



By email to: [localplan@yorkshiredales.org.uk](mailto:localplan@yorkshiredales.org.uk)

### **Comments on Yorkshire Dales NPA Local Plan Preferred Options – July 2022**

The Campaign for National Parks is the independent national voice for the 13 National Parks in England and Wales. Our mission is to inspire everyone to enjoy and look after National Parks – the nation's green treasures. We have been campaigning for more than 80 years to ensure that our National Parks are beautiful, inspirational places that are relevant, valued and protected for all.

We work closely with the National Park Societies ('Friends of' groups or similar) in each of the National Parks and we have liaised with Friends of the Dales over the preparation of this response. We are generally very supportive of many of the proposed local plan policies and we believe that the new Plan will provide more opportunities to ensure that the Yorkshire Dales National Park is both protected and enhanced in future. Our response focuses primarily on ensuring that the new Local Plan will provide strong support for achieving the National Park purposes and we have not commented on all the proposed policies.

#### **Core Policy**

##### **CP1 – Sustainable Development**

We support this policy and particularly welcome the fact that it provides clarity on the meaning of sustainable development in the context of the National Park.

##### **CP2 - Landscape Character**

We broadly support this policy particularly the reference to the Landscape Character Assessment. However, we believe there is an opportunity to strengthen it by including wording which protects the setting of the National Park and which allows for the possibility of requiring certain types of redundant development, such as telecommunications infrastructure that is no longer in use, to be removed from the landscape.

##### **CP3 - Biodiversity**

While we support the aim of ensuring that development should deliver biodiversity enhancements, we would not want to see biodiversity net gain being used as a way of justifying development which might harm the landscape. In order to address this concern, it would be helpful to clarify either in the policy or in the supporting text that biodiversity enhancements cannot be used to justify development that has an adverse landscape or visual impact.

##### **CP6 – Flood Risk**

We support this policy and particularly welcome the fact that it includes a requirement for sustainable drainage systems.

## **CP7 – Major Development**

We support the inclusion of a local interpretation of the major development test. However, we believe this policy could be strengthened by the inclusion of a reference to the impacts of major development on the special qualities of the National Park. Research<sup>1</sup> that we commissioned jointly with CPRE and the National Trust in 2016 identified that having a local policy which relates the major development test to the Parks' special qualities is one of the most effective ways of protecting a National Park against inappropriate development.

## **CP8 – National Park Purposes**

This policy should be amended to include a reference to the Sandford Principle. It could also usefully be strengthened by an inclusion of a reference to the need to ensure that development in the setting of the National Park does not have a negative impact on the statutory purposes.

## **CP9 - Spatial Strategy and Housing Land Target**

We are broadly supportive of this policy. However, it is essential that it takes account of National Park purposes and the constraints on developing in an area designated for its natural beauty, wildlife, cultural heritage and recreational opportunities. This means that if it does not prove possible to meet the proposed housing allocations for any of the districts listed then there should be no requirement on the Plan to make up this shortfall in other locations if this would have unacceptable impacts on the National Park.

## **Access and Connectivity**

### **AC1 – Infrastructure needed to support development/AC2 – New and improved infrastructure**

As these policies apparently cover all types of infrastructure, there is a need to include a clear statement about roadbuilding in National Parks along the lines of: "New roads and significant road widening schemes are not considered appropriate in the National Park and will not be permitted unless it can be robustly demonstrated that they will meet a compelling need which cannot be met in any other way and are acceptable in terms of landscape, climate and other impacts." This is in line with the presumption against roadbuilding as set out in the National Policy Statement on National Networks.

### **AC3 – Walking, Cycling and Pedestrian travel/AC5 – Vehicle Movements**

We welcome the emphasis on promoting active travel and access to public transport. However, we would also like to see this strengthened by the inclusion of targets (either here or in policy E13) for reducing the number of visitors who travel by car. This would ensure that measures to reduce the need to travel and encourage alternative forms of transport are incorporated into future planning decisions which have an impact on visitors to the Park. We would also like to see the inclusion of policies which safeguard quiet rural roads and restrict developments which would generate additional traffic on inappropriate roads in order to maximise the opportunities for encouraging walking and cycling in the National Park.

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<sup>1</sup> Full details of the research findings are available here: <http://www.cnp.org.uk/SHU-planning-research>

## **Archaeology and Built Heritage**

### **AB3 – Conversion of Traditional Buildings and acceptable uses**

We welcome the fact that the policy under which barn conversions are considered continues to be a conservation policy rather than a housing one. It is essential that the conversion of traditional buildings continues to be considered first and foremost with regard to the contribution that conserving these structures makes to the special qualities of the National Park as this is the only way of ensuring that these special qualities continue to be protected and enhanced effectively. Permission should only be granted for conversions which genuinely retain the historic integrity of the original barn, its surroundings, and their contribution to landscape character and the Traditional Buildings Toolkit and Design Guide should be applied rigorously.

We also welcome the fact that the policy restricts which buildings can be converted according to their location. However, we would like to see the inclusion of a stricter definition of what constitutes a roadside location which is limited to locations within 20m of a road maintainable by the Highway Authority to avoid the risk of increased numbers of conversions in open countryside. Any proposals for more remotely located conversions (i.e. outside settlements) must be subject to a more rigorous landscape assessment. The conversion of isolated and remote field barns is not appropriate as not only the conversion itself but the associated need for infrastructure and services and the increased traffic generation will have a negative impact on the special qualities of the Park. In addition, we would also like to see the inclusion of controls to restrict the cumulative impact of multiple barn conversions and to avoid the risk of ribbon development between settlements.

There should be a limit on the floor area of barn conversions and also a restriction on any subsequent extensions to ensure that such conversions are delivering the kind of housing which meets local needs. Allowing the building of large homes as a result of conversions will only result in more housing that is unaffordable to local people. The use of conditions such as the removal of permitted development rights must be monitored and enforced.

The wording in the second set of bullet points is confusing as there is a mixture of 'and' and 'or' criteria in the same list. This needs to be revised and we would like to see wording added to make it clear that conversion to holiday accommodation should only be allowed where it can be shown that there is no need for additional affordable housing in a particular area.

## **Community**

### **C1 – Housing in towns and large villages/C2 – Housing in small villages**

We support these policies, particularly the requirement that all new housing in the National Park will be restricted to principal residence and the emphasis on local occupancy and affordable housing as this will help ensure that new housing development is delivering the kind of homes that are most needed in the area. However, we would like to see the addition of a reference to all new housing being of high-quality design. There is a need to ensure consistency in the terminology used and to include definitions for terms such as 'principal residence'.

### **C3 – Rural exception sites**

We welcome the fact that this policy ensures all new housing on exception sites will be affordable. However, we would suggest the need for additional wording to make it clear that local occupancy criteria would apply.

### **C4 – Rural Workers' Housing**

We broadly support this policy but believe it needs amending to incorporate a reference to ensuring that any new accommodation is located and designed in such a way as to minimise its impact on the landscape. It could also be strengthened by restricting occupancy to relevant rural workers. The policy as drafted requires evidence of need for a worker to live in that location but does not include any reference to future occupancy.

### **C5 – Sub-division, Replacement and Residential caravans**

We support this policy but suggest that it would be strengthened by removing permitted development rights for any future extensions of the resulting dwellings.

### **C9 – Waste Management**

We would like to see this policy amended to include support for waste minimisation.

## **Economy**

### **E2 – Rural Land-based Enterprises**

We support this policy and welcome the fact that development will only be allowed where it does not have a detrimental impact on the special qualities of the National Park.

We also welcome the emphasis on supporting diversification where that encourages more nature friendly farming. Adopting such an approach is the most appropriate way of conserving the distinctive landscape character of the Dales, whilst also ensuring that the land is being managed in a way which maximizes the benefits for nature, climate and people.

Given the permitted development rights which now exist for agricultural buildings it would seem sensible to add a clause to make it clear that permitted development rights would not apply to any new development granted under this policy.

We would also like to see the inclusion of a definition for 'eco-tourism' which makes it clear that this policy is only intended to support tourism activities which are compatible with National Park purposes.

### **E3 – Re-use of existing buildings and brownfield land**

This policy should be strengthened by making it clear that priority will be given to developments which are accessible by public transport and which are within walking distance of existing shops and services to encourage support for the local economy.

### **E13 – Visitor Facilities**

We support this policy and particularly welcome the emphasis on supporting proposals at Bolton Abbey which are supported by improved access by public transport or active travel and on supporting small-scale facilities within existing settlements as this will encourage

visitors to support other local shops and services. We also welcome the emphasis on high design quality in this policy.

## **Landscape**

### **L4 – The Open Land**

We strongly support the inclusion of a policy which clearly identifies areas where there are stronger restrictions on the type of development which can take place. Such a policy ensures that there are parts of the Park which are relatively wilder alongside areas where more traditional farming practices continue, ensuring protection and enhancement of the cultural heritage and landscape character of the Dales as well as providing new recreational opportunities. Such a policy thus supports both the National Park statutory purposes.

### **L6 – Dark Night Skies**

We support the inclusion of a policy aimed at protecting the Park's dark night skies but believe this could be strengthened with regard to addressing the impacts of lighting across the whole of the Park. The equivalent policy in the North York Moors Local Plan (Policy ENV4) makes it clear that all development is expected to minimize light spillage through good design and lighting management.

## **Natural Environment**

### **NE2 – Protecting irreplaceable habitat, trees, hedgerows and walls**

We strongly support this policy. However, although it provides good support for the prevention of the loss of existing trees it could usefully be supplemented by a policy which supports developments which include native tree-planting in appropriate locations and/or promote recreational use of woodlands.

## **Appendix 4: Local occupancy housing**

We welcome the fact that the wording of criterion (ii) has been amended to replace 'full-time employment' with 'permanent employment' of at least 16 hours as this ensures the policy reflects trends in the patterns of employment with more people now working part-time.

However, we're disappointed that the period during which the property can only be marketed to those meeting the basic local occupancy criteria has not been extended from 12 weeks to 6 months in order to increase the chances of the properties being sold to people with strong local connections.

For further information about any aspect of this response, please contact Ruth Bradshaw, Policy and Research Manager (email:ruthb@cnp.org.uk).