



The countryside charity
North and East Yorkshire

PO Box 189
York
YO7 9BL

www.cpreney.org.uk

Tel: 07983 088120
Email: info@cpreney.org.uk

Branch Chair
Mrs Jan Arger

Authority: Yorkshire Dales National Park Authority

Type of consultation: Policy Consultation

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At land: N/A

Type of response: Written Representation

Date of Submission: 11th May 2023

All responses or queries relating to this submission should be directed to the Secretary for the Trustees at the contact details shown above on this frontispiece.

All CPRE North and East Yorkshire comments are prepared by the charity using professional planners whose research and recommendations form the basis of this response in line with national CPRE policies.

External planning consultant used in this response:



KVA Planning Consultancy
Katie Atkinson, BA (Hons), Dip TP, MA
MRTPI
www.kvaplaning.co.uk

Comment

CPRE North and East Yorkshire ('CPRENEY') welcomes the opportunity to comment on Consultation No. 6 Land for Housing Development having responded previously to the consultations no's 1-5.

CPRENEY welcome the efforts taken in the consultation exercises to date by the Yorkshire Dales National Park Authority ('NPA'). Once adopted the new Local Plan will provide a single planning policy framework for the National Park and replace the existing local plans covering different local authority areas which make up the National Park.

It is understood that the NPA are seeking to plan for a housing requirement of 850 dwellings across the National Park throughout the Plan period (2023-40) which equates to circa 50 dwellings per annum to meet the needs of its communities, addressing the diminishing population and particularly the retention of younger age groups. If the housing target is to be delivered, there will need to be a sufficient supply of land, however, identifying land for development in an area which is nationally designated for its special landscape quality and offered the highest protection in planning policy terms will be challenging. Existing planning permissions will contribute towards the 850 target but will only account for circa 330 dwellings. New dwellings will need to support affordable housing (particularly 1-2 bedroom) and provide the right type and tenure of housing, in the right locations – supported by a range of services so as to meet the needs of communities whilst retaining and enhancing the special qualities of the National Park.

Having had the opportunity to consider the Consultation Background document, Maps, Housing Land Availability Assessment ('HLAA') and the Landscape Sensitivity Assessments CPRENEY remain generally supportive of the objectives of the NPA and the consultation documents. CPRENEY concur with the settlement hierarchy which focuses the main delivery of dwellings to the local service centres and larger villages as these have the best range of services and existing infrastructure to support new developments. The NPA have stated that larger sites (consisting of 5 or more dwellings – as opposed 10 or more dwellings outside a National Park) will be allocated in these settlements. Smaller infill or rounding off developments will also be permitted within these larger settlements as well as within a number of smaller settlements. - The NPA are promoting the use of development boundaries which will dictate where the smaller-scale developments will be permitted which is supported by CPRENEY.

At this stage, as at the previous Consultation No 5 stage, CPRENEY are supportive of the affordable housing thresholds proposed by housing value area as set out in Table 2 of the consultation document by 'south and east' and 'north and west' housing areas.

CPRENEY are fully supportive of the intention to ensure the remaining percentage of housing in each area is restricted to 'principal residence' to ensure that housing remains available to both existing and new residents of the National Park, and those with a specific 'need' to be residents in the national park without being swallowed up by second homes or holiday lets.

The NPA have identified a total of 33 sites capable of yielding around 600 dwellings across the Plan Period. The following section of this representation sets out CPRENEY's comments to specific sites (please note, CPRENEY reserves the right to comment at a later stage in relation to any site going forward to the draft Local Plan even if no comment has been made at this stage).

Embsay – EMB2 – potential yield 100. CPRENEY are aware that a larger site encompassing this site was submitted during the preparation of the Housing Development Plan (2012) and the south eastern corner of the site was initially recommended for allocation, but subsequently rejected. This is one of two substantial sites proposed for potential allocation within the NPA's administrative area and the largest potential allocation in Embsay (a second site has been proposed with a potential yield of 19). The Landscape Sensitivity Assessment

(‘LSA’) set out a moderate-high sensitivity for the larger site but considered that a *‘built development on a smaller scale, within a more limited site, that is confined to the lower slopes of Hill Top and tucked against the existing built edge of the settlement, could be integrated without damage to Embsay’s distinctive landscape setting.’* CPRENEY are concerned that even at a reduced scale of 100 rather than 140 dwellings the site remains prominent and open at the edge of the settlement and set within the ‘impact risk zone’ for the West Nidderdale, Barden and Blubberhouses Moors SSSI, the landscape impact would still remain moderate-high. CPRENEY would encourage a site specific LVIA to be undertaken at a reduced level prior to allocation. It is encouraging that the NPA recognise the need to ensure a softer edge to the settlement by concentrating development on lower slopes which will preserve the sensitive skyline of Embsay Crag in particular, however, have concerns that the site at its current proposed scale remains too large. Should this site be allocated, CPRENEY would welcome the requirement for a masterplan to be submitted alongside any future application and a detailed development brief setting out the requirements for the site should be included within the Local Plan.

EMB3 – potential yield 19. CPRENEY have no comments with regard to the specific site. However, should the NPA consider that the potential allocation at EMB2 is indeed too large as a result of this consultation, CPRENEY consider that additional dwellings could be incorporated into this site to the east of the public right of way and to the north of Skipton Road.

Grassington – GRA1 – potential yield 8. It is acknowledged that development on this site would be a logical extension northwards from the existing settlement. However, despite the proposed number of units for the site, CPRENEY are concerned that any development at this location would impact Bridle Road, a historic track still used as a bridleway today and which contributes to the distinctive character of the settlements landscape setting. Development of this site would extend houses to the edge of the bridleway and would constrict the landscape setting of the town at a sensitive point. Further, the potential allocation of this site would be detrimental to views from the historic Grassington Bridge (Grade II listed) because built development in the south west corner of the site could be visible in views northwards from both the road bridge and the riverside public rights of way.

GRA5 – potential yield 35. This large site comprises two open walled pastures which abut new housing development on the southern edge of Grassington. They form the principal vehicular gateway to Grassington from the south on the B6265. The site is the largest potential allocation in Grassington and in some respects forms a natural extension to the settlement, however, the site would be prominent in long views from the B6160 on the opposite side of the valley. The LSA describes the site as having moderate-high impact on overall landscape sensitivity. CPRENEY are concerned that the size of the site at this prominent location will dominate the setting of Grassington and risks detracting from the open valley slope farmland in which the network of stone walls reveals and express the character of land formed over many years and which so characterises the National Park.

GRA6 – potential yield 10. CPRENEY are aware that the potential allocation at this location would impact local rural character of the settlement. Development of this site would need careful consideration so as to protect the wider landscape setting of the National Park.

GRA7 – potential yield 20. This larger site in Grassington would round off development at this location. It is not widely visible from the surrounding road network or PROWs and therefore the impact of development would be localised. Any development of this site would need to be commensurate with an edge of settlement location and ensure firm boundaries going forward.

Orton – ORT1 – potential yield 9. CPRENEY are concerned that the allocation of this site would introduce residential development into the rural setting of the settlement and the Conservation Area into an area north of the B6261. Indeed the LSA sets out that *‘Development on this relatively elevated, open field on the edge of Orton*

would damage the historic landscape setting of a village that has an exceptionally distinctive historic settlement form, which has remained unchanged over centuries.’ A 2015 appeal decision refusing the site for outline development set out that “...the clearly defined village edge at this point and the surrounding countryside....are important aspects of the setting of the village and the conservation area” In our opinion, nothing has changed which alters this assessment and as such this site should not be included in the Local Plan.

Sedbergh – SED15 – potential yield 30. This is the only potential allocation which is outside the current village envelope and is a substantial size for the National Park. Despite this, as a result of a recent planning approval, the site will soon be surrounded on three sides by development and its landscape context will change to a more urban setting, therefore it would in effect become an obvious infill site for development ensuring that encroachment into the eider countryside beyond the existing built development does not occur.

Threshfield – THR4 – potential yield 100. This is the largest potential allocation in Threshfield and one of only two sites with a potential yield of 100 in the National Park. The site has been deemed to have a low -moderate landscape sensitivity to development and is already adjacent to built development and a school. This is in effect a large infill site within the settlement which would conserve gateway views to the settlement from the B6160 to the north west. Potential development of the site could be partially visible in the wider view to Threshfield from Grass Moor Lane, but would be perceived as a logical extension to the existing village which is set back from the sensitive river corridor and partially screened by the trees along Wharfedale Avenue. There is an opportunity to add to existing trees, to strengthen the landscape boundary and enclose views westwards from Grassington and the Dales Way and CPRENEY would recommend a masterplan and detailed development brief in policy should the potential allocation be taken forward to the draft Local Plan.

CPRENEY has not considered any alternative sites for housing development within the Plan area.

CPRENEY are fully supportive of housing development boundaries and would encourage the NPA to incorporate any potential allocations within such boundaries should the proposed sites be taken forward into a draft Local Plan for the sake of clarity and to ensure defensible boundaries to development for the sake of the landscape setting and wider National Park.

CPRENEY consider that the important open spaces identified on accompanying maps are appropriate and have not been made aware of any concerns by members at this stage in relation to these or any other areas within the National Park.

Conclusion

CPRENEY welcomes the opportunity to comment on Consultation No. 6 – Land for Housing Development and is supportive of the approach taken ensure the protection, preservation and enhancement of the NP and its special qualities when undertaking the challenging site selection process.

CPRENEY looks forward to receiving the next stage of consultation documents in the plan making process.

CPRENEY, therefore, reserves the right to comment further at the appropriate time during the next phases of the plan making process.