

Table 1

Craven District Council Comments on Gargrave Draft Neighbourhood Development Plan

Consultee Name Address Ref. No.	Page No.	Para. No.	Vision / Objective / Policy No.	Support / Object / Comment	Comments received	Parish Council Consideration	Amendments to NDP
Craven District Council 1.	4			Comment	Which statutory bodies were consulted in the draft plan and what were the comments received.	<p>Noted.</p> <p>A list of consultation bodies is provided in the accompanying consultation statement. This document also sets out the responses submitted and how these have been considered and any resulting changes in the Plan.</p> <p>Refer to the above in the text.</p>	<p>Amend Plan.</p> <p>Insert new para 1.9:</p> <p>“Winter 2015 to Spring 2016 – Formal Public Consultation on Draft Plan</p> <p>1.8 The Draft Plan was published for two periods of formal public consultation under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 from 5 November to 21 December 2015 and from 8 February until 21 March 2016. The second period of consultation was undertaken because due to an error some consultation bodies were not informed of the first consultation period.</p> <p>1.9 The Consultation Statement sets out more information about this process and includes a complete list of all the representations submitted by</p>

							consultation bodies, local people and community groups, and how these have been considered and any resulting changes in the Plan.”
2.	7	Map		Comment	<p>There have been recent changes to the Gargrave Parish boundary. What are the intentions re the NP boundary, an increased NP boundary would require further consultation?</p> <p>If the intention is to reflect the revised boundary of the Parish this will need consultation</p>	<p>Noted.</p> <p>The designated area will remain the neighbourhood plan boundary, although this differs from the Parish Council boundary which was subsequently amended to include Stirton with Thorlby.</p> <p>Amend Plan.</p>	<p>Amend Plan.</p> <p>Amend wording of last sentence in para 1.2 to:</p> <p>“The designated area boundary is shown on Map 1 above. (The Parish Boundary contains Stirton with Thorlby which was combined into Gargrave in April 2014 but this part is not within the designated neighbourhood area.)”</p>
3.	11	2.1		Comment	<p>We are hopeful of adoption of the CDC Local Plan in 2017 rather than 2015. This has been delayed due to the time taken to get evidence in place.</p> <p>Amend final sentence of paragraph to read, Craven District Council are currently preparing a Local Plan, for the part of Craven which lies outside of the Yorkshire Dales National Park, the current timetable works towards an adoption date during 2017.</p>	<p>Accepted.</p>	<p>Amend Plan.</p> <p>Insert new text after 2.1 to read:</p> <p>“Craven District Council are currently preparing a Local Plan, for the part of Craven which lies outside of the Yorkshire Dales National Park, the current timetable proposes an adoption date during 2017. “</p>

4.	12	2.6		Comment	<p>The Local Plan for Craven has a plan date of up to 2032 (revised in light of likely 2017 adoption), the beginning date is 2012, thereby making the plan length twenty years. The plan length therefore will align with the Council's Strategic Housing Market Assessment. At five dwellings per annum this would mean 100 dwellings, rather than 75.</p> <p>Craven District Council are working on the preparation of a Local Plan with a plan period from 2012 to 2032 to reflect a likely adoption date of 2017 and to align with evidence in the updated Council's Strategic Housing Market Assessment. Policy SP4 of the revised draft consulted on in March 2016, identifies that Gargrave will be expected to provide around 5 dwellings per annum over the 20 year plan period i.e. around 100 houses.</p>	Accepted.	<p>Amend Plan.</p> <p>See below.</p> <p>Amend Front cover to reflect new Local Plan dates.</p>
5.	12	2.6		Comment	<p>It is no longer intended to allocate employment land within Gargrave within the Local Plan.</p>	Noted.	<p>Insert additional text at the end of 2.6: - see below</p>
6.	12	2.6		Comment	<p>The plan refers to the Craven district level rather than Craven Local Plan level. Within the district there are two Local Plans being prepared, one for the area outside of the Yorkshire Dales National Park (the Craven Local Plan) and the other for the area</p>	Accepted.	<p>Amend Plan.</p> <p>Amend text to read:</p> <p>"Within Craven District there are two new Local Plans being prepared, one for the area outside of the Yorkshire Dales</p>

				<p>including the National Park (as well as parts of the National Park outside of Craven). This plan is being prepared by the Yorkshire Dales National Park.</p> <p>The emerging Local Plan identifies Gargrave (alongside Ingleton and Glusburn/Cross Hills) as Local Service Centres within the plan area (tier 3 of the settlement hierarchy).</p> <p>Change reference from Craven District Level to Craven Local Plan. Insert reference re recognition of Gargrave’s role as a Local Service Centre.</p>	<p>National Park; the Craven Local Plan 2012 – 2032 by Craven District Council¹ and the Yorkshire Dales National Park Local Plan 2015 – 2030² for the area including the National Park (as well as parts of the National Park outside of Craven). This plan is being prepared by the Yorkshire Dales National Park.</p> <p>2.3 The emerging new Craven Local Plan identifies Gargrave (alongside Ingleton and Glusburn/Cross Hills) as Local Service Centres within the plan area (tier 3 of the settlement hierarchy).</p> <p>2.4 The new Craven Local Plan has a plan period from 2012 to 2032 to reflect a likely adoption date of 2017 and to align with evidence in the updated Council’s Strategic Housing Market Assessment. Policy SP4 of the revised draft consulted on in March 2016, identifies that Gargrave will be expected to provide around 5 dwellings per annum over the 20 year plan period i.e. around 100 houses. Craven District Council has advised that it is no longer intended to allocate employment land within Gargrave within the Local Plan.</p>
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¹ <http://www.cravendc.gov.uk/newlocalplan>

² <http://www.yorkshiredales.org.uk/planning/planningpolicy/future-policy>

							2.5 The National Park published a draft Local Plan for consultation in the summer of 2015. There are no specific proposals for Gargrave as the settlement in the main lies outside of the Park area. Any development proposed for the area that form part of the Park will need to be considered in the context of the existing and emerging Yorkshire Dales National Park planning policies.”
7.	14			Comment	<p>The text identifies a number of non-designated built heritage assets. There could be potential here for a local list policy which seeks to specifically protect these assets.</p> <p>Consider potential for local list policy.</p>	Accepted.	<p>Amend Plan.</p> <p>Insert new Policy and supporting text to protect non designated heritage assets.</p> <p>Insert new wording after para 6.3.9 (after historic photos) and renumber others:</p> <p>“In addition to the numerous statutorily protected heritage assets, Gargrave has a number of locally significant heritage assets which are considered worthy of protection. These include for instance the cricket pavilion, Summer Seat and the railway waiting room on the platform for trains to Hellifield and the north.”</p> <p>Insert new policy (and renumber others):</p>

							<p>Policy G? Protecting Local Heritage Assets</p> <p>Designated and non-designated heritage assets enhance local distinctiveness and should be preserved in a manner appropriate to their significance. All development should seek to protect and, where possible enhance, both designated and non-designated heritage assets and historic landscape character, and put in place measures to avoid or minimise impact or mitigate damage.</p>
8.	14			Comment	<p>The Council has commissioned consultants Alan Baxter to undertake Conservation Appraisals for those Conservation areas within Craven currently without an up to date appraisal, including Gargrave. The appraisal has identified a number of important buildings and key views. It would be good to mention this within the document.</p>	<p>Accepted.</p> <p><i>Publish the Assessment of Proposed Local Green Spaces as a separate background document as part of the Submission NDP's evidence base..</i></p>	<p>Amend Plan.</p> <p>Insert additional text after new 6.3.9 as above.</p> <p>6.3.11 Craven District Council has commissioned Conservation Appraisals for those Conservation Areas within Craven currently without an up to date appraisal, including Gargrave. The appraisal for Gargrave has identified a number of important buildings and key views and considers those elements which contribute to the special character of the area such as materials, scale, height, massing etc. The Parish Council supports the principles in the document and the neighbourhood plan</p>

							<p>brings these forward into the planning policy below. (Significant views are considered in Policy G11 below).</p> <p>Policy G6 New Development in the Conservation Area</p> <p>New development in the Conservation Area is required to respond positively to the area’s distinctive character and should be designed to enhance the setting of existing buildings and open spaces.</p> <p>Designs should seek to maintain the existing height and scale of buildings in the two character areas as described in the Conservation Area Appraisal. In Character Area 1, buildings should consider carefully the surrounding buildings and be of 2 or 3 storeys, with pitched roofs and front the back of pavement or be set behind low stone walls and small front gardens. In Character Area 2 development should be less dense and more rural in character, with a maximum of two storeys. Use of traditional materials is encouraged including incorporation of the following:</p>
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							<ul style="list-style-type: none"> - Yorkshire gritstone for walls, set in random courses - Tooled gritstone around windows and for gateposts - Grey slates for roofing such as Yoredale sandstone and Westmoreland slates - Timber framed windows. Upvc replacement windows detract from the character of the Conservation Area and are not encouraged. <p>Renumber other policies.</p> <p>Insert new wording in new paragraph 6.3.12:</p> <p>“The Conservation Area Appraisal recognises the role of all the proposed local green spaces as open spaces that make a strong contribution to the character and appearance of the Conservation Area (see Map X above – refer to Conservation Area map already included in the Plan). More detail about this is provided in the background document, Assessment of Proposed Local Green Spaces, using the Craven District Council Methodology”.</p>
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							<p>In addition, insert Conservation Appraisal map after new para 6.3.10.</p> <p>Jpeg to be provided by CDC</p> <p>Insert new paragraph after 6.3.23:</p> <p>“ The Conservation Area Appraisal identifies a number of significant views which contribute to the character of the Conservation Area. These have been carried forward into Policy G11 below.”</p> <p>Insert new wording into Policy G11 Protecting and Enhancing the Rural Landscape Setting of Gargrave:</p> <p>“The following views are identified as significant in the Conservation Area Appraisal and are indicated on Map X. Development should be sited and designed to enhance and better reveal these views and should not obstruct them. The approach should be set out clearly in any design and heritage statements.</p> <p>The Significant Views are:</p> <p>View 1 (HD1 in Conservation Area Appraisal) View out of the Conservation Area looking north along West Street</p>
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						<p>just south of Higherlands Bridge over the Canal with open fields beyond.</p> <p>View 2 (MF1 in Conservation Area Appraisal) From Gargrave Bridge looking along the course of the river to east and west</p> <p>View 3 (MF2 in Conservation Area Appraisal) North towards Gargrave Bridge from just north of St Andrew's Church</p> <p>View 4 (MF3 in Conservation Area Appraisal) Along the Canal east and west from Higherlands Bridge</p> <p>View 5 (MD1 in Conservation Area Appraisal) Views east and west from the Canal towpath along the Canal</p> <p>View 6 (MD2 in Conservation Area Appraisal) The View of the Canal and village from Eshton Road looking south west with fields in the foreground</p> <p>View 7 (MD3 in Conservation Area Appraisal) Views towards the Conservation Area along Church Street and leaving the village along the same road going south</p>
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							<p>View 8 (MD4 in Conservation Area Appraisal) View east over Middle Green from Church Lane</p> <p>View 9 (MD5 in Conservation Area Appraisal) View from Marton Road looking south towards the Scheduled Monument.</p> <p>View 10 (MD6 in Conservation Area Appraisal) View from Marton Road south east towards St Andrew’s Church (across the fields south of Marton Road)</p>
9.	18	4.2.2		Comment	See comment at para 2.6 Change to reflect 20 year plan period	Accepted.	Amend “15” to “20” years
10.	19	4.3.2		Comment	<p>Retail & leisure study is currently being finalised and is expected to be completed imminently. The Retail and Leisure study did not look at Gargrave, as this was not recognised as a larger village centre in the same way as Ingleton and Glusburn & Cross Hills (due to a lack of an obvious concentration of shops and services).</p> <p>Change final sentence to reflect updated evidence.</p>	Accepted.	<p>Amend Plan</p> <p>Delete final sentence of 4.3.2 and replace with:</p> <p>“A Retail and Leisure study has been prepared as part of the evidence base for the Local Plan. The study did not consider Gargrave, as this was not recognised as a larger village centre in the same way as Ingleton and Glusburn and Cross Hills, due to a lack of an</p>

							obvious concentration of shops and services.”
11.	19	4.3.2		Comment	Due to a lack of available evidence the ELR has not set a recommended distribution for new employment land within Craven, but instead recommends an overarching figure of between 28 and 32ha of net new employment land.	Accepted.	Amend Plan. Add in additional text to 4.3.2: “Due to a lack of available evidence the Employment Land review has not set a recommended distribution for new employment land within Craven, but instead recommends an overarching figure of between 28 and 32ha of net new employment land.”
12.	22	4.4.1		Comment	Reference should be made to the SSSI lying within the boundary of the proposed Neighbourhood Plan. Haw Crag Quarry, SSSI. Important for the understanding of carbonate environments in the Craven Basin. Insert reference to Haw Crag Quarry, under natural environment	Accepted.	Amend Plan. Add in additional text to 4.4.1 to first paragraph under the natural environment: “There is a Site of Special Scientific Interest (SSSI) within the boundary of the Neighbourhood Plan at Haw Crag Quarry. This is important for the understanding of carbonate environments in the Craven Basin.”
13	26		Obj 2	Comment	The wording of Objective 2, ‘the level of residential development should not exceed that which is demanded by the Local Plan,’ may not be found to be in the spirit of the NPPF which has a presumption	Accepted.	Amend Objective 2 Point 2 to: “Residential development should be provided in line with the housing requirement in the emerging Craven

					in favour of sustainable development. There should not be a cap on development that is sustainable.		Local Plan, with a presumption in favour of sustainable development”
14.	30	6.1.3		Comment	100 houses rather than 75.	Accepted.	<p>Amend housing figure to 100 in paragraph 6.1.3.</p> <p><u>Paragraph 6.1.10</u></p> <p>Insert up to date Housing Requirement figures provided by CDC at meeting on 19/04/2016. <u>Put into a Table.</u></p> <p>“Dwellings PA: 5</p> <p>Total Requirement 2012 to 2032: 100</p> <p>Net completions 01/04/12 to 31/03/15: 14</p> <p>Residual Requirement (100 – 14): 86</p> <p>Outstanding Consents on sites of more than 5 dwellings at 01/04/16: 29</p> <p>Residual Requirement for allocations (86 minus 39): 57</p> <p>Potential loss of 25 units from Neville House site: 25</p> <p>Total requirement (57 plus 25): 82</p>

							Also amend proposed number of units for each site based on the CDC density of 30 dph and 40 dph for Neville House.
15.	34		Site GA03/2 G2/6	Object	It should be recognised that whilst a Certificate of Lawful Use was granted on this site, thereby being exempt from requiring planning permission. In planning terms an alternative development on a high flood risk site may well not be considered acceptable, particularly for residential use. We would recommend removing this site from the allocations.	<p>Not accepted.</p> <p>The GNP is encouraging sustainable development leading to good planning outcomes within the designated plan area and with respect to the Old Sawmill Site considers development will bring many benefits.</p> <p>Paragraph 104 of the NPPF 2012 states 'Applications for minor development and changes of use should not be subject to the Sequential or Exception Tests' but should still meet the requirements for site-specific flood risk assessments.'</p> <p>Following a site specific flood risk assessment concerns for risk and consequences of flooding can be resolved. Measures to deal with Fluvial Flood</p>	No change.

						<p>Risk, Surface Water Flood Risk, SUDS Compliance and Flood Resilience may be required of an appropriate development and can be designed in.</p> <p>The Old Saw Mill is an historic building which needs attention for its preservation. It's change of use through a sympathetic renovation and conversion will preserve it for now and the future enhancing our built environment.</p> <p>The Old Saw Mill Site scored 85 in the GNP Sustainability Site Assessment which is significantly higher than the score of 80 set for inclusion as a proposed site in the GNP. In The GNP Informal Consultation The Old Saw Mill Site received 36 representations of support and 8 of objection making it a supported site overall by the community. The redevelopment of The Sawmill Site brings an</p>	
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						<p>opportunity to improve the visual impact of the site within this Special Landscape Area.</p> <p>The PC considers that redevelopment of this site brings opportunities of much needed improvement to many aspects of this site and should comply with the NPPF 2012 and its treatment of flooding.</p> <p>Redevelopment of this site will lead to good planning outcomes for Gargrave.</p>	
16.	37	6.1.10	G2	Comment	<p>Allocations under Policy G2 identify capacity for 94 dwellings, (site G2/4 is a commitment of 29). Needs to be greater clarity on what are allocations and what are commitments.</p> <p>Needs to be greater clarity on what are commitments and what are allocations, how much is expected to be delivered from each site.</p>	Accepted.	<p>Table 2</p> <p>Former Site Option G2/6.</p> <p>Delete from Table and renumber others.</p> <p>Insert additional text to 6.1.11:</p> <p>“The site Land West of Primary School and East of Anchor Bridge is no longer shown as a proposed site allocation,</p>

							<p>but is included as a commitment (<i>insert footnote</i>) on the Proposals Map”.</p> <p>Delete Site G2/4 from the site allocations.</p> <p>Renumber other site allocations.</p> <p>Amend Proposals map to show the site as an existing commitment (in orange).</p> <p><i>Footnote: A ‘commitment’ is where a proposal has already been granted planning permission since the start of the Plan period (2012) but has not yet been built, or where there is an existing allocated site from the previous plan which has yet to receive planning permission.</i></p>
17.	37		Site G2/2	Comment	<p>Site G2/2 states the site would be suitable for 100% affordable housing, this does not form part of the policy. This site may result in a loss of some housing, therefore there needs to be consideration over net gain rather than gross.</p> <p>Need to consider loss of housing and what net gain would be.</p>	Accepted.	<p>Amend Plan.</p> <p>Delete reference to “This site would be suitable for 100% affordable housing” in Table 2.</p>

18.	38		Site G2/6	Comment	Sites are referred to in the text and the policy with different numbers, this is somewhat confusing. Change policies and text so there is consistency between site references.	Partially accepted.	Amend Plan. Table 2 refers to former "Site Options". Insert new text in Table 2 setting out former and current numbering eg "Former Site Option G2/1 and NDP Proposed Site G2/1 etc"
19.	38		Site G2/11	Object	This site is high flood risk. Objectives within the plan are to not allocate sites at high flood risk in line with national policy. The Certificate of Lawful Use on this site whilst establishing that the existing caravan use on site is lawful does not mean that residential development is acceptable on planning grounds. Suggest removal of this site.	Not accepted. See response to 15. Above.	No change.
20.	41		Site G2/3	Comment	Where is access to/from this site, allocations shows no area for access. If access cannot be obtained suggest removal of this site.	Not accepted. Comments from NYCC Highways set out that: "access from the existing highway network is acceptable but needs demolition of property".	No change.
21.	45	6.1.13 /6.1.1 4		Comment	Suggest look to finalised 2015 SHMA to update figures in this paragraph.	Accepted.	Amend Plan. Amend 6.1.11 to refer to 2015 Update North Yorkshire Strategic Housing Market Assessment (NY SHMA) 2011-16

						<p>GVA Grimley on behalf of the North Yorkshire Authorities</p> <p>http://www.cravenc.gov.uk/article/1618/Housing-need</p> <p><u>Amend in line with comments submitted by CDC Strategic Housing / Cross Reference to ensure consistency.</u></p> <p>6.1.14 Section 7.107 of Appendix I summarises the key findings bringing the evidence and analysis together.</p> <p>6.1.15 The net affordable need across the Craven District according to the most up to date SHMA, published in June 2015, is 114 dwellings per year for the next 5 years.</p> <p>6.1.16 The analysis suggests that intermediate products could play an important role in improving housing choice and addressing an element of housing need. The potential is identified for this affordable tenure type to accommodate approximately 25% of households currently in housing need (based on their financial capacity to afford a 50% equity stake). Significantly though this tenure does not, at the moment, represent a tenure of choice as evidenced by the limited numbers of</p>
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							<p>households either currently living in, or considering a move into, this tenure based on the results of the 2011 household survey. This is likely to be a function of the relative 'youth' of this product in the housing market and therefore its relatively small levels of stock across Craven and North Yorkshire more generally.</p> <p>6.1.17 The introduction of the Affordable Rent model, as an alternative (and addition) to traditional social housing in Craven also holds potential to accommodate households who would otherwise struggle to enter the open market. The differentials between Affordable Rent, open market rents and social rent suggest the model could form a valid 'stepping stone' between tenures for 2 and 3 bedroom accommodation, although the financial capacity of households in housing need suggests that the incomes of up to 80% of households in Craven may well be overstretched if required to reach Affordable Rent charged at 80% of the market rate for larger dwellings.</p> <p>6.1.18 Considering demand by property size the analysis shows the highest level of demand / need for smaller properties</p>
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							across Craven. The shortage of these properties is having a disproportionate effect on Craven’s capability to address its backlog of housing need, and to meet the needs of new households in the future.”
22.	46		Policy G3	Comment	Amend 75 houses to 100 houses to cover 20 year plan period.	Accepted.	Amend Policy G3 Change “75 units” to “100 houses over the 20 year Plan period”.
23.	46		Policy G3	Comment	At point 2. May need to provide clarity re acceptability of open market housing provided of a certain size. Clarity needed on threshold for affordable housing.	Partially accepted. Affordable Housing thresholds in line with the emerging Local Plan are provided over the page on page 46. The need for smaller units of open market housing is provided in the evidence base of the SHMA – see 45. Above.	Cross Reference to comments from Strategic Housing. Amend G3 Insert “Market housing” at the beginning of the sentence and delete “properties” .
24.	46		Policy G3	Comment	A local needs survey should not be a requirement of all housing schemes.	Accepted.	Amend Plan. Amend G3

					Remove requirement for local needs survey for all schemes.		Delete reference to local housing needs survey .
25.	46		Policy G3	Comment	Reference to developments of 3 houses or more requiring mix of tenures but under affordable housing section of the policy it states the threshold to be five dwellings and above. Remove reference to requirement for mix of tenure at 3 houses or above.	Accepted.	Amend Plan. Amend G3 Delete reference to requirement for mix of tenure at 3 houses or above.
	67-69			Comment	See comments previously provided regarding Local Green Space	Noted.	See 14 above. No further change.
26.	77		Policy G9	Comment	The NPPF sets out the importance of conserving national parks for their landscape and scenic beauty, the policy should make reference to this. Insert reference to great weight being given to conserving and National Parks for their landscape and scenic beauty.	Accepted	Amend Plan. See comments from Natural England. Amend G9. Insert additional text: “Great weight is given to the need to conserve and enhance the Yorkshire Dales National Park for its landscape and scenic beauty.”
27.	82			Comment	See separate sheet Whilst planning policy guidance (PPG) advises that, “Planning obligations assist in mitigating the impact of development which benefits local communities and	Accepted.	Amend Plan. Insert additional text after 6.4.2: “Developers may be asked to provide contributions for infrastructure by way of the new Community Infrastructure

				<p>supports the provision of local infrastructure”, it also makes clear that, “Policy for seeking planning obligations should be grounded in an understanding of development viability through the plan making process”. According to paragraph 173 of the NPPF, “Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened”. The current draft of policy G10 does not appear to meet these requirements and needs to demonstrate that viability and costs have been taken into account and that the plan is deliverable.</p> <p>Suggested change</p> <p>Developers may be asked to provide contributions for infrastructure by way of the Community Infrastructure Levy (CIL). Craven District Council is considering the introduction of CIL. Where a neighbourhood plan is made, the parish council may receive up to 25% of charges levied in the neighbourhood area.</p>	<p>Levy (CIL). Craven District Council is considering the introduction of CIL. Where a neighbourhood plan is made, the parish council may receive up to 25% of charges levied in the neighbourhood area.”</p> <p>Amend Policy G10:</p> <p>Policy G10 Supporting Public Transport Improvements and Encouraging Walking and Cycling and Community Infrastructure Levy (CIL)</p> <p>Developer contributions from new development will be sought wherever possible to support and improve existing public transport links to local towns and facilities, and to improve routes and networks for walking and cycling. Such contributions should include those from Community Infrastructure Levy once the Charging Schedule is adopted by Craven District Council.</p> <p>Priorities for the expenditure of CIL by the Parish Council include the following:</p> <p>Insert list as before.</p>
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					Therefore, policy G10 could be redrafted to focus on the potential introduction of CIL and could include a list of priorities for the expenditure of CIL by the parish council.		
28.	84	6.4.6		Comment	<p>There is some confusion here in combining surface water and flooding from rivers and seas. It is correct that residential development should be located in flood zone 1 wherever possible. Where there are a lack of available sites, demonstrated through a sequential test, development may be acceptable in flood risk zone 2. Residential development will only be acceptable in flood risk zone 3a through passing an exception test. In both flood zones 2 and 3a developers will need to submit a flood risk assessment alongside a planning application. Residential development in flood risk zone 3b (functional floodplain) will not be permitted.</p> <p>Surface water flooding is a separate albeit still important consideration and rather than developments either being in flood zone 1 or low or very low risk from surface water flooding as worded in policy G11, new developments should seek to be in both flood risk zone 1 and at very low or</p>	Accepted. Cross reference to comments from Environment Agency.	Amend Plan. Redraft 6.44 and 6.4.5. Delete references to “flood zone 1 or low or very low risk from surface water flooding” and replace with “and”.

					<p>low risk from surface water flooding.</p> <p>Both the wording of paragraphs 6.4.4 – 6.4.5 and policy G11 and G12 need greater clarity to make the distinction between flood risk zones and surface water flooding.</p> <p>Rather than using terms flood zone 1 or low or very low risk from surface water flooding it should instead be flood zone 1 and low or very low risk from surface water flooding.</p>		
29.	86		Policy G13	Support	This policy is welcomed.	Noted.	No change.
Affordable Housing Development Officer – Jenny M Wood Strategic Housing – CDC 30.	Pg 45, 6.1.11 –			Comment	Whilst the SHMA is a relevant document the 2011-2015 SHMA is now outdated and was replaced in June 2015. It is also important to note that the 2011 SHMA was only valid until 2015 not 2018 as stated.	Accepted. Amend wording as suggested.	Amend Plan. Update reference to SHMA to refer to updated version published in June 2015.
31.	Pg 45, 6.1.15			Comment	The NET affordable need across the Craven District according to the most up to date SHMA, published in June 2015, is 114 dwellings per year for the next 5 years. This figure is a District wide figure. Affordable housing numbers in the	Accepted. Amend wording as suggested.	Amend para 6.1.15 to “The net affordable need across the Craven District according to the most up to date SHMA, published in June 2015, is 114 dwellings per year for the next 5 years. “

					previous SHMA (2011-2015) were broken down by ward. This is now no longer the case and the affordable housing shortfall is a district wide figure with all affordable housing completions contributing to making up that shortfall.		
32.	Pg 45, 6.1.16			Comment	Social housing (social rent) is now no longer a product offered by Registered Providers (RPs). Government grant is no longer available for this form of housing, nor can it be included in any scheme over which the Homes and Communities Agency 'presides'. Affordable rent was introduced as a product in 2011 and has been widely utilised by RPs since then. However, funding for Affordable rents by National Government has now largely ceased as the Government looks towards increasing home ownership through intermediate sale products such as shared ownership and the proposed introduction of Starter Homes. As a result Affordable rent products are unlikely to be provided by RPs on sites, unless there are opportunities for cross subsidy. As a product it no longer holds potential to accommodate households who would 'struggle to enter the open market'. Now is a time of rapid and significant change	Accepted. Delete para 6.1.16.	Amend Plan. Delete para 6.1.16. Add in additional text to 6.1.15: "This is a time of rapid and significant change and the Parish Council welcome the opportunity of working closely on an ongoing basis with Craven District Council Strategic Housing to help identify ways in which to meet affordable housing need, as identified by the SHMA 2015. "

					and ideally we would like to work with the PC on an ongoing basis to help identify ways in which to meet affordable housing need, as identified by the SHMA 2015.		
33.	Pg 46, Draft Policy (1)		G3	Comment /Object	The definition of affordable housing contained within the Neighbourhood Plan is incorrect and does not accord with NPPF. Whilst the two forms of affordable housing noted (rental and shared ownership) are indeed affordable housing, the definition provided does not incorporate all forms of affordable housing as defined within NPPF. Thought also needs to be given to the introduction of Starter Homes, which are likely to be a form of affordable housing that can be legitimately be provided on sites – It is recommended that the definition is amended to include all forms of affordable housing as defined by NPPF. This would also bring the Neighbour plan into line with Cravens DC's 2015 <i>'Approach to negotiating affordable housing contributions'</i> .	Accepted.	Amend Plan. Amend Policy G3 Point 1 to "Affordable housing as defined in the NPPF (insert footnote referring to Appendix X – Affordable Housing as defined in the NPPF: Affordable housing: Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision. Social rented housing is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to

							<p>the above, as agreed with the local authority or with the Homes and Communities Agency. Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable). Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing. Homes that do not meet the above definition of affordable housing, such as “low cost market” housing, may not be considered as affordable housing for planning purposes.”</p>
34.	Pg 46, Draft Policy (3).		G3	Comment	Lifetime homes are no longer a requirement and developers and indeed RPs cannot be required to design to such standards. Nor does the SHMA 2015 give priority to affordable housing for the elderly, though it does note there are	Accepted. Delete reference to lifetime homes in point 3.	Amend Plan. Delete reference to “lifetime homes” in point 3. Insert additional supporting text after 6.1.17:

					<p>'market aspirations' for bungalows adding that there should be 'open market housing marketed at older people' (para 7.22 , SHMA 2015). There is mention of Extra Care accommodation – self-contained apartments for those with care needs. Care is the province of NYCC, currently tendering the provision of Extra Care across the county, initially replacing existing care homes and looking at larger market towns and service centres because of the scale of building required to make care provision viable.</p>		<p>"The SHMA 2015 notes that there are 'market aspirations' for bungalows adding that there should be 'open market housing marketed at older people' (para 7.22 , SHMA 2015). There is mention of Extra Care accommodation – self-contained apartments for those with care needs. Extra Care will initially replace existing care homes across the county focussing on larger market towns and service centres to support viability."</p>
35.	Pg 46, Draft Policy (2)			Comment /Object	<p>A mix of 60% x 2 beds, 20% x 1 beds and 20% x 3 bed affordable homes should be provided on sites which include an element of affordable housing, unless agreed otherwise by Cravens District Council's Strategic Housing Team (e.g. where site specific factors dictate otherwise). This mix is in line with the findings of the 2016 SHMA.</p>	<p>Accepted.</p> <p>Delete para 2 under Affordable Housing and replace with text as suggested.</p>	<p>Amend Plan.</p> <p>Amend G3.</p> <p>Delete para 2 under Affordable Housing and replace with: "A mix of 60% x 2 beds, 20% x 1 beds and 20% x 3 bed affordable homes should be provided on sites which include an element of affordable housing, unless agreed otherwise by Cravens District Council's Strategic Housing Team (e.g. where site specific factors dictate otherwise). This mix is in line with the findings of the 2015 SHMA. "</p>

36.	Pg 46, Draft Policy .			Comment /Object	A local housing needs survey is not necessary for each new development that takes place. Housing needs surveys provide only a snapshot in time of the needs of a parish. The SHMA accords with government guidance and provides sufficient and robust evidence of the needs for affordable housing across the district. Whilst sites that are brought forward will prioritise households with a local connection, the affordable housing shortfall is quantified by district and local connection criteria will cascade out to ensure district wide affordable need is addressed.	Accepted. Delete sentence as suggested.	Amend Plan. Amend G3. Delete: “All proposals for new housing will be required to be supported by an up to date local needs survey”.
37.	Pg 47, Afford able housin g -			Comment /Object	Affordable housing provided on site should be in clusters of around 5 – 8 units. Pepper potting is not the preferred method of distributing affordable housing within a site as it makes the management and maintenance of such homes more difficult and costly. That said, we would not wish to see segregation of affordable housing - 100% mono tenure cul de sacs (of either affordable or market housing) should particularly be avoided.	Accepted. Delete reference to “pepper potting”.	Amend Plan. Amend G3. Delete reference (ie“pepper potting”) on p 47.
38.	Pg 47, Afforda			Comment /Object	Viability (which is likely to be particularly relevant on brownfield sites) is the only	Accepted.	Amend Plan.

	ble housing -				legitimate reasons to look at a reduction in CDC's target provision of affordable housing on a site and/or the reduction of public open space contributions. The viability of a scheme should not be considered on the merits of providing other community benefits. If a scheme is not viable and results in the reduction of affordable housing then a developer cannot be expected to provide other community benefits at the expense of more affordable housing. For example a scheme where it is viable to provide 30% affordable housing cannot then have this reduced to 10% to enable the provision of other community benefits – unless weighed in the balance and deemed acceptable in determining the planning application.	Add in additional supporting text after 6.1.17 as suggested. Policy G3 - delete “where schemes can demonstrate delivery of other community benefits”	Insert additional supporting text after 6.1.17: “Viability (which is likely to be particularly relevant on brownfield sites) is the only legitimate reasons to look at a reduction in CDC's target provision of affordable housing on a site and/or the reduction of public open space contributions. The viability of a scheme should not be considered on the merits of providing other community benefits. If a scheme is not viable and results in the reduction of affordable housing then a developer will not be expected to provide other community benefits at the expense of more affordable housing. For example a scheme where it is viable to provide 30% affordable housing cannot then have this reduced to 10% to enable the provision of other community benefits – unless weighed in the balance and deemed acceptable in determining the planning application. “ Policy G3 - delete “where schemes can demonstrate delivery of other community benefits”
39.	Pg 46, Draft Policy			Comment /Object	Affordable housing in Craven is provided on sites of 5 or more dwellings. Provision of affordable housing on sites as small as 3 dwellings is unlikely to be viable in the parish. Also, Government policy towards affordable housing is changing as part of the revisions to the housing bill, with a greater push on providing homes available	Accepted. Delete paragraph beginning “on sites of three...”	Amend Plan. Amend G3. Delete: “On sites of 3 or more dwellings a mix of tenures, types and sizes must be provided. Sites comprising 3 units or above which include affordable housing

					for sale. On sites as small as this, it is to be expected that all the units will end up as one tenure.		must integrate these houses and market housing across a site. Development that leads to concentrations of single types and tenures of homes in separate groups on a site will not be permitted.”
CDC Further comments re meeting with GNPWG 19/04/2016.					<p>It was proposed at a meeting with Craven DC that the section relating to supporting further development on the Systagenix site should be deleted in response to concerns from the Environment Agency due to the site’s location partially in an area of flood risk. The existing employment use of the site is protected in the Local Plan but further built development would not be acceptable on the site.</p> <p>An email from Craven DC dated 22/04/2016 provided the following advice: <i>“Systagenix Site –The Local Plan provides support for the safeguarding of this site from uses other than B class uses and therefore affords protection alongside three other sites in Gargrave. We have not identified the Systagenix site in our potential employment sites for expansion.</i></p> <p><i>Please see our consultation document (specifically policy EC2 (page 101 of the Local Plan and the map on page 181 of the PDF file (not the actual local plan page</i></p>	Accepted.	Delete section page 50 – 52 (paras 6.2.3 - to and including Policy G4).

					<p><i>number)for more information on the Council's New Local Plan web page."</i></p> <p>A further email dated 04/05 2016 confirmed that <i>"Craven DC are happy for (the removal of the Systagenix Site) as the Local Plan provides support for safeguarding the existing built land for employment purposes under policy EC2."</i></p>		
CDC Further Comments on Submission Draft NDP June 2016		1.2		Comment	<p>Suggest the last sentence is reworded as follows:</p> <p>"The parish boundary contains Stirton with Thorlby Parish which was transferred into Gargrave following a Community (Parish) Governance Review in 2011. This part of Stirton with Thorlby Parish is not within the designated Neighbourhood Plan area. "</p>	Accepted.	Submission Plan amended.
		1.5		Comment	<p>Second to last para – suggest it is reworded as follows:</p> <p>"ahead of consultation on the pre publication draft Local Plan".</p>	Accepted.	Submission Plan amended.
		2.2		Comment	<p>This paragraph could be revised to state that the timetable for submitting the Craven Local Plan to the Secretary of State is 2017.</p>	Accepted.	Submission Plan amended.

		2.4		Comment	<p>Suggest first sentence is reworded as follows:</p> <p>“The draft Local Plan”</p> <p>Suggest second sentence is reworded as follows:</p> <p>“Policy SP4 of the revised draft consulted on between April and May 2016....”</p>	Accepted.	Submission Plan amended.
		5.1		Comment	<p>Vision refers to by 2030, this should be amended to read 2032.</p>	Accepted.	Submission Plan amended.
		6.1.3		Comment	<p>Suggest second sentence is reworded as follows:</p> <p>“In the Draft Local Plan Policy SP4: Spatial Strategy and Housing Growth Gargrave is identified as a tier 3 village with an allocation of around 5 houses pa or 100 new homes over the plan period 2012 – 2032.</p> <p>This paragraph provides an opportunity to explain that any sites with planning permission or dwellings built since 2012 are included in this overall figure.</p>	Accepted.	Submission Plan amended.
		6.3.15-16 etc	G10	Comment	<p>Local Green Spaces para 6.3.15, 6.3.16, table 4, Policy G10</p> <p>CDC would advise that the NPs assessment of LGS sites follows CDCs</p>	Local Green Spaces - the working group have used the CDC methodology and a separate, background paper will be submitted as part of the evidence base which	No change.

					<p>methodology for assessing Local Green Space. See http://www.cravendc.gov.uk/article/4453/Planning-for-parishes#LGS</p> <p>Para 6.3.15 states that the Greens are registered as Village Greens, which affords them protection from development under the Open Spaces Act 1906. The NPPF (para 77) states that “LGS designation will not be appropriate for most green areas of open space”. Government guidance on designating LGS is clear that if areas of land are already protected under separate legislation, designation of LGS may not be necessary.</p>	includes the assessment and justification for each proposed LGS.	
			G3	Comment	<p>HC has provided comments re need for amendments to affordable housing policy to take account of decision of appeal court to allow Written Ministerial Statement, which means that on site affordable housing can only be achieved on sites of more than 10 dwelling, with Gargrave being able to request off site contributions on sites of 6-10 as a designated rural area.</p>	<p>There were further discussions by email and wording was agreed for Policy G3 and supporting text.</p>	<p>G3 and supporting text amended further to include latest advice in Planning Practice Guidance on affordable housing in rural areas and vacant building credit.</p>
			G4	Comment	<p>CDC support this policy and note the information presented in paras 6.1.24 – 6.1.26. NYCC Health and Adult Services has responded to the draft Local Plan</p>	<p>This is not worth amending at this stage but hopefully NYCC will submit detailed comments reflecting their latest proposals at Reg 16</p>	<p>No change.</p>

					<p>(April – May 2016) and CDC feel it would be useful if Gargrave NP Working Group was aware of the comments made. These are set out below:</p> <ul style="list-style-type: none"> • At this moment in time we have identified a minimum requirement for 203 units of extra care accommodation for the Craven area. • Of the 203 identified units 81 units have been delivered at sites in Skipton (Woodlands) and Settle (Limestone View) • Priority area of development is Gargrave with a planned procurement to deliver extra care to take place in 2016. <p>We will be in contact with NYCC to try and develop an understanding of the approximate number of units required for Gargrave as this would help support both the Local Plan and NDP. We would advise that the policy is tightened to give an idea of scale as at the moment it is not clear what scale of development would be considered acceptable in the NDP i.e. a smaller type care facility or for example a car village.</p>	and if the Examiner agrees with their suggestions then wording changes will be made post Examination.	
		G2	Comment	Site Allocations for New Housing – Policy Whilst CDC support the policies in section	It is too late in the process for this, but the other	No change.	

					<p>6.3 relating to design and protection of the environment, green spaces and the character of Gargrave, we feel there has been a missed opportunity for development principles to be set out for site allocations. These could provide guidance for developers on what type, scale and design of housing would be required, together with details of access etc (especially in relation to site G2/3). We are proposing to include development principles for preferred site allocations in the Local Plan and are using the Tunbridge Local Plan as good practice in presenting such principles.</p> <p>http://www.tunbridgewells.gov.uk/__data/assets/pdf_file/0007/84229/Site-Allocations-DPD_Final-Draft.pdf</p> <p>(FROM PAGE 42)</p>	<p>planning policies in the document will apply to any proposals coming forward and cover things like design, landscaping etc anyway.</p>	
		6.1.11		Comment	<p>Site Allocations for New Housing – para</p> <p>These figures were provided by CDC in April 2016, however they do not include 17 units provided through OPPs on sites yielding below 5 dwellings. 31/3/2016 housing monitoring figures show a residual housing requirement of 40 units (however this does take into account the loss of 25 units of extra care</p>	Accepted.	Table revised and updated to include dwellings of less than 5 units.

					accommodation) SEE SIAN on which figures we should provide.		
			G6 and G7	Comment	May be worth liaising with Historic England prior to submission to understand acceptability of these policies.	Historic England commented at Reg 14 that they were happy with the Plan. Again if they have further detailed suggestions then these can be made at Reg 16.	No change.
				Comment	<p>SFRA Following the meeting between the working group and CDC in April 2016 we did promise that we would report to the working group the outcome of a meeting CDC had with the Environment Agency. The advice given during this meeting from the EA is that CDC need to update the SFRA (prepared back in 2010) Since this meeting CDC has commissioned JBA Consulting to update the SFRA. The timetable for completing this work is by September 2016, with a draft produced by August 2016.</p> <p>It may be the case that the working group has planned a detailed flooding risk assessment to be carried out and the sequential and exceptions tests applied, particularly in relation to site GC/5 (see Environment Agency letter dated 11th March 2016). This work may be completed before CDCs update to the SFRA, however if it is useful CDC will share</p>	Noted.	No change.

					the findings of the updated SFRA with the working group once finalised.		
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