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Dear Colin

**Craven District Council Local Development Framework
Core Strategy Development Plan Document Preferred Options Draft**

The Yorkshire and Humber Assembly welcomes the opportunity to comment on the Craven Core Strategy Development Plan Document (DPD) and to continue its involvement in the development of a coherent spatial planning framework for the region. The comments offered in this letter are intended to be within the spirit of continued and productive joint working.

At this stage, the Assembly's response to the consultation document is a set of officer comments. The aim is to highlight where issues related to general conformity with the Regional Spatial Strategy might arise. When the Core Strategy DPD is submitted to the Secretary of State a formal Assembly view on its general conformity with the Regional Spatial Strategy will need to be given.

The following officer comments are made in relation to the existing Regional Spatial Strategy for Yorkshire & the Humber (based on the selective review of RPG12 issued in December 2004) and the draft Regional Spatial Strategy – the Yorkshire and Humber Plan (submitted to the Secretary of State in December 2005).

The comments place emphasis on the draft Regional Spatial Strategy (RSS), which reinforces and develops the general thrust of existing RSS. Paragraph 4.19 of PPS12 makes it clear that an RSS under preparation gathers more weight as it passes through its preparation process. It states that

“Where the regional spatial strategy... has been through an Examination in Public, and the Proposed Changes have been published, considerable weight may be attached to that strategy because of the strong possibility that it will be published in that form by the Secretary of State”.

The Assembly has therefore referred to the Proposed Changes to the draft RSS (published at the end of September 2007) in this response but would like to make it clear that the Assembly will be commenting on the Proposed Changes and that the final RSS is expected to be published in Spring 2008.

General Conformity with the Regional Spatial Strategy

As you know, the Planning and Compulsory Purchase Act 2004 introduced mechanisms to help ensure that Development Plan Documents (DPDs) drawn up by Local Authorities as part of the Local Development Framework (LDF) are in general conformity with the Regional Spatial Strategy (RSS). The intention is to ensure that DPDs are contributing to the delivery of the RSS and that the two strands of the Development Plan for an area (the RSS and DPDs) are mutually supportive and not in conflict.

We are therefore pleased to see that references to the RSS, including an explanation of the need for 'general conformity' between the RSS and the LDF, are made at the start of the document. This demonstrates the need for strong links between the LDF and the RSS and also helps to clarify the significance of references to the RSS throughout the document.

In addition, it would be helpful if the dates and status of the current and draft RSS were explained in the DPD. For clarification, current RSS was published in December 2004 and draft RSS was published in December 2005. The Panel Report of the Examination in Public of the RSS was published in May 2007 and the Secretary of State's Proposed Changes were published on 28 September 2007. The Yorkshire and Humber Plan is due to be published in early 2008.

Summary of comments

Overall, the DPD reflects the policy direction of current and draft RSS. In particular, the Assembly supports:

- The introductory explanation of the RSS and the need for general conformity

- The way in which the rejected options, reasons, justification and supporting evidence are clearly presented for each preferred policy option
- The overall settlement hierarchy and approach to the location of new development
- The approach to the economy and employment land distribution and the use of an up to date evidence base to inform this approach

The Assembly would wish to see changes to the DPD to ensure that:

- The distribution of new housing between settlements is focused on the Principal Service Centre of Skipton in line with the draft RSS
- The proportion of new housing built on previously developed land in Craven contributes to the overall regional target of 65%
- The Core Strategy helps to address a sub-regional shortfall of at least 57 pitches for Gypsies and Travellers by 2010

These points are expanded on in Annex A.

I trust that these comments are helpful to you as you prepare the Core Strategy for submission. If you wish to discuss any of the points made here please do not hesitate to get in touch. We look forward to continuing to work with you on your DPD.

Regards



Jenny Poxon
Head of Planning Delivery and Conformity

Annex A

General Comments

The Assembly welcomes the clear structure of the document and particularly likes the way in which each preferred policy option is accompanied by information about previous consultations; other plans and strategies; evidence; the SA/SEA; delivery mechanisms and rejected options. To further enhance the structure of the document, the Assembly would like to see the Settlement Strategy chapter moved to the front of the Core Strategy to set the context for the thematic policies and to provide a written explanation of the key diagram.

Vision, Objectives and Key Diagram

The Yorkshire and Humber Assembly welcomes the vision and spatial objectives, which support the core approach of draft RSS. We particularly welcome spatial objective 5, which seeks to accommodate future population and employment growth as well as local needs and demand in line with the RSS. The Key Diagram could be clearer if the larger settlements were named on or next to the diagram. In addition, moving the Settlement Strategy chapter to the beginning of the Strategic Spatial Policies section would help to explain and clarify the Key Diagram.

Sustainable Infrastructure

We support Policy INF1, which seeks to secure community services and benefits through the use of planning obligations. Draft RSS Policy ENV11 requires development strategies, plans and decisions to improve the health of residents in line with the Regional Strategic Framework for Health and ensure adequate and accessible health care facilities. We therefore welcome Policy INF2, which refers to the need to ensure provision of adequate healthcare facilities, particularly given the context of an ageing population. It should be noted that the Proposed Changes suggests amendments to this policy.

Both current (Policy T2) and draft RSS (Policy T3) include accessibility criteria. Policy T3 (d) of draft RSS states that Local Authorities should use the public transport accessibility criteria, as set out in Tables 16.8 and 16.9 to guide the allocation of sites in development plans. The Secretary of State's Proposed Changes to the draft RSS amends Policy YH8 of the core approach to reinforce and further strengthen this requirement. The Assembly therefore welcomes part iii of Policy INF3, which refers to the accessibility criteria of the RSS. Policy INF3 (vii) also refers to the parking standards of Policy T2 in the draft RSS. It should be noted that the Proposed Changes amends Policy T2 to require more restrictive standards in city and town centres.

Craven falls within the Remoter Rural sub area in the draft RSS. Policy RR1 (d) sets a transport priority for the sub area to encourage innovative public transport initiatives – both road and rail and new cycling and walking facilities for residents and visitors to improve access to service centres and to more distant larger centres. It should be noted that the Proposed Changes retains this priority but adds an additional focus on retaining and improving public transport. The Council should also note Policy T5 (transport and tourism) and Policy T8 (rural transport) of draft RSS which are of particular relevance to Craven.

Sustainable Construction

The Yorkshire and Humber Assembly supports Policy INF6 that requires new developments to incorporate high quality design and sustainable forms of production. In particular, the Assembly welcomes the expectation for developers to achieve recognised sustainable construction standards such as the Department for Communities and Local Government's Code for Sustainable Homes and BREEAM ratings for commercial buildings.

Draft RSS Policy ENV5 sets an indicative renewable energy generation target for Craven of 17.6MW to 2010. We are pleased to see that the Core Strategy refers to this target but would like to see Part 1 of Policy INF7 specifically state this figure. It should be noted that the Proposed Changes to RSS sets a target of 18MW to 2010 and 48MW to 2021. The Core Strategy already refers to the need to ensure that 10% of energy to be used in sizeable developments comes from on-site renewable sources. This is in line with draft RSS Policy ENV5. Proposed Changes removes the 10% target from the RSS policy but requires Development Plan Documents to set an appropriate local target for on-site renewable energy generation bearing in mind the 10% standard but with an expectation for greater percentages where it is feasible and viable.

Settlement Strategy

Policy YH8 (A) of draft RSS sets out principles for the location of development and focuses the majority of new development on the Regional and Sub Regional Centres (Towns); followed by the Principal Service Centres (Towns) and finally the Local Service Centres. The Proposed Changes to draft RSS do not change this focus. The Assembly therefore supports the Core Strategy's settlement strategy. The settlement strategy identifies Skipton (a Principle Town) and Settle, Glusburn/Crosshills and High Bentham (Local Service Centres) as the main locations for new development. It is important that the Core Strategy is clear about the amount of development to be directed to settlements below the Local Service Centre level and that any development in the smaller local service centres, villages and open countryside is to meet local needs only and does not undermine the core approach of the draft RSS.

Policy YH8 (B) of draft RSS sets out guidance for the location of development and allocation of specific sites within towns and requires local planning authorities to adopt a sequential approach which gives first priority to the re-use of previously developed land and buildings, followed by other suitable infill opportunities within towns and then to planned growth areas on the periphery of or well related in public transport route terms to towns. Part C of Policy YH8 requires a transport-orientated approach to ensure development makes best use of existing infrastructure and capacity; is focused along existing or planned public transport corridors; maximises accessibility by public transport, walking and cycling and maximises the use of rail and water for uses generating large freight movements. Policies SS1 – SS5 of the Core Strategy are in general conformity with this approach.

Housing

Draft RSS sets a housing provision target for Craven of 250 homes per annum in the period 2004-11, 200 in the period 2011-16 and 180 in the period 2016-21. It should be noted that the Proposed Changes has removed the three time phases for delivery and sets Craven targets of 250 homes per annum (2004-8) and 180 homes per annum (2008-2026). The Council should ensure that Policy HO1 of the Core Strategy is in line with the housing figures contained in the RSS.

The Core Strategy should ensure that the main local focus new housing development is Skipton in order to support and enhance its role as the Principal Town for Craven, in line with the draft RSS. Given that Skipton is the only Principal Town identified for Craven, the Assembly would suggest that at least 50% of new housing development should be located in Skipton. After Skipton, the focus should be on the Local Service Centres. It is vital that the proportion of development directed to smaller settlements below Local Service Centre level does not undermine the core approach of the draft RSS.

The Assembly welcomes Policy HO3 that requires all housing developments to make full and effective use of previously developed land. Draft RSS (Policy H1) sets a regional target of 65% for the proportion of housing development taking place on previously developed land and through conversions of existing buildings. For Craven, draft RSS sets a target of 70%. It should be noted that the Proposed Changes removes targets for individual districts but maintains the regional target of 65%. Policy HO3 should contribute to achieving this 65% target.

Both current and draft RSS (Policy H4) set out guidance on housing mix. Draft RSS requires Local Authorities, Sub Regional Housing Partnerships and developers to ensure the provision of homes for a range of size, type and tenure of household that reflects the needs of the area. Work currently being undertaken by Ecotec on behalf of the Assembly and Government Office on Strategic Housing Market

Assessments will provide evidence on the mix of housing required in Craven and, once completed, should be used to inform Policy HO4 of the Core Strategy.

Policy H3 of draft RSS advises that for developments of more than 15 homes or sites of more than 0.5 hectares in areas of high need, Local Authorities should look for over 40% of the total number of dwellings to be provided to be affordable. The Regional Housing Strategy 2005 identifies affordable housing need in the North Yorkshire districts as high and the Craven Housing Needs Assessment indicates a need for 238 affordable homes per year. The emphasis on delivering affordable housing and the requirement for 60% of housing on all residential and mixed use development sites to be affordable is clearly justified in view of this high level of need. It should be noted that the Proposed Changes requires targets to be set locally in the Local Development Framework but maintains the provisional estimate of at least 40% for the North Yorkshire districts.

The Assembly welcomes the intent expressed in Policy HO8 to set out a criteria-based policy to determine planning applications for Gypsy and Traveller sites. The Proposed Changes to draft RSS requires the Region to meet housing needs of Gypsies and Travellers to address an overall shortfall of at least 255 pitches across the region. The Proposed Changes requires North Yorkshire to address a shortfall of at least 57 pitches by 2010.

Economy

Draft RSS establishes a context and methodology for Local Planning Authorities to undertake employment land reviews. The Proposed Changes reinforce this requirement (Policy E3). Having an up-to-date and robust evidence base is vital for informing and justifying the policies of the Core Strategy. Craven District Council should therefore be commended for having a draft Employment Land Review.

For Craven, draft RSS forecasts a net change of 1 to 8 hectares in total employment land to 2016. The Proposed Changes gives a figure for industrial and storage/distribution land, which for Craven is 0 hectares to 2021. The Core Strategy seeks to provide 37.5 hectares, which differs from draft RSS and the Proposed Changes. However, the Assembly assumes that the Core Strategy figure is based on up-to-date and robust local evidence.

Both draft RSS and the Proposed Changes provide guidance on the portfolio of employment land required in each district across the region. In both documents, Craven is described as requiring an employment land portfolio that is based on small to medium high quality specialist sites located in accordance with the RSS Core Approach. Draft RSS also states that an investigation should take place on the ability of Skipton to accommodate new sites suitable for distribution/warehouse uses.

Policy EC1 positively supports the settlement strategy and economic objectives of the draft RSS, which are carried through in the Secretary of State's Proposed Changes. It is pleasing to see that it is proposed to direct the majority of employment land provision to Skipton, the Principle Town. It would be helpful to refer explicitly to the sequential approach for allocating employment sites, in line with Policy YH8 of draft RSS. It should be noted that minor changes to this policy are put forward by the Proposed Changes to draft RSS.

Environment and Design

Policy ED1 which seeks to ensure environmental protection within the Forest of Bowland Area of Outstanding Natural Beauty is in line with Policy ENV10 of draft RSS which seeks to safeguard and enhance landscapes that contribute to the distinctive character of Yorkshire and the Humber and specifically names the Forest of Bowland. The Proposed Changes puts forward amendments to this policy but does not remove the reference to the Forest of Bowland.

Policy ENV11 of draft RSS states that all development strategies, plans and decisions will improve the health of residents by safeguarding and enhancing facilities for sports and recreation. The Assembly therefore welcomes Policy ED5 of the Core Strategy which supports the approach of the draft RSS. It should be noted that the Proposed Changes amends Policy ENV11 to *provide* as well as to safeguard and enhance facilities for sports and recreation.