly oppose any future development planning. This land provides very important green, natural, recreational, and aesthetic qualities to Skipton which are enjoyed by both local residents and our important visitors.

NAME	ADRESS	SIGNATURE	DATE
JULIE Wilcock			10.3.19
JAN Wilcock			10/3/19
CILLIAN DEAN			10/03/19
JAMES DEAN			10/03/19
JUSTIN M'CHESNEY			10/3/19
JAYNE M'CHESNEY			10/3/19
STUART HAMILTON			10.3.19
DAVID CLEMENTS			10-3-19
JULIE CLEMENTS			10-3-19
Jean Grimes			
Keith Grimes			
MASARAT RAMZAN			10/03/19
Asif Ali			10/03/19
EILEEN KENNEDY			10/3/19
LYNNE PRINCE			10.3.19
Robert A. Davey			10.3.19
Anna L. Davey			10.3.19
Carole Harris			10.3.19
Jane Naylor			10.3.19
CHRIS NA-LOK			10.3.19
Caroline Donald			10/3/19
Tim Thompson			"
M Hectett			10/3/19
A B STEED			10/3/19
MARK STEED			10/03/19
SILVIA WINDJAY-WATT			10/03/19
JOAN WILSON			10/3/19
CHRIS WILSON			10/3/19
J. HARVEY			10/3/19
P. CURKIN			10/3/19
J. MEECE			10/5/19

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). Please fill in a separate form for each representation you wish to make.

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mr
First Name:	O
Last Name:	Wild
Job Title (where relevant):	
Organisation (where relevant):	
Address 1:	
Address 2:	
Postcode:	
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	N/A
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

If you wish your personal details to be treated in confidence and not published please tick the box below:

Please explain below, why you have made this request:

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: Equality	
Insufficient level of equality assessment conducted on site G2/4 gargrave (off Walton close/Marton Road).	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

Hilly
 Paths (now)
 not safe for prams
 Traffic
 lights
 Speed

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

- Significant investment made to infrastructure
- Equality assessment to be conducted with remediating actions put in place
- Or alternative suitable site which will cater for all disadvantaged groups

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.


Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

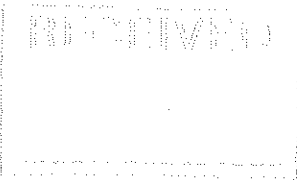
Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	27/3/2019



Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). Please fill in a separate form for each representation you wish to make.

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mrs
First Name:	Carolyn
Last Name:	Wild
Job Title (where relevant):	Client Manager
Organisation (where relevant):	
Address 1:	
Address 2:	
Postcode:	
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	N/A
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

If you wish your personal details to be treated in confidence and not published please tick the box below:	
Please explain below, why you have made this request:	

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: Equality	
Insufficient level of equality assessment conducted on site G2/4 gargrave (off Walton close/Marton Road).	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

<p>Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.</p> <p>If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.</p>

Access to Village
 Road Safety
 Poor Lighting + Visibility
 No Foot Paths
 Steep Hill
 Distance to Village from site

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

- Significant investment made to infrastructure
- Equality assessment to be conducted with remediating actions put in place
- Or alternative suitable site which will cater for all disadvantaged groups

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.


Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	27/3/19



Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). Please fill in a separate form for each representation you wish to make.

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mr
First Name:	Nick
Last Name:	Wild
Job Title (where relevant):	[Redacted]
Organisation (where relevant):	[Redacted]
Address 1:	[Redacted]
Address 2:	[Redacted]
Postcode:	[Redacted]
Telephone:	[Redacted]
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	N/A
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

If you wish your personal details to be treated in confidence and not published please tick the box below:

Please explain below, why you have made this request:

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: Equality	
Insufficient level of equality assessment conducted on site G2/4 gargrave (off Walton close/Marton Road).	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

No foot paths
 Lighting
 Dangerous Road
 Traffic (Tractors / Farmers)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

- Significant investment made to infrastructure
- Equality assessment to be conducted with remediating actions put in place
- Or alternative suitable site which will cater for all disadvantaged groups

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

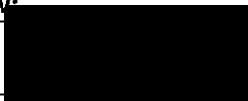
Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	

From: John WILKINSON [REDACTED]
Sent: 08 March 2019 13:30
To: Tony Blackburn; Sian Watson; Councillor John Dawson;
Subject: Park Hill change of status

John Wilkinson [REDACTED]
[REDACTED]

8/3/19

Dear Sir

Please note my objection To the Status of "Park Hill" as a Local Protected Green Space being changed.(Protection removed)

I and many others use the public footpaths, I would not like to see this area developed into a building project.

Thank you
John Wilkinson

From: Vincent Wilkinson [REDACTED]
Sent: 31 March 2019 19:55
To: Local Dev. Framework
Subject: local plan objection
Attachments: local plan objection.pdf

After visiting your website as advised by councillor Dawson, I was unsure if an email objection was sufficient so I am attaching a completed form,

I have sent an email objection separately.

Regards
V.Wilkinson

Sent from [Mail](#) for Windows 10

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mr
First Name:	Vincent
Last Name:	Wilkinson
Job Title (where relevant):	Retired
Organisation (where relevant):	
Address 1:	██████████
Address 2:	██████████
Address 3:	██████████

Address 4:	██████████
Postcode:	██████
Telephone:	██████████
Email:	██████████████████

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: 1	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

Parkhill is a valuable asset to the town that is used by the community and visitors. Local schools and groups use the land for varied events. I have actually lived on the old nursery that joins Parkhill, for around fifty years and as my father had the nursery prior to that I joined in on many of the communal events in my earlier years, such as bonfires and sledging.

Rambling groups along with families and individuals can be seen making use of the footpath at all times of the year.

The Ancient Monument site has been used on occasions by re-enactment groups.

The Stapleton family have had the tenancy (Agricultural tenancy which is for I believe 3 generations of which only 1 generation has been used) for the land for quite a number of years. Suitable alternative land would be required by them to allow them to sustain their family farming business.

If any of this land was really needed for housing then it should be kept well to the West of the public footpath.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

Keep any development well to the West of the public footpath and the Ancient Monument site.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)

Yes, I do wish to be notified	Yes
No, I do not wish to be notified	


Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)

Yes, I do wish to be notified	Yes
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:

Signature	
Date	29/03/2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ |
www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



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

Craven Local Plan Examination

From: Vincent Wilkinson [REDACTED]
Sent: 31 March 2019 19:59
To: Local Dev. Framework
Subject: FW: ROY BANKS objection to amended local plan.

Sent from [Mail](#) for Windows 10

From: [Vincent Wilkinson](#)
Sent: 31 March 2019 19:30
To: contactus@cravendc.gov.uk
Subject: ROY BANKS objection to amended local plan.

Dear Sir,

I wish to object to Parkhill being included in the local plan as possible building land. This is a valuable asset to the town as an open space.

Parkhill is of value to the community and visitors. Local schools and groups use the land for varied events. I have actually lived on the old nursery, that is attached to Parkhill, for around 50 years and as my father had the nursery prior to that I joined in on many of the communal events in my earlier years, such as bonfires and sledging.

Rambling groups along with families and individuals can be seen making use of the footpath at all times of the year.

The Ancient Monument site has been used on occasions by re-enactment groups.

The Stapleton family have had the tenancy (Agricultural tenancy which is for I believe 3 generations of which only 1 generation has been used) for the land for quite a number of years. Suitable alternative land would be required by them to allow them to sustain their family farming business.

If any of this land was really needed for housing then it should be kept well to the West of the public footpath.

Regards

[REDACTED]
Mr Vincent Wilkinson

From: Leeming, Paul [REDACTED]
Sent: 11 March 2019 10:08
To: Local Dev. Framework
Cc: Sian Watson
Subject: ack email sent by RP 11.3.19 Craven Local Plan Proposed Main Modifications Consultation [CJ-WORKSITE.FID218013]
Attachments: 5043901_1.pdf; 5044862_1.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sirs

Please find attached commentary and representation to the proposed Main Modifications insofar as they affect the Wilman family landholding on the eastern edge of Skipton, in particular the SK090 draft allocation.

We would welcome feedback from the Council on these comments, a collaborative approach regarding the delivery of SK089 and SK090, as well as early pre-application engagement with CDC and the LEA regarding the school proposals.

Sincerely

Paul
Paul Leeming MRTPI
Associate, Partner

Carter Jonas

T: [REDACTED] | M: [REDACTED] | carterjonas.co.uk
First Floor, 9 Bond Court, Leeds, LS1 2JZ



INVESTORS
IN PEOPLE

Gold
Until 2019



Please consider the environment. Do you really need to print this email?

This e-mail does not constitute any part of an offer or contract, is confidential and intended solely for the use of the individual(s) to whom it is addressed. If you are not the intended recipient be advised that you have received this email in error and that any use, dissemination, forwarding, printing, or copying of this email is strictly prohibited. Although the firm operates anti-virus programmes, it does not accept responsibility for any damage whatsoever that is caused by viruses being passed. Carter Jonas LLP is a Limited Liability corporate body which has "Members" and not "Partners". Any representative of Carter Jonas LLP described as "Partner" is a Member or an employee of Carter Jonas LLP and is not a "Partner" in a Partnership. The term Partner has been adopted, with effect from 01 May 2005, because it is an accepted way of referring to senior professionals.

Carter Jonas LLP
Place of Registration: England and Wales
Registration Number: OC304417
Address of Registered Office: One Chapel Place, London, W1G 0BG.

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravendc.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	
First Name:	
Last Name:	
Job Title (where relevant):	
Organisation (where relevant):	The Wilman Family C/o Carter Jonas LLP, Agent
Address 1:	
Address 2:	
Address 3:	

Address 4:	
Postcode:	
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	Carter Jonas LLP (Paul Leeming)
Address:	First Floor 9 Bond Court Leeds LS1 2JZ
Telephone number:	██████████
Email:	████████████████████

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	The Wilman Family
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM:10, 20, 79, 81, 119, 120, 121, 123 and 124	

Section 4: Legal Compliance & Duty to Cooperate

Do you consider that this modification of the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant		
2. Sound	<input checked="" type="checkbox"/>	
3. In Compliance with the Duty to Cooperate		

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

Please see attached correspondence which deals with a number of matters in relation to the proposed site allocation at SK089/090 Land north of Airedale Avenue and Elsey Croft. Skipton.

The correspondence sets out how the Main Modifications will improve the soundness of the Local Plan.

Concerns still remain regarding the Council's evidence and the site requirements, in particular the yield of the site and what measures the planning authority will take when the sites come forward (up on adoption of the Local Plan).

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

Please see attached correspondence. A number of tweaks are suggested to the relevant polices and the narrative /justification.

We would suggest a collaborative approach with regard to delivery of infrastructure and the SK089 site through the Council's JV with Barnfield Construction. Also a programme of pre-application engagement is requested with the planning authority and the County Council (as Local Education Authority) to bring the SK090 element forward.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which Main Modification your representation relates)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.


Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	Yes
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	Yes
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	11th March 2019`

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ | www.cravencd.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravencd.gov.uk



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

Craven Local Plan Examination

Planning Policy Team
Craven District Council
1 Belle Vue Mills
Broughton Road
Skipton
BD223 1FJ

First Floor
9 Bond Court
Leeds
LS1 2JZ

T: [REDACTED]
F: [REDACTED]

Your ref:
Our ref: J1074798

By Email: localplan@cravencd.gov.uk

11th March 2019

Dear Sirs

CRAVEN LOCAL PLAN 2012 TO 2032 MAIN MODIFICATIONS (MM) 10, 20, 79, 81, 119, 120, 121, 123 & 124 - RE SK089/SK090 LAND AT ELSEY CROFT, SKIPTON

Thank you for the opportunity to respond to the Council's current consultation on proposed modifications to the emerging Local Plan. A copy of the Council's proforma is attached.

This correspondence is submitted, on behalf of the Wilman family, to the Proposed Main Modifications as they relate to their landholding which includes the majority of the proposed allocation of SK089/090: Land North of Airedale Avenue and Elsey Croft, Skipton. A range of comments have been submitted through the progression of the Local Plan, discussed at the Examination sessions and now set out in the proposed Main Modifications.

For the most part, it is considered the Local Plan is a sound document in terms of the legal and procedural tests, and the changes proposed provide clarifications and reflect the changes and discussion at the Examination sessions. Overall the Council's document is considered to be positively prepared and in accordance with national policy. There are however, particular concerns relating to the land north of Airedale Avenue in both the Council's ownership and the Wilman family should the resulting scheme not deliver the housing numbers suggested. These comments have been stated on a number of occasions and, in our view, remain valid.

In response to those comments and following a request from the Examination Inspector, two layouts have been commissioned by the Council and are included on the Examination website as items EL5.002a Indicative Masterplan (8186 SK05 Rev A) and EL5.002b Indicative Layout (8186 SK04). Prepared by architects Bowman Riley these layouts suggest that the site can deliver 211 dwellings at a density of 31 dph, (comprising 77no. 1 & 2 bed; 99no. 3 bed and 35no. 4 bed units), along with the 1.8ha new school, open space and the green corridors.

In our view the layouts are simplistic and do not reflect the true nature of the site, constraints, flood risk (on SK089), drainage infrastructure and geography which results in an unrealistic yield. On a technical point the layout fails to acknowledge drainage infrastructure already installed (on to SK090) as part of the adjacent Elsey Croft residential development. Whilst the proposed separate access points are appropriate, it is considered that the dense suburban form does not reflect the site characteristics of a sloping site on the

edge of the town, with general views towards and from the National Park. Such a dense form would seem inappropriate in this location and would run counter to the policy guidelines which require retention of the existing “open, rural feel”.

Experience would suggest that the density of development on sloping sites on the edge of Skipton generally achieve about 20 dwellings per hectare. In this vein, the Bowman Riley scheme suggests a yield of 54 units for the SK089 part of the site. However, we are aware that the emerging scheme being pursued through the Craven Barnfield JV, comprises of no more than 34 units (equating to 20dph), representing only 60% of the anticipated Local Plan yield. Transposed across the net site (6.8ha) suggests a yield of 125 units.

Furthermore the suggested location for the proposed school does not meet the locational requirements suggested by the County Education Authority (LEA) which would seek to provide the buildings and associated playing fields on a generally level area.

Such matters of detail do not render the Local Plan unsound; it simply provides uncertainty when a planning application does come forward. Representatives of the Craven Barnfield JV have indicated that their application (for SK089) will be submitted during Spring 2019 as it relies upon secured funding to provide highway enabling works which need to be completed within a restricted time frame. Carter Jonas will be pursuing preapplication engagement with the District Council for the remainder of the allocation. It is important that when a planning application emerges (particularly across SK090) that the District Council as determining authority do not have unrealistic expectations which may delay the scheme bringing forward much needed housing and community facilities. Some surety is required from the Council on this point.

Turning to the individual proposed changes the following provides our comments:

MM10 Policy SP5 Strategy for Skipton Tier 1

Changes proposed through this Modification mainly suggest clarifications to the figures. On the face of it these are accepted as indicative figures. Our concerns regarding the net area and yield remain.

MM20 Policy SP5 Site SK089 and SK090

Within these amendments the Council is seeking to clarify the mix of uses and the extent of those uses. The explanation suggests the changes are to improve clarity and to reflect the discussion at the Examination, particularly the requirement for land for a primary school which was introduced at a late stage in the Local Plan’s preparation. Discussion with the LEA (Local Education Authority) suggest that a “nursery provision” may be attached to a primary school, hence the extent of the potential land requirement.

It would be appropriate for the **policy wording** to suggest “and **up to** 1.8has for the provision of a new school”. This would reflect the comments of the LEA.

Turning to the explanatory part of the Policy, it now includes a review mechanism (linked to INF6) should the educational need for a new school fall away or the format of the requirement change. The principle is supported of providing a new school for this part of the town; however, some flexibility is required and we would suggest changes to the narrative as it is highly likely that any education provision will be located on SK090.

“A new ~~primary~~ school will be provided on **up to** 1.8 ha of the area of sites ~~SK089 &~~ SK090 to meet the educational requirements for Skipton, over the plan period, unless this identified educational need is met elsewhere in the town. If a new ~~primary~~ school is no longer required on this site, as determined by the Local Education Authority and in accordance with Policy INF6, residential development will be acceptable in principle, subject to meeting other local plan policies.”

Changes to the narrative also include reference to green infrastructure provision and “to maintain the open rural feel”, particularly for the existing PROW’s (footpaths), and safe walking routes to the school site. We would suggest reference is made simply to the school and removal of the word “primary”. The inference

from this narrative is a relatively low density open aspect development, unlike the layout commissioned by the Council (EL5.002a & b).

Amendments to the narrative about access (deletion of "Otley Road") are supported and provide a greater degree of clarity.

With regard (cross) reference to INF7, we would accept that there are likely to be consequences to the local highway network with new development coming forward. It is appropriate that a contribution to the A6131/A65 located to the east of the site may be suitable. However, it not clear what level of impact there will be upon the operation of the A65/Gargrave Road/A629/A59 junction as it is located on the opposite side of the town and unlikely to be affected by development of the SK089/090 site. We would request that this element of the Modification is deleted.

MM79 and MM81 Policy ENV4 and ENV5

These two amendments seek to address concerns raised and discussed at the Examination about the specificity of Biodiversity and Green Infrastructure requirements in the Local Plan. At the Examination it was determined that a more generic approach to site principles was required, which are broadly agreed.

The two policies list as part of their provisions the approximate land area required for Green Infrastructure and Biodiversity. It is important when reading across the two policies (ENV4 and ENV5) that there is clarity. If reading the two policies it is not clear if the two requirements are the same or comprise a cumulative requirement, in this case for SK089/SK090, approximately 4.0has. This would seem to be the case for all of the sites listed. On the face of it this will simply further reduce the residential yield of Site SK089 and SK090.

To address this concern we would suggest that the land area requirements in ENV 5 are deleted, and that a reference is made that Green Infrastructure (as set out under Policy ENV4) is also utilised to achieve a net gain in biodiversity.

MM118 and MM119 Policy INF6 Education Provision

A series of modifications are included within the text to both Policy INF6 and the supporting text at Para 8.55. These reflect discussions with the District Council, the LEA and the Examination Hearing sessions and address a number of the concerns raised in representation.

M118 in particular refers to the identification of land and the Council, LEA and ESFA (Education and Skills Funding Agency) approach to safeguarding land for educational needs in Skipton (and Bentham). It is recognised that such an approach is an important element of achieving sustainable communities. We have no specific comments upon the policy wording or the narrative and welcome that a mechanism is included to review the need for the school sites. It would be helpful if a timeframe for undertaking that review and any changes to the Local Plan through a Review or a detailed SPD is set out.

For M119, consistent with our comments elsewhere, it would be appropriate for the policy wording at provision (b) to be amended to include the phrase "up to" (1.8 hectares of land).

MM120 and MM121 New Policy INF7 and Supporting Text

It is appropriate that traffic arising from new development can be accommodated upon the local and strategic highway network. Preliminary modelling suggests the need to make improvements to various junctions along the A65. It is appropriate that each site allocation meets the costs of such growth in accordance with the number of residential units. However, the potential impact should also be considered. We would suggest that the potential impact of SK090 upon the Gargrave Road/ A65 roundabout junction would be minimal (or nil) given its location upon the opposite side of the town, and also as a consequence of the anticipated yield of the site. With our concerns about potential yield we would also question whether the Council has appropriately addressed the viability issue, a lower yield would simply increase the cost (contribution) per unit.

MM123 Appendix B

This modification sets out the mechanism for the application Policy INF6. Whilst the clarity is welcomed, we would query the level of detail enclosed and whether this may be better contained in an SPD. This reflects our concerns about the on-going review for school places. Although the premise is supported for the provision of a new school east of Skipton and land is provided and safeguarded, it would be appropriate if the requirement for education provision could be clarified and the timetable for the on-going review set out to give some certainty.

On this basis the Local Plan is unclear and in our view potentially unsound. Some guidance from the LEA and CDC would be welcomed. This could be achieved through the forthcoming preapplication process.

MM124 Infrastructure Delivery Plan

It is appropriate that the IDP is removed from the Local Plan and added as an evidence base document. This improves the soundness of the Plan.

Conclusions

Craven Council's proposed Main Modifications are largely welcomed as they reflect the discussions and the Hearings and generally improve the soundness of the Local Plan.

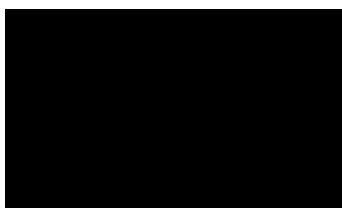
In supporting the Modifications we still remain concerned that the SK089/SK090 allocation will not deliver the housing numbers set out. This is apparent from the emerging CDC Barnfield proposals on SK089. We will discuss these matters in more detail through the forthcoming preapplication dialogue.

Changes to the education provision are welcomed, particularly with the inclusion of a review mechanism as part of the Local Plan process. We have suggested some modest modifications to allow flexibility but raise concerns that there is no timescale for the LEA school requirement. It would have been more appropriate for such a review to have been in place prior to the Local Plan, rather than post-adoption.

Further comments are raised about potential double counting for greenspace/biodiversity along with highway contributions and we have suggested amendments or requested clarification as necessary.

It is hoped that these comments are found to be helpful and if the Council and Inspector require any clarification we will happily provide further detail. As it is we would welcome further dialogue as part of the pre-application process.

Yours sincerely



P
Partner

E: 
T: 
M: 

Encl

Cc Client
File

From: Jacky Wilson [REDACTED]
Sent: 28 March 2019 20:38
To: Local Dev. Framework
Subject: HE-LGS1

Examination of the Craven Local Plan

Inspector Matthew Birkinshaw

Dear sir,

I am writing to express my disappointment at the large reduction in size that you have recommended for the local green space HE-LGS1 in the new Craven Local Plan. The area of Gallaber Pond which you have proposed as the LGS is not connected to the village of Hellifield and is too far away for less able people to access on foot from the village. I would like to suggest that the area of the other 2 flashes (Dunbars) and the rest of the area to the east of the main public footpath be included as another area of Green Space. This area is special to the local community and is much used by them for recreational and health reasons, both physical & mental, as it is easily accessible by footpath.

It is a tranquil area, away from the busy A65 road, and is a haven for wildlife. There are at least 150 different bird species on the Flashes, many of them endangered. There are also many other types of wildlife, including Great Crested Newts and several species of deer, as well as much plant life.

I hope you will reconsider your decision on the size of HE-LGS1.

Yours sincerely,

Jacqueline M Wilson.

[REDACTED]

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). Please fill in a separate form for each representation you wish to make.

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	MRS.
First Name:	PATRICIA (PAT)
Last Name:	WILSON
Job Title (where relevant):	
Organisation (where relevant):	
Address 1:	
Address 2:	
Postcode:	
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	N/A
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

If you wish your personal details to be treated in confidence and not published please tick the box below:

Please explain below, why you have made this request:

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation: ✓	PAT WILSON
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: Equality	
Insufficient level of equality assessment conducted on site G2/4 gargrave (off Walton close/Marton Road).	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

Reasons are.

1. Accessibility to the village, poor or no footpaths. Over the bridge into the village too narrow for family with push chair + holding a child's hand. Also invalid chairs. Gradient up the hill too steep for older people. Also road safety, traffic, especially tractors driving too fast for Bank Newton. Access from Hill Mill into the road very poor especially with speed of traffic from Bank Newton. Flooding + drainage also a problem in the area. Access from Church Street into Mark Rd. Very narrow causes congestion

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

- Significant investment made to infrastructure
- Equality assessment to be conducted with remediating actions put in place
- Or alternative suitable site which will cater for all disadvantaged groups

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.


Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	28.3.19

From: Steve Wilton [REDACTED]
Sent: 15 March 2019 15:12
To: Local Dev. Framework
Subject: Response to Main Modifications to the Craven Local Plan
Attachments: local plan - response to consultation on major amendments.doc

The attached response is forwarded as part Public Consultation on the Main Modifications to the Publication Draft Craven Local Plan.

You will note that the response is signed using an image of my signature. If you require a 'wet' signature please let me know and I will provide a signed hard copy of the document. If I do not hear from you I will assume that the electronic version provided is sufficient.

Steve Wilton

[REDACTED]
mobile [REDACTED]

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	Mr
First Name:	Stephen
Last Name:	Wilton
Job Title (where relevant):	N/A
Organisation (where relevant):	N/A
Address 1:	██████████
Address 2:	██████
Address 3:	

Address 4:	
Postcode:	██████
Telephone:	██████████
Email:	████████████████████

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	N/A
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	Stephen Wilton
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM:3	

Section 4: Legal Compliance & Duty to Cooperate

Do you consider that this modification of the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant	<input type="checkbox"/>	
2. Sound	<input type="checkbox"/>	
3. In Compliance with the Duty to Cooperate	<input type="checkbox"/>	

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravencdc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

This is a sensible modification as it ensures the Plan reflects the current position. It would be even more helpful if the net additional dwelling figure could be continually updated on any on-line version of the Plan to ensure it always contained the up-to-date figure

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

Add:

'[NB Since the 31 March 2018 the balance of housing provision for the remainder of the plan period has been further reduced to XX net additional dwellings.]

Section 3: Main Modification

Name or Organisation:	Stephen Wilton
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM:7 supporting text to SP4 – para 4.47	

Section 4: Legal Compliance & Duty to Cooperate

Do you consider that this modification of the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant	<input type="checkbox"/>	
2. Sound		<input type="checkbox"/>
3. In Compliance with the Duty to Cooperate	<input type="checkbox"/>	

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

<p>Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.</p> <p>If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.</p> <p>The inclusion of the wording 'or other appropriate land' renders this modification unsound. As there are no examples provided as to what land might be considered 'appropriate' the wording as it stands is so vague as to amount to a 'blank cheque' enabling developers to argue that any land is appropriate.</p>
<p>Section 6: Proposed Modifications to the local plan</p> <p>Please set out what changes(s) you consider necessary to make the Main Modification legally</p>

compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

Delete the word 'or other appropriate land' from paragraph 4.47

Section 3: Main Modification

Name or Organisation:	Stephen Wilton
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM:7 supporting text to SP4 – para 4.49	

Section 4: Legal Compliance & Duty to Cooperate

Do you consider that this modification of the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant	<input type="checkbox"/>	
2. Sound		<input type="checkbox"/>
3. In Compliance with the Duty to Cooperate	<input type="checkbox"/>	

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

<p>Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.</p> <p>If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.</p> <p>The deletions and insertions in paragraph 4.49 which detract from the sound principle that any previously developed (or 'brownfield') sites should be considered first and only if there are none available should consideration be given to other land.</p>
<p>Section 6: Proposed Modifications to the local plan</p> <p>Please set out what changes(s) you consider necessary to make the Main Modification legally</p>

compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

Ensure the paragraph unequivocally establishes the 'brownfield first' principle.

Section 3: Main Modification

Name or Organisation:	Stephen Wilton
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM:75	

Section 4: Legal Compliance & Duty to Cooperate

Do you consider that this modification of the Local Plan is: (tick as appropriate)		
	Yes	No
1. Legally Compliant	<input type="checkbox"/>	
2. Sound	<input type="checkbox"/>	
3. In Compliance with the Duty to Cooperate	<input type="checkbox"/>	

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravencdc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

I strongly support the inclusion of the Skipton Castle, its surrounding grounds, Skipton Castle Woods and hunting park and the Civil War Battery as these form a key element of the District's character. In particular the Castle and the Church at the top of the High Street are crucial elements of Skipton being an Historic Market Town while the grounds and woods guarantee the 'feel' of the open countryside coming right up to the town centre – something which few other towns can claim.

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

The additional paragraph should be retained.

Section 3: Main Modification

Name or Organisation:	Stephen Wilton
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM:87 – Policy ENV10	

Section 4: Legal Compliance & Duty to Cooperate

Do you consider that this modification of the Local Plan is: (tick as appropriate)		
	Yes	No
4. Legally Compliant	<input type="checkbox"/>	
5. Sound		<input type="checkbox"/>
6. In Compliance with the Duty to Cooperate	<input type="checkbox"/>	

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

I oppose the deletion of Skipton-LGS64 'Land to the north of Skipton, bounded to the north by Skipton Bypass, to the East by Embsay Road & The Bailey; and to the west by Grassington Road, Skipton'.

I consider this modification is the area in question meets the Government guidelines for Local Green Space Designation – namely it is:

(a) in reasonably close proximity to the community it serves

The area in question is clearly close to the people of Skipton – the summit of Park Hill being within 15 minutes walk of the top of the High Street (see also response under b) below)

(b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife

The areas is special to the local community as it forms part of the backdrop of hills that surround the town centre. This is one elements that combine to create the sense of well-being experienced by Skipton residents that was identified in a recent poll. Even in the most densely developed parts of the town you only have to lift your eyes to enjoy the open countryside afforded by Park Hill, Rombalds Moor and the moors above Carleton with their constantly changing palette of colour.

In addition Park Hill has historic significance as it was the site of one of the Parliamentary batteries

during the siege of Skipton Castle in the Civil War. As a Castle tour guide I regularly direct visitors to the footpath to the summit of Park Hill so they view this historic site and look across at the other two sites where it is believed Cromwell's forces placed their siege cannons. *[Although not part of this consultation the Park Hill would be enhanced by an interpretation point for visitors explaining its historic past].*

Park Hill's recreational value arises not only from the fact that two long distance footpaths – the Dales High Way and Lady Anne's Way - run over the top of Park Hill from Chapel Hill to Short Lee Lane but also from its popularity as view point affording a stunning roof-scape of Skipton and the hills to the south and north. In addition, I am not alone as a runner in regarding the steep ascent from the town as a measure of fitness.

(c) local in character and is not an extensive tract of land

The fact that Park Hill virtually starts at the top of the High Street and can be seen from most parts of the town makes it geographically local in character. The feeling of being encompassed by hills (of which Park Hill is one) is one of the characteristics of Skipton 'sense of place'.

While the tract of land in question provides a sense of open space which greatly enhances its recreational value it cannot be described as 'extensive' as the entire area to the west of Skipton Castle Woods can be viewed from the summit of the Hill and is clearly defined by the Woods, the By-Pass and Grassington Road.

Section 6: Proposed Modifications to the local plan

Please set out what change(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

Reinstatement in the final version of the Craven Local Plan of Skipton-LGS64 'Land to the north of Skipton, bounded to the north by Skipton Bypass, to the East by Embsay Road & The Bailey; and to the west by Grassington Road, Skipton'.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)

Yes, I do wish to be notified	<input type="checkbox"/>
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	<input type="checkbox"/>
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	16.3.19

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ |
www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



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

Craven Local Plan Examination

From: wolfysmith Wolfenden-Smith [REDACTED]
Sent: 21 March 2019 14:47
To: Local Dev. Framework
Subject: Hellifield Flashes

Dear Planners,

I am a resident of Long Preston and i would like you to Please protect Hellifield flashes and do not allow the proposed developments to go ahead. We need to protect this land as it is special to the local community. This land has local significance for many reasons, here are to name but a few: :

-Beauty

-Historic significance

-Recreational value

-Tranquility

-Richness of wildlife (it is especially important to birdlife).

I have also been told that there has been [REDACTED] from [REDACTED] with [REDACTED] for the proposed development. There is a lot more research and investigations that need to be carried out.

Please stop this development to protect our beautiful land.

Many Thanks

Sally Wolfenden-Smith

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). Please fill in a separate form for each representation you wish to make.

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	
First Name:	CLARE WOODHEAD
Last Name:	WOODHEAD
Job Title (where relevant):	PHYSIO
Organisation (where relevant):	
Address 1:	
Address 2:	
Postcode:	
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	N/A
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

If you wish your personal details to be treated in confidence and not published please tick the box below:	
	<input checked="" type="checkbox"/>
Please explain below, why you have made this request:	

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: Equality	
Insufficient level of equality assessment conducted on site G2/4 gargrave (off Walton close/Marton Road).	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

<p>Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.</p> <p>If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.</p>

Assessment of road usage:-

How would the extra traffic impact the safety of ^{Gargrave} residence and pedestrians?

The road is narrow in places, has an awkward turning onto Merton Road from Church Street. Many tractors use the road and other industrial vehicles. There is no lighting or pavement. There is a nursing home further down road, wheelchairs are often on road. Many people from the village walk along the road to get to school as a circular route around the village.

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

- Significant investment made to infrastructure
- Equality assessment to be conducted with remediating actions put in place
- Or alternative suitable site which will cater for all disadvantaged groups

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.


Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:	
Signature	
Date	28/3/19.

NOT RECORDED

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

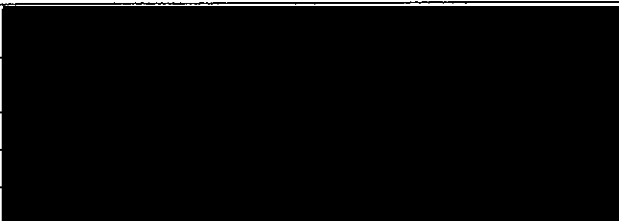
For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). Please fill in a separate form for each representation you wish to make.

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	
First Name:	PETER
Last Name:	WOODHEAD
Job Title (where relevant):	
Organisation (where relevant):	
Address 1:	
Address 2:	
Postcode:	
Telephone:	
Email:	

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	N/A
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

If you wish your personal details to be treated in confidence and not published please tick the box below:	
Please explain below, why you have made this request:	

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM: Equality	
Insufficient level of equality assessment conducted on site G2/4 gargrave (off Walton close/Marton Road).	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

<p>Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.</p> <p>If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.</p>

The sign of the development will increase traffic along Marton Rd, and the junction with Church St is already awkward. Significant dangers to cyclists and pedestrians will result.

Section 6: Proposed Modifications to the local plan

Please set out what change(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

- Significant investment made to infrastructure
- Equality assessment to be conducted with remediating actions put in place
- Or alternative suitable site which will cater for all disadvantaged groups

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published

Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	Please notify me
No, I do not wish to be notified	

Section 9: Signature

Please sign and date by	
Signature	
Date	28/3/19

From: Richard O'Callaghan [REDACTED]
Sent: 01 April 2019 21:14
To: Local Dev. Framework
Subject: Main Modifications Response
Attachments: CRAVEN RESPONSE.docx

To whom it may concern
Please see attached the Woodland Trust's response to the main modifications to the Craven district local plan.
Yours faithfully
Richard

Richard O'Callaghan
Regional External Affairs Officer - North

Telephone: [REDACTED] | Mobile: [REDACTED]
Email: [REDACTED]

Woodland Trust, Kempton Way, Grantham, Lincolnshire, NG31 6LL
[REDACTED]
www.woodlandtrust.org.uk



Stand up for trees

The information contained in this e-mail along with any attachments may be confidential, legally privileged or otherwise protected from disclosure. It is intended for the named individual(s) or entity who is/are the only authorised recipient(s). If this message has reached you in error please notify the sender immediately and delete it without review.

Anything in this email which does not relate to the Woodland Trust's official business is neither given nor endorsed by the Woodland Trust. Email is not secure and may contain viruses. We make every effort to ensure email is sent without viruses, but cannot guarantee this and recommend recipients take appropriate precautions. We may monitor email traffic data and content in accordance with our policies and English law. Thank you.

The Woodland Trust is a charity registered in England (No. 294344) and in Scotland (No. SC038885).

A non-profit making company limited by guarantee.

Registered in England No. 1982873.

Registered Office: Kempton Way, Grantham, Lincolnshire, NG31 6LL.

<http://www.woodlandtrust.org.uk>

Craven Local Plan 2012-2032 (outside the Yorkshire Dales National Park)

Main Modifications Consultation Representation Form

Public consultation on the Main Modifications to the Publication draft Craven Local Plan runs from Tuesday 19th February 2019, for a six week period until Monday 1st April 2019.

Representations must be received no later than Monday 1st April 2019. Please note that late representations cannot be accepted.

Please return completed forms (Parts A & B) to:

Planning Policy, Craven District Council, 1 Belle Vue Mills, Broughton Road, Skipton, North Yorkshire, BD23 1FJ

Or by email to: localplan@cravencd.gov.uk

For further information please contact the Council's Planning Policy Team via email at the address set out above or telephone 01756 706472

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in a separate form for each representation you wish to make.**

Please note each representation must be signed and dated

Part A

Section 1: Personal Details

Title :	MR
First Name:	RICHARD
Last Name:	O'CALLAGHAN
Job Title (where relevant):	REGIONAL EXTERNAL AFFAIRS OFFICER – NORTH
Organisation (where relevant):	WOODLAND TRUST
Address 1:	KEMPTON WAY
Address 2:	GRANTHAM
Address 3:	LINCOLNSHIRE
Address 4:	

Postcode:	NG31 6LL
Telephone:	[REDACTED]
Email:	[REDACTED]

Section 2: Agent Details

Please supply the name, address, telephone number and e-mail of any planning agent you have working on your behalf.

Agent name:	
Address:	
Telephone number:	
Email:	

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FoIA). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FoIA, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 1998, and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

If you wish your personal details to be treated in confidence and not published please tick the box below:

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

Part B

Please fill in a separate form for each representation

Note: Comments can only be made on the proposed Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes that relate only to the Main Modifications. This is not the opportunity to make comments on any other aspects of the Local Plan. If you submitted representations during consultation on the Publication Draft Craven Local Plan undertaken between Tuesday 2nd January 2018 and Tuesday 13th February 2018, these have already been forwarded to the Inspector and there is no need to submit them again. Representations which do not relate to the Main Modifications, the updated Sustainability Appraisal, the updated Habitats Regulation Assessment and the Schedule of Policy Map Changes will not be considered by the Inspector.

Section 3: Main Modification

Name or Organisation:	
To which Main Modification (MM) does this representation relate? (insert MM Reference below, which can be found in the first column of the Schedule of Main Modifications e.g., MM1 etc.)	
MM87	
Concerning deletion of SK-LGS64: Land to north of Skipton, bounded to the north by Skipton Bypass, to the east by Embsay Road and The Bailey and to the west by Grassington Road, Skipton	

Section 4: Legal Compliance & Duty to Cooperate

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

Please refer to the Council's Representation Form Guidance Notes at, which can be viewed at:

www.cravenc.gov.uk/planningpolicyconsultations

Section 5: Details of Representation

Please give details of why you consider that this modification to the Craven Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of this Main Modification to the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

The Woodland Trust objects to the deletion of this site from Local Green Space designation. As per the requirements for Local Green Space in the NPPF, this site is “demonstrably special to a local community and holds a particular local significance... because of its beauty, historic significance, recreational value... tranquillity [and the] richness of its wildlife”.

Its current status as Local Green Space adds to the beauty of Skipton Castle and Skipton Castle Woods, providing not just a tranquil haven but beautiful views of Skipton town below. Indeed, the views have been painted and drawn by many artists, including those of international significance like Turner.

The site is a popular area for walking by tourists and the path there is used by visitors and locals alike as a round trip with the return through the Woodland Trust’s Skipton Castle Woods, a flagship woodland for the Trust in the North of England which was recently awarded Visit England accreditation.

It also has historic significance as it encompasses a former royal hunting ground and a Civil War era battery.

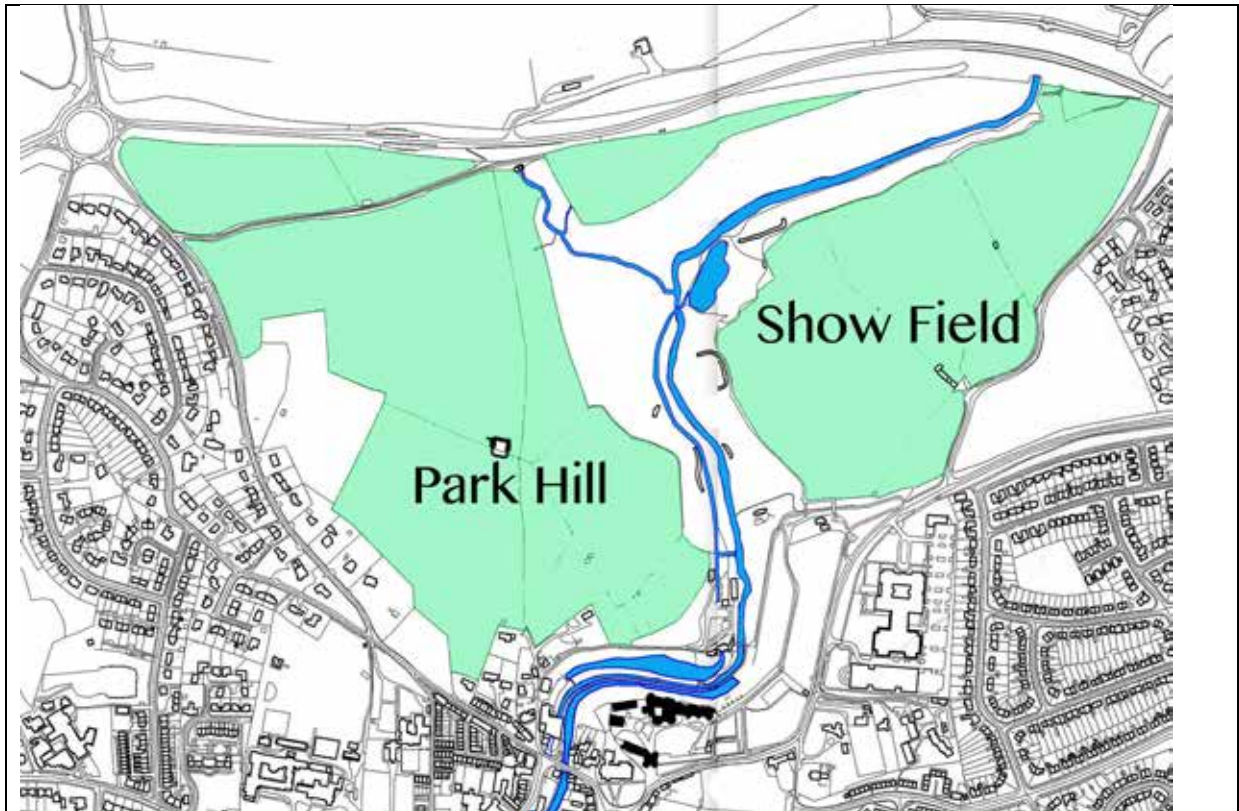
The site’s special value from a Woodland Trust perspective is its interplay with Skipton Castle Woods, how it adds to the tranquillity and ecological significance as well as the rich wildlife of this ancient woodland. Local Green Space designation helps to ensure a valuable buffer for the Woods, enhancing landscape character and wider biodiversity connectivity for the benefit of people and wildlife alike. Development adjacent to Skipton Castle Woods would seriously detract from this and could have the following impacts:

- Disturbance to the habitats of breeding birds, vegetation damage, litter, and fire damage all of which can arise from intensification of the recreational activity of humans and their pets.
- Potential colonization of the woodland (which is irreplaceable ancient woodland) by non-native plants.
- Noise and light pollution occurring from adjacent development, during both construction and operation.
- Indiscriminate felling of branches and even whole trees where the wood edge overhangs public areas, thereby reducing the woodland canopy.
- Dumping of garden waste in woodland by adjacent properties.
- There will inevitably be safety issues in respect of trees adjoining public areas and buildings, which will threaten the longer-term retention of such trees.
- Changes to the hydrology, altering the quality and quantity of ground and surface water.

Section 6: Proposed Modifications to the local plan

Please set out what changes(s) you consider necessary to make the Main Modification legally compliant or sound, having regard to the Main Modification you have identified in section 3 above where this relates to soundness. You will need to say why the change(s) will make the Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording to the Main Modification. Please be as precise as possible.

A minimum requirement would be re-designating two important local green spaces on either side of Skipton Castle Woods: one to the West - known as Park Hill - and the other to the East - known as Show Field. This would create an adequate buffer for the ancient woodland (important for rich wildlife and tranquillity); protect the site’s beauty, recreational and historic value; and therefore no longer result in an “extensive tract of land” being designated.



Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

Section 7: Request to be notified that the recommendations of the Craven Local Plan Inspector have been published


Would you like to be notified that the recommendations of the Craven Local Plan Inspector have been published? (please select one answer with a tick)	
Yes, I do wish to be notified	X
No, I do not wish to be notified	

Section 8: Request to be notified of adoption of the Craven Local Plan

Would you like to be notified that the Craven Local Plan has been adopted? (please select one answer with a tick)	
Yes, I do wish to be notified	X
No, I do not wish to be notified	

Section 9: Signature & Date of Representation

Please sign and date below:

Signature	
Date	28 MARCH 2019

Once the period of public consultation on the Main modifications to the Craven Local Plan has ended, all representations that relate to the Main Modifications will be considered by the Inspector.

Craven District Council | 1 Belle Vue Square | Skipton | BD23 1FJ
| www.cravenc.gov.uk

Planning Policy Team | 01756 706472 | localplan@cravenc.gov.uk



INVESTOR IN PEOPLE



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

Craven Local Plan Examination

From: Jim Woodward-Nutt [REDACTED]
Sent: 21 March 2019 11:21
To: Local Dev. Framework
Subject: Objection to local plan amendment
Attachments: Flashes objection letter.doc

Follow Up Flag: Follow up
Flag Status: Completed

Attached please find a letter of objection to the amendment to the draft local plan.

James Woodward-Nutt

This email has been checked for viruses by Avast antivirus software.
<https://www.avast.com/antivirus>



21st March 2019

CDC Local Plan
Belle View Mills
Broughton Road
SKIPTON
BD23 1FJ

Modification to Draft Local Plan – Hellifield Flashes

I wish to object in the strongest possible terms to the modification to the draft local plan which substantially reduces the area of the Hellifield Flashes which is designated as a local green space.

As a n 83-year-old resident of Hellifield, I am not able to walk far from my home, and the area known as the Hellifield Flashes is of prime importance to me, as it is adjacent to the residential area of the village, yet is an area of quiet and peace, across which I can and do walk regularly.

The area also benefits from the extensive flocks of wild birds and animals which I can watch, and which are attracted to the water in the flashes.

Although the area is not extensive, it is of a size across which I can walk, along with many other members of the community, and I request that you take all possible steps to retain this beautiful and tranquil area in its present form as a green space.

James Woodward-Nutt

From: Mark Woronowski [REDACTED]
Sent: 13 March 2019 11:46
To: Sian Watson
Subject: Craven Local Plan

Dear Ms Watson

I note the decision of the Planning Inspector to remove SK-LGS64 from the list of sites proposed for designation as Local Green Spaces, and the proposal by Craven District Council to replace this with smaller areas SK-LGS50 and SK-LGS53.

However, this proposal would result in Park Hill losing its designation as a Local Green Space.

Park Hill seems to meet all the criteria for Local Green Space:

- It is not allocated for alternative use and no incompatible planning permission has been granted.
- It is close to the community it serves. The route through Park Hill is used by the local community for both short walks, linking up with Skipton Woods and/or Grassington Road, and for access to places such as Sharpaw Fell for those who like longer walks. Both of these types of walk can and do start from people's own front doors.
- It is local in character; it is comparative in size to other sites, such as LGS-SK33 which the Inspector has not deemed to be an extensive tract of land
- It is special to the local community in terms of Beauty, Historic Significance, Recreational value.
 - Beauty: The views from Park Hill are spectacular
 - Historic Significance: the site is a Scheduled Ancient Monument
 - Recreational Value: as has been previously noted, the site is used by the local community as part of various walking routes.
- The site is clearly capable of enduring beyond the Local Plan period.

I would therefore like to propose that the area bounded to the north by Skipton By-Pass, to the east by Skipton Woods and to the west by Grassington Road be designated as Local Green Space.

I am a resident of Skipton who regularly uses this space

Yours faithfully

Mark Woronowski

From: Susan Wrathmell [REDACTED]
Sent: 01 April 2019 09:38
To: Sian Watson
Subject: Local Plan: Park Hill

Dear Sian

Please find attached my description of Park Hill in support of a request by the Civic Society and others for the area to be given Local Green Space status in the Local Plan.

I have sent a copy to Tony Blackburn.

With thanks,

Susan Wrathmell

Park Hill, Skipton, status as Local Green Space in the Local Plan

The following statement of significance is written in support of the re-instatement of the western section of the area referred to as SK-LGS64 known as Park Hill, as Local Green Space. It provides information relating to the natural environment, land use, and heritage.

(1) The area today.

The rounded form of Park Hill indicates that it is a drumlin, ie a glacial deposit left as ice retreated at the end of the last ice age. The hillock is similar to those seen throughout the river valleys of this area, most of them used as pasture for sheep and cattle.

A public footpath crosses the hill (described here from south to north) and is accessed from the town via the High Street, Mill Bridge and Chapel Hill. There is a panoramic view of the town, the Aire valley, and the hills and dales of the National Park from the stile carrying the footpath. It continues to the low meadow down the north side of the hill to divide in three directions. West as Short Lee Lane to Grassington Road; north across the A59 by-pass as the Lady Anne Way and Dales High Way; east into the wooded eastern slope within Skipton Woods.

The fields are now defined by dry-stone walls, one stretching the length of the crest of the hill. Close examination shows that there are different stones in its construction, including water-worn, quarry-dressed and tooled pieces. A very collapsed wall with earth packing partially encloses a small group of trees on the western end of the hill crest, a prominent landmark group.

The low ditch and bank earthwork of a scheduled monument, marked on Ordnance Survey maps as 'Battery' can be seen close to the stile and gateway on the crest of the hill. It lacks any fencing or indication of its heritage significance, (see section 2).

The ditches and low banks of former hedge lines surrounding smaller fields are visible as earthworks running mainly north-south, and one hedge line remains in the western part, with hawthorn and other hedge trees growing.

Several mature ash trees remain in these former field boundaries, in particular two on the north-south earthwork parallel and west of the public footpath. These and other trees have root systems and buttresses projecting a metre above the surrounding ground level, indicating that they grew in earth and stone banks.

The earthworks of field drainage systems and possibly earlier cultivation systems can be seen in low sunlight on both the north and south slopes of the hill.

The eastern slope of Park Hill extends to the wooded deep ravine of the Eller Beck which cuts through the limestone and other rocks where former quarries and water courses relating to the corn milling and textile industry can be seen, the area now maintained by the Woodland Trust.

The western and southern slope of the hill reaches to the Grassington / Raikes Road and is characterised by (north to south): the western end of Short Lee Lane; open pasture; wooded former quarry / lime kiln; houses and gardens with mature trees and shrubs dating from the late C19; the mid / late C19 Raikes Road Burial Ground; the C17 former pinfold and later related buildings now houses, shops and restaurant; the corner to Chapel Hill with a former market garden area.

(2) The history and land use of Park Hill

This section provides a brief time-line for Park Hill, using information available from historic maps and other published research, sources readily available in the town. The information is provided to emphasise the historic significance of these fields both to the local area and in the wider region.

Late C11 - C13: part of the land belonged, with the settlement to the south, to Skipton Castle. A hunting forest opposite / overlooking castle's original western entrance. Probably of considerable strategic importance for the approach to the town from the north and west to the original castle entrance.

eC14 - c1640: the Clifford family were owners of the Castle; hunting in their park to west of castle; route of Short Lee Lane perhaps a boundary or access to the castle buildings via the bridge crossing of the Eller Beck ravine. This would

have been an access route to the large fish and eel pond, Skipton Tarn, on the west side of the road north [low ground south-west of the Craven Heifer].

Mid C17 and the scheduled monument site: Skipton during the Civil War. The town's importance on the east-west routeway through the Aire Gap was crucial throughout the period of conflict and afterwards as the focus for recovery for the community. Put simply, support for Parliament came from parts of the Dales, Lancashire and the West Riding, and for Charles I from castles, towns and the Royalist headquarters to south and east with headquarters in York. Local family conflicts between the Royalist Cliffords and other land-holders dated back to the C16 and skirmishes are recorded throughout. Park Hill was the site of a defended earthwork by the end of the war with others on Sod Hill and Cock Hill to the south. The castle was besieged and Sir John Mallory forced to surrender on December 21st 1645, by which time the entire population of the town was living in the church and castle.

References to events on and around Park Hill include: 1645 1st August : Colonel General Sydenham Poyntz, professional soldier led horse, foot, artillery of light cannon from Pontefract to Skipton. Support from Colonel Lambert and Col Alured's regiments, they camped about a mile away from the town, about 4,500 men. 3 Aug forced entry into the town, through unmanned defensive works, the infantry within 150 yards of castle. Treaty refused by Mallory; **Poyntz ordered siege guns from York; took possession of Park Hill. From there could fire into castle and church.**

8th Nov Colonels Leigh and Cobb in castle were told on 15th that they must hazard a storm if don't surrender; an assault launched 20th Nov; 3 days hard fighting to capture the town. **23rd Nov batteries made, and more ordnance ordered from York.** Early December castle defenders sallied out, took prisoners and killed 5; 'it must be starved out'. **Park, Sod and Cock Hill sites re-occupied.**

1648, Oct 16th order given for slighting of Skipton Castle; castle in ruins until oct 1655. Park Hill's use changed as Anne Clifford undertook the rebuilding of the church, castle and repair to damaged buildings. The Hill may have become an area of grazing for cattle at this time, with access to the town via Mill

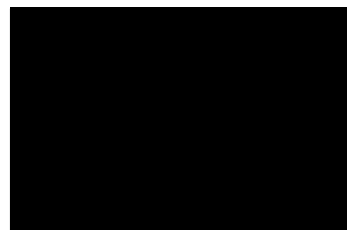
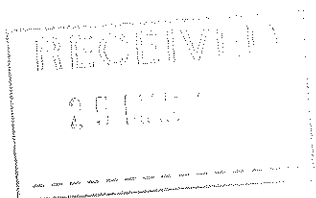
Bridge, the present public footpath entrance. By 1660- pleasure grounds and three fish ponds had been made on lower south east side.

1720 Samuel Buck sketched a view of the town from Park Hill, showing the fields and dramatic view overlooking castle, town and church, with the line of a footpath indicated. Park Hill's open nature and character as the edge of 'Old Park' is shown on the 1757 Crow map. The upper slopes are shown as open ground with a narrow routeway downhill to the corn mill, suggesting a funnelling /drove point to bring animals from the hill and beyond to the town centre.: lower slope south side small fields, Rakes Close, The Close by the Garden, the Garden, Mill Croft, The Crofts, Old Park Wood Close; the Old Park. Later maps show that Park Hill was enclosed with small fields (those now traced as banks and ditches) in the later 18th century.

The 1843 Tithe Map shows field boundaries, approx twenty small fields over whole hill; a boundary wall along the crest as now, square treed enclosure for the battery, numbered 684 **Earl of Thanet / Thomas Smith / plantation / open / pasture / A R 16perches**; a second small enclosed rectangle, no trees. Field names such as Old Park East, Old Park West are given. Raikes cemetery was taken in shortly after and remained in use after the Waltonwrays town cemetery was opened in 1876.

Susan Wrathmell, MA, IHBC

March 31st 2019



Sian Watson (Spatial Planning Manager)
Craven District Council
1 Belle Vue Square, Broughton Road
Skipton, BD23 1FJ

Dear Sir

Park Hill - Skipton

I write to ask that Park Hill be re-instated as a protected Local Green Space in the Local Plan for Skipton. Park Hill is a local piece of land, close to Skipton town, with historical significance (part of long established footpaths, a site of a Civil War battery). It is a quiet, open space overlooking Skipton giving the town great character and enjoyment for its inhabitants as well as for visitors.

Yours sincerely



Catherine Wright

From: Barbara Wright [REDACTED]
Sent: 29 March 2019 09:53
To: Local Dev. Framework
Subject: Hellifield Flashes Green Space application

Dear Sirs

I write in support of the green space application in the local plan for the area known as Hellifield Flashes. I am aware that there is an issue about the size of the area being requested as green space and wish to convey to you why the whole area is of such significance to myself and to other villagers of all ages and abilities. This whole area is of massive importance to the people for many reasons.

In the Spring and Summer months the village children can be seen flying kites, playing golf and other ball games in the field closest to the village, in winter we see the snowmen appear and can watch groups of children snowballing, and families with sledges! The first field is such a very safe environment, as it is visible to many overlooking houses. Indeed my own children, and now grandchildren play in that first field, away from traffic and away from many of today's threats. As they grew older, my own children used to spend hours in the second and third fields looking for insects in the flashes, and today I see other groups of children heading over that way. Most weekends and evenings we see families heading for walks across the fields.

For my own part, after having undergone major surgery, my consultant has told me to get as much exercise as I can; as a result I bought a dog and try to get out for a walk every day. Some days I only feel fit enough to walk over the first field to the fence, other days I make it to the 'road to nowhere', stopping en route to watch the birds on the Dumber flash, and other days I can enjoy the full circular walk from the village, along the road to nowhere and back through the wood and back across the fields. Some days this may take an hour, other days less (the full walk according to my tracker is approximately 6,000 steps!). On many occasions I have stopped to watch the herd of deer that appear on the flashes from time to time, and on one occasion whilst walking through the wood something caught my eye to the side of me, I was amazed to see a deer just two arms-length from me among the trees watching me, with the rest of the herd behind; an amazing experience. The spring is of special significance in the closest fields watching the new born and young lambs just gives so much pleasure and joy of the new life beginning, it encourages me to get out there and enjoy it.

I cannot describe to you the importance of those fields, the entire area has been so significant in my recovery, and in my well-being. As soon as I get into that first field there is a sense of peace and freedom, I can forget everything and just enjoy an hour or so of fresh air and peace. Furthermore, being a widow living alone, I can almost guarantee meeting up and chatting with other walkers along the route. As I sit typing this at 9.30am on a Friday, I see two individuals walking in the first field, and one in the second field walking towards the wood, I shall be joining them shortly!

The whole area is so important for so many reasons. Please help us to protect it for the people and wildlife of the future.

Yours sincerely
Mrs Barbara Wright

[REDACTED]

From: Sara Robin [REDACTED]
Sent: 02 April 2019 11:44
To: localplan@craven.gov.uk
Cc: David Feeney
Subject: FW: Main modifications consultation

I have had a message to say that my email was undeliverable so am resending.
Yours

Sara Robin
Conservation Officer (Planning)
Yorkshire Wildlife Trust
Tel: [REDACTED]
Email: [REDACTED]
Website: www.ywt.org.uk

From: Sara Robin
Sent: 27 March 2019 10:24
To: 'localplan@craven.gov.uk' <localplan@craven.gov.uk>
Subject: Main modifications consultation

Many thanks for consulting Yorkshire Wildlife Trust on the above.

The Trust is pleased to see the modifications to the supporting text for Policy EC4 in relation to tourism development at Hellifield, and the changes to the map of the tourism development area.
Best wishes

Sara Robin
Conservation Officer (Planning)
Yorkshire Wildlife Trust
Tel: [REDACTED]
Email: [REDACTED]
Website: www.ywt.org.uk

Image removed by sender. Become a Member



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