

Gargrave Neighbourhood Plan

Summary of Representations submitted to the independent examiner in accordance with para 9 of Schedule 4B of the Town and Country Planning Act 1990.

These representations were received under Regulation 16 of The Neighbourhood Planning (General) Regulations 2012 during a 6 week public consultation period on the submitted Gargrave Neighbourhood Plan held from 25th June to 6th August 2018.

Gargrave Parish Council submitted its draft Neighbourhood Plan to Craven District Council for independent examination in May 2018.

Name of Representor	Policy/Section of Gargrave Neighbourhood Plan commented on	Summary of Representation received
National Grid	General comment	<p>An assessment has been carried out with respect to National Grid’s electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines, and also National Grid Gas Distribution’s Intermediate and High Pressure apparatus.</p> <p>National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.</p>
Sport England	General comment	<p>It is essential that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 73 and 74. It is also important to be aware of Sport England’s statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Para 74 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.</p> <p>Any new housing developments will generate additional demand for sport. If existing</p>

		<p>sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered.</p> <p>In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities.</p>
Canal & Rivers Trust	Policy G2 (Site Allocation G2/1 Neville House, Neville Crescent)	<p>We welcome the identification within the policy that the site has an aspect to the canal.</p> <p>The policy text that new development should have a principle elevation facing the waterfront is welcomed, especially as it would avoid the need for rear boundary treatments facing the waterway, which can be visually incongruous and degrade from the canal environment.</p> <p>Future developers should note that any new connection to the towpath from the development would require the permission of the Trust, and may require an appropriate license.</p> <p>If a greater number of units are development on this site than indicated there may be a requirement for off-site contributions to ensure that the towpath can be improved to accommodate the additional usage development here could bring.</p>
	Policy G5: Tourism and Rural Business Development	<p>We welcome the Policy's emphasis on the promotion of the re-use of buildings for employment uses, as it could assist in the re-use or any necessary conversion of the building to provide for greater levels of activity and surveillance over the waterway. We therefore welcome the wording in this policy that new development for employment uses should not impact negatively on the character and rural feel of the village. This, we believe, would allow for greater control on the layout of any new employment development next to the waterway, to ensure that its appearance and character can be protected.</p>
	Policy G8: Promoting High Quality Design	<p>We welcome the identification in this policy that, at canal side locations, development should be configured appropriately and orientated towards the waterfront.</p> <p>This policy could be more effective if the supporting text was expanded to explain how development could be appropriately configured. At present, the wording of the policy that development should be 'configured appropriately' could be open to</p>

		<p>interpretation. We believe that an additional paragraph to describe what types of layout are considered appropriate would assist in making the policy more clear and precise. For example, we would ideally expect new development to optimise views of the canal and to provide for the natural surveillance of the water space through the siting, configuration and orientation of buildings.</p>
	<p>Policy G12: Protecting and Enhancing the Rural Landscape Setting and Wildlife of Gargrave</p>	<p>We welcome part 5 of this policy, which supports the provision of new riverside and canalside walks.</p> <p>We support this general approach, as we recognise that use of waterways for leisure, including walking and cycling, can improve life satisfaction, happiness and reduce anxiety.</p> <p>As there is an existing towpath next to the canal, and some existing riverside paths, we do question whether this policy should be expanded to refer to the provision and improvement of riverside and canalside walks. Simple improvements such as new signage and improvements to the footpath surfacing could significantly encourage the use of existing footways with little initial capital investment. We therefore believe that an amendment to the wording of this policy could make it more effective in achieving its overall aims.</p>
	<p>Section 5: Vision & Objectives</p>	<p>We support the formation of a cycle route along the canal towpath, and welcome its inclusion within Objective 4 of the Neighbourhood Plan.</p>
<p>Coal Authority</p>	<p>General comment</p>	<p>Confirmation that The Coal Authority have no specific comments to make on the Gargrave Neighbourhood Plan</p>
<p>M Palin</p>	<p>General comment</p>	<p>I should like to register my support for it. It meets all the regulatory requirements, makes objective and quantitative assessments as much as possible and is ambitious for its community.</p>
<p>Network Rail</p>	<p>Policy G14: Supporting Improvements to Accessibility</p>	<p>We support the aspiration to create step-free access to the down (northbound) platform at Gargrave station as outlined in policy G14.</p>
<p>Windle, Beech, Winthrop (WBW)</p>	<p>Housing Site Selection (Section 6.1)</p>	<p>The Gargrave Neighbourhood Development Plan fails to promote a sustainable pattern of growth for new housing development. Several of the allocated housing sites are on the fringes of the village within locations that are remote from the services and facilities that the village has to offer and do not have safe pedestrian access to the centre of the village (Site G2/4, at the western end of Marton Road, is an example of such a site).</p> <p>Alternative housing sites are available closer to the village centre, but these have</p>

		<p>been omitted from the Neighbourhood Plan. Two suggested alternative housing sites, submitted by WBW on behalf of their client are sites GA023 & GA014 (land south of Marton Road), which are proposed for designation as Local Green Space in the NP. These sites are significantly closer to the village centre, are imminently developable, and can be built on without any unacceptable planning impact. It is contended that the Gargrave Neighbourhood Development Plan will create unsustainable development due to its approach of preventing new development close to the village centre in favour of promoting housing development on sites that are remote from the village.</p>
<p>Johnson Mowatt on behalf of Client, Richard Morton of KCS Development Ltd</p>	<p>General comment</p>	<p>We wish to express our concerns in relation to the site specific allocation methodology and the Plan's general conformity with the Local Plan process. It is our view that the Neighbourhood Plan (NP) has been advanced ahead of the emerging Local Plan (eLP) and there are therefore significant implications which prejudice the effectiveness of the NP. It is therefore our view that the Neighbourhood Plan Examination should be suspended at this time to allow the Local Plan Examination to proceed. The NP should only advance following the Local Plan adoption to ensure conformity.</p>
	<p>Policy G4: Supporting Care Home Provision in Gargrave.</p>	<p>Objection to identification of Land off Eshton Road, north of Canal for extra care. This proposed site (GA009 as previously referenced) was rejected as a suitable option for development by the Working Group at an early stage. We see no change in the site's suitability or sustainability to now warrant an allocation for extra care provision. It is our view that the allocation of this site does not meet the Basic Condition to achieve sustainable development and that alternative more suitable and sustainable sites are available for residential and/or extra care provision. Site GA025, Land adjacent the Cricket Pitch, Skipton Road has been put forward as a residential allocation and it remains our view that site GA025 has been omitted from the emerging Local Plan, and subsequently the NP, due to its perceived flood risk which has now been proven to be factually incorrect. GA025 could provide 44 dwellings and is in a sustainable location, representing a natural and logical extension to the existing built form. There is good accessibility to local services and facilities with the Village Hall, Library, Primary School, convenience shops, Post Office, pharmacy, public houses and cafes etc all within walking distance. The site is also well located for accessibility to public transport, located on the A65 and within</p>

		400m of a bus stop.
D Clark	Policy G10: Local Green Spaces	I object to the inclusion of the Croft bounded by Church Street, Church Lane & Riverside (site GA005) as 'Local Green Space'. The designation of several of the proposed Local Green Spaces and especially site GA005 are based on incorrect and debatable figures & assumptions. No serious attempt is made to indicate how the formal NPPF criteria - 'Demonstrably Special' and 'Local in Character' are met by site GA005; the only conclusion to be drawn is that they do not conform.
Historic England	General comment	Having carefully considered the Submission Draft Gargrave Neighbourhood Plan 2018, we do not consider it necessary to provide any further comments.
North Yorkshire County Council	General comment	The elements of the Neighbourhood Plan that will help to achieve the ambitions of the NYCC Council Plan 2018-2022 are supported. The National Planning Policy Framework requires Neighbourhood Plans to be in general conformity with the strategic provisions of the Local Plan.
	Section 5: Vision & Objectives	It is considered that the plan's Objectives set out in section 5.2 could be enhanced by more clearly setting out what the intended outcomes are for the identified topics.
	Appendix 1	Appendix 1 does not appear to reference the most up to date version of the Craven Local Plan that has been submitted for Examination. It is important that there is consistency on the strategic issues provided for in the Local Plan including housing allocations, such as on Eshton Road.
	General comment	Care should be taken to avoid duplication or conflict with the Craven Local Plan where the Neighbourhood Plan has overlapping topic areas, for example Policies G2: site allocations and G15: development in areas of flood risk.
	Policy G1: New Housing within the Settlement Boundary	Support for this policy approach.
	Policy G14: Supporting Improvements in Accessibility	The Local Highway Authority (LHA) will support measures which encourage alternative means of transport to the car.
	Section 4.5.2: Roads	Any proposals to amend a speed limit will need to secure the agreement of North Yorkshire Police and be the subject of formal consultations in accordance with NYCC's Policies and Protocols. Any traffic calming on the A65 will need to be appropriate for the nature of the route and the traffic it carries.
	Section 5.2 - Objectives for the Neighbourhood Plan, Point 4:	This is a reasonable objective to have.

	Infrastructure, bullet point 1	
	Section 6.4: Infrastructure, bullet point 1 Bullet point 2	This is a reasonable objective to have, but it would help to clarify what safety issues are referred to.
	Section 6.4.5 - Priorities for the expenditure on local infrastructure – Traffic Calming measures and Speed Limits 6 th bullet point 8 th bullet point	This is a reasonable objective to have. Any proposals to amend or install parking restrictions or other traffic regulation orders will need to be subjected to NYCC’s standard policies and protocols on this matter.
	Policy G15: Development in Areas of Flood Risk from Water Courses & Surface Water Policy G16: Design for Flood Resilience and Resistance Policy G17: Design to reduce surface water run off	Overall policies G15, G16 and G17 are a good start to effectively managing development in high risk areas however the requirements will unreasonably restrict development and do not wholly comply with NPPF, national guidance and what has been put forward within the Craven Local Plan. Policy G15: We don’t believe this policy follows the tone set within Craven’s Local Plan, Draft Policy ENV6: Flood Risk, and can be unreasonable at points. It is recommended that this policy is altered to ensure that development takes place in flood zone 1 as a priority however permits certain development (minor development, less vulnerable, water compatible) in Flood Zone 2 and 3 following the submission of adequate mitigation measures as set out in Policy G16. Policy G16: We recommend that developments within Flood Zone 2 and 3 should ensure the appropriate mitigation measures and that no mitigation measures should be required other than typical drainage design standards for development proposed in flood zone 1. G17: It is suggested to recommend and support the use of Ponds and Wetlands rather than try to enforce these SuDS components. We would strongly recommend that there is a reference to North Yorkshire County Council’s SuDS Design Guidance in the plan as this document provides direction for the successful implementation of SuDS and flood risk mitigation.
	G4: Supporting Care Home Provision in Gargrave	No comment.

	Executive Summary & Policy G6: Protecting Local Heritage Assets	We are pleased that the Neighbourhood Plan places a high value on local heritage assets including archaeological remains. The protection and enhancement of the historic landscape and its features is a theme that runs through the entire document including its executive summary and a number of its policies (e.g. G1.3 & G6). We also support the proposal to create a 'local list' of heritage assets (6.3.10).
Natural England	Habitats Regulations Assessment	Natural England welcomes the detail and presentation of the assessment and is broadly satisfied with the conclusions, however we have a number of outstanding concerns with regards to the Habitats Regulations Assessment of the Craven Local Plan (please see our letter dated 13 February 2018, our ref 234760) which we consider may have relevance to the Gargrave Neighbourhood Plan. In particular we advise that more details should be provided in relation to the assessment of recreational disturbance on the North Pennine Moors Special Area of Conservation (SAC) and Special Protection Area (SPA) alone and in-combination with the wider Craven Local Plan and the assessment of traffic emissions on the North Pennine Moors Special Area of Conservation (SAC) and Special Protection Area (SPA) in combination with the draft Craven Local Plan and Harrogate Local Plan.
	Strategic Environmental Assessment	Notwithstanding the concerns regarding the Habitats Regulations Assessment we do not have any significant concerns regarding the assessment of other environmental interests in the assessment. However we advise that you ensure that the assessment format is in line with the legislation and best practice. We note, for instance, that the assessment does not appear to set out SEA objectives against which the policies and allocations in the plan are assessed.
Yorkshire Wildlife Trust	General comment	Many thanks for consulting the Yorkshire Wildlife Trust on the Gargrave Neighbourhood Plan. Unfortunately due to pressure of work and holidays the Trust was not able to submit a comment before the end of the consultation.