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Dear Ruth

Craven District Council: Core Strategy Issues and Options

Thank you for consulting the Yorkshire and Humber Assembly on the Core Strategy Issues and Options document for Craven District Council (outside the Yorkshire Dales National Park). As I said in our recent phone conversation, I am sorry that this response will arrive so much later than your consultation deadline and I trust that you will still be able to take our comments into account at this stage in the process.

As I said to you on the phone, we are pleased to see that you have made the need for there to be general conformity between the RSS and the LDF so clear at the start of your documents. The summaries of RSS that you provide throughout the documents are helpful ones and it does help to set the local issues that you identify into their broader context.

Because we are in a moment of time when there is an existing and an emerging RSS, these Assembly comments are based on both documents. The comments place emphasis on draft RSS, which reinforces and develops the general thrust of existing RSS; furthermore it is more up to date and has significant "weight" in its own right. The weight attached to the draft RSS will increase as it passes through its Public Examination (September and October 2006) and once the Panel's Report is received (expected Summer 2007) before it is issued by the Secretary of State (expected late 2007).

At this stage in the drafting of the Core Strategy, 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 RSS might arise. When the Core Strategy 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.

Overall, we feel that the consultation papers, the options within them and the sustainability appraisal provide a comprehensive review of the issues facing the Craven District and how they might be tackled in order to achieve sustainable development. Perhaps surprisingly it is not clear which of the options provides the 'best fit' with the RSS as they all raise different issues – the comments below therefore reiterate the key messages from RSS that we would wish to see reflected in the Preferred Options document for the Craven District.

Consultation Paper 1 – Vision, Strategic Objectives & Settlement Strategy

We welcome the references to RSS and the summary that provides the context for this consultation paper. Whilst the RSS does not identify Local Service Centres, it might be helpful to refer to the Regional Settlement Study that identifies the following as Local Service Centres in the Craven District: Settle, Grassington/Threshfield, Crosshills/Glusburn/Sutton and Bentham. The RSS makes it clear that that this Study was a starting point from which local planning authorities would need to identify the Local Service Centres in their areas – based, for example, on the more local studies that are summarised in these documents - that should provide a focus for limited housing and economic development.

The objectives identified from the 'Shaping Places and Spaces Conference' would seem to provide an appropriate basis from which a Core Strategy could develop. In aiming to meet all of these objectives, it would perhaps be surprising if a spatial plan was supported that did not aim to meet all the objectives of sustainable development. As a minimum, an option should not be supported that would seek to undermine the achievement of these objectives – this is an analysis that the sustainability appraisal will clearly help with.

Through the approach taken to setting out options, it is clear how different settlement hierarchies could be encouraged and how different settlement patterns could emerge as a result. It will be interesting to see what debate is generated from these options. At this stage, the Assembly would wish to emphasise the need for the Core Strategy to reflect the key locational principles set out in existing RSS, which are developed further in the draft RSS Core Policies YH1 to YH8.

The aim of existing RSS (December 2004) is to guide development to sustainable locations and to focus development in main urban areas, market and coalfield towns (Policy P1). This key strategic approach is reinforced in the Yorkshire and Humber Plan (Draft RSS December 2005), which is more specific about the desired location of development in Policies YH1 to 8. These clearly provide a policy context and direction that emphasises the need to concentrate development in Regional and Sub-Regional Centres, provide for sufficient development in Principal Service Centres for them to fulfil their important role and to allow limited development in Local Service Centres, primarily to meet local need for affordable housing and to enable economic diversification. The overall aim is to reverse the trend of dispersal of development, encouraging a settlement pattern that helps to fulfil the RSS objectives.

The particular characteristics of the Craven area mean that there is likely to be a need for development in centres smaller than those identified as Local Service Centres. In line with RSS policies, these developments would be specifically to meet local needs for affordable housing and to allow economic diversification. How these centres are identified within the settlement hierarchy will be important and the Preferred Options document will need to make it clear how local evidence has been used to generate the preferred settlement hierarchy. RSS policies would point to accessibility by public transport, levels of service

provision, availability of brownfield land, levels of local need, opportunities for economic diversity, need for environmental protection, as all being important factors to take into account.

In relation to each of the options, the following brief comments are offered:

Option 1 might encourage too much of a dispersed settlement pattern.

Option 2 represents more of an urban focus than the other options but might not pay enough attention to the need to meet local needs; there might also be concerns regarding the impact on natural resources.

Option 3 raises some issues regarding the (unintended) consequences on travel patterns

Option 4 raises some concerns about the impact on the natural and built environment

Option 5 perhaps surprisingly also raises concerns regarding the level of dispersal of development that might result – perhaps this option is more of an aggregate of the other options so the concerns relating to each of them are aggregated?

Given the above, the Assembly would encourage a Preferred Option to be developed that sets out a settlement hierarchy that reflects the locational principles of concentration, whilst meeting local needs, providing opportunities for economic diversification and minimising environmental impact. This is likely to be a combination of options 2, 3 and 4, based on a clear assessment of opportunities for the given settlements to be sustainable communities.

Consultation Paper 2 - Housing Strategy and Distribution

The Assembly welcomes the references to the housing targets of draft RSS. As this consultation paper states, the distribution of the housing will be determined by the overall settlement strategy of the Core Strategy. Our comments above are therefore relevant here.

Consultation Paper 3 - Economic Strategy and Distribution

In relation to economic development, the 'key message' from draft RSS for Craven is *"There will need to be additional provision for small-medium, high quality sites, particularly those suited to accommodate small businesses. An investigation should take place on the ability of Skipton to accommodate new sites suitable for distribution/warehouse sites"* (Draft RSS, Table 14). The Forecast Change in Total Employment Land in Use 2006 – 2016 is 1 to 8 ha (Draft RSS, Table 14.6).

The Assembly is pleased that there is an Employment Land Review nearing completion and emphasises the need for this to be carried out in line with the accepted regional methodology to ensure that there is consistency across all Districts with regard to economic forecasting and the need for employment land that is calculated as a result. Ongoing liaison between the Council and the Assembly over this issue will probably be helpful as the Core Strategy and Draft RSS are taken to their next stages of development.

At this stage, we would also draw attention to policies E6 (Sustainable Tourism) and E7 (Rural Economy) of Draft RSS.

Consultation Paper 4 - Environment and Design

We welcome the reference that is made to draft RSS policies and targets and feel that the approach to consultation taken here is a helpful one. The results of the Strategic Flood

Risk Assessment will be important in the next stages of developing the Core Strategy.

I hope that these comments are helpful to you. Clearly we wish to see the Core Strategy developing in general conformity with the Regional Spatial Strategy and I would be happy to discuss the points we raise here further if it would help this process.

Please do not hesitate to get in touch if anything is not clear. We look forward to working with you further on your Core Strategy and to commenting on the Preferred Options document in due course.

Regards

A handwritten signature in blue ink, appearing to read 'Jenny Poxon', written in a cursive style.

Jenny Poxon
Head of Planning Delivery and Conformity