



Response to 2nd Draft (2016)  
Craven District Local Plan

Campaign to Protect Rural England  
North Yorkshire Branch (500333)

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## Craven District Local Plan - Second Draft 2016

The North Yorkshire branch of the Campaign to Protect Rural England (CPRENY) commissioned KVA Planning Consultancy of Helmsley to examine and report on the Craven Local Plan, (draft text, policies and policies map with sustainability appraisal interim report and sustainability appraisal of policies) consultation document to combine with reports received from local areas.

In June 2013 the Craven district group of CPRENY commented on the previous publication stage of the emerging Local Plan produced by Craven District Council (CDC), which is intended to replace the saved policies of the Craven District (Outside the Yorkshire Dales National Park) Local Plan (adopted July 1999) and other documents produced as part of its evidence base including a detailed report on the CDC Strategic Housing Land Availability Assessment: Phase 2 (SHLAA) and proposed sites in 2013 and welcome the opportunity to comment further upon this draft publication.

Having studied the draft document and associated supporting documentation including the Sustainability Appraisal (SA) Craven district CPRE are of the opinion that whilst there is evidence of some positive planning features within the emerging Local Plan, on the whole, the draft document is not legally compliant, does not appear to comply with the Duty to Cooperate and in its current guise, is not sound, having borne in mind the policy tests as ascribed by Paragraph 182 of the National Planning Policy Framework (NPPF).

The following sections of this response deal with specific issues relating to the following themes: an overview of the emerging Local Plan including: context, vision and objectives and overarching principle of sustainable development; comments on strategic policies and the spatial strategy; comments relating to specific development management policies; and, comments pertaining to specific site allocations.



## 1 Overview of the emerging Local Plan

1.1 The Consultation Document of the Local Plan fails to set out anywhere within the document where this publication features within the planning process in terms of the Local Development Scheme.

1.2 There is no reference to any future consultation or pre-submission publications to enable the public and/or interested parties to understand what will happen to any representations they make or whether indeed there will be a future opportunity to comment further on the document before it is submitted to the Planning Inspectorate prior to adoption.

1.3 There is a note on page 44 which informs the reader that the specifics of policies SP5 to SP12 will be included in the document once the pool of sites options has been consulted on (currently underway) and assessed, which may lead the reader to assume that there will be a future variation of this document, however, no reference to how these policies will be consulted on in the future.

1.4 Having considered the Local Plan Timetable on the CDC website, there is also limited detail in this respect. The timetable simply states: Craven Local Plan - Preparation and Consultation - 2015/2016, Publication and Submission - Sept and Dec 2016, adoption - 2017.

Given that it is now May 2016; one can only assume that CDC do not intend to publish for consultation a further document to consider these additions but will simply incorporate them into the pre-submission document. This will potentially lead to significant delay should considerable modifications need to be made to the document following the formal consultation period required at this stage. Alongside this doubts being cast over the adequacy of the Sustainability Appraisal of those policies and sites which have not been considered fully by the public until such a late stage in the preparation.

1.5 CPRE are also concerned that the CDC Statement of Community Involvement was adopted in June 2006 and has not been updated since despite a number of legislative changes to the planning system since then.

1.6 Section 1 of the draft text sets out the introduction. Section 1.11 details the Duty to Cooperate (DtC) which is a requirement that was introduced under the Localism Act (2011) and detailed in paragraphs 178-181 of the NPPF.

1.6.1 CDC have provided no evidence as to whether or not they have indeed worked collaboratively with cross-boundary agencies and neighbouring authorities within their Local Plan or alluded to a separate evidence base which details this.

1.6.2 The Craven Local Plan Response Paper (dated 22/9/14) published as an update on the CDC website (26/4/16) highlights that this point was raised in the previous consultation.

1.6.3 The CDC response table states that a change is required to the Local Plan and states the required action as: *“Prepare a Duty to Co-operate statement to support the plan and refine the introduction to reflect the statement.”* This has not been achieved and is certainly not evident in the consultation draft or shown in the evidence base on the CDC website.

1.6.4 A number of other Local Authorities, including neighbouring authorities to CDC, within the same City Region and Local Enterprise Partnerships (LEP) have produced papers explaining how the DtC has been complied with and how collaborative working has been

achieved for cross border strategic issues over a number of years. It seems strange that CDC have not adopted the same method of presentation of this evidence which has been approved in a number of independent examinations of Local Plans and Development Plan Documents in the same LEP area which would have served to prove some collaboration has taken place.

1.6.5 It is acknowledged that Section 2 details some of the area's socio-economic, migration and population movements - however, these have been illustrated via a variety of studies including the LEP's Strategic Economic Plan, the Office of National Statistics (ONS) Annual Population Survey and the ONS's Business Demography Statistics and the NLP Review of Employment Land and Future Land Requirements for Economic Growth on behalf of CDC and cannot be attributed to evidence of any DtC having been undertaken.

**It is therefore the opinion of CPRE that the current Consultation Document would not pass the legal compliance test by an Independent Examiner and this would therefore need modifying prior to the formal pre-submission consultation.**

1.7 Paragraphs 1.15-1.21 represent the largest section of the introduction and covers the topic of Neighbourhood Plans, however, no detail is given as to whether or not Neighbourhood Area Designations have been agreed or as to the take up rate of Neighbourhood Plans within the CDC Plan Area and merely appears to repeat National Policy.

1.8 Section 2 sets the context for Craven District in 2016 identifying the key issues and challenges for the area. Paragraphs 2.20-2.22 state that the area has good or good and frequent public transport connections, it should be noted that rural bus services have been cut following reductions in funding and the remaining services are described locally as anything but secure.

**Therefore, CPRE are concerned that the Local Plan does not adequately reflect the current situation.**

1.9 The key issues arising from the context of the Craven plan area have been identified at paragraph 2.40. Whilst CPRE welcomes the recognition of the text stating that any greenfield development needs to be reconciled with the appropriate protection of the plan area's outstanding environment, including its natural and heritage assets, CPRE were disappointed that no mention of the loss of agricultural land is given, particularly the need to protect those areas which have been designated as the best and most versatile areas. Given that the Craven District as a whole contributes enormously to national food production CPRE would have liked to have seen reference to the essential need to retain greenfield sites as much as possible and not lose this important economic asset to the District which also helps to shape its identity.

1.10 Section 3 is entitled Sustainable Development and sets out the Vision for Craven over the plan period to 2032. The Vision in itself appears to be good, however, it is felt that the use of the brackets surrounding the following text in the second paragraph is not necessary: "*on previously developed land where it has been possible and appropriate*".

Regardless of the quantity of brownfield land available, CDC should still insist upon a 'Brownfield First' policy in line with policies within the NPPF. CPRE would fully support a smart growth policy such as this. CPRE would therefore suggest amending this text to read: "*Most new homes are situated on brownfield land within and around market towns and villages between extensive public open spaces...*"

1.11 The presence or indeed protection and enhancement of the Yorkshire Dales National Park, the forest of Bowland Area of Outstanding Natural Beauty (AONB) and many environmental assets and designations has not been recognised, nor has the importance of protection of their setting.

Lip service is paid to the high quality landscape in a brief one sentence paragraph which is disappointing given the opening sentence to paragraph 5.1 of the consultation document: *“Craven’s countryside - its land and scenery - and the quality of its landscapes are the areas defining feature and the jewel in its crown.”* This reinforces the introductory paragraph of Chapter 3 of the Saved Local Plan which explains that: *“the rural environment of Craven District is one of its most valuable resources... People derive a great deal of satisfaction from seeing, and being in, the countryside, however, the countryside is a finite resource and it is essential therefore that it is used and managed wisely.”*

**It is the opinion of CPRE that this ‘defining feature and jewel in the Crown’ remains highly important so should be better reflected in the new Local Plan.**

1.12 Ten (10) Plan Objectives immediately follow the Vision in the consultation document, however, there is no explanatory text to explain that the objectives are intended to help deliver the Vision to the reader.

1.13 PO1 should be amended to read *“achieve sustainable patterns of development”* in order to help fulfil the requirements of the NPPF which has a golden thread of sustainability running through it and also Policy SP1 of this Local Plan (discussed below).

1.14 It is acknowledged that the need to conserve and enhance the character and settings of Craven’s landscapes and special qualities of the protected landscapes are set out in PO3, however, to what end given that this is not in the Vision?

CPRE does acknowledge reference to the town of Bentham as a gateway to the AONB, however, the setting of the AONB is more than just this one location and should be recognised

1.15 PO9 mentions renewable forms of energy generation. CPRE would welcome the inclusion here of ‘all’ forms of local development including incorporating energy efficient designs into all forms of built development where appropriate.

1.16 P10 briefly mentions farming. CPRE are gravely concerned that agriculture has been significantly overlooked in the production of this policy document. Food production brings a huge source of income to the District. **Whilst CPRE recognise that diversification of traditional farming practises is occurring all over the District and indeed across the country and applaud the industry for doing so, it is also vital to protect and conserve what remains of the traditional industry and the high quality land in Craven for this purpose.** This is discussed in greater detail when considering Policy EC3 below.

1.17 It appears that there is no objective covering ‘design’. It is noted that there is a Policy (ENV3) covering this, however, given that Good Design is Core Principle of the NPPF (paragraph 17), CPRE are of the opinion that this should probably feature as an objective and would certainly help deliver the Vision.

1.18 The overarching principle of the presumption in favour of sustainable development is set out at paragraph 3.1 and is followed by Policy SD1. The supporting text to the policy does not explain why it is important to embrace the two key planning policies and embed

them in the Craven Local Plan. It does not set out this policy should be at the heart of all future decisions in Craven District to guide development to the most suitable locations.

1.19 Policy SD1 is an amalgamation of national policies and although technically would 'do the job' it **does not offer any local distinctiveness** and could be amended to read: *"The Council will take a positive and proactive approach to the consideration of development proposals that reflects the presumption in favour of sustainable development that is contained in the NPPF whilst seeking to protect Craven's unique character, landscapes and valued natural and heritage assets."*

1.20 The Policies Map is considered to be too small for accurate use. Whilst it is important to be able to comprehend the District as a whole, given the sparse distribution of the population and the number of designations it would perhaps be helpful to the reader to display a number of inset maps which would show the 'sub-areas' of the District and the relevant extent of policies. This would also be more helpful to prospective developers as it would allow them to see the extent of a potential area and its environs at a more appropriate scale rather than reliance on the district-wide policies map and the site allocations maps which do not illustrate all the surrounding constraints.

Image: the Hellifield Flashes (courtesy R Haffield)



## 2 Strategic Policies and Spatial Strategy

The following section of this representation deal specifically with the policies and supporting text as set out in the Consultation Document.

Section 4 sets out the strategic policies and spatial strategy intended to meet the 10 policy objectives.

2.1 CPRE have had a continuous liaison with CDC regarding setting a housing target for the Craven Plan area and remain concerned that the provision of 5,120 additional dwellings in the plan area over the period 1<sup>st</sup> April 2012 to 31<sup>st</sup> March 2032 is not viable.

The annual requirement of 256 (outside of the National Park area) net additional dwellings is therefore not achievable as shown by CDC's Table 3 which states that between the period 1<sup>st</sup> April 2012 and 31<sup>st</sup> March 2015 (a period of 3 years) only 282 units were actually delivered.

According to the CDC 5-year Housing Land Supply Methodology and Report (May 2015), the average build since 2005 is 179 units per annum and shows that there is a history of consistent under-delivery in Craven.

Table 3 in the Local Plan sets out that as at 31<sup>st</sup> March 2015 there were also 988 sites with planning permission or under construction which exemplifies the fact that units are not coming forward as quickly as CDC would hope.

The remaining balance on the 20-year plan period was therefore 3,850 which would mean that 226 units would need to be delivered annually over the remaining 17-year period in order to deliver the balance of 3,850 units.

This does not account for the 988 units which had been approved but not delivered, nor does it include any windfall allowance and is a figure which historically has not been achieved. CPRE, ergo, do not believe that this figure is realistic.

2.2 CPRE have grave concerns that with the consistent under-delivery record that Craven has alongside the fact that Craven does not currently have a 5-year supply of deliverable sites, it will not be possible to refuse sites which may come forward and are not 'allocated for development' within the Plan on the grounds that they are unsustainable.

This could potentially mean that areas which would not otherwise be developed become so at the expense of further encroachment onto Greenfield or countryside sites which could impede on important green wedges and infrastructure networks.

By opting for a high housing requirement figure, CPRE believe, that CDC have basically paved the way for 'planning by appeal' under the provisions of paragraph 14 of the NPPF rather than through the policies of a sound Local Plan.

2.3 As stated in previous correspondence, CPRE believe that in order to plan positively for growth CDC need to adopt a realistic figure which would allow housing targets (which are meant to be a minimum) to be delivered and still allow flexibility with the ability to provide a continuous 5-year supply and incorporate sites which have not been delivered.

CPRE are of the opinion that this figure therefore needs to be re-addressed and set at a lower level in order to stand up to scrutiny. The link, therefore, between future housing and the need for future employment needs also requires re-establishing.



2.4 CPRE are also concerned that the information provided in this public consultation is a year out of date and should have been supplied with the most up to date evidence available in order to make the most accurate assessment.

The 5-year Supply paper was published in May 2015 and this document submitted for consultation in April 2016 following a long delay. It might have been more beneficial to the Council and to the readers to have incorporated this information into the consultation draft in order to reflect a more accurate position.

2.5 Nationally, CPRE has produced a research paper stating why housing targets based on flawed numbers threaten the countryside called: Set up to Fail (Nov 2015).

CPRE analysed the 54 Local Plans adopted in the past two years that have included a new housing target. This research showed that the average housing requirement is 30% above the Government's household projections and 50% above the average build rate (taken over the past 15 years) - this is largely because national policy and guidance advise local authorities to base their plans on aspiration rather than actual need.

The result is that local authorities are being driven by national policy to release more land for development in a bid to meet targets. Developers are then able to pick the most profitable sites, usually greenfield ones. However, they do not necessarily have the motivation or capacity to build faster.

Building rates therefore remain low, housing targets are missed and the countryside is lost. Brandon Lewis (Minister of State for Housing and Planning) stated that *"plans and decisions should take into account the different roles and character of the different areas, and recognise the intrinsic character and beauty of the countryside - to ensure that development is suitable for the local context"* (<http://www.gov.uk/government/publications/letter-to-the-chief-executive-of-the-planning-inspectorate>)

However, the statistics reveal this is not happening, only 7 of the 54 plans (13%) contain housing targets that are in part determined by environmental factors. CPRE, therefore, is campaigning for amongst other things the NPPG on SHMAs to be amended to provide a clear distinction between 'need' and 'demand' and give primacy to meeting genuine housing need and for Local plans to be allowed to weigh up all the evidence for housing need, demand and constraints on an equal basis and come to a housing target which is flexible and subject to regular reviews.

**CPRE are concerned that unless Local Authorities use their evidence to protect the countryside in their areas and use existing planning guidance to explain why high housing targets are not sustainable we are likely to see ever greater loss to the countryside.**

2.6 Policy SP2 sets out the provisions for economic activity and business growth in the Craven Plan area over the plan period. Linked to the response to Policy SP1, NLP considered six different scenarios for future employment space requirements based on a number of approaches which reflect economic growth.

There is a huge disparity between the outcomes of the different models ranging from 14Ha to 32Ha. The Council have opted for a mid-range of need of 28Ha in order to 'align with the required housing need'.

CPRE are of the opinion that CDC have picked the employment land requirement option that best suits the higher housing requirement figure rather than the option that is potentially realistic and achievable for the Craven area, or that is certainly what the wording in paragraph 4.13 implies. In an ideal scenario there should be a parallel link between the two themes rather than a situation where one is retrofitted to further a different argument.

2.7 A link to Policy EC3 would strengthen Policy SP2 further, as support is not currently given for agricultural or land-based industries which currently form a significant part of the District's economy - particularly within the remoter areas of Grassington Wharfedale and North Craven; accounting for the majority of self-employment in these two areas, as published in the Economic Strategy for Craven District 2010-2016.

2.8 Policy SP3 in principle sits well within the document, however, will be difficult to assess fully without the knowledge of the contents of policies SP5-SP11. It is assumed that there will be some information regarding potential phasing within these policies in order to attempt to deliver the housing requirements over the plan period?

2.9 The Spatial Strategy and plans for housing growth is set out within paragraphs 4.17-4.27 of the consultation document. Paragraph 4.23 sits below a heading entitled Distribution of Growth - the Preferred Option, this is the first recognition within the plan that this is a preferred option approach. However, because it has been singled out, the reader is still confused as to whether it is just this policy which has achieved this stage in the planning process, or whether in fact the whole plan is based on preferred options, in which case, singling out this policy in the title leads to confusion.

2.10 CPRE are in agreement with CDC that the stated Settlement Hierarchy is the most sensible for the District. However, as discussed in more detail below in relation to Policy H1 - CPRE would welcome the inclusion of a separate Tier relating to homes in the open countryside and why this should potentially be re-use of existing buildings or as proven to be required for agricultural/rural enterprises.

2.11 Policy SP12 details the provisions for infrastructure, strategy and development delivery.

**CPRE are surprised that there is no supporting text to this policy to explain how in reality this will be achieved.**

**It is also surprising that there is no reference to the Infrastructure Delivery Plan which should ideally be published prior to submission of the Local Plan.**

### 3.0 Development Management Policies

Whilst generally pleased with the supportive text to the introductory paragraphs of Section 5, the Environment, under paragraph 5.3, CPRE notes that the text states that the *“most up to date landscape appraisal for Craven at the time will be an important tool in drawing up and determining proposals for new development.”* This goes on further to state that currently the Craven Landscape Appraisal was published in 2002 and that it *may* (our emphasis) be updated during the plan period in which case successor documents will be used in decision making process - CPRE would hope that this important tool will be updated and used frequently. **It is important that the evidence base and tools pertinent to the decision making process are kept as up to date as possible.**

3.1 CPRE welcomes the inclusion within the supporting text of 5.12-5.15 regarding dark skies. CPRE is the leading charity that campaigns against light pollution.

Paragraph 125 of the NPPF states that *“by encouraging good design, planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.”*

Policy ENV1 of the draft Local Plan provides for the countryside and landscape. Bullet point d) of the policy refers to the dark landscapes and the experience of dark skies.

Whilst this is welcomed, CPRE would be keen to see this part of the policy (relating to dark landscapes and skies) deserve its own bullet.

The setting of and the Forest of Bowland AONB and the setting of the National Park are indeed recognised for their dark skies, however, CPRE are of the opinion that Paragraph 125 of the NPPF is not dealing specifically with these highly protected landscapes and should therefore apply to all of the areas of open countryside within the Craven District especially in a time where an increasing number of local authorities are taking action to control artificial lighting by producing lighting-control technical documents, specific lighting policies or trialling ‘switch-off schemes’.

3.2 Policy ENV2 on Heritage and its supporting text is supported by CPRE. It is felt that this policy could be further strengthened, however, by the addition of the words *“and their settings”* into the first sentence of bullet point b) immediately after *“designated heritage asset”*. Views towards and out of heritage assets often add value to these assets and inappropriate development in these areas should be avoided.

3.3 The importance of good design is detailed in paragraphs 5.23 - 5.37 and generally supported. CPRE believe that more could be done to facilitate the inclusion of energy efficient housing schemes within bullet point k) of Policy ENV3, perhaps by the inclusion of reference to BREAM standards and the use of grey water collection/solar photovoltaic schemes or combined heat sources.

CPRE also note that there is a brief mention of both tranquillity and dark skies within bullet point a) of this policy. According to the Economic Development Strategy for Craven District (2011), Craven covers ‘1,177 square kilometres (15% of the physical area of North Yorkshire) and with a population of 55,500 is sparsely populated. The District has a population density of 47 people per square kilometre, placing it within the top ten most sparsely populated areas in England (the average for the country as a whole is 245 people per square kilometre)’.

CPRE believe that the tranquillity of the sparsely populated area is a very important factor in the character of Craven District and as such should be detailed in another policy and within the supporting text. Ideally this should be featured within the section detailing the importance of countryside and landscape conservation and within Policy ENV1.

3.4 Paragraph 5.38 - 5.43 deal specifically with Biodiversity matters and support Policy ENV4.

CPRE note that there is no mention of the Local Nature Partnerships (LNPs) in this section and feel this is a section which could be made stronger before submission.

It is felt that the first criterion of bullet point a) could be made stronger by the inclusion of the following words to read: *“ensure that there is no adverse impact on any locally, nationally or internationally designated sites and their settings, unless the benefit of the development clearly outweighs the impact on the designation. The benefit of and underlying need of this development would need to be proved to the satisfaction of the Local Authority prior to the approval of any proposal.”*

CPRE welcomes the clarity given in bullet points c) and d) of this policy which infer that impractical schemes and those which result in loss/harm to biodiversity will be resisted.

3.5 It is disappointing that the list of allocated sites has not been included in Policy ENV4, however, CPRE would welcome the opportunity to comment on this during a future consultation event (which as stated previously in this representation could lead to delays should the next stage be the pre-submission document).

3.6 Paragraph 5.46 relating to green infrastructure networks is welcomed.

CPRE particularly support the reference to *“preserving and enhancing existing assets, creating new assets and strengthening connections between assets”* - this is crucial to helping to maintain the rural character of the District at a time when growth is being promoted. The detail of paragraphs 5.48-5.49 need to be incorporated into a DtC matrix to prove legal compliance prior to submission.

3.7 Policy EN5 sets out the requirements for Green Infrastructure provision in the Local Plan.

The opening sentence to the policy is repetitive (the word growth) and does not read well.

CPRE believe that this policy will allow developers to promote sites that do not enhance or expand the networks due to the phrasing *“wherever possible”* in bullet point a). This could be strengthened by rewording to read: *“Development proposals will:”*

Bullet Point b) could be strengthened by the alteration of the text to read: *“...Where improvements are viable these should be achieved on site, however, if to the satisfaction of the Local Authority this is not achievable and the development still considered necessary at this location, contributions for off-site enhancements should be made...”*

As before, CPRE would welcome the opportunity to comment further on this policy during the next public consultation stage when the list of allocated sites has been included.

3.8 Paragraphs 5.52-5.54 deal specifically with flood risk and supports Policy ENV6.

It is the opinion of CPRE that this policy again needs strengthening in order to avoid development occurring in inappropriate locations.

Bullet point a) does not need the caveat '*where possible*' and should place greater emphasis on the sequential and exceptions test. It is also felt that a bullet point could be included to reference the importance of reducing flood risk by maintaining and restoring upland areas and wooded valley slopes in line with the supporting text in paragraph 5.54.

3.9 CPRE are gravely concerned about the supporting text to Policy ENV7 Land Quality.

CPRE feel that the text does not recognise the value of the lower-grade agricultural land to the District of Craven.

The land classification table should be included here and explained to the reader. It is also important to understand that although the classification table refers to agricultural use, the table is primarily focussed on arable production.

It is a fact that much of the area is indeed classified as grade 4 and 5 as stated in paragraph 5.56, however, it should be borne in mind that this 'lower-grade' land is perfect for the production of beef, lamb, wool and dairy products.

This 'poor quality' agricultural land attracts buyers and sellers from a wide area to Skipton Auction mart, whose turnover in 2014 was £39,445,819.23 which for a rural authority like Craven is a significant proportion of the generated income to the area.

This land is regularly being promoted and approved for housing development which has traditionally been grazed or used to produce silage or hay. It is important to note that Grades 1 and 2 may be categorised as the most versatile and yield crops but grades 3, 4 and 5 yield meat and dairy products essential for 27% of a balanced and healthy diet.

Farming production is worth £26billion per annum and related food industries £103 billion per annum to the UK economy and should in no part be ignored.

3.10 Policy ENV11: Protection of Agricultural Land from the CDC Local Plan (adopted 1999) states "*The Council will safeguard the best and most versatile agricultural land (grades 1, 2 and 3A) and agricultural land of moderate quality (grades 3b and adjacent grade 4) located in valley bottoms and on hills and uplands which is important to the local agricultural economy, unless it can be shown that the need for development overrides agricultural considerations*".

The importance of this sector to the agricultural economy has not changed since the adoption of this plan. It could be argued it has increased given the potential food shortages and current food security issues facing Britain (GB was 78% self-sufficient in food production in 1984 to only 53% in 2015), therefore **CPRE would welcome the inclusion of this type of Policy within the new Local Plan.**

3.11 Policy ENV7 - Land Quality should have its bullet point list re-ordered to enable a brownfield first policy.

CPRE suggest the inclusion of a fourth bullet point to include reference to the need to protect vital grazing land for agricultural uses on land classified as grade 3b, 4 and 5.

3.12 The remainder of Policy ENV7 is given to Air Quality and is supported by the brief text found in paragraph 5.59.

There appears to have been an amalgamation of policies here as the majority of the points within the air quality section is attributed to vehicle congestion and the reduction of car use.

Whilst it is acknowledged that emissions from vehicles and vehicle congestion can lead to impacts on air quality, there appears to be no policy or supporting text within the consultation draft local plan that reflects the requirement of sustainable modes of transport or indeed any policy relating to transport in general which would be reflective of the NPPF paragraphs 29-38.

It is the opinion of CPRE that Bullet point e) would be better suited to a separate policy relating to the promotion of sustainable transport methods which encourage alternative methods of transport to cars and the necessity for development to be located close to the strategic road network.

3.13 CPRE welcome the recognition for the need for upgrading and enlargement of the existing sewerage infrastructure within the Aire Valley within paragraph 5.60, however, this issue somehow needs referencing into Policy ENV8 (water resources, water quality and groundwater) to ensure that the policy is effective and enforceable through bullet point a).

CPRE welcome the inclusion of measures for water conservation practises into bullet point b) and would hope to see this reflected in Policy ENV3 Good Design to ensure a holistic approach to development throughout the plan.

3.14 CPRE welcomes the acknowledgement that people in Craven rely more heavily on their private cars due to the fact public transport is limited in this sparsely populated rural district at paragraph 5.63.

3.15 It is understood that there are numerous constraints in the Craven District which would impact upon proposals for large scale renewable generation developments therefore CPRE concur with CDC that it is not possible to identify potential areas of opportunity, however, that should not prohibit micro-schemes being delivered where appropriate.

As previously mentioned, CDC should consider offering support for new developments to incorporate renewable energy practises into their design. A further consideration could also include opportunities for addressing renewable energy practices that increase energy efficiency in existing housing stock which would in turn help lower the district's high carbon emissions.

3.16 Policy ENV9 specifically deals with renewable and low carbon energy. The second part of the policy deals with commercial scale wind turbines/farms.

CPRE are of the opinion that the introductory sentence to this part of the policy is unnecessary as it is fully explained in the supporting text justification. By repeating it in the policy, CPRE feel that this could be exposed as negative and not therefore conforming to the soundness test of being 'positively planned'

3.17 Paragraphs 5.79 - 5.81 immediately proceed Policy ENV10 Local Green Space (LGS). CPRE supports the opportunity for LGS designation and would welcome the ability to comment further on proposed allocations at the next stage of consultation referred to in paragraph 5.80.

CPRE comments extensively on LGS in Section 2 Local Area specific in particular Hellifield and Embsay

3.18 Section 6 of the draft Local Plan deals specifically with issues relating to housing.

CPRE concur with CDC that it is essential that the amount and location of additional development coming forward will need to be in line with the local plan strategy and objectives, to avoid the pattern and scale of growth being significantly distorted away from that being planned as outlined in paragraph 6.3.

**CPRE, however, have significant concerns regarding the ability to enforce the principle of the supporting text to Policy H1 new homes on unallocated sites at paragraph 6.4 which states “it is important that the number of new additional homes in a particular location does not increase significantly the level of planned growth in that location”.**

Although this principle appears sound, given the phrasing of the first paragraph of Policy H1 which states that “*Policy SP4 also proposes a low level of growth in Tier 5 settlements and open countryside to be delivered on **unallocated sites***” (our emphasis) and the spatial strategy as set out in Policy SP4 which states that this is intended to be 18 new dwellings per annum, the plan also states at paragraph 6.1 that Policy SP1 “*represents the minimum number of new homes needed in the Craven plan area*”.

CPRE has been told by Officers at CDC that planning proposals on unallocated locations will not be refused when deemed sustainable if the planned quantum of housing has not been achieved.

This point coupled with the fact that CDC does not currently have a 5-year supply of sites raises serious concerns within CPRE that there could be a proliferation of sites under 0.1ha or under 5 dwellings coming forward from smaller builders/self-build projects on unallocated sites **that CDC will not be able to control or refuse** and therefore this could impact significantly upon the countryside and character of smaller villages and hamlets throughout the district of Craven in a way which would not otherwise have been planned.

The problem appears to lie in the fact that Tier 5 is for unallocated sites. Perhaps it may be wise to have a no development in the open countryside policy unless for a specific reason denoting to agricultural/rural practises/re-use of an existing building which necessitates meeting strict criteria prior to approval, this may require an additional tier in the settlement hierarchy.

3.19 Paragraphs 6.7-6.19 are related to affordable housing, financial contributions and rural exception sites.

CPRE welcomes the inclusion of these paragraphs particularly the reference to the affordable housing target of 40% being proven to be realistic through the councils Affordable Housing and Community Infrastructure Viability Study (2013).

All too often in Craven, developers agree to the target of 40% to secure a permission and then claim it is not viable and seek to vary the condition which exacerbates[[[ the problem of the shortage of affordable units.

e.g.

62/2014/15073 [http://www.planning.cravencd.gov.uk/fastweb/fastweb\\_upload/Letters/Correspd/Settle/62-2014/62-2014-15073/ORIGINAL%20SUBMISSION%20DOCS/15073%20-%20Report.pdf](http://www.planning.cravencd.gov.uk/fastweb/fastweb_upload/Letters/Correspd/Settle/62-2014/62-2014-15073/ORIGINAL%20SUBMISSION%20DOCS/15073%20-%20Report.pdf)

However, from the design & access 62/2013/13590 the following should be noted in relation to approval: *This scheme offers a choice of quality homes at a range of values and tenures, in line with the Local Authority Affordable Housing policy. This is an issue to rural settings such as Settle and this scheme achieves 40% Affordable housing provision. The creation of mixed neighbourhoods is central to the government's sustainable communities agenda.*

**CPRE therefore welcomes this target and looks forward to the opportunity to comment on the appropriate level of contribution to be made from small sites once finalised.**

3.20 Having studied paragraphs 6.25-6.32 relating to housing density and also Policy H4, CPRE would wish to point out to CDC that although the Policy states that the dwelling density should be 40 dwellings per Ha, some of the settlement maps actually show the density as being 30 dwellings per Ha. Care should be taken to ensure that these correlate to avoid confusion over figures in the future.

3.21 Policy EC2 deals specifically with safeguarding existing employment uses and focuses in particular on those employment sites within 'B' Class use.

It would be useful to the general reader to have some definition of what types of development would be encompassed by this classification. Generally, however, Policies EC1 and EC2 appear to be well written.

3.22 Paragraphs 7.9 - 7.13 provide the text justification for Policy EC3 Rural Economy.

CPRE completely agrees with CDC in paragraph 7.9 where it states that "Farming, industry, tourism, transportation, shops, pubs, community services, small businesses, self-employment and so on, all contribute to the rural economy that helps maintain the vitality and viability of the countryside, the quality of the landscapes and villages and the sustainability of rural life."

Similarly, CPRE agrees with the point made in paragraph 7.10 stating "rural locations can provide their own unique types of business opportunities, but they can impose limitations and restrictions too, including the potential negative impact of development on the character of the countryside, the relatively poor transport links and broadband connections available in some locations".

CPRE remains fully supportive of the current Superfast North Yorkshire Broadband initiative which aims to deliver 100% of Craven's businesses and residents by 2017 and welcome the inclusion of this within the Local Plan.

3.23 Paragraph 7.13 clearly identifies that "Craven's landscape, heritage, culture, quality of life and overall success depend on a living and working countryside and on economic development that preserves and enhances these qualities, whilst bringing greater prosperity to local communities."

However, other than the brief mention and implied connotations of the above quote and that shown above relating to paragraph 7.9, **there is scant mention of the farming industry or recognition of the importance of food, farming and agricultural land to the district within the draft plan, particularly within Section 7.**



The majority of rural Craven is predominantly used for grazing with farms traditionally rearing cattle and sheep for onward selling or slaughter, as previously mentioned Craven Cattle Mart turns over £35million pounds annually which is testament to the good quality grazing land found within the District (which is currently categorised as 3b-5 by DEFRA's Agricultural Land Classification) that many Developers argue is poor quality when promoting a site for housing development.

It must be remembered that this classification of land refers to arable land not that in traditional grazing use by animals.

CPRE are currently campaigning for this to be recognised and a separate arable / agricultural land classification table be produced.

**3.24 It is paramount that development on existing farms should add value to agriculture rather than move away from it entirely, therefore the phrasing "use of farmland and buildings for things other than agriculture" fails to identify and recognise the importance of the farming industry on the rural economy including tourism, biodiversity, food production and cultural heritage as described by paragraph 7.13.**

CPRE have on numerous occasions asked for recognition to be given to the traditional farming industry and clearly identified within the Local Plan. The Spatial Planning Committee also agreed that this should be achieved, however, CPRE fail to see this recognition being offered.

CPRE understand the benefits that farm diversification can deliver to the rural economy and to individual livelihoods but this should not be undertaken at the expense of the existing industry, or character of the countryside or district as a whole that so many tourists flock to the area to enjoy. Currently each maintained farm, field, iconic dry stone wall, hedgerow and watercourse positively contributes to the rural character and appearance of Craven, thus highlighting the importance of the farming industry to tourism in the district.

CPRE would therefore welcome some inclusion within Policy EC3 of text which acknowledges and offers support to the protection and enhancement of existing traditional farms and associated agricultural enterprises within the District.

As mentioned above, tourism and agriculture are intertwined throughout the district of Craven. **Paragraph 7.15 fails to recognise farming practises when discussing how tourism helps in the understanding and appreciation of Craven's natural environment.** It is the farmers who maintain and manage the character and appearance of the majority of the Craven area.

**3.25 Paragraphs 7.14-7.22 deal specifically with tourism and is the textual justification to Policy EC4.**

Whilst recognising that Craven district has been a tourism destination for many years, due largely to the outstanding quality of the countryside and also the close proximity to the National Park and AONB, CPRE are also aware that the recent sporting events (the Tour de France and subsequent Tour de Yorkshire) are also responsible for illuminating the beautiful landscapes and towns that Craven has to offer to a whole new audience via the various forms of media covering the events which is introducing a large set of potential future visitors to the area.

Whilst it is important to be able to offer a range of suitable temporary visitor accommodation, it is crucial that CDC do not negatively impact upon the countryside and landscapes that the visitors come to enjoy by allowing the proliferation of numerous

tourist accommodation providers to be developed in rural areas. There is a need to ensure existing sites are improved where possible and where appropriate expand where they are well screened and restricted to short stay holiday occupancy only.

*image illustrates lack of screening for 12 months of the year at Gallaber Park ( a large trailer park in Hellifield - deciduous trees, poorly maintained fail to screen when the leaves drop. Image illustrates impact on the Long Preston Conservation area (foreground)*



### 3.26 Static caravans

Static caravan parks require clear policy guidance to assist developers and protect the unique qualities of Craven District.

Without more clarity in the policies there exists a danger of misuses in the planning policies relating to tourism. A key problem is the use of tourism activities to gain approval for a touring caravan site followed by the reduction of and in some cases complete removal of touring caravans to be replaced by lodge, park and trailer homes.

In many cases, these trailer homes form the main residence of the occupants creating large scale estates in areas where planning permission for residential development would not normally have been awarded. This has occurred at Gallaber Caravan Park outside Hellifield where residents use the parks as their main residence for all but 6 weeks of the year. This places increased pressure on infrastructure and brings little to the tourism economy.

**CPRE believe that the replacement of touring pitches with static pitches should be prevented to protect the tourism industry in Craven. A more defined tourism policy will enhance and compliment the objectives of CDC working in collaboration with the Yorkshire Dales National Park Authority policies, who have identified the alarming trend of touring accommodation being replaced with static caravans over the past 10 years.**

CPRE therefore recommends the use of clear separate policies for camping, touring caravan accommodation sites and static caravan/lodge/park homes.

CPRE are of the opinion that new static parks and/or increases to existing static parks should not be permitted in Craven due to the limited size of the area, the need to provide affordable homes, offer protection to the open countryside and farming industry and also to protect the settings of the National Park and AONB.

Policy EH4 does not currently provide enough control or flexibility to allow improvements to be made to existing sites to ensure that they sit well within their overall landscape setting.

### 3.27 Hellifield Tourism Development Opportunity Site

CPRE believe that there should be a separate detailed landscape-led policy detailing the requirements of the Hellifield Tourism Opportunity Site given its size and current commitments. It is imperative that this policy and the development brief for this opportunity is focussed on the quality and preservation of land and its setting in order to prevent this from becoming overdeveloped and forming a coalescence with other tourist accommodation providers in the area which would negatively impact upon the Long Preston Conservation Area and the setting of the National Park. For the avoidance of further confusion, doubt and to ensure that the right kind of development occurs in the right place CPRE strongly recommends a long overdue in depth examination and report into the HTDOS and the development within as well as extant permissions etc. This should be transparent exercise for the benefit of planning officers, councillors and local residents and Parish Councils. Please see section 4/Hellifield when a full description of key issues relating to the controversial HTDOS can be found.

### 3.28 Policy EC5 sets out the requirements for retail provision for the Craven plan area.

In general, CPRE are supportive of a town-centre first approach, therefore support the inclusion within the policy of reference to the sequential and impact tests that will be applied to proposals. However, CPRE are concerned that paragraph 7.4.1 of the supporting text to this policy does not quite go far enough when explaining the requirement for appraising any application for an out of centre retail use. It would be more useful to mention the sequential test within this paragraph which is supported by Paragraph 24 of the NPPF.

3.29 CPRE believe that Policy EC5A Residential uses in town and village centres is generally well written and supportive of maintaining the vitality of town centres in line with the core principles of the NPPF.

3.30 Section 8 of the emerging Local Plan deals with infrastructure, services and facilities. It is imperative that CDC recognise concerns raised by a variety of parties regarding the capacity of infrastructure providers to cope with an increased number of dwellings and services within Craven district.

CPRE welcomes the final sentence of paragraph 8.1 which states that “Development will be resisted if necessary mitigation measures cannot be secured through appropriate conditions or obligations”.

CPRE do have concerns that paragraph 8.4, however, is essentially introducing in effect a ‘get-out clause’ for developers before an application has been submitted, which will lead to developers trying to negotiate on affordable housing or tariff-style contributions from the outset.

It is essential that CDC have policies which will allow them to rigorously assess the viability of any proposed scheme and deliver the number of units which Craven needs without being led into a situation which allows them to agree to a lower number of units or receive less funds due to weak policies or text justification. Policy INF1 is relatively sound in this sense however needs to be appropriately justified by the supporting text.

3.31 CPRE welcomes the recognition given to the importance of community assets and civic and cultural venues in the emerging Local Plan including the 'local pub'.

CPRE are in agreement with CDC over the importance of providing suitable homes, services and facilities for all members of the community and the essential need for specific provision for the growing ageing population in Craven. Therefore, policy INF2 is supported.

3.32 With regard to sport, open space and recreation facilities,

CPRE welcomes the conclusions of the various CDC studies into current and future needs and is supportive of the protection and enhancement of these facilities.

CPRE welcome the recognition by CDC that open space can provide much recreational joy for all members of the community and must be protected alongside formal recreation sites.

It is vitally important for the health, well-being and quality of life of Craven residents that the level for requesting contributions for providing either on or off-site provision is adhered to by developers throughout the District as stated in Policy INF3 bullet point b) i.e. more than 5 dwellings contribute to off-site provision and those of 50 dwellings or more potentially provide on-site dependent upon scale of site.

It is vital that CDC enter into an agreement with the developer regarding on-going maintenance of these facilities in order to prevent them from falling into disrepair.

3.33 CPRE welcomes the recognition in paragraph 8.31 of Craven's sparse rural nature which inevitably leads to residents (and visitors) being heavily car reliant due to often limited public transport options.

It is essential that new developments are situated where the need to commute/travel is minimised with as much consideration as possible given to other road users, particularly vulnerable ones, in line with the NPPF.

Parking provision is certainly one way which can help congestion, however, for car-share schemes to work, Council's must ensure the right incentive is utilised given the heavy reliance on the private car in the District.

CPRE fully support the move to encourage increased use of low emission vehicles over the plan period in order to reduce the impact of poor air quality.

3.34 Superfast Broadband

Whilst fully supporting the initiative to introduce superfast broadband to 100% of businesses and residences of Craven by 2017 and supporting the need to be able to access all forms of advancing technology, it is vital that the infrastructure for such services are located in the most appropriate places, reusing existing structures where appropriate and under-grounding cables as required to avoid the potential for proliferation of mobile

phone masts and energy carrying cables and supports as this sector continues to advance, at the expense of the District's iconic landscapes .

Policy INF5 could be strengthened by referencing the need for the consideration of undergrounding of cables etc. It would perhaps be sensible to separate the two related points made in bullet point b) regarding the siting of new infrastructure in general and the siting of new infrastructure on a building in order to prevent the latter section being 'lost'.

CPRE welcome the inclusion of the need for assessment in bullet point b) regarding impacts on the character and appearance of the surrounding area and also bullet point c) which directly relates to the need to avoid harm to sensitive areas, buildings/ structures and accords with Local Plan policies ENV1, ENV2 and ENV4.

*Image illustrates the rural setting of Ingleton*



## Specific Site Allocations and HTDOS

The following pages of this representation relate to specific site allocations being consulted upon alongside the local plan. Comments have been sent to CPRE from members of the public and local groups. The original response from June 2013 is attached for information which cover some areas where CPRE have simply not had the time or there have been no comments received during this latest consultation.

We have taken the documents in order from:

[www.cravenc.gov.uk/CHttpHandler.ashx?id=10534&p=0](http://www.cravenc.gov.uk/CHttpHandler.ashx?id=10534&p=0)

POOL OF SITE OPTIONS WITH POTENTIAL FOR RESIDENTIAL OR MIXED USE AND SUSTAINABILITY APPRAISAL  
CONSULTATION DOCUMENT

Approved by Craven Spatial Planning Sub- Committee 4th April 2016



*National Park in the far ground, Craven District landscape out-with YDNP foreground*

## CONONLEY (CN)

Cononley has a thriving active community with a strong proactive Parish Council working. The comments received from this village have been high in volume and therefore merit comments from CPRE

Since the introduction of the NPPF in 2012 attractive and desirable villages such as Cononley have been inundated with planning applications and appeals from developers.

Cononley has a target of 45 new houses over the next 15 years (3 per year).

Existing approvals to be developed are:

Church centre	8 dwellings	
Meadow Croft	4	(affordable/housing association)
Pear Tree Barns	3	
Meadow Close	20	
Woodside View Farm	1	
Woodside House	1	
Weasle Green	1	
Shackleton Ghyll Farm	1	
New Inn Fold	2	

Identifying 41 new homes for Cononley once approvals are developed.

The preferred option which will provide housing requirements for Cononley is

**CN006 Station Works, north of Cononley Lane, Cononley 2.168ha. 45 houses\***

*Stage 6 Include in pool of sites for Mixed Use for B1 and housing reusing the multi-storey section of the mill for apartments*

\*However, the proposal by Candelisa on CN006 is currently for 46 apartments with 51 new build houses creating 97 new dwellings for Cononley.

Therefore there is clear evidence that Cononley's needs for the next 15 have been address. If CN006 and the existing permissions are combined this illustrates 138 new dwellings or 46 years supply.

There are concerns regarding vehicles and congestion on this site which should be examined and addressed to avoid negative impact on parking and access in Cononley for all residents and rail users.

### Parking

There will be restrictions on parking on the main road near the railway station which will aggravate the already difficult parking. Parking will not be permitted on the proposed estate as a management company will be set up and parking restrictions/wheel clamping introduced. There is a proposal by Candelisa to build a new car park opposite but the land is not owned by them and they will give no indication of size and whether it will be pay and display. They do not have a plan B if they can not acquire the land.

The remaining commercial unit will be a new build and be 15,000 sq ft. This will be a fraction of the existing availability, although it is not fully used because they are not high quality units. Rural Solutions said that the commercial element had to be reduced and dwellings increased to make it financially viable. The same argument used on the Wyvern Park application and Settle's Falcon development..

There will be no garages for the housing units to save space and reduce cost



image showing Cononley village and the mill site CN009

The following sites should be removed from the Local Plan:

In particular CN019 and CN009 which has been identified as: *Stage 6 Include in pool of site. Broadens the range of sites in the village.* The aim of the local plan is to identify housing need and availability of land not to provide choice for developers. Inclusion of sites is therefore about need. Both of these sites are within the Cononley Conservation area.

#### **CN009 Land East of Crag View**

Two previous applications on this site have been refected by officers and appeal dismissed. reference: 14542 April 2014 APP/C2708/A/14/2222889.

The Inspector dismissed the appeal: failure to preserve the character and appearance of the Conservation Area, ribbon development would erode the wider countryside setting and openness, would be clearly visible from surrounding countryside and cause significant harm to the built and historic environments. A reduced application for 4 dwellings was similarly refused by officers.



Planning experts, i.e. Inspector and Planning officers have deemed the site unsuitable for development yet the site is included within the local plan.

#### **CN019 land at junction of Cross Hills Road and the railway line**

This site is directly opposite CN009 where planning was refused and appeal dismissed. The same rationale can be used for this site. In addition, it has flooding issues. Notably this site is also the focus of a current application for 13 new dwellings 21/2016/16681. The inclusion of this site in the draft seems to open the way, as with many such options, to planning applications.

Whilst both sites are included in the draft local plan to 'Broaden Choice' it should be noted that this method of broadening choice for developers only serves to reduce the quality of the landscape and therefore Craven's jewel in the Crown.

#### **CN011 Land to West of Skipton Road**

Whilst a relatively small site, questions regarding how this site has progressed to this stage must be asked. The site is in an agricultural field within the conservation area and noted as a prominent location by CDC in the draft local plan.

for reference

[http://www.cravenherald.co.uk/news/14518707.Cononley\\_residents\\_39\\_up\\_in\\_arms\\_39\\_over\\_plans\\_to\\_build\\_on\\_village\\_centre\\_plot/](http://www.cravenherald.co.uk/news/14518707.Cononley_residents_39_up_in_arms_39_over_plans_to_build_on_village_centre_plot/)

**Cowling (CW)CW001 Off Wianman's Close, rear of Bannister Walk 3.155ha**

Stage 6 Include in pool of site. Broadens the range of sites in the village.

In CPRE's original response to the SHLAA in 2013 the following was stated:

*In April 2012, Bannister Wood to the North was designated as Ancient Woodland by Natural England.*

*The pressures that a 92 build development nearby would put on the rich biodiversity of this woodland would be unacceptable.*

*The site is outside the built-up area and would have acknowledged access problems - Lane Ends Lane is narrow and already has a collision history and a dangerous junction to the North, while the A6068 at this point has a history of poor driving. Moreover, Lane Ends Lane is bordered to the West by an Important Hedgerow (possessing at least 4 characteristics), lacking any designation to protect it.*

The site however, has been included at stage six to 'broaden the range of sites in the village. This decision requires qualification as it wholly ignores the impact on Biodiversity, the proximity to the Ancient Woodland and road issues.

In addition the key on the map provided is flawed, illustrating that something is missing

We are fully aware that a local developer is attempting to build a trailer home park in Bannister Wood

This site should be removed from the local plan, should this fail, then the council must explain their decision making process.

[http://www.cravenherald.co.uk/news/10468504.Bannister\\_Wood\\_at\\_Cowling\\_gains\\_ancient\\_woodland\\_status/](http://www.cravenherald.co.uk/news/10468504.Bannister_Wood_at_Cowling_gains_ancient_woodland_status/)

## EMBSAY with Eastby

Embsay with Eastby consists of two distinct settlements under one Parish. Embsay along with Cononley, Sutton and Hellifield has been the subject of repeat applications and appeals.

Embsay is divided between Craven District Council and the Yorkshire Dales National Park. The boundary should be clearly defined on the map in the proposed plan. It is not.

Embsay has a target of 45 homes over 15 years or 3 per year.

In addition the village has a conservation area running through the middle. The Conservation area was created in 1986 one of the key reasons for its creation was 'to protect the site from inappropriate development.

The village has a strong, thriving community spirit and an active and proactive Parish Council.

EM016 was granted planning approval for 46 homes which significantly contributes to the required number of homes in Embsay.

### **EM001; East of Laurel Croft, south and east of Village Hall; 0.747 ha.**

The continued inclusion of this site is astounding. Two applications and one appeal have been refused and dismissed on this site because of the conservation, road access, impact on character and appearance of the local area. Heritage England and the National Park (YDNP) and Highways objected strongly as did CPRE. A second appeal is currently being considered.

Site EM002 has been identified as follows:

Stages 2-5: The site is in the Conservation Area. Possible access from the site is difficult as West Lane is a narrow road with a hazardous bend adjacent to the site.

The Planning Authority state that EM001 is:

*Stage 6 (Pass): The majority of the site is in FRZ1 and the surface water risk is low. The site is partly in the Conservation Area. The western portion of the site may be utilised for residential development as it has an existing access (Laurel Croft), but the laneway dividing the site and the eastern portion may be left as open green space due to its strong landscape character.*

There is a lack of consistency in the approach to passing sites illustrated by EM001 and EM002

This fails to recognise the access problems, infrastructure, proximity to the village halls and local school (ie properties here would overlook children at play) and the importance (endorsed by the Planning Inspectorate) of the conservation area.

The Parish Council have objected to applications on this site illustrating that they view the land as an important part of the character and appearance of the Embsay village and Conservation area.

[http://www.cravenherald.co.uk/news/11803477.New\\_homes\\_scheme\\_for\\_Laurel\\_Croft\\_Embsay\\_is\\_turned\\_down\\_by\\_planners\\_/?ref=mr](http://www.cravenherald.co.uk/news/11803477.New_homes_scheme_for_Laurel_Croft_Embsay_is_turned_down_by_planners_/?ref=mr)

### **EM001 should be removed from the local plan**

*image shows line of trees with the conservation area running through the centre of Laurel Croft meadows*



EM010 & EM012 should be viewed as one site however, for this exercise we have examined them individually and jointly

**EM012; Land between Emsay and Eastby; 12.252 ha.**

Stage 6 (Pass): A potential site for residential development, but it is a very large site which may be inappropriate for full development given the relatively low housing requirements for Emsay. Some issues of medium to high risk of surface water flooding areas scattered throughout the site. A listed building is close to the site to the west. A gas pipeline runs through the site. The national park border is adjacent.

As with the inclusion of EM001, there is a great deal of local opposition to this i.e. the Parish Council and local residents. An application to build 32 houses 26/2014/14881 was refused by the Local Authority in 2014.

Development on EM012 was objected to by the Yorkshire Dales National Park, The local Parish Council, CPRE and numerous local residents. The site is indicative of traditional ridge and furrows, sits next to the Yorkshire Dales National Park and development on this site would have an adverse impact on Heritage Assets and the two conservation areas of Emsay and also the Eastby conservation area. It should be noted that a high pressure gas pipeline runs through the middle of the site.

This large site provides 3b grazing land which should be protected.

Any development of this important space will degrade the setting of the local area, the character and landscape of the local area and the setting of the Yorkshire Dales National Park.

We are informed that the Parish Council and local residents have strongly objected to the inclusion of this site and that some residents, whilst sending their objections to the site

relating to the local plan via electronic response to CDC 'were not received' and therefore have not had their comments included. See also comments following EM10 which apply to both EM12 & EM010

**EM012 should be removed from the draft plan.**

**EM010 Land to the south of Kirk Lane, Eastby; 0.985 ha.**

Stage 6 (Pass): A potential site for residential development, but it is quite isolated from the village centre of Embsay. Some issues of medium to high risk of surface water flooding, which would need investigation.

This site is part of determined attempt to develop which is not in the best interest of the local people and the local area.

**EM010 should be removed from the draft plan.**

**EM010 and EM012 English Heritage, when commenting on application 26/2014/14881 stated:**

'Eastby and Embsay are two separate historic rural settlements, each with their own conservation areas. We consider that reducing the gap between these two rural

*image showing EM010 from footpath out of and into the YDNP*

settlements would harm the setting of the Embsay and Eastby conservation areas, eroding



the distinction between them and eroding the perception of their having a rural setting. It is our view that the proposal fails to protect the setting of the Embsay and Eastby conservation areas or of the Grade II listed heritage assets on Kirk Lane (Church of St Mary the Virgin and Embsay Kirk) It fails to preserve or enhance the character or appearance of these conservation areas and fails to safeguard elements that make a positive contribution to the setting of these heritage assets”.

**With regard to both sites:**

Any development on EM012 & 010 would have an adverse impact on the setting of the Yorkshire Dales National Park, listed Heritage assets and the existing road network used by numerous cyclists and tourists. The area is much used by cyclists and walkers en route to the historic Bolton Abbey. The road is not suited to increased vehicles. The footpath running through the site is an historic link from Eastby to the Church.

for full details as to the unsuitability of this site see CPRE response to application

26/2014/14881 32 houses application withdrawn Parish Council, CPRE and approximately 300 local residents objected to building on this site.

We note that the Parish Council of the Embsay with Eastby area recommend the removal of EM 010 and EM 012

**Local Green Space**

The area EM012 (EM010) is we believe the subject of a Local Green Space Designation application. This we believe, in view of the quality, setting and location of the landscape in question should be endorsed and supported by CPRE. The level of objections to application 14881 illustrates the importance of this area to local people.

*image illustrates current landscape and heritage assets. the road marks the boundary of the Yorkshire Dales National Park*



## HELLIFIELD (HE)

Hellifield is a thriving community with a strong sense of community. The village has a strong PC and many active groups contribute to village life. Over the last fifteen years it has seen a 50% increase in housing and therefore according to the village profile, has seen it's fair share of development.

Recommended housing for this area 15 per five years or 3 per annum.

The plan fails to reflect the Gallaber Trailer and Lodge Park forming the main residence of it occupants for all but six weeks of the year when many move into rented accommodation or travel.

The Hellifield Flashes which are part of the questionable Hellifield Tourism Development Opportunity site have been identified by village groups as a local green space.

### HE001 Station Road; 0.345 ha.

Stage 6 (Pass): Residential development can make a very good contribution to improving the appearance of this prominent site near to the rail station. Small part of the site to the north within the Settle-Carlisle Railway Conservation Area. Station Road servicing the site is currently a private road, and a change to public ownership would be necessary. The quality of this service road can be improved. The map of options map fails to illustrate road capacity/access issues have been identified.



*Image illustrates Parking adjacent to the site looking toward Hellifield railway station*



*Image illustrates parking adjacent and opposite the site looking down from Hellifield railway station*

CPRE comments from response to SHLAA 2013 still apply:

*reasons for excluding this site.*

*Southern end is playing field . This area used daily and a highly valued asset to the village. The playing field is meticulously managed by the Parish Council.*

*Assuming the retention of the playing field, any further increase in road traffic would increase the potential for accidents*

*Station road is owned in part by the residents.*

*Station road is already stretched to capacity with the railway traffic and new housing. Access is frequently difficult due to volume of traffic and parked vehicles. see image*

*The Station road area has already been the site of development (Station Court) any further development would be harmful to the amenity of residents.*

*The northern end falls into the Settle Carlisle Conservation area:*

*Site is within 500 Meters of Recorded Great Crested Newts.Probable Hibernation area*

*HE001 is a known area for badger foraging*

*Development would impact adversely on the setting of the Hellifield Railway Station, a grade 2 listed building which is one of the best illustrations of Victorian architecture and used by the Settle Carlisle railways which provides tourism for the area.*

*Drainage is already a problem for existing houses on Station Road, further development would exacerbate an existing problem.*

*The site is on the border of the Yorkshire Dales National Park*



It is our considered opinion that site HE001 must be excluded from the local plan.

**HE013 Land south of Skipton Road; 2.845 ha.**

This site, was not included in documents prior to the 2013 consultations indeed the first indication of the inclusion of this site was at the consultation in the village with CDC.

When questioned about it, officers reported that it was on the web site, however, villagers checked and there was at the time no mention. Therefore comments relating to this site were not included in the CPRE response and there would naturally have been few comments or 'post it notes' from the Consultation.

The site would dramatically alter the entrance to the village and impact adversely on the heritage asset which form the first building one sees on arrival in this thriving village.

CPRE addendum to the SHLAA report 2013 as follows:

*HE013 - Late addition to SHLAA - no information available on line contra to statement by Sian Watson at Village meeting in July 2013. As of September 2013 still no information on line.*

**HE009 Land south of Townson Tractors, off Kendal Road**

It should be noted that this site is already the subject of one refused application with an appeal running concurrently with a new application based on housing figures and the lack of local plan. There is therefore a determined effort to develop this site.

In 2013 CPRE responded to the inclusion of this site as follows:

*HE009 55 houses land south of Townson Tractors off Kendal Road*

*Reasons to exclude this site*

*within 500 m of a SSSI*

*Open countryside*

*100% agricultural fields*

*Access via unadopted road*

*Flood risk*

*Land under numerous ownerships*

reference: 42/2015/15870 with 42/2016/16640 and APP/C2708/W/16/3144368 running concurrently

## **The Hellifield Tourism Development Opportunity Site (HTDOS)**

The significance of the status of this land cannot be underestimated. CDC have previously been asked not to 'save' the designation of the TDOS because the rationale behind its creation no longer exists yet the status has enabled development in an area where planning permission would not normally be granted (\*see attached letter July 2011) However, the matter was refused by Sian Watson of CDC. Planning Officers themselves frequently state that the site has a complex history therefore we are left with no alternative but to describe the site history.

The A65 was planned to by pass Hellifield and Long Preston leaving the land on the site of the TDOS would no longer be bisected by a fast, high volume A road.

The proposal involved the purchase of the land by Craven Council from the Railway authority. This land was then sold on to the developer. The developer implemented planning permission in 1999 with the erection of a steel frame for the visitor centre building. That structure failed to meet building regulations and the developer was successfully prosecuted.

**However, no remedial works were ever carried out and today 2016 some seventeen years later there remains an unsafe building**

In addition, an existing mound, which formed part of the landscape for the approved scheme 5/42/149/B was removed and the contours of the land no longer reflect the approved planning permission. This means the access and parking arrangements approved in 5/42/149/B cannot now be implemented in accordance with the approved plans, unless the very significant removed material was to be reinstated. In view of the volume of material that has been excavated by the landowner/developer, significant changes in land levels have resulted. Therefore reinstatement of the land is extremely unlikely. We have been informed by planning officers that the land on the site is contaminated.

Significant parts of the site have been implemented over the last fifteen years, which included - the redevelopment of Gallaber Farm to provide eight houses, the creation of a lorry park, the creation of a large trailer and caravan park and the development of a large five bedroomed house with triple garage in open countryside, within the Long Preston conservation area which sits next to the Settle Carlisle Railway Conservation area and next to the National Park.

£250,000 of European funding was used to build the infamous 'Road to Nowhere' or Waterside Lane which has now reverted back to the ownership of one of the developers.

Two significant element therefore have not been implemented. Firstly the concept behind the TDOS relied on the construction of the new by pass for Hellifield. This would have defined the south western boundary of the TDOS and allowed the existing route of the A65 which bisects the TDOS to be down graded. In other words, the current A65 within the TDOS would no longer have been a major through route and could have been adapted as an access road to serve developments within the TDOS.

The concept for the regeneration of this area and therefore the creation of the HTDOS relied upon the implementation of planning 5/42/149B (September 1999). Permission was the erection of an engine shed and railway heritage & visitor centre and land for 'associated uses' and car parking. This proposal would have completed the new access road from the A65 and provided new parking facilities for the visitor centre and station.

The potted history above illustrates that whilst the rationale for the HTDOS no longer exists, it has enabled questionable development in Hellifield and therefore the HTDOS is a clear and present danger to the setting of the YDNP, the Long Preston Conservation Area,

the Settle Carlisle Conservation Area, the Grade 2 listed heritage asset Hellifield Railway Station and Bendgate House.

There remains extant planning permission for an hotel, the location and position of which is clearly identified in 42/2002/2763 and the reserved matters application.

The hotel itself presents questionable issues in that the reserved matters application shows a 50% increase in the footprint of the hotel.

As already stated for the benefit of current and future planning officers, councillors, Parish Council members and local residents a full, transparent investigation and report should be conducted regarding the Hellifield Tourism Development Opportunity Site.

The need was clearly illustrated at the meeting held at CDC between SOCC and planning officers when SOCC met to discuss Local Green Space Designation. Present were Christine Sharpe Chair, Roger Haffield, J Wilson, S Gregory, D Gooch (PC) of SOCC, S Butcher (ex planning committee CDC) Cllr C Moorby and Henry Cumbers, Mrs Parker and Roy Banks.

R Banks stated that the entire HTDOS site on had planning permission but could not find supporting evidence.

**CPRE strongly recommends that the HTDOS status is removed, that a full and transparent investigation regarding extant planning permissions and site history be conducted for the avoidance of any doubt and that local green space designation be placed on the land of the Hellifield Flashes which are of high importance to local people and highly visible from the Settle Carlisle Railway.**

#### **Supporting information regarding HTDOS and Local Green Space**

\*Letter sent to CDC (Sian Watson) July 2011 regarding saved status of HTDOS

*Dear Madam*

*We request that the Tourism Development Opportunity status for Hellifield is not 'saved'.*

*Our rationale for this is as follows:*

1. *The area was designated as a Tourism Development Opportunity site on the basis of the proposed A65 By-pass of Hellifield and Long Preston Villages.*
  - a. *This new by-pass was to alleviate the widely acknowledged traffic congestion in and around the villages of Hellifield and Long Preston.*
  - b. *The TDO boundary followed the route of the by-pass. The current route of the A65 bisects the TDOS the by-pass would mean that the old route was no longer a major through route.*
  - c. *The A65 is over crowded and is the source of many delays and accidents. Further pressure on this already busy road would be unacceptable. The volume and speed of traffic passing through Hellifield causes concerns for safety, creates pollution, noise and danger for children, the elderly and the disabled (source Village Plan 2007 Hellifield).*
2. *Use of the railway road (Waterside Lane aka the Road to Nowhere) to ease access to the local station is no longer an option. We believe ownership of the road has reverted to the landowner and this road is no longer for public use.*
3. *Any further congestion on Station Road would be hazardous. Further housing has been built on Station Road causing increased traffic on that road. It is important to note that half of Station Road is owned by the residents. The rest of the road is*

unadopted. Residents have complained to Hellifield PC on many occasions regarding the speed limit on this road. The road is not governed by the Highways department so there is no speed limit.

4. The TDOS also relied upon the implementation of 5/42/149/B (the erection of an engine shed and railway heritage centre. There have been problems with this development and the structure built so far does not meet Building Regulations. Even though the Council (CDC) successfully prosecuted the owner, no remedial works or any building works have been carried out since 1999. Craven District Council's own planning department feel that any future work on this project is "extremely unlikely to happen".

Therefore as the TDO Status was granted due to the A65 bypass and the Railway Heritage Centre and neither of those two developments are ever likely to happen, one cancelled and one dormant since 1999 we suggest that the basis for the Hellifield Tourism Development Opportunity Site no longer exists.

We further suggest that it's existence will cause harm and to the residents of Hellifield and Long Preston because of the following rationale:

- Development of the land would damage natural resources (agricultural fields)
- Development would increase the pressure on the sewage system in Hellifield
- Drainage is already a problem in Hellifield
- The TDO is the site of the Hellifield Flashes, a recognised site for migratory and wading birds
- The TDO is the site of the Kell Well Beck which flows into the Pan Beck as SSSI and onto the River Ribble, a class A River and is therefore controlled waters.
- Development of the site would destroy the character and appearance of the rural landscape
- Destruction of that landscape character and appearance would damage existing tourism based businesses.
- It is not an efficient use of the land (<http://www.official-documents.gov.uk/document/cm80/8082/8082.pdf>)
- It will not respect environmental limits

According to the Village Meeting 2007 and the Village Plan 2007, the people of Hellifield listed the Hellifield Flashes and surrounding fields as one of the most valued open spaces in the village. Conservation was one of the key concerns of the villagers of Hellifield. The people also list respect for the landscape and ecology of the area as areas of utmost importance.

We request that the Hellifield Tourism Development Opportunity site is not 'saved' as the two developments that formed the basis of the creation of this site never materialised and the continued TDO status actually caused harm to the landscape of area, to existing tourism based business and to a large group of residents of the village.

Do not hesitate to contact our group should you require further help with this matter and we look forward to receiving your comments.

The following report by Save Our Craven Countryside was sent to CPRE and should be included in our response.

SAVE OUR CRAVEN COUNTRYSIDE (SOCC)  
Comments on the Draft Local Plan

**Craven Local Plan** – second draft (5/4/16)

**Document name** :- Policy EC4 , ENV4 , ENV10

**Subject of the comment**

COMMITTED TDOS, HELLIFIELD , GREEN SPACE , INSET MAP EC4

**Nature of the comment**

AMENDMENTS TO BOUNDARY'S AND ENHANCED BIODIVERSITY AREA'S AS DISCUSSED

**Detail of the comment**

ADDITIONAL COMMENTS SUPPORTING PREVIOUS SUBMISSION OF GREEN SPACE DESIGNATION

FOR THE HELLIFIELD FLASHES  
DRAFT POLICY EC4.

Following an informative and productive meeting with Local Plan officers and members of Socc, to engage in discussions regarding proposals to designate Green Space allocation on the area known as the Hellifield Flashes, It was requested by CDC that the following comments were formally submitted to the policy team..

**1. Committed Tourist Development Site Boundary.**

The Rational for the proposed Committed TDOS boundary was explained by CDC to match existing Planning permission boundary's, However it was recognised that this boundary was incorrect and the boundary should match Amended Drawing G25 011B Of planning application 42/2005/5082 ( Hellifield rural environment Centre )

Received 26 May 2005

Socc therefore request that the Committed TDOS boundary on the inset map of Draft Policy EC4 is amended to match the drawing referenced above. With Green space boundary's to remain as per draft Inset Map .

**2. Green Space**

The importance of the Hellifield Flashes in respect of the high Biodiversity value and community value was discussed at length .

Socc presented information on Priority Protected Species and the interaction of areas on the Flashes site including the documented connections to Long Preston deeps SSSI .also legislation related to important wildlife

Species and sites.

All agreed the site required protection.

Socc therefore propose that for clarity, The Three Main pond areas are noted on the Draft Policy inset map for their importance for Biodiversity . noted on the plan below.

**3. Conservation Areas**

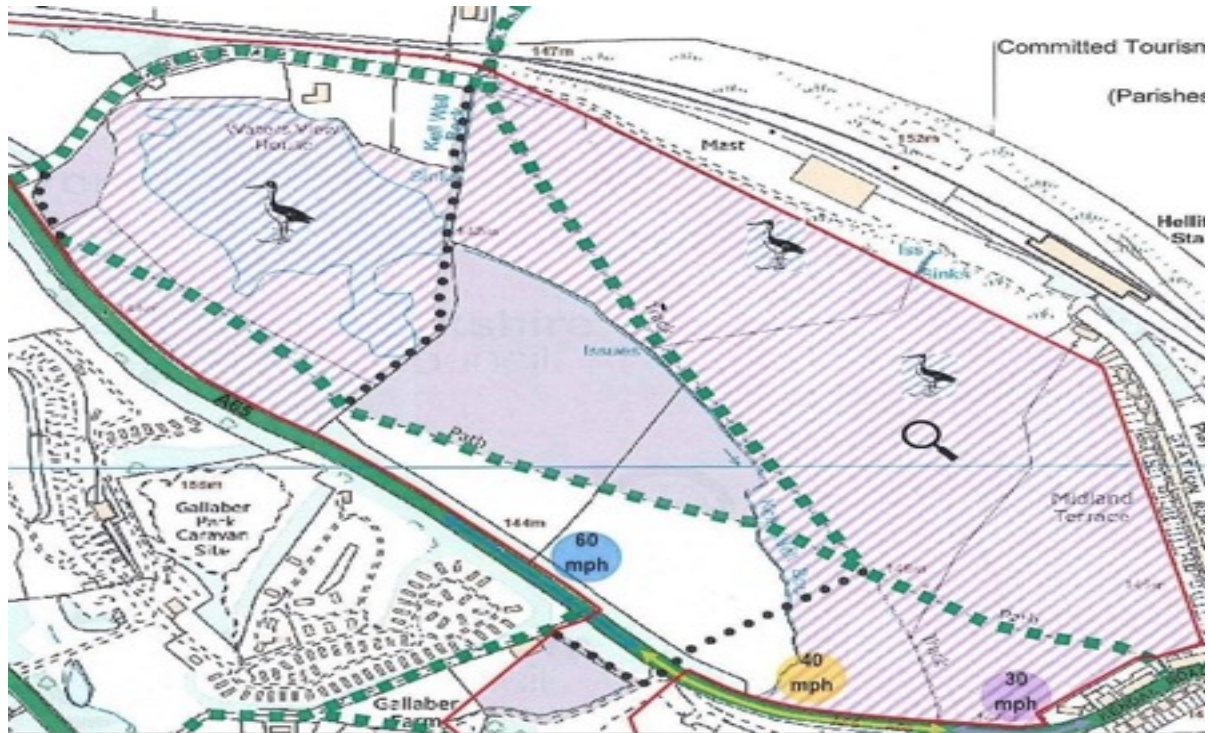
Socc questioned the omission , from the inset map , of The Long Preston Conservation area Boundary which covers part of the Flashes site . and also The Settle- Carlisle Conservation area which lies adjacent to the site

Socc proposes that for clarity , the section of the Long Preston Conservation area on the site is indicated on the inset map.and also the Settle -Carlisle conservation Boundary's

#### 4. Proposed additional footpaths

After discussions on proposed additional footpaths, safety issues were raised relating to the proposed footpath from Gallaber Park . crossing the A65.

SoCC propose that this footpath is discussed with Highways for clarity on the safety issue.



**Areas of Biodiversity Importance  
Draft Policy inset Map EC4**

Local Green Space Designation applied for by SoCC

CPRE North Yorkshire endorses and fully supports this proposal for the creation of a local green space designation on this important piece of land between two villages.

## SUTTON IN CRAVEN (SC)

Objections and comments received by CPRE are high.

The map for Sutton gives a total of 15.513 Ha, nearly all greenfield, at a capacity of 30 dwellings per hectare, equalling 465 dwellings (93 years worth for Sutton), however the latest recommendations are for 40 dwellings per hectare - this amount of land would yield 503 dwellings (100 year's worth). Whilst Craven District has consistently *under*-delivered with respects to new housing, *Sutton* has consistently over-delivered.

Over the past 14 years permission have been granted for 276 new homes in Sutton-in Craven. These approvals include: large developments of Silent Night, Woodturners and Greenroyd Mill, plus a 60 bed care home. There has been no improvement to the local infrastructure to accommodate these permissions. This relates to an average of 19.7 new homes per year providing enough housing for 55 years.

The map of the preferred sites for Sutton in Craven shows the 10 houses currently under construction at West Line, but neglects to show the 10 units being built at Royd Hill (conversion of a BROWNFIELD site) opposite SC040 and the 10 units at SC030 (also BROWNFIELD) plus 2 dwellings at The Balgray - so there are currently permissions granted/building underway for 32 units - 6 year's supply.

Concerns have been raised with CPRE regarding the consultation and lack of acknowledgment re the comments made by the Parish Council. The view received from members is that most is based upon the Summer 2013 Craven Local Plan Community Engagement Event with 56 attendees.

The local PC suggest and identify a number of brownfield sites they consider suitable for development. The brownfield sites identified at the time were:

SC025, SC030, SC073, SC075 and SC 076

Only one of these brownfield sites (SC030) has been taken forwards (with current permission granted)

SC084, the land formerly occupied by Yeadon House, brownfield, has been excluded on the basis that the site contains less than 0.1 hectares of land that is at the lowest risk of flooding (flood zone 1). This is an inaccurate description - the land is nowhere close to the beck, and has not flooded, unless over-capacity drains are counted. Land directly abutting the beck has been included as suitable (green-field) - illustrating an inconsistency in decision making.

NPPF Section 11 Conserving and Enhancing the natural environment states:

*“Planning Policies and decisions should encourage the effective use of land by reusing land that has previously been developed (brownfield land) provided that it is not of high environmental value”*

Therefore the sites deemed suitable for development in Sutton-Craven are:

SC025 Land and premises south of Bridge Road, access adjacent to Bridge road. 0.155 hectares. SC025 is a brownfield site currently being used for employment, so has been excluded. This is generally correct, however there is a godly portion of the site which is currently scrub land, not occupied by the business, is a real eyesore, and could probably contain 10 homes.

SC030 Works and land at Low Fold, Manor Way, 0.348 ha

SC073 Land between 11 and 13 Harper Grove 0.076 ha

SC075 Salt Pie Farm, Sutton 0.236 ha

SC076 16-18 Albert Street, Sutton 0.021ha.

We echo the sentiments already submitted by one resident stating:

*We understand that the site of the old Yeadon House is likely to become available for development in the very near future and suggest that this is a much more appropriate use of land, preferable to destroying a green-field site.*

*If additional housing really is required, which is debatable, unless we are continuing to build affordable homes for people from outside the area, there are more suitable sites within the village. Examples include the Yeadon House site, the old engineering works (SC030), there is scrub-land next to Aire Valley Glass on Bridge Road (SC025?), the Alvic Field at the end of Bridge Road which is also scrubland and an eye-sore.*

### **SC040 site - 3.486 Hectares**

**The local Parish Council, the first tier of Local Government and the body representing the views of local people have stated that SC 040 is not suitable for development both in January 2008 consultation and more recently, in submitted comments to the Spatial Planning Officer Mrs. S Watson (December 2013). Objections are minuted clearly in the PC meeting 6 January 2014.**

CPRE in their 2013 response to the SHLAA (copy attached to the end of this document) clearly outlined that this site was unsuitable.

Concerns have been raised to CPRE and to Craven District Council regarding the consultation. Key points raised as follows:

Inclusion appears to have been based upon Summer 2013 Local Plan Community Engagement Event. 56 attendees. the “post-it” consultation. Of the 34 comments made, 4 made a potentially favourable for development of SC040 providing the road could be improved, 1 attendee made a comment objecting to the inclusion and 29 made no comment for or against. It was not made clear at this event that making comment on a post-it would be a trigger for inclusion or not.

However, the council are well aware that this is controversial site. There have been numerous application recently on this site. The first resulted in 224 resident objections along with Sutton Parish Council, CPRE and Historic Environment Team NYCC.

The 224 written objections combined with the in-depth reports by the PC, CPRE and HE (NYCC) should carry significant weight and certainly more than 4 post it notes supporting development on this site. Two appeals have been dismissed relating to development on this controversial site. Residents from across Sutton, not just those directly adjacent to the site, continue to fight development on this site.

Key points:

1 The site sits outside the current development limit forming an important break between settlements namely Sutton in Craven and Eastburn. More importantly the site sits between two counties North and West Yorkshire. This important break should be maintained in full.

*The border North Yorkshire and West Yorkshire Sutton Lane.*

2 The site SC040 is developed in part or full would degrade the ‘natural gateway’ to Sutton.



Both these points are endorsed in the appeal findings of APP/C2708/W/15/3134174

3. SC040 is made up of fields below Ravenstone Woods on a sloping site.
4. The fields are agricultural providing the necessary grazing land in an area where the



agricultural practices are based upon grazing cattle and sheep.

5. The fields currently absorb run off water from the hill side which would otherwise land on Sutton Lane.
6. Sutton Lane is a known and accepted rat-run to the A629.
7. The fields are criss-crossed with dry stone walls providing habitat for insects and small mammals and form part of the crucial biodiversity super highway.
8. Development of this site places increased pressure on Bradford Metropolitan Council to maintain the natural break between settlements and the sense of leaving one place before entering another.

Relevant appeal and application documents are available from CPRE North Yorkshire on request however, these are all clearly logged with CDC.

The mitigation measures identified in the document:

POOL OF SITE OPTIONS WITH POTENTIAL FOR RESIDENTIAL OR MIXED USE AND SUSTAINABILITY APPRAISAL CONSULTATION DOCUMENT Approved by Craven Spatial Planning Sub- Committee 4th April 2016

which state:

Stage 6. Include in pool of sites. Restrict development to western end of site (up level of Corn Mill Walk) to reduce intrusion into open countryside.

There are no houses directly on the opposite side of this site, those on Corn Mill Walk are set back with green space in front, therefore development of even a small portion of the site would encroach on the open countryside.

The inclusion of SC040 as a preferred site contrary to local opinion therefore fails to address and acknowledge the local Parish Council and community view and that the local

Parish Council community have offered alternate brownfield sites in lieu of SC040. This fails to protect the setting of Sutton in Craven, maintain the clear gap between settlements and villages and degrades the natural gateway to Sutton

In the previous formal public consultation on preferred sites, SC040 received 81 letters of opposition to its inclusion in the preferred sites document, making it the most objected to site in the entire district of Craven we believe.

**CONCLUSION: AS STATED BY THE LOCAL PC, AND ON NUMEROUS OCCASIONS BY THE PUBLIC AND CPRE, THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN. There are no material and justifiable grounds to include this site.**

**SC043 West of Holme Lane and south of Holme Beck, Sutton 2.747 ha. Known locally as Thompson's Field**

Stage 6 Include in pool of sites. Extent of development will be restricted by flood risk and need to retain trees on river bank

In 2013 CPRE submitted the following:

*One questions the validity of 80 builds on a site for which 56 houses were proposed. (PA 66/2011/12210)*

*Vehicular access, shared by SC 044, into Hazel Grove will severely impact on Lyndhurst Wood (Woodland Trust)*

*- a local Area of Biodiversity. Access onto Holme Lane will be problematical as will the acceptability of the traffic from these two estates on all routes into and out of Sutton.*

This site, whilst development has been refused by Planning Committee and an appeal upheld by the Inspectorate has again been included within the local plan

[http://www.thenorthernecho.co.uk/news/10524447.Sutton\\_green\\_wedge\\_protected\\_as\\_homes\\_appeal\\_rejected/?ref=rc](http://www.thenorthernecho.co.uk/news/10524447.Sutton_green_wedge_protected_as_homes_appeal_rejected/?ref=rc)

[http://www.keighleynews.co.uk/news/10019842.Hundreds\\_attend\\_Sutton\\_meeting\\_on\\_Thompson\\_s\\_Field\\_homes\\_bid/](http://www.keighleynews.co.uk/news/10019842.Hundreds_attend_Sutton_meeting_on_Thompson_s_Field_homes_bid/)

<http://www.sutton-in-craven.org.uk/list-thread.asp?PostID=10395>

[http://www.planning.cravenc.gov.uk/fastweb/fastweb\\_upload/Letters/Correspd/Sutton%20in%20Craven/66-2011/66-2011-12210/AMENDED%20APPLICATION%20DETAILS/12210-Figure%206%20-%20Sutton%20in%20Craven%20Parish%20Council%20Response-A4.pdf](http://www.planning.cravenc.gov.uk/fastweb/fastweb_upload/Letters/Correspd/Sutton%20in%20Craven/66-2011/66-2011-12210/AMENDED%20APPLICATION%20DETAILS/12210-Figure%206%20-%20Sutton%20in%20Craven%20Parish%20Council%20Response-A4.pdf)

Brownfield sites have been identified to meet the housing need for Sutton-in-Craven. The harm of development of this site outweighs any perceived benefits.

**The site SC043 should be removed from the local plan**

**SC044 West and north of Hazel Grove Road, south of Holme Beck, Sutton 3.402 ha**

In the 2013 response to CDC, CPRE clearly stated the following:

*The merging of settlements would be complete.*

*SC 044 represents an alarming encroachment on valuable Grade 3 farmland and extension of the village to the West. The pressure on the invaluable Local Area of Biodiversity of Lyndhurst Wood would result in its becoming Vandalised Urban Wood rather than the valued haven of environmental interest and tranquillity it is at present.*

As already identified, existing brownfield sites have been identified. This is grade 3 (BMV) land providing valuable agricultural land and would extend the village eroding the gap between settlements therefore the harm clearly and demonstrably outweighs any perceived benefits and therefore

**SC044 should be removed from the plan**

**SC048 Gott Hill Farm, east of Ellers Road, Sutton 2.413 ha**

Stage 6 Include in pool of sites for low density housing. Development should be confined to the western part of the site to avoid intrusion into open countryside.

In 2013 CPRE commented as follows:

*An unacceptably large site on rising land, visible from the Aire Valley (and even further afield to the North-East?). Its 70 houses, facing North, could be enhanced by planting.*

*The challenge that is The Ellers Road should give pause.*

*Pressure on the Local Biodiversity site of Ancient Woodland in Sutton Clough should not be overlooked.*

Ellers Road is notoriously difficult and should be reason enough to exclude this site

**CROSS HILLS AND GLUSBURN (SC)**

Crosshills and Glusburn are separate settlements whose individuality and character should be maintained and enhanced.

Glusburn was the site of the old Horsfall's Mill with associated traditional development around the site.

There has been a history of contentious or controversial planning application on Green Lane which cause fear and anxiety amongst residents. Following years of the apply apply appeal appeal method of securing planning permission, planning was finally granted.

**Site SC 034. North of Old Hall and West of Green Lane. 3.3 ha**

**Stage 6 Include site in the pool of sites for consideration for housing. To prevent visual intrusion into the open countryside to the north development would be limited to the southern part of the site. East part of site forms a setting for Glusburn Hall**

comments from the CPRE response to the SHLAA 2013

This site, as so many, is unacceptably large, extending up a steep slope to create an impact on the valley landscape. Were it more modest - say, 50% - it would not also impinge on the four features listed to the North:

Between White Abbey Farm and Binns Lane extends a rare Hay Meadow recognised, but as yet undesignated, by NYCC Countryside Department.

It is on the Yorkshire Wildlife Trust's Living Landscape Map of Airedale.

Running along the South boundary of the Hay Meadow and exactly on the North development boundary is a small stream and a hedge exhibiting characteristics of an Important Hedgerow:

Hedgerow Criteria - 4 woody species per 30m run;  
footpath; bank, ditch, parallel hedge at 15m

- also Important.

Hedgerow Regulations require it must be protected by a Retention Notice.

At the South end of the hedge is a listed Veteran Sycamore No. 35331 on the Woodland Trust Ancient Tree register. Such trees have special protection from development.

4) The South-West block of proposed development extends over old ridge and furrow associated with old settlements.

It may be helpful to mention that this hill is spring-filled. When the Old Hall Estate was built it was flooded. A dyke to the North of Old Hall Estate is evidence of remedial work that took the water from the field to Holme Beck via a drain under the A6068. In 2007 the stream already mentioned and one to the North, caused Green Lane to become a torrent that flooded the A6068 and ponded the Institute.

This area exhibits the potential to become a heritage, environmental and educational conservation area for the settlements of Glusburn:

Cornmill - C12th origins and remnants of mill pond weir and leat. (Research document and photos lodged with Skipton Reference Library.) Manor House - C17th. Old Smithy - C18th. Group of C18th cottages. Bridge on site of old bridge and ford being the the Yorks-Lancs toll road. Ridge and furrow. Ancient hedge, hay meadow and Veteran tree(s).

One would hope this idea might be explored before it is irrevocably under development. Any development should be modest, linked environmentally to the wider countryside by planting and respect local building style and materials.

#### **SC036 South of Lothersdale Road, Glusburn 1.242 ha.**

**Stage 6 Include in pool of sites but development will create a visual intrusion into open countryside**

As identified by CDC the development of this site would create visual intrusion into the open countryside.

CPRE comments from SHLAA 2013:

This site is obtrusive ribbon development on a high ridge and is hardly in relation to the seven nearby houses. Major access works will encourage further development along the escarpment.

The CDC map indicates an odd discrepancy to the North at Gappe Stones, where the property curtilage has been halved, suggesting access from Lothersdale Road. One would hope that an extension of Glusburn, West and North, is not envisaged.

#### **SC037 Land at Ashfield Farm, Skipton Road, Cross Hills 13.06 ha.**

**Stage 6 Include in pool of sites. The majority of the site is in the flood plain and should not be developed. However, there may be scope to develop the area around Ashfield Farm and the area to the south adjacent to Skipton Road**

CPRE comments SHLAA 2013 apply:

This, with SC 039 Clayton Hall, represents the major changes to the settlement. They will require the most sensitive attention in order to prevent the actual and visual merging of Cross Hills with Eastburn, particularly as Bradford Metropolitan Borough has cancelled the Green Wedge on the Eastburn side of Holme Beck.

There are positive aspects:

- Sites to the East of Cross Hills are closer to major road and rail connections.

One third of SC 039 is flood-prone - FZ 3b. This gives an opportunity for a wide green biodiversity corridor along the beck-side to, in some measure, retain the Green Wedge and also conform to the requirements of the Pitt Review. The corridor could be continued into SC 037, also flood-prone.

The developer proposes a bridge from this estate over the railway to a link with the Valley Road A629. This bridge, long mooted, would come as a relief, but the encouragement it might give to increased freight traffic through the South Craven villages, including Cowling, needs scrutiny. Such an increase would be unacceptable. Vibration is affecting Main Street buildings, at 1,000 HGVs per day.

There is a distinct possibility here for an enhancement of the valley floor along the left bank of the beck from the A629 in the East to Glusburn Bridge in the West. It is a windswept gap being filled with varyingly acceptable housing estates. The flood plain, which does flood, gives the opportunity to bring the natural environment into the development, mitigating its effect and complementing the superlative landscapes on the local heights.

**SC052 Bounded by railway, Baxter Wood/Park Rd and Station Rd, Crosshills 7.332 ha.**

**Stage 6 Include in pool of sites but development will create a visual intrusion into open countryside**

CPRE comments SHLAA 2013 apply: The large sites to the East of Glusburn and Cross Hills will cause immense access problems as well as landscape vandalism. Site SC 052's dense housing will impact detrimentally on the whole Aire Valley landscape from Kildwick to Skipton. It should be removed from the plan.

**SC061 Land to west of Glusburn Corn Mill 1.078ha.**

**Stage 6 Include in pool of sites. The majority of the site is within the flood zone but the northern half of the site may be able to accommodate residential development.**

CPRE Comments 2013 SHLAA apply:

This is a historic site adjoining the original C12th Cornmill. It carries the mill leat and in the West adjoins the Ancient Woodland of Sugden Wood. The heavily treed beck-side, home to bat colonies, is a visual amenity from Glusburn Bridge and should be properly TPO'd. TPOs were proposed but missed in the 1990s.

The historic character and appearance of the area must be enhanced and protected

**SC058 Land adjacent to The Old Cornmill, Malsis School, Glusburn 1.723 ha.**

**Stage 6 Include in pool of sites as part of SC085.**

To be allocated for Mixed use and require a comprehensive proposals for;

- Restoration and reuse of the listed former school building for residential including hotel (C1), residential institution (C2) plus ancillary uses.
- Enabling residential development.
- Retention and improvement of sports pitches as a strategic sports centre for south Craven

There is dense tree cover along the beck that should be kept for environmental reasons. A Cedar of Lebanon needs a TPO. A number of trees were donated and planted for

posterity by children of Malsis School in 1973 with Government encouragement and are therefore of historic interest. The extreme point of land to the East, at the bridge, belongs to the Parish Council. There is a watercourse to the West, linking a lake to Holme Beck.

**SC070 Land to the West of Green Lane, Glusburn 0.173 ha.**

**Stage 6 Include in pool of sites for consideration for housing**

from CPRE SHLAA comments 2013

In wet conditions, a watercourse opens in the field to the North-West and gushes across the field, flooding the South extremity of SC 070.

**SC071 Linghall Farm 0.93 ha**

The site is at the top of Cononley Brow and is visible for miles

Late additions:

## GARGRAVE

In spite of requests for comment by members from CPRE at the later stages of the consultation period, due to the limited time and workload in the district we have been unable to check reports received. Our comments during the 2013 SHLAA therefore remain where appropriate.

## INGLETON (IN)

It is important the the boundary of the Yorkshire Dales National Park is clearly illustrated on all maps in particular those areas which are bisected by the boundary.

It is apparent from the information provided within the Draft Local Plan Pool of sites documentation that Ingleton has numerous and some large sites approved to Stage 6. With this in mind we submit that any development of or encroachment into the Ingleton Conservation area is unnecessary and should be avoid to preserve and enhance that Conservation area therefore recommend the removal of IN006 which currently forms essential car parking, reducing congestion on existing roads and improving ease of access for residents and tourists.

Ingleton, in the northern part of Craven is a key rural tourism point, gateway to the Three Peaks and Yorkshire Dales National Park. There appears scant recognition within the plan of Ingleton, its people and character, merely identification of housing sites.

## RATHMELL (RA)

A small settlement highly visible from the surrounding countryside in particular the Yorkshire Dales National Park. Access too and from is dependent upon the private car or taxi.

**RA001; Hollins Croft; 0.774 ha.**

**Stage 6 (Pass):** The majority of the site is in FRZ1, and the site has a low risk from surface water flooding. This is a village centre site which gives good access to the village services of the primary school and the church. A prominent site which would need to respect village design patterns. This is Grade 3 agricultural land.

We note this could be viewed as infill however, the loss of Grade 3 or Best & Most Versatile Land outweighs the benefits and the site should be removed

**RA003; Land north of Hesley Lane; 1.023 ha.**

**Stage 6 (Pass):** The majority of the site is in FRZ1, and the site has a low to high risk from surface water flooding in some parts of the site. A prominent site which would need to respect village design patterns. This is Grade 3 agricultural land. This is quite an open site and a significant loss of open countryside would occur with full development of this site, which may be inappropriate in the context of Rathmell's current housing requirements.

The loss of Grade 3 or Best & Most Versatile Land outweighs the benefits and the site should be removed

## RA 004 & RA005

Proximity and relation to village indicate that these sites should be viewed as preferable

**RA006; Land to north of Beauty House, Main Street; 0.794 ha.**

**Stage 6 (Pass): Suitable for residential development. Good accesses can be formed and the site is adjacent to existing village development.**

No requirement for this site due to village housing requirement, would extend the village settlement, site highly visible from the surrounding landscape towards Long Preston, Settle and the Yorkshire Dales National Park, A65 and Settle Carlisle Railway area.

## GIGGLESWICK

**Giggleswick village adjoins Settle, the main focus of the village is Giggleswick School.**

The village whilst small has a large number of sites identified and again a large number of sites which are Stage 6 or Pass.

The map produced by CDC needs to clearly illustrate the Yorkshire Dales National Park Boundary which must be taken in to account when determining applications.

The village appears to be under determined attack for large scale development yet there is a determined residents group attempting to ensure the right kind of development in the right place at the right time for the right reasons. There appears to be a move to relocate an existing industrial estate (Sowarth) in Settle to land adjacent to the A65.

Local residents, action groups and the Parish Council have submitted comments and a web site exists illustrating local concerns.

<http://www.rageo.co.uk/index.html>

Sites taken forward are:

SG004; South of Church Street, east of Tams Street; 0.348 ha.

SG008; Land east of Bankwell Road; 0.28 ha

SG011; Castleberg Hospital, Raines Road; 1.154 ha. Conservation Area

SG014; Land adjacent to Lord's Close and Sandholme Close; 0.934 ha.

SG015; South of Riversdale and north of school playing fields; 0.359 ha.

SG062; Between Morrison House and Raines Court, Raines Road; 0.226 ha. Conservation area

SG072; Land at Four Lane Ends, south of Brackenber Lane; 0.731 ha.

SG083; Land at the corner of the A65 and Brackenber Lane; 6.29 ha.

SG085; Land to the west of Raines Road; 1.083 ha.

SG086; Land to the east of Raines Road; 0.936 ha.

The area of land identified as suitable for further consideration is disproportionately high for the size of the community therefore all sites require careful consideration and the comments of local residents and Parish Council should be considered of great importance.

**SG083 Land at the Corner of A65 and Brackenber Lane 6.29 ha  
Grade 3 agricultural land which falls into the Best & Most Versatile farm land grading.**

Craven as identified is a predominantly rural area dominated by Cattle and Sheep grazing. Land such as this in the valley bottoms is essential to maintain and enhance our existing agricultural businesses and continue the high quality production of cattle and sheep for the food chain. How BMV land is used is vital to sustainable development. This includes decisions about protecting it from inappropriate development. The Government has also



re-affirmed the importance of protecting our soils and the services they provide in the Natural Environment White Paper The Natural Choice:securing the value of nature (June 2011), including the protection of best and most versatile agricultural land (paragraph 2.35).

Whilst most of Craven's agricultural land falls below 3a, all of that agricultural land is of high importance to grazing however, in the case of land identified as 3 then the NPPF 112 states

*112 Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.*

The recent Tour de France and Tour de Yorkshire focussed the world's media on the local area, Settle in particular. The outstanding quality of the countryside was shown by the media to the world.

The resulting potential increase in and existing tourism industry's depend upon the quality of the surrounding countryside and agriculture to maintain that landscape.

The entrance to Settle and North Ribblesdale would therefore be degraded and the extensive views of the landscape interrupted with industrial and housing development.

It is important to note that views extend to and from the YDNP and these should be factored in.

The drive to create new employment opportunities should not impact adversely on existing businesses.

The area is prone to flooding and any development on the site has the potential to impact on surface water flooding which impacts on the Ribble Valley via the Class A Ribble River.

An unacceptable increase in light pollution in an area of relatively dark night skies.

Impact on biodiversity

**The site should be removed from the Local Plan and the views of the many should take precedent over what could be described as the 'dreams of perhaps just a handful of people'.**

**SG085 Land to the West of Raines Road 1.082 hectares & SG086 Land to the east of Raines Road; 0.936 ha.**

Permission exist for 7 houses on SG085. A recent application for housing met with local objections and was refused by the Planning Authority. This should be noted in the considerations for this site.

The key consideration in relation to SG085 & SG 086 is the proposal that Best & Most Versatile land be used for housing development when it is apparent that numerous sites have been identified. Therefore these two sites should be removed from the plan to protect high quality agricultural land.

**SG011; Castleberg Hospital, Raines Road; 1.154 ha.**

Stage 6 (Pass): The site is in the Conservation Area. This is a brownfield site which can offer a suitable location for residential development. There may be an intensification opportunity here, given the site's village centre location.

**Question however the purpose, function, need and impact of closure regarding the Harden Ward which would be closed should this site go forward.**

## SKIPTON

There is no doubt that Skipton must play a large part in satisfying the housing target for Craven but that should not be at the expense of its status as an attractive small market town not only the "Gateway to the Dales" but a tourist attraction in its own right.

Protection of road approaches and retention of open space help to draw the countryside into the town not only attracting visitors but providing important highways for wildlife. Without careful planning, Skipton risks having a concrete barrier extending round much of its perimeter.

While few of the potential sites are within flood risk zones, many are on the steeply sloping areas that surround much of the town. The new flood defences will reduce but cannot remove the risk of flash floods to the lower lying areas. The increased frequency of extreme weather experienced over the past few years as a result of climate change must be taken into account when assessing the suitability and size of developments. Craven should adopt a proactive approach to maintain and improve upland areas and create wooded valley slopes to help to minimise the increasing risk.

An up to date traffic survey for Skipton has not been produced and this surely is the starting point for determining the preferred sites. The levels of development in the Shortbank Road, Gargrave Road and Carleton Road areas will impact on roads already congested and/or unsuitable for the additional traffic that will be generated.

There are no planned infrastructure improvements detailed within the draft yet the increase in population will put a strain on existing water, health and education facilities. No land has been identified for education despite this having been raised by NYCC Education following consultation on the first draft. Recent planning applications for sites in Skipton have had a contribution for education recommended by the Authority indicating a current under capacity.

An up to date figure for extant planning approvals for Skipton has not been made available but must already number in excess of 700 with applications for developments at Horse Close and Aldersley Avenue likely before adoption of the Local Plan bringing the total number nearer to 1000 units, a seven year supply at the rate indicated in the preferred Spatial Strategy. Phasing of future development must be robust to ensure that further development in Skipton is sustainable and does not jeopardise the overall plan for balanced growth throughout Craven.

The following assessment of the pool of potential sites within Skipton has been undertaken and supplied to CPRE by Skipton in Craven Civic Society.

Plot reference no.	LOCATION AND NOTES	RESPONSE	/:yes X: no X/:part only
SK013	<i>East side, large field on steep slope. Shown on the Green Infrastructure map for Skipton of 2009 [map date]. Additional information from Rachel Wallbank?</i>	Partial development acceptable; limit housing to ensure retention of the existing green corridor between lower reaches of Rumbolds Moor and Shortbank Road	/ X
SK015	<i>Top of Shortbank Road; tile works site? Brownfield site.</i>	Partial development; keep to existing building line	/X
SK018	<i>Garages Whinnygill; brown field</i>	Yes to infill	/

<b>SK044</b>	<i>Former allotments and garages, Broughton Road</i>		
<b>SK049</b>	<i>Proposed development of south west site inside bypass; flood plain. Employment Zone</i>	Partial only and employment only; area next to Engine Shed Lane is satisfactory if flooding can be avoided; keep any buildings low and create green belt to shield cemetery area.	<b>XX/</b>
<b>SK052</b>	<i>Carleton Road; setting of important Victorian villas</i>	No to garden grabbing but already in progress	<b>/</b>
<b>SK058</b>	<i>Whitakers' factory; brownfield</i>	YES; consider retention of houses	<b>/</b>
<b>SK060</b>	<i>Merritt &amp; Fryers</i>	YES; retain and convert mill buildings to ensure variety of building types. Mix employment and residential	<b>/</b>
<b>SK061</b>	<i>Canal-side; access from Burnside estate. Horse Close access</i>	Yes	<b>/</b>
<b>SK080</b>	<i>Employment Zone. Understood to be both the triangle north of SK033 and the bull-nose fields at corner of Gargrave Road traffic island.</i>	NO. Important open land on the edge of the town. Retain and enhance the green corridor at the entrance to the town; the traffic island junction should be a landscaped area, planted up with trees.	<b>X</b>
<b>SK081</b>	<i>North side of Gargrave Road; important town approach; Parkwood Way and Parkwood Drive access</i>	Partial development to ensure the character of the environment is retained and the green area around the water course is respected. A restricted area for development is indicated on our map.	<b>/X</b>
<b>SK082</b>	<i>Field next to recreation ground. Access off White Hill; noisy as close to bridge and bypass. Access to SK108?</i>	The site continues from 108; our concern is to maintain a green corridor to the ring road and to White Hills. Limit any housing to an extension of the development of SK108.	<b>/</b>
<b>SK108</b>	<i>Land west of Park Wood Drive and Stirtonber</i>		
<b>SK082</b>	<i>Land bounded by White Hills Lane and A65</i>		
<b>SK087</b>	<i>Employment Zone. North side Harrogate Road railway track; tip; line of quarry; some industrial archaeology [railway etc]</i>	Avoid development so far out of the town and affecting the park homes.	<b>X</b>
<b>SK088</b>	<i>Hawbank Fields, North of Otley Road and South of A6132</i>		

<b>SK089</b>	<i>Remains of Elsey Croft site; some permission already given for the south end; a drainage area. A landscape issue: on a tree-lined road at the approach to town beyond the railway line. The Leeds Road entrance to the town; any further development would destroy this important approach.</i>	We understand that permission has been given to develop the south section and we have marked this on the map. No further development is acceptable on this prominent site.	X
<b>SK090</b>	<i>Land north of Airedale Avenue east of railway line</i>	No, high wildlife value; keep as amenity area	X
<b>SK094</b>	<i>Employment Zone. Carleton Road; south of Burnside estate; employment site indicated; flood; river Aire and Eller / Waller beck flood area.</i>	NO, possible for employment but not suitable living area.	X
<b>SK101</b>	<i>Employment Zone. South of SK061; canal approach to the town; south of the Horse Close Bridge; access issues</i>	NO; important open views over farmland and town setting	X
<b>SK114</b>	<i>Beyond Horse Close; check for archaeology; already some permission; an important water course to be preserved.</i>	Check for archaeological survey / site inspection to ensure heritage and natural environment conservation.	/
<b>SK116</b>	<i>Employment Zone. Important open land on the canal approach to the town, high landscape quality.</i>	NO, see SK101	XX
<b>SK119</b>	<i>East of SK114; important landscape value; keep town eastern boundary.</i>	NO; consider archaeological significance this area.	XX

Report compiled and produced by

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May 2016

## CPRE Craven

### Craven District Council Local Development Plan Strategic Housing Land Availability Assessment: Phase 2 Checklist

CPRE Craven in association with KVA Planning Consultancy

CPRE Craven have prepared a series of reports relating to the Local Development Plan for Craven inside and outside the Yorkshire Dales National Park consisting of

- Housing numbers
- Site allocation Criteria
- Biodiversity
- Response to the Yorkshire Dales Management Plan (partly within Craven)

This latest report required in depth, professional planning input. CPRE Craven were supported with grant aid from the Yorkshire & Humberside Regional Group of CPRE.

CPRE Craven commissioned Katie Atkinson of KVA Planning Consultancy to work with the J Wilson and J Marley of CPRE Craven on the construction of this report.

Katie Atkinson is a member of RTPI and has extensive planning experience having worked as Planning Policy Officer for Northumberland County Council specialising in rural and coastal policy issues working with 7 District Councils and the Northumberland National Park Authority. Katie undertook County Planning Consultations for the District Councils and also wrote regional ones on behalf of the NEA with whom they had a Service Level Agreement. Katie Atkinson was also County representative on a major co-joined wind farm inquiry affecting the National Park and its hinterland. Katie also has extensive experience working at Planning Manager for BAA Scotland based at Glasgow Airport but covering all 3 Scottish BAA owned airports where she was responsible for coordinating the EIA planning application for the Aberdeen Airport runway extension and the production of the 3 airport Master Plans for growth over the next 25 years. She has also worked for the Environment Agency as Planning Liaison Officer and as a Planning Officer for Stirling Council. More recently Katie was Regional Planning Officer for CPRE Y&H.

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## **Strategic Housing Land Availability Assessment: Phase 2 Checklist Report for CPRE Craven**

### **1.0 Introduction**

1.2 The purpose of the Strategic Housing Land Availability assessment (SHLAA) is to allow the Council to allocate enough land to meet the housing need for the district of Craven (outside the Yorkshire Dales National Park) over the Plan period.

The SHLAA is a way of gathering information about all of the sites that have been suggested to the Council to see which might be the most suitable for this purpose.

The sites have been suggested to the Local Planning Authority by a wide range of individuals and organisations who either own or manage land, or who know of a potential site which may be suitable for development.

The SHLAA is intended to inform the planning process as to which sites are most appropriate for development and when they may be available for development in order for the Local Plan to meet the Government requirement that housing is adequately planned for in the district over the next 15 years.

1.3 Craven District Council (CDC) has already completed stage one of a two part test against a range of criteria which should determine the appropriateness of a potential site. Certain sites which failed the Part One tests have already been discounted as inappropriate and will not be taken further in the process.

A site which has passed the broad checks in Part One can be viewed as being available for development and in a suitable location and is ready to have further checks applied in Part Two. CDC will require information from stakeholders in order to fully assess the suitability of sites as part of the Phase Two checks.

Only when a site has passed Phase Two, will it be classed as a potential site to be allocated for development and be more widely available for consultation as part of the process in developing a Local Plan.

1.4 This report is intended to form the basis of CPRE Craven's response to the stakeholder consultation undertaken as part of the Phase Two test and will also provide information for comments to be made regarding the Stage Two assessment criteria which forms the basis of the tests to determine the suitability of a site.

## 2.0 Policy Framework: The National Planning Policy Framework

2.1 The National Planning Policy Framework (NPPF March 2012) sets out the Government's planning policies for England. The policies provide a framework for local people and their Local Planning Authority to produce a distinctive and area-specific Local Plan and Neighbourhood Plans which reflect the priorities and needs of the communities. The NPPF must be taken into account in the preparation of Local Plans and relevant policy documents.

2.2 The NPPF states that the purpose of the planning system is to 'contribute to the achievement of sustainable development' (para. 6) and that the Government's view of sustainable development contains three dimensions: economic, social and environmental.

Paragraph 152 states that significant adverse impacts on any of these dimensions should be avoided and, where possible, alternative options which reduce or eliminate such impacts should be pursued.

The UK Sustainable Development Strategy Securing the Future sets out five 'guiding principles' of sustainable development: Living within the planet's environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance; and using sound science responsibly. It is CPRE Craven's view that these principles and achieving sustainable development should be at the forefront of policy and decision making within Craven.

2.3 Paragraph 14 of the NPPF goes on to state that at the heart of the Framework is a presumption in favour of sustainable development. 'For plan-making this means that:

- Local planning authorities should positively seek opportunities to meet the development needs of their area;

- Local plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
  - Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against policies in this Framework or taken as a whole; or
  - Specific policies in this framework indicate development should be restricted\*.'

It is imperative to note the footnote that is attached to this policy which CPRE Craven believe is essential to plan-making:

'\*for example, those policies relating to sites protected under the Birds and Habitats Directive (para. 119 of NPPF) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion.'

CPRE Craven would wish to highlight the primary importance given to this policy within the NPPF and the fact that it is seen as the 'golden thread' which should guide plan-making. The example given in the footnote should also be considered with great significance, therefore CPRE Craven would urge CDC that potential sites within or adjacent to a location protected under a designation, either internationally, nationally or locally, or a site which is at risk of flooding should not be considered suitable for development, ergo, should not pass the Part Two test.

2.4 The 'core planning principles' detailed within the NPPF (para. 17) should be pivotal to the plan-making process and should therefore provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. These core principles instruct Local Planning Authorities to:

- take account of the different roles and characters of different areas, promote the main urban areas,
- protect Green Belts,
- recognise the intrinsic character and beauty of the countryside and support thriving rural communities within it,

- contribute to conserving and enhancing the natural environment,
- allocations of land should prefer land of lesser environmental value,
- encourage the effective reuse of previously developed land (brownfield), recognise that some open land can perform many functions (for wildlife, recreation, flood risk mitigation, carbon storage or food production),
- conserve heritage assets,
- take account of and support the improvement of local health, social and cultural wellbeing for all.

These principles sit alongside other equally as important principles, however, CPRE Craven believe it necessary to remind CDC of the importance of the ones highlighted above. The Craven area, as a district, is distinctive from other areas of England and thrives on being so. The Yorkshire Dales is renowned for its unique features, traditional market towns and beautiful pockets of open countryside. Consequently tourism and agriculture (including agri-tourism) are primary activities associated with the area.

The CDC Local Development Framework needs to support and protect the area's vibrant and rural character in order to keep attracting the thousands of visitors every year who visit the area and use the services provided locally.

Should the potential site allocations be in the least appropriate areas, then Craven will be at risk of urban sprawl and loss of rich habitat, thus degrading the reputation the area has and subsequently discourage visitors to the area for which so many people depend. It is, therefore, essential that the CDC Local Development Framework is locally distinctive and not one that could relate to anywhere else in the country.

2.5 Delivering a wide choice of high quality homes should be a key feature of any Local Development Framework. Paragraph 47 states that Local Planning Authorities must:

'use their evidence base to ensure that the Local Plan meets the full, objectively assessed needs for markets and affordable housing in the housing market area..'

CPRE Craven supports the use of the 160 minimum figure identified by CDC in earlier studies. According to the CDC Annual Monitoring Review (AMR) 160 is in line with the average 180 build over the past twenty years, therefore CPRE

Craven believe that a higher target figure is not justified and will not stand up to scrutiny.

Chapter 6 of the NPPF, relating to housing figures goes on to state that windfall sites may be included within the first five-year supply if compelling evidence exists that sites have consistently become available for development within the local area.

CDC's AMR and the results of the SHLAA should provide information as to the status of windfall sites. The NPPF also encourages Council's to bring back into usage redundant and vacant homes. CPRE Craven would urge the Council not to discount these important elements of housing.

2.6 Craven district is rural by character. CPRE Craven strongly supports the principle that within rural areas, housing developments should be directed to where it will enhance or maintain the vitality of rural communities (para. 55).

The NPPF uses the example that development in one village may support services in nearby villages, where there exists a group of smaller settlements in principle. CPRE Craven does not wish to see the proliferation of housing developments on every available piece of land in Craven.

CPRE Craven accepts that the area must have new housing, however, wishes to see it located in places where it will support existing thriving centres, re-uses brownfield land and as much as possible where the development will not depart from the existing development limits of a settlement.

2.7 It is a fact that climate change is having a direct impact on our environments. Local Plans must therefore take account of climate change over the longer term, including factors such as flood risk and changes to biodiversity and the landscape.

Paragraph 100 of the NPPF clearly instructs Local Planning Authorities that: 'inappropriate development in areas of risk of flooding should be avoided by directing development away from areas at highest risk..'

Sites which are put forward for development in the Local Plan need to be supported by a Strategic Flood Risk Assessment, undertaken by a neutral body (not at this stage a developer with an interest in the site).

CPRE Craven would urge CDC to apply the sequential test to all potential sites in order to determine whether or not a location is suitable for development and

to also take into account the increasing number of flooding events which have occurred this past few years.

2.8 Protecting the natural environment, habitats and biodiversity in general is a key policy theme running throughout the NPPF. Chapter 11 is dedicated to giving Local Planning Authorities the tools to conserve and enhance the natural environment. Plans should allocate land with the 'least environmental or amenity value' (para. 110).

The chapter reinstates the importance of encouraging the effective use of brownfield land (even asking Council's to consider setting a target for the use of brownfield land). CPRE Craven would support CDC in encouraging this and believe developing brownfield land first should be a priority.

2.9 Local Planning Authorities should 'set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged' (para.113).

CPRE Craven would welcome the use of these criteria based policies when determining the suitability of potential sites being proposed in the SHLAA.

In a similar way, CPRE Craven believes that principles set out in paragraph 118 of the NPPF should be applied to potential sites during the Part Two tests of the SHLAA, particularly:

'Planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweighs the loss.'

It is essential when determining whether a site is suitable for development whether a habitat which is indeed irreplaceable will be damaged or lost and of equal importance should be the setting of that habitat.

2.10 CPRE Craven welcomes the recognition afforded to the importance of tranquillity and the need for 'quiet places' to be maintained within the NPPF (para. 123).

CPRE nationally fought for the inclusion of tranquillity within the NPPF and the Craven branch would welcome its use in determining whether potential sites put forward in the SHLAA are indeed appropriate locations as part of the Part Two checks.

2.11 Historic heritage assets contribute hugely to the distinctiveness of an area and the Craven district has a wealth of historic assets which need preserving for generations to come.

When determining a site's appropriateness during the plan making process, Local Authorities should:

'identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise...Where there is evidence of deliberate neglect or damage to a heritage asset the deteriorated state of the heritage asset should not be taken into account in any decision' (Para's 129-130).

Heritage assets in Craven district contribute to the character of the district as a whole, therefore CPRE Craven urge CDC to protect and conserve sites which include or are adjacent to a heritage asset or those which could detrimentally affect the asset.

### 3.0 Policy Context: Yorkshire and Humber Regional Spatial Strategy

3.1 The Yorkshire and Humber Regional Assembly published the Government's Regional Spatial Strategy (RSS) in 2008. It provides a regional planning framework to 2026 as to where development should be located, target figures as to how much development should occur and a regional transport strategy. In July 2012, the Government announced the immediate revocation of RSS's through the 'Localism Act 2011'.

3.2 The Yorkshire and Humber RSS was formally revoked on 22nd February 2013. Although the Policies contained within it are effectively redundant, the evidence which was thoroughly scrutinised at its Examination in Public, is still pertinent. CPRE Craven would argue that the following policies contained within the RSS illustrate the importance of the Craven area to the Yorkshire and Humber region as a whole, ergo, the evidence which was supplied in order to create the policies should still be a material consideration when considering any planning application or potential site allocation.

3.3 Policy RR1 of the Yorkshire and Humber RSS refers to environmental quality and states that Local Planning Authorities should:

‘1. Protect and enhance the unique character, heritage and biodiversity of the sub area’s upland natural environment, including the Yorkshire Dales and North York Moors National Parks, the Howardian Hills, Nidderdale and Forest of Bowland AONBs, and protect the integrity of internationally important biodiversity sites;

2. Safeguard the sub area’s unique built environment in settlements and upland farming features;

3. Encourage appropriate planting and management measures in the sub area to ameliorate downstream flood risk and enhance biodiversity.’

The fact that the Yorkshire Dales National Park and the Forest of Bowland AONB were given primacy in the RSS’s first policy relating to the remoter rural areas of the region highlights their regional importance and their need to be safeguarded from inappropriate developments, alongside their setting.

3.4 Areas within the Craven District were also recognised for its high landscape values within the RSS. Policy ENV10 specifically relates to landscape and states that:

‘The Region will safeguard and enhance landscapes that contribute to the distinctive character of Yorkshire and the Humber. Plans, strategies, investment decisions and programmes should safeguard and enhance the following landscapes and related assets of regional, sub-regional and local importance: Yorkshire Dales and North York Moors National Parks and the Nidderdale, Howardian Hills, Forest of Bowland, North Pennine and Lincolnshire Wolds Areas of Outstanding National Beauty...’

Therefore, CPRE Craven would support any policy or a criterion which actively seeks to safeguard and enhance the areas landscape.

## 4.0 Policy Context: North Yorkshire County Structure Plan

4.1 The North Yorkshire County Structure Plan (Oct 1995) was the statutory planning policy document guiding and controlling development in England’s largest County. It brought together all the relevant strategic planning policies and fulfilled the County Council’s duty to prepare and publicise the County Structure Plan. The Secretary of State issued a Direction in 2007 to abolish the



Structure Plan, the only Policy saved was Policy ENV8 in relation to the York Green Belt.

Other policies were deemed to be sufficiently covered by national and regional planning policies that they were not required.

## 5.0 Policy Context: Craven District Council

5.1 The Craven District (Outside the Yorkshire Dales National Park) Local Plan was adopted July 1999. In September 2007, the Secretary of State issued a Direction to save a number of policies and related chapters within the Plan which were not sufficiently covered by policies contained within other Planning Policies at either a County wide or National level. Therefore the saved Local Plan Policies are currently what are being used to assess planning applications and offer planning advice by CDC alongside the North Yorkshire Structure Plan, the Regional Spatial Strategy for Yorkshire and the Humber (until Sept 2013), and the NPPF.

5.2 The introductory paragraph of Chapter 3: the Rural Environment, of the saved Local Plan explains that:

‘the rural environment of Craven District is one of its most valuable resources. It is a place of employment and food production, a wildlife habitat and a source of recreation. People derive a great deal of satisfaction from seeing, and being in, the countryside, however, the countryside is a finite resource and it is essential therefore that it is used and managed wisely.’

CPRE Craven applauds this sentiment and wish to see it at the heart of the plan-making process for the Craven District. When CDC assess the potential sites in the Part Two checks, it is imperative to the character of Craven as a district that the Local Planning Authority remember that the countryside is indeed a finite resource and once it is developed and habitats lost, it cannot be undone.

In terms of its special landscape quality, 10% of the Craven area (out with the National Park) is designated as part of the Forest of Bowland Area of Outstanding Natural Beauty (AONB). The rest of the area outside the AONB was identified as a ‘Special Landscape Area’ in the County Council’s Conservation Strategy. Craven is renowned for its outstanding landscape qualities as demonstrated by the large quantities of literature produced about

the area and it is vital that this precious resource is not entirely built upon but preserved.

CPRE Craven understands the need for new housing but would seek to encourage the use of the 'brownfield first' policy identified in the NPPF.

- 5.3 The Saved Local Plan Policy ENV1: Development in the open countryside, states that the Council will protect the character and quality of the open countryside from being spoilt by sporadic development by defining development limits.

CPRE Craven urges CDC that when evaluating potential sites within the SHLAA process, the Council should actively encourage the sites available within village development limits to be deemed as the most highly appropriate before promoting development in the open countryside which will adversely affect the character of the District. Saved Policy ENV10: Protection of Trees and Woodlands, also states that the Council will safeguard an area of recognised Ancient Woodland, of which there are many in the Craven District. It is also important to remember that the setting of these woodlands should be preserved in line with Policies in the NPPF.

- 5.4 Chapter 4: the Built Environment, in the saved Local Plan states that open spaces: 'between buildings and particular landscape features often form a setting or backdrop to settlements and important buildings.

It is essential that such open spaces are offered protection from development (para. 3.2.1)'. Saved Policy BE3 refers to green wedges and states that 'development will be resisted where it would compromise the gap between settlements'.

These are policies which CPRE Craven strongly support and hope that these sentiments will be carried forward in the plan-making process to the SHLAA in order to aid the determination of appropriate sites.

## 6.0 Craven District Council SHLAA Part Two Site Checklist

- 6.1 Sites for potential development have been put forward to CDC by a number of stakeholders who either own or manage land or who know of a potential site. Part One tests have already been conducted by CDC as part of the SHLAA process; those which failed the tests have been discounted and will not be progressed further.

CDC are currently applying Part Two tests to sites which passed the preliminary sweeps undertaken in Part One. The objectives of the Part Two tests are to look at those sites in greater detail. CPRE Craven has already sent comments to CDC regarding their opinion on the Site Allocation Criteria. This report forms the basis of CPRE Craven's response to forthcoming consultations on the Part Two checklist.

## **6.2 Delivery Point**

6.2.1 CPRE Craven believes that the landowner/developer should be responsible for providing this information to CDC.

The Local Planning Authority should pay regard to Chapter 6 of the NPPF when recommending sites for delivery in the initial 5-year period of the plan and take into account potential windfall opportunities. CPRE Craven would support CDC using the 160 minimum figure as identified in the Council's AMR.

## **6.3 Food Production**

6.3.1 Craven district as a whole contributes enormously to national food production. Craven consists predominantly of grazing land and its importance must be recognised. It is CPRE Craven's opinion that this grazing land is vital to the agricultural related industry (business, agriculture and agri-tourism) in producing some of the best quality lamb and beef in the country, a fact which has been supported by Jeremy Eaton of Craven Cattle Mart.

CPRE nationally will soon be discussing whether or not to campaign for grazing land to be awarded the same status as arable land in terms of the Best and Most Versatile grading system.

Pressure from the housing industry on the agricultural land within Craven outside the national Park, will impact and devastate farming by placing high land values on green field (agricultural) sites and restrict farming further. Paragraph 3.4.1 of the CDC Saved Local Plan refers to farming as being intrinsic to part of the District's economy and by far the largest land use.

CPRE would urge CDC Craven to keep it that way through sensible land allocation.

## **6.4 Brownfield Land**

6.4.1 CPRE Craven is fully supportive of encouraging the effective re-use of brownfield land, provided it is not of high environmental value. The NPPF gives

scope to the Local Planning Authority to set brownfield targets within their Local Plan to encourage its usage.

CPRE Craven would actively support CDC in doing this and believe that there would not be local opposition to the re-use of redundant sites or buildings. The NPPF has removed the 'brownfield first' common sense approach to planning.

However, CPRE Craven ardently supports the principle and believe that if CDC were to set brownfield targets as set out in the NPPF they would achieve its sustainable development principles. It would also help to make the region distinctive which would support the idea of localism.

## **6.5. Economic Development**

6.5.1 The theory behind this test is sound that land available for housing development should be checked for economic development/mixed use potential and vice versa. If sites have been previously allocated for economic development and have not been delivered and is a suitably appropriate location for housing, i.e. within development limits of an existing settlement, close to facilities, transport networks and utilities, then it should be considered as a potential housing site before green field and edge of settlement sites are allocated thus ensuring the protection and conservation of the open countryside, tranquil places, wildlife habitats and heritage assets.

## **6.6 Relationship to Existing Built-Up Areas**

6.6.1 The core principle of this test is that

'it would be' an advantage if development of a site could be carried out in a way that relates well to the form, character and density of the existing settlement'

CPRE Craven believes that the wording of this criterion needs to be much more specific and therefore tighter. The wording should state that all developments on a site must be carried out in a way that relates well to the form, character and density of the existing settlement.

In order to retain the distinctive character of the Craven District area it is imperative for CDC to produce tight and meaningful policies which clearly instruct decision makers when assessing planning applications. Concise policies setting out exactly what must be achieved on new developments in order to preserve and enhance existing settlements and built up areas are. Therefore,

vital. Potential sites that do not relate well to existing settlements should therefore be discounted as part of the Stage Two checks.

## **6.7 Ground Conditions**

6.7.1 It is imperative that groundwater sources are safeguarded. The wording in this criterion needs to be much less vague.

CPRE Craven believes that if the criteria in the initial SHLAA are not tight enough at the preliminary stage, potential sites could be laid open to development which could damage and harm groundwater sources.

It is a fact that some of Craven's waterways are designated as Sites of Special Scientific Interest (SSSI) for example, Pan Beck Fen. If contaminated substances were allowed to be deposited on adjacent sites and then leached into the water this could be disastrous for the SSSI and the A-Class River it flows into.

## **6.8 Flood Risk**

6.8.1 Flooding is occurring at a much higher rate than in the past as a result of changing weather patterns and climate change. Therefore it is essential that flood risk should be avoided in new developments. Sites at the greatest risk of flooding should therefore be excluded as part of the Part Two tests. Potential sites which are located in areas of medium flood risk should be carefully assessed by an external neutral body with a specialism in Strategic Flood Risk Assessment in line with paragraph 100 of the NPPF.

CPRE Craven would not recommend an over-reliance on mitigation techniques given the more frequent extreme events that the Craven District has been experiencing. It should also be borne in mind that the Government has delayed new legislation with regard to Sustainable Urban Drainage Systems (SUDs). Given the increase in surface water flooding events that the District has experienced in recent years, flexibility should be written into this criterion in order to comply with new policies once published. Inappropriate sites which would encourage surface water flooding (where it is deemed SUDs would be ineffectual) should be discounted as part of the Part Two tests.

## **6.9 Biodiversity/Geodiversity**

6.9.1 CPRE Craven firmly believes that this criterion should be included within the Part One Checks. If a site is designated with high environmental value and recognised as an SSSI, Special Protection Area (SPA), Special Area of Conservation (SAC), or Site of Importance for Nature Conservation (SINC) they

must be safeguarded from development and ergo, discounted as an 'appropriate site' immediately as part of the SHLAA.

CDC's Part Two checklist also refers to the fact that non-designated sites of known environmental value (e.g. potential SINC's) 'may' also need to be safeguarded.

CPRE Craven again believes that this wording should be strengthened and altered to reflect the fact that these sites 'must' also be safeguarded.

CDC's own Craven Biodiversity Action Plan (2008) identified the Hellifield Flashes as a potential SINC therefore this area must be safeguarded from any kind of development. Although this has not yet been officially designated, its high environmental value has still been recognised and should be protected. Section 40 of the NERC Act (2006) endorses CPRE Craven's views: 'every public body must in exercising its functions, have regard, as far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.'

6.9.2 Paragraph 118 of the NPPF states that Local Authorities should aim to conserve and enhance biodiversity by applying the following principles:

'[...], proposed development on land within or outside a SSSI likely to have an adverse effect on the SSSI (either individually or in combination with other developments) should not normally be permitted... [...].'

It has also been officially recognised that development outside the boundary of an 'area of importance' can impact adversely on the character and tranquillity of that site. Therefore the possibility of amending the site boundary to remove this constraint should not be considered

(NE243 – England's statutory landscape designations, a practical guide to your duty of regard).

This should clearly be applied to the boundary with the YDNP and the Forrest of Bowland AONB as well as any sites designated under national and European law for environmental value. This is a view supported by the RSPB and the NYCC Ecologist amongst others. Inappropriate development could adversely impact the setting of any of these remarkable areas and sites with this potential must be discounted as part of the SHLAA.

This would also be supportive of the 'golden thread' of sustainable development, for which the NPPF clearly states, should be at the heart of plan-

making. This report in paragraph 2.3 has already highlighted the importance of the footnote attached to the policy in paragraph 14 of the NPPF, that development should be restricted for those sites protected by designations such as SSSI, Local Green Space, AONB, National Park, heritage assets and land at risk of flooding, amongst others.

## **6.10 Trees, Woodland and Hedgerows**

6.10.1 This criterion although sound in principle must be tightened in order to avoid the felling of mature trees which should be safeguarded from development. For example, a development in Abbeyfield, Skipton damaged trees which resulted in felling and the removal of hedgerows and trees located in Long Preston Conservation Area. Wording within the criterion, therefore needs to become stronger i.e. 'should' needs to become 'must'.

CDC Saved Policy ENV10 relates to the protection of trees, ancient woodlands and hedgerows and CPRE Craven would support a reflection of this Policy when assessing sites as part of the SHLAA.

## **6.11 Forest of Bowland AONB and the Yorkshire Dales National Park**

6.11.1 Development of a site within, adjoining or adjacent to the AONB and/or National Park must be capable of conserving their special landscape and scenic beauty.

The rural environment of Craven is one of its most valuable resources. Thousands of tourists visit the region every year to witness the unique open countryside and beautiful landscapes it has to offer. The National Park and the AONB each represent large swathes of the Craven District. It is essential to ensure that development outside of these areas does not adversely impact these highly reputed areas. It is widely recognised that the setting of a National Park/AONB plays a pivotal role in protecting the designated area from harmful developments which could impact negatively upon the site either directly or indirectly. CPRE Craven would refer CDC to NE 243, as quoted above in paragraph 6.9.2.

## **6.12 Heritage Assets**

6.12.1 In a similar vein to biodiversity and high environmental value sites, heritage assets including: Conservation Areas, Listed Buildings, Ancient Monuments, parks and gardens, archaeological remains and non-designated heritage assets need to be safeguarded from inappropriate development.

CPRE Craven supports the English Heritage recommendation that sites which include a Scheduled Monument or Grade I or II Listed Building should be removed at the first sieve and to widen constraints at the second stage. This could potentially include the setting of a monument etc. to reflect paragraphs 129-130 of the NPPF.

### **6.13 Infrastructure**

6.13.1 CPRE Craven would urge CDC to consider whether development of a site is suitable to be accessed via public transport, bicycle, foot or car (in line with a Green Transport Plan) before the site is put forward for potential development as part of the SHLAA process. In a similar way tests should be undertaken by utility companies to assess the potential advantages of certain sites.

### **6.14 Topography, Geomorphology, Watercourses, Aspects and Views**

6.14.1 It would be unacceptable if development adversely impacted on existing settlements or habitats. Therefore CPRE Craven supports the principle that the development of a site should to be undertaken to ensure that it harmonises with existing features making good use of existing assets, including views into and out of the site.

CPRE Craven believes that in order to safeguard the rural character of the district that so many people derive satisfaction from, it is imperative that development on any site must be done in a way to complement existing development and assets and would welcome a stronger criterion reflecting its importance.

### **6.15 Open Space**

6.15.1 Open spaces often help to define a location's character. It is important to retain corridors of open space within development limits where possible in order to encourage a rich biodiversity to thrive within rural communities. Equally important is the need to be able to access 'open space' as this has been recognised as being a factor which can contribute towards 'well-being'.

Paragraph 73 of the NPPF states that: 'planning policies should be based on robust and up to date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision.'

CPRE Craven would not wish potential sites to be developed at the expense of vital open space which is needed for biodiversity and for the public good.



Paragraph 3.2.1 of the CDC Saved Local Plan states that it is 'essential' to offer protection to open spaces and CPRE Craven would agree.

6.15.2 CPRE Craven supports the need to retain 'Green Wedges' and green corridors throughout the Craven district which provide 'gaps' between settlements. If these important areas were lost to development, the amalgamation of settlements would ensure that Craven district lost its unique rural character on which so many livelihoods depend.

## 6.16 Minerals

6.16.1 Areas which need protecting from development in order to safeguard potential mineral deposits of local or national importance should be discounted as part of the Part Two detailed tests carried out through the SHLAA process.



## 7.0 Conclusion

7.1 KVA Planning Consultancy was commissioned by CPRE Craven to produce a report on the SHLAA Part Two criteria produced by Craven District Council. This report will form the basis of the CPRE Craven response to forthcoming consultations on the SHLAA.

7.2 CPRE Craven fully accepts the fact that houses must be built, however the number and location of where these new dwellings must be sited is not straight forward.

CPRE Craven firmly believes that the proposed minimum target of 160 houses per year in Craven District (outside the Yorkshire Dales National Park) should be adopted. It may prove necessary for the target to be exceeded during the course of the initial five year period; however, to adopt a higher figure at the outset would result in inappropriate planning decisions being taken in order to comply with the target. 160 is historically what has been achieved in Craven over the past twenty years in accordance with the CDC AMR which would be upheld at Examination in Public.

CPRE Craven also believes that the opportunity to include windfall developments within the initial five year supply should be utilised in line with the NPPF.

7.3 In terms of 'where' new residential developments should occur, CPRE Craven recommends that the NPPF be adhered to and those policies saved in the current CDC Local Plan.

It is paramount that Craven's biodiversity and special landscapes which are recognised as being high in environmental value are safeguarded.

CPRE Craven ardently believe that any potential site located on or adjacent to a designated site (internationally, nationally or locally recognised) for its environmental significance, and those sites which have been identified but not yet designated, should be discounted as part of the Part One tests and should not proceed to Part Two. Potential sites which could adversely impact the setting of the aforementioned sites, or the YDNP, or the Forest of Bowland AONB should be carefully considered and discounted where appropriate in Part Two. Sites which would damage and destroy protected trees and

woodlands should also be safeguarded as part of the SHLAA. It is essential for the area to retain its rich biodiversity for which it is so widely reputed.

7.4 CPRE Craven would also support English Heritage's recommendation to discount any sites which would be harmful to heritage assets in the first trench of tests.

7.5 CPRE Craven advocates a 'smart growth' approach to development and would urge CDC to achieve Brownfield regeneration by the inclusion of Brownfield targets as implied by the NPPF. The reduction of Greenfield development should be a priority and development within existing village development limits would be welcomed.

CPRE Craven would also encourage CDC to seek to reduce the number of empty homes in the area in accordance with paragraph 51 of the NPPF. Open Spaces between settlements including Green Wedges should be retained as important structures for preventing the merging of settlements and for increasing the wealth of biodiversity in the area.

7.6 Craven's reliance on agriculture should be safeguarded and its importance in national food production acknowledged. Craven exists mainly of grazing land which must be safeguarded in order for the economic prosperity of the area to increase.

7.7 CPRE Craven would like to see all potential sites which are at high risk of flooding be excluded as an appropriate site during Part One of the tests and that areas of medium risk be carefully considered during Part Two. CDC should rely on Strategic Flood Risk Assessment undertaken by a neutral specialist body (not a developer at this stage) in order to fully gain an understanding of the site in line with Paragraph 100 of the NPPF.

7.8 In order to achieve these core principles in allocating appropriate sites for development through the SHLAA, criteria used has to be robust and able to stand up to scrutiny.

Many of the criteria use vague and ambiguous language, for example: 'may', 'could' and 'should'. In order to undertake the level of detailed checks required to appropriately assess potential sites in Part Two, the language needs to be strengthened: for example: 'need' and 'must'. If a stronger syntax is not used, some sites which are not appropriate for development in reality may 'slip through' and become an allocated site. This could then lead to inappropriate

development which may in turn adversely impact upon one or some of Craven's many assets directly or indirectly.

7.9 The chapters relating to policy context in this report highlight the need for CDC to recognise its rich rural character including its highly valued landscapes and safeguard and enhance it for generations to come. Thus complying with the sustainable development core principles and the 'golden thread' running through the core of the NPPF. Craven District Council's own Landscape Character Appraisal (2002) states on numerous occasions that: 'Craven District is renowned for its outstanding landscape quality'.

7.10 Given the need for the Craven District Council Local Development Framework to be locally distinctive and appropriate for Craven as a District (outside the YDNP) it is imperative that its heritage assets, woodlands, landscapes, tranquil and quiet places and its biodiversity are conserved and protected.

CPRE Craven firmly believes that if sites are protected from inappropriate development and located in sensible areas which conform to national and local policies, that the housing allocations will provide sufficient strategic guidance and spatial direction for subsequent Development Plan Documents and development decisions, as well as providing an effective basis for the policies of the Local Plan.

CPRE Craven, a district of the Campaign to Protect Rural England North Yorkshire Branch (500333) [cprecraven@me](mailto:cprecraven@me)

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Katie Atkinson MRTPI

## **8 A response to proposed SHLAA sites**

### **A South Craven - Glusburn, Cross Hills, Sutton - and CW 001 in Cowling author MB**

- The sheer number of builds proposed - even though some will be discounted - seems out of all proportion to the area and its needs:2,435, not counting the crass proposal to develop the large landscape-dominant site, with its tacit approval, of Harper's Wood, Sutton.
- The sites are too big; they lack any sense of moderation or accommodation to site topography or neighbouring settlements even in density - SC062/037/039/041/007.
- There is an unsettling discrepancy between the number of proposed builds and numbers already given consent or proposed SC035/043. This, with observations above, cannot but undermine confidence.
- Comments on the following sites reflect:
  - omissions and inaccuracies within the Assessment;
  - serious reservations on the suitability of the site.

Comments are intended to be informative and constructive rather than critical.

### **GLUSBURN AND CROSS HILLS**

#### Site SC007. Adjacent to Millstones, Baxter Wood.

This site looks promising but one hopes the increased impact of development on the Aire Valley will be mitigated by TPO'd planting on council owned sites. A small decrease in density could achieve this environmental enhancement. The view over the Aire Valley precludes expectation of owner tree planting.

#### Site SC 014. S. and E. of Hayfield Mill.

This site must be considered, as must SC 044 and SC 043, in relation to its impact on Lyndhurst Wood (Woodland Trust) to the South across Holme Beck. The wood is home to bats and a good deal of other wild life - an otter was found half a mile upstream in 2012.

It is also a natural refuge of quiet for walkers, dog-walkers, the elderly and children, in spite of spates of occasional vandalism from cyclists and motorcyclists.

The Assessment makes no reference to Lyndhurst Wood as a Local Area of Biodiversity.

The greatest care needs to be taken to preserve the qualities of the wood as the pressures of development - access from Sc 014, SC044, SC043 - could quickly remove any value for wildlife survival. Imaginative assessment might suggest a wide swathe of tree and shrub planting along the river bank in SC 014 and insistence on low and firmly directional lighting.

Lyndhurst Wood also forms part of the corridor of connectivity (Lawton Report) that exists along Holme Beck from its source to the River Aire; as such its value is doubled.

#### Site SC 015. West of Primary School.

Access via Sunny Bank Road is unrealistic. Access will need to be via Beanlands Drive.

#### Site SC 034. North of Old Hall and West of Green Lane.

This site, as so many, is unacceptably large, extending up a steep slope to create an impact on the valley landscape. Were it more modest - say, 50% - it would not also impinge on the four features listed to the North:

- 1) Between White Abbey Farm and Binns Lane extends a rare Hay Meadow recognised, but as yet undesignated, by NYCC Countryside Department. It is on the Yorkshire Wildlife Trust's Living Landscape Map of Airedale.
- 2) Running along the South boundary of the Hay Meadow and exactly on the North development boundary is a small stream and a hedge exhibiting characteristics of an Important Hedgerow:  
  
Hedgerow Criteria - 4 woody species per 30m run;  
footpath;  
bank, ditch, parallel hedge at 15m  
- also Important.  
Hedgerow Regulations require it must be protected by a Retention Notice.
- 3) At the South end of the hedge is a listed Veteran Sycamore No. 35331 on the Woodland Trust Ancient Tree register. Such trees have special protection from development.
- 4) The South-West block of proposed development extends over old ridge and furrow associated with old settlements.

It may be helpful to mention that this hill is spring-filled. When the Old Hall Estate was built it was flooded. A dyke to the North of Old Hall Estate is evidence of remedial work that took the water from the field to Holme Beck via a drain under the A6068. In 2007 the stream already mentioned and one to the North, caused Green Lane to become a torrent that flooded the A6068 and ponded the Institute.

This area exhibits the potential to become a heritage, environmental and educational conservation area for the settlements of Glusburn:

Cornmill - C12th origins and remnants of mill pond weir and leat. (Research document and photos lodged with Skipton Reference Library.)

Manor House - C17th.

Old Smithy - C18th.

Group of C18th cottages.

Bridge on site of old bridge and ford being the the Yorks-Lancs toll road.

Ridge and furrow.

Ancient hedge, hay meadow and Veteran tree(s).

One would hope this idea might be explored before it is irrevocably under development. Any development should be modest, linked environmentally to the wider countryside by planting , and respect local building style and materials.

SC 061 extends to the Ancient Woodland of Sugden Wood and the Important Hedgerows of West Closes. **This is an escarpment worthy of Heritage protection.**

Site SC 035.

This ill-advised development will remove Green Lane as the historical centre of Glusburn and affect many properties throughout the immediate area as a total remake of access is required.

The 'gentle slope' referred to in the Assessment is in fact, steep and will be terraced.

The TPO'd sycamore is unlikely to survive, so replacement is requested. Very concerning is the conversion of PP11429, granted for 49 houses, to 88 builds. The discrepancy needs explanation.

The very least that can be requested before development would be for low, unobtrusive, firmly directional lighting.

[Site SC 036](#). South of Lothersdale Road.

This site is obtrusive ribbon development on a high ridge and is hardly in relation to the seven nearby houses. It looks as if it is outside the settlement boundary. Major access works will encourage further development along the escarpment.

The CDC map indicates an odd discrepancy to the North at Gappe Stones, where the property curtilage has been halved, suggesting access from Lothersdale Road. One would hope that an extension of Glusburn, West and North, is not envisaged.

[Site 037](#). Ashfield Farm.

This, with [SC 039](#) Clayton Hall, represents the major changes to the settlement. They will require the most sensitive attention in order to prevent the actual and visual merging of Cross Hills with Eastburn, particularly as Bradford Metropolitan Borough has cancelled the Green Wedge on the Eastburn side of Holme Beck.

There are positive aspects:

- Sites to the East of Cross Hills are closer to major road and rail connections.
- [One third of SC 039 is flood-prone - FZ 3b](#). This gives an opportunity for a wide green biodiversity corridor along the beck-side to, in some measure, retain the Green Wedge and also conform to the requirements of the Pitt Review. The corridor could be [continued into SC 037](#), also flood-prone.
- The developer proposes a bridge from this estate over the railway to a link with the Valley Road A629. This bridge, long mooted, would come as a relief, but the encouragement it might give to increased freight traffic through the South Craven villages, including Cowling, needs scrutiny. Such an increase would be unacceptable. Vibration is affecting Main Street buildings, at 1,000 HGVs per day.

There is a distinct possibility here for an **enhancement of the valley floor along the left bank of the beck from the A629 in the East to Glusburn Bridge in the West**. It is a windswept gap being filled with varyingly acceptable housing estates. The flood plain, which does flood, gives the opportunity to bring the natural environment into the development, mitigating its effect and complementing the superlative landscapes on the local heights.

[Site SC 039](#).

Please see above for a response to this large site. It could be integrated into and enhance the local landscape... or it could be a regrettable legacy.

[Site SC 052](#). Baxter Wood/Park Road.



The large sites to the East of Glusburn and Cross Hills will cause immense access problems as well as landscape vandalism. Site SC 052's

dense housing will impact detrimentally on the whole Aire Valley landscape from Kildwick to Skipton. It should not be envisaged.

#### Site SC 061.

This is a historic site adjoining the original C12th Cornmill. It carries the mill leat and in the West adjoins the Ancient Woodland of Sugden Wood. The heavily treed beck-side, home to bat colonies, is a visual amenity from Glusburn Bridge and should be properly TPO'd. TPOs were proposed but missed in the 1990s. I hope these remarks will be noted.

#### Site SC 058. Malsis School.

There is dense tree cover along the beck that should be kept for environmental reasons. A Cedar of Lebanon needs a TPO. A number of trees were donated and planted for posterity by children of Malsis School in 1973 with Government encouragement and are therefore of historic interest. The extreme point of land to the East, at the bridge, belongs to the Parish Council. There is a watercourse to the West, linking a lake to Holme Beck.

#### Site SC 070. West side of Green Lane.

Note: In wet conditions, a watercourse opens in the field to the North-West and gushes across the field, flooding the South extremity of SC 070.

## **SUTTON IN CRAVEN**

We begin with an already restricted village with difficult access roads to the South and West, a narrow pedestrian-dangerous road to the East and connecting road to the North that ends at a difficult T-junction onto a 20 mph, often congested, village main street.

#### SC 040

All the fields making up the entrance to Sutton Village are now included in the SHLAA. This would join up the villages of Sutton and Eastburn which is West Yorkshire in built form. These fields are currently outside the development limits. They are gently sloping sites sitting below Ravenstone Woods. The fields absorb the run off water from the hillside which would otherwise land on Sutton Lane. The area is crossed with dry-stone walls providing habitat for insects and small mammals

and walls which form part of the biodiversity super highway which is essential (see CPRE report on biodiversity) Access would be onto Sutton lane which is unsuitable for heavy traffic. An application in the 1980's was dismissed at appeal because the PI deemed it harmful to the nature of the countryside, the natural gateway to the village and outside development limits. There are numerous TPO's in this area.

**Site SC 041.** East of Holme Lane and North of Holme Beck.

The size of the site and its extension to Holme Beck itself will lead to a merging of settlements which would be regretted by both communities. The site would be more acceptable if it stopped well short of Holme Beck. Were Site SC 050 reserved as flood-plain/flood storage land, contiguous with a green corridor of flood-prone/flood storage FZ3b land in SC 039, the size of these developments would be more acceptable and the area would benefit from increased environmental and landscape enhancement. PPG 17 already suggests such a vision.

**Site SC 042.** West of Holme Lane, North of Holme Beck

This has been an amenity site for Sutton village for many years. It also represents part of the Green Wedge that separates the settlements of Cross Hills and Sutton. PPG 17 acknowledges these functions. The narrow margin along the beck side will not serve as effective green corridor or amenity. It appears no wider than the present footpath which is too confined for walkers to meet or pass comfortably.

**Site SC 043.** 'Thompson's Field'.

One questions the validity of 80 builds on a site for which 56 houses were proposed. (PA 66/2011/12210)

Vehicular access, shared by SC 044, into Hazel Grove will severely impact on Lyndhurst Wood (Woodland Trust)

- a local Area of Biodiversity. Access onto Holme Lane will be problematical as will the acceptability of the traffic from these two estates on all routes into and out of Sutton.

PPG 17 suggests there are already reservations.

**Site SC 044.** West of Hazel Grove.

The merging of settlements would be complete.

SC 044 represents an alarming encroachment on valuable Grade 3 farmland and extension of the village to the West. The pressure on the invaluable Local Area of Biodiversity of Lyndhurst Wood would result in its becoming Vandalised Urban Wood rather than the valued haven of

environmental interest and tranquillity it is at present.

[Site SC 048.](#) East of the Ellers.

An unacceptably large site on rising land, visible from the Aire Valley (and even further afield to the North-East?).

Its 70 houses, facing North, could be enhanced by planting.

The challenge that is The Ellers Road should give pause.

Pressure on the Local Biodiversity site of Ancient Woodland in Sutton Clough should not be overlooked.

[Site SC 050.](#) See note on SC041 including SC 039.

An enlightened approach to restricting build numbers in order to achieve landscape enhancement, while allowing flood mitigation would seem an appropriate approach here.

[Site SC 073.](#)

The loop-hole of access to the crass proposal to develop Harper's Wood could profitably be closed.

[Site SC 069.](#) East of Throstle Nest Farm.

Being outside the settlement boundary, to the West and on rising ground with no access, SC 069 would seem unacceptable.

[Site SC 074.](#)

That this key landscape dominant feature should be considered at all would be crass.

## **COWLING**

I am confining my remarks to a single Assessment Site in Cowling where an important recently designated biodiversity site has been overlooked.

[CW 001.](#)

In April 2012, Bannister Wood to the North was designated as Ancient Woodland by Natural England.

The pressures that a 92 build development nearby would put on the rich biodiversity of this woodland would be unacceptable.

The site is outside the built-up area and would have acknowledged access problems - Lane Ends Lane is narrow and already has a collision history and a dangerous junction to the North, while the A6068 at this point has a history of poor driving. Moreover, Lane Ends Lane is bordered to the West by an Important Hedgerow (possessing at least 4 characteristics), lacking any designation to protect it.

## MID CRAVEN

### **B HELLIFIELD 5 Years supply at 3 per annum = 15 houses**

**The two sites below fulfill the five year requirement for Hellifield.**

**All other sites should be excluded.**

There is no requirement for overcapacity. Hellifield has seen more than its share of growth over the last few years. Further growth is unacceptable. (see Village Plan produced by the PC). Local opinion high in Hellifield: Hellifield is a living village with a thriving community. Further development would be detrimental at this stage.

Access to the railway station is congested with limited parking provision.  
See Draft Profile for Hellifield

#### HE005 Land to the west of Gisburn Road Black horse site 11 Houses

This site would be classed as brownfield and infill  
no reason to exclude this site

#### HE006 Car sales show room and forecourt with land 6 houses

no reason to exclude this site

Extant planning available. 100% brownfield site

The site below, out of all the sites available could be considered in the event of the above two sites being unsuitable. However we would recommended reducing the housing capacity by approximately 60% and using the land closer to the village's built environment.

#### HE011 26 houses East of Thornfield Road, off Skipton Road

Access onto the A65 hazardous.

Trees on the site

Multi ownership of the land

**100% agricultural greenfield**

However, the impact on the village itself would be less than other proposed sites

**Remaining sites:**

## HE008 Between Gisburn Road and the Railway line 78 houses

### **100% Greenfield, agricultural land**

The loss of any agricultural or grazing land should be avoided where at all possible however this site backs on to the railway line, does not have any watercourses or listed buildings.

### **Sites for exclusion**

#### HE 001 land at Station end of Station Road. 29 houses

reasons for excluding this site.

1. Southern end is playing field . This area used daily and a highly valued asset to the village. The playing field is meticulously managed by the Parish Council.
2. Assuming the retention of the playing field, any further increase in road traffic would increase the potential for accidents
3. Station road is owned in part by the residents.
4. Station road is already stretched to capacity with the railway traffic and new housing. Access is frequently difficult due to volume of traffic and parked vehicles. see image
5. The Station road area has already been the site of development (Station Court) any further development would be harmful to the amenity of residents.
6. The northern end falls into the Settle Carlisle Conservation area:
7. Site is within 500 Meters of Recorded Great Crested Newts.Probable Hibernation area
8. HE001 is a known area for badger foraging
9. Development would impact adversely on the setting of the Hellifield Railway Station, a grade 2 listed building which is one of the best illustrations of Victorian architecture and used by the Settle Carlise railways which provides tourism for the area.
- 10.Drainage is already a problem for existing houses on Station Road, further development would exacerbate an existing problem.
- 11.The site is on the border of the Yorkshire Dales National Park

### HE 004 Land south of Park Avenue adjacent to the railway line 62 houses

reasons to exclude this site

This Site has been identified by the Environment Agency, in the Village Plan 2012, as being almost entirely

Flood Zone **3** area

This is understandable as this site is dissected by the Hellifield Beck Watercourse.

It would seem that the only option to prepare this site for Housing would be to Culvert the Beck.

It is known that culverts can have a serious effect on the aquatic life in our watercourses, and cause problems with the biodiversity upstream,

### HE007 South of Sunningdale House and Hellifield House 36 houses

Reasons for exclusion

1 100% Greenfield and agricultural land

2 Cannot be viewed as in fill,

3 outside development limits

4 Hellifield House is according to English Heritage, a grade 2 listed building

5 Rook Cottage (former Toll Bridge) and St Aidan's Church are both Grade 2 listed in close proximity to this site in fact a substantial proportion of the Listing for Hellifield

exist close to or bordering on this site.

6 Planning Permission has been granted for houses on the Hellifield House site and further development in this area would be unacceptable.

7The site backs on to open countryside.

### HE009 55 houses land south of Townson Tractors off Kendal Road

Reasons to exclude this site

1) within 500 m of a SSSI

2) Open countryside

3) 100% agricultural fields

4) Access via unadopted road

5) Flood risk

6) Land under numerous ownerships

Site HE012 garage site off Park Crescent

This tiny site would only be the access for Site HE004. would not be required if HE 004 is rejected.

HE013 - Late addition to SHLAA - no information available on line contra to statement by Sian Watson at Village meeting in July 2013. As of September 2013 still no information on line.

Source for information:

<http://www.cravencdc.gov.uk/CHttpHandler.ashx?id=5920&p=0>

Addition information in relation to Hellifield

Correspondence and supporting evidence

Examples of comments received in relation to proposed sites in Hellifield.

From: [SBrown](#)

To: [j](#)

Subject: RE: HEOO1 Hellifield

Date: Wed, 17 Apr 2013 09:56:48 +0000

Dear Mr Sharpe,

Thank you for your email.

Part of the Hellifield Station road site is playing fields and has a restrictive lease on it and I am also of the view that the playing field area should have been removed before this stage of the process. I have arranged an meeting with Council property services department to go through the Council owned sites that remain in the process to make sure there are no other Council owned sites like this that incorrectly remain in the site assessment process.

I acknowledge the points you raise in relation to how we shape a policy approach for Hellifield in a new Local development Plan given that the settlement has received more proportionate housing growth than any other settlement in Craven in recent years. Informal public consultation is scheduled to take place in early summer on the strategy for the scale and distribution of housing in the District (outside the National Park) and on the information collected on individual sites.

Regards,

Stephen  
Stephen Brown  
Principal Planning Officer (Planning Policy Team)  
e: [SBrown@cravenc.gov.uk](mailto:SBrown@cravenc.gov.uk)

**To:** Stephen Brown  
**Subject:** HEOO1 Hellifield

Dear Mr Brown,

i am very shocked and appalled to hear that part of station road playing field could be taken away for the building of yet more housing in that area. Although i do not live in that area i do live at the west end of Hellifield. my Grandchildren go along to play on the play area regularly and often on their own this promotes their independence and also gives them exercise and fresh air and i know this applies to many other children living in my area.

Station road at this present time is a very difficult place to negotiate in a car and travelling to the station or the houses up there can be quite a concern.

Many years ago you will remember a promise of a new road to the Station and how these plans failed to provide any relief for this area, which was a concern even then. I struggle to remotely imagine why you should even be considering this already bottle neck of a road that has already had more than its fair share of housing.

I also understand that money was provided for the playing field from the new housing to upgrade this and that the young people of the village have raised money to put a track down for their use.

It would seem that Hellifield has been targeted yet again with housing despite the local feeling that 40% increase is quite enough.

I know you are keen to see more development in Hellifield that became apparent when you came to visit our PC meeting but i believe you are also aware of Public feelings.

Hellifield seems to be an easy target we have been fighting development and the wrecking off Hellifield flashes for many years and this again having devastating effect on Station road and its residents.

I would therefore ask this to be removed from your housing plan as the consequences of this could be devastating to the area.

with Regards  
Tim Sharpe



HE007

The land in question is 100% Greenfield and Agricultural Land, prime grassland where the Hellifield Highlanders breed.

The way the land is managed attracts many species of birds, in fact there is permanent bird activity where the cattle graze.

I would not like to see this area of land ruined by development.

Hellifield has already far exceeded the housing quota when the Auction Mart site was developed.

I hope someone can see sense and realise that food production is more important than jobs for developers and builders.

Andy Holden. Resident Hellifield

Dear Sir,

I am sending this to register my strong disapproval of any further large scale development in Hellifield.

The village has already been doubled in size with the development of the old auction mart site. There are many

houses for sale on this site and throughout the village which are proving hard to sell without further building.

There is no industry here and very few jobs within a ten mile radius. I believe the school is full. The A65 is

becoming increasingly busy, it often takes 5 mins to get across the road. All the green spaces which give the

village its' character and appeal are disappearing. It seems like Hellifield is always the easy option for Craven's unpopular policies, because we are just outside the national park, and because people generally don't complain.

Enough is enough, if they want more houses let the councilors and politicians build in their own backyards.

John McGeoch  
The Green  
Hellifield

He001 To whom it may Concern

As a resident of Hellifield for almost 50 years I am dismayed to find out that you may be giving consent to build up to another 29 houses in Station Road (site HE001). As a resident of Station Road I find this very disturbing, you obviously have never tried to access this Road on an evening or when a steam train is coming to the station.

I understand the playing fields are part of the planned area to be used, surely this cannot be so! The village was given money from the previous development in Station Road (Station Court) which was used to upgrade the playing fields and only last Week thousands of pounds was spent by the Parish Council installing a pump track for bike/skateboards to be used on. My 13 year old son and many other Hellifield youths have spent numerous hours enjoying the playing fields and its fantastic upgraded equipment. Are you planning to just destroy this? On the Television daily there are reports that the kids of Today do not get enough fresh air/exercise etc because they spend too much time on their electronic gadgets, If you take away the playing fields then they will have nothing to encourage them to go out and get some of the lovely fresh air which we are blessed to have in the countryside.

The top end of the planned site (Station end) is a very pretty part of the village, The woodland has numerous trees, Horse Chesnut, Sycamore, Ash and many more. It is also home to other habitants such as Pheasant, Rabbit, Squirrel, Stoats, Frogs, Newts need I go on.....

The Residents of Station Road, Midland Terrace are sick and tired of the threat of further development, For the last 19 years at least there has been the threat of development at the back and now the chance of further development at the front. When is this going to stop!

I work outside the village and return home usually around 6.15pm, Only last Week I had to wait 10 mins ½ way down the road whilst a supermarket delivery van delivered shopping to a resident. There was nowhere for him to park whilst he delivered as there were cars parked on either side of the street. When a steam train comes to the station which is usually on Wednesdays, Saturdays and Sundays the volume of traffic is immense, The visitors have no regard for speed limits or where they park their cars (see attached photos).

The road leading up to the station is also unadopted and the residents are responsible for the upkeep as most on the left hand side own to the middle of the road. The drainage is practically nonexistent, From the Station down to 87 Station Road there is one drain which has to cope with all the water coming down from the station end.

I please urge you to consider removing this site from your list of areas to be developed and preserve the natural beauty and the fantastic amenities which we have at the moment.

Regards Sally Gregory Frustrated/Dismayed Resident of Staion Road Hellifield

Hellifield continued (updated August 2013)

Following a presentation in the village institute on July 19<sup>th</sup>, villagers were dismayed to find a further site with little information had been added to SHLAA. Statements made by representatives of CDC created ill feeling amongst many of those gathered. Representatives of the Parish Council, Save OUR Craven Countryside and CPRE Craven were amongst those in attendance.

Whilst it has been reported that the villagers were angry, this was a result of the lack of consistent objective and informed comment by those representing CDC. Blame for development was laid at the Parish Council's door.

Frustration due to misinformation cannot be used as an excuse to deride a community view.

The local group SoCC reported the issue to the Parish Council who met with CDC to discuss the controversial comments made by CDC representatives. id

## **GARGRAVE**

The following comments have been received from residents within Gargrave:

Serious concerns were raised at a meeting of parishioners and PC members at a meeting on the 8<sup>th</sup> of June 2013 regarding the sewerage system and flooding within Gargrave.

**GA025, GA022 and potentially GA009** already suffer from flooding during heavy rainfall periods (which appear to be increasing at certain times of the year).

Flooding from Ray Bridge Lane causes problems on the A65 every year. Villagers proposed that a meeting should be arranged with Yorkshire Water to discuss this issue as it was felt that Gargrave could not not manage any further stress to this system.

**GA004 (site of NYCC Home for the Elderly) Neville House, Neville Crescent**

19 Houses proposed.

The number of houses on this site should be reduced and perhaps homes suitable for the elderly should be considered.

**GA017 Low Green Farm, Middle Green 96 houses**

Agricultural Buildings and land, predominantly greenfield, outside the development limits of Gargrave, with FZ3B risk covering the north east and centre of site. This is

in the river valley, with trees on site and a proposal for 96 houses. Recommend reduction in number of houses to utilise the brownfield aspects only and retain the agricultural land. The grade 3 status of this land should be recognised for its value to food production and the economy of Craven. Whilst scant recognition of the value of agriculture is paid within the CDC plans, we submit that agriculture is responsible for production of food, the maintenance of the hedgrows and walls that form the character of Craven and ultimately leads and contributes to the area's popularity as a tourist destination.

#### GA20 West of Primary School, east of Anchor Bridge 27 houses

CPRE recognises the importance of agricultural land in Craven, this falls into classification 3 which is considered Best & Most Versatile Land and should be protected for food production. The site is 100% greenfield and outside Gargrave Village development limits.

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#### GA022 Land to the west of Ray Bridge Lane 109 houses

100% Greenfield land outside the development limits. Grade 3 Agricultural land meaning Best & Most Versatile. There are mature trees and aged hedgerows on site. The housing proposal is for 109 houses where there is a clear and present danger of flooding see para entitled **GA025, GA022 and potentially GA009**. However, it is acceptable to continue the linear development of houses along the Eshton Road to meet Ray Bridge lane - this would be in keeping the character of Eshton Road.

#### GA025 Land North of Skipton Road, to east of cricket and football ground 129 houses

Grade 3 Agricultural land providing high standard of grazing land in an area where little land falls above the categorisation for Best & Most versatile land. This classification of land should be valued and maintained for food production. There is already in place a national beef shortage and every effort should be maintained to protect land of this categorisation. Craven is a key area in meat production, this land is used to fatten cattle and sheep before selling on to other areas in England.

The area is outside the development limits of Gargrave containing mature trees and protected hedgerows. Again para **GA025, GA022 and potentially GA009** applies.

## GA026

There is concern regarding the permissions already granted for the construction of three storey houses behind existing two storey houses overlooking the canal. These three storey houses would overlook the canal. The site has two TPO'd mature trees and again concerns raised regarding the sewerage system's capacity to cope with increased workload.

Document ends last updated 10 June 2013