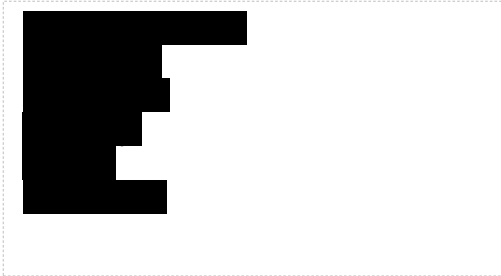
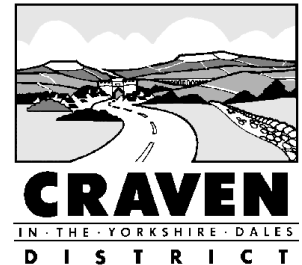


1 Belle Vue Square
Broughton Road
SKIPTON
North Yorkshire
BD23 1FJ



Telephone: 01756 706232

01756 706472

Mobile: 07928128872

[Redacted] : Principal Spatial Planning Officer

[Redacted] : Spatial Planning Officer

spatialplanning@cravendc.gov.uk

30th January 2023

Dear [Redacted]

RE: Craven District Council Response to the Submitted Bradleys Both Neighbourhood Plan Regulation 16 Consultation

Prior to submission of the Bradley Neighbourhood Plan Craven District Council (CDC) worked closely with Bradley Parish Council, advising them on pre-submission drafts of the Neighbourhood Plan as part of our duty to support them throughout this process. Much of CDC's comments, advice and recommendations for amendments were taken on board during the preparation of the draft Neighbourhood Plan. CDC is concerned however that during the development of policy ENV1, relating to the designation of Local Green Space (LGS) sites, Bradley Parish Council has not taken account of all of CDC's recommendations. CDC considers that whilst many of our advice and suggestions have been taken into account in relation to the choice, assessment and proposed designation of LGS sites, some key concerns have not been fully resolved.

It should be noted that no new issues or concerns are raised by CDC in this response to the submitted Bradley Neighbourhood Plan. However, CDC feel that it would be helpful to the Examiner if a summary of the comments provided to Bradley Parish Council and how they were responded to during the pre-submission preparation stage of the neighbourhood plan were provided. Please find below a summary of CDC's key concerns made in relation to policy ENV1 with references included to the relevant parts of the submitted Consultation Statement and submission draft SEA document, providing more detail:

1. LGS Methodology – Extensive Tracts of Land:

- Throughout the period of pre-submission consultation from 2016 to 2021 CDC advised Bradley Parish Council that the assessment of LGS sites should follow CDC's LGS Methodology, which was used in the preparation of the Craven Local Plan and found sound by the Inspector at Examination. (See [CLP Inspector's Report](#)). In responding to CDC's comment in 2016 relating to the suggestion that sites are assessed using the CDC LGS methodology, Bradley Parish Council confirmed that they had revisited proposed LGS sites using this methodology and that a number of sites proposed were subsequently removed as they failed to pass the 'tests' set out in the methodology. In responding to the 2021 pre submission Bradley Neighbourhood Plan CDC stated that it was satisfied that the LGS site assessments followed the principles of both

Paul Shevlin, Chief Executive
Calls may be recorded for training and monitoring purposes
For general enquiries telephone 01756 700600
www.cravendc.gov.uk



- CDC LGS methodology and NPPF paras 99-100. (See pages 99/100 and 135/136 respectively of the Consultation Statement).
- At a meeting in June 2018 CDC raised concerns about the extent of LGS designations proposed in the Bradley Neighbourhood Plan. The proposed LGS included all of the SHLAA sites which ringed the village and CDC were concerned that this would prevent future residential sites from coming forward and fail to achieve sustainable development. Bradley Parish Council responded by stating that CDC's comments were considered as part of the drafting of policies (See page 92 of the Consultation Statement).
- In responding to the 2021 pre submission Bradley Neighbourhood Plan CDC set out its concerns that four sites (No. 6, No. 9, No.10 and No. 12) represent extensive tracts of land and that LGS designation on these sites would significantly affect the ability of Bradley to grow and develop in a sustainable way in the future. Whilst CDC was satisfied that the LGS site assessments followed the principles of both CDC LGS methodology and NPPF paras 99-100, at this point CDC raised concerns about the way the draft Bradley Neighbourhood Plan had interpreted application of the methodology in relation to whether sites were extensive tracts of land. Bradley Parish Council's response was that large areas of land were retained outside of the proposed LGS designations and would allow for future expansion of the village outward from its core. Furthermore, they stated that the extent and coverage of proposed LGS designations had been substantially reduced from the pre-submission version Bradley Neighbourhood Plan (see page 135 of the Consultation Statement).

2. Consultation with landowners and statutory consultees:

- During the Regulation 14 pre-submission consultation in 2016 CDC recommended that consultation with relevant statutory bodies was carried out to gain advice on the supporting evidence provided as part of each LGS application relating to community, landscape, historical, recreation and wildlife value. When responding to the 2021 pre submission Bradley Neighbourhood Plan, CDC queried again whether consultation with the Environment Agency, Natural England, Historic England and the Yorkshire Wildlife Trust had taken place in this regard. CDC suggested that the responses from these consultees should be included in Appendix 4 and the Consultation Statement. (see page 92 and 135 of the Consultation Statement). Whilst general consultation was carried out with the statutory bodies on pre-submission drafts of the Bradley NP and accompanying HRA/SEA, Bradley Parish Council has not confirmed whether specific consultation was carried out regarding the designation of LGS in order to gain advice on the community, landscape, historical, recreational and wildlife value of the sites. There is no evidence of such engagement within the Consultation Statement.
- At an informal meeting between CDC and Bradley Parish Council in June 2018, and in responding to the 2019 pre submission Bradley Neighbourhood Plan and the 2021 pre submission Bradley Neighbourhood Plan, CDC queried whether landowners had been given an opportunity to comment in relation to their land being proposed for LGS designation and whether responses had been received. CDC suggested that if this consultation had been carried out then it needed to be evidenced within the Bradley NP or Consultation Statement. Bradley Parish Council confirmed that the assessment of potential LGS sites had been consistent with the CDC assessment methodology, however no response was provided specifically in relation to consultation with site owners (see pages 92, 104 and 134 of the Consultation Statement)

3. Strategic Environmental Assessment (SEA):

- The SEA concludes (page 29) that over the neighbourhood plan period, there are positive impacts on both socio-economic and environmental elements. However, it suggests that it may be beneficial to investigate how the number and location of the proposed LGS will influence what potential development sites can come forward beyond this time period as the potential for continual development aligned to the existing built form of the village would seem to be quite limited due to the combination of LGS designations to the west and south, the CFS2 designation to the south, and some topography issues to the north. The report states that it is expected that the allocated site in the plan will come forward, however if this does not happen, due to unforeseen circumstances, there may be potential difficulties in locating alternative site(s) during the lifetime of the plan. The report states that there are no mitigation measures required during the lifetime of the neighbourhood plan, however, the number and location of LGS sites may inhibit development opportunities beyond the timespan of this neighbourhood plan. The report

- suggests that this potential restriction could be analysed during the neighbourhood plan's examination and/or at the 5-year review of the neighbourhood plan, however it is advisable that further consideration is given in this regard.

I hope you find the above summary of CDCs outstanding concerns, that we feel have not been fully resolved prior to submission of the Bradley Neighbourhood Plan, useful and that you can consider these as part of the Examination.

If you require any further information, please do not hesitate to contact Rachel Cryer, Spatial Planning Officer or myself via the email addresses provided at the top of this letter.

Kind regards,



Principal Spatial Planning Officer
BA (Hons) MRTPI