

Policy Number/Topic	Response from Friends of the Dales
CP1 – Sustainable Development	We strongly support this policy.
CP2 – Landscape Character	We strongly support this policy.
CP3 – Biodiversity	<p>We support the requirement of a <b>Sustainability Statement</b>. It would be helpful if the policy clearly identified as to which types of development this applied.</p> <p>With respect to <b>Biodiversity Net Gain</b> (and the footnote explaining this), the policy should clarify that BNG should not be used as a way of justifying developments that might harm the landscape or special qualities of the national park.</p> <p>The policy should make clear that the proposed 20% minimum biodiversity uplift is <b>in addition to existing priority habitats</b>, not to replace them.</p> <p>The expectation should be that BNG is <b>always delivered on-site</b> by the creation of new habitats; enhancing existing habitats; or managing existing habitats better. There should be a presumption against provision of BNG off-site, whether on other land within the applicant’s control or by purchasing biodiversity credits and should be approved as a last resort and when applicant can demonstrate that they have no alternative.</p> <p>We support the aim that new development should leave the natural environment in <b>better state after completion</b> than before and should make the habitat network more resilient to the impacts of climate breakdown.</p>
CP4 - Design	We strongly support this policy.
CP5 - Energy	We support this policy.
CP6 – Flood Risk	We support this policy.
CP7 – Major Development	We support this policy.

<p>CP8 – National Park purposes</p>	<p>This is a very important policy and should be moved to the top of the policy list as CP1.</p> <p>This policy should be strengthened by including a reference to the Sandford Principle namely that <b><i>where irreconcilable conflicts exist between conservation and public enjoyment in National Parks, then conservation interest should take priority.</i></b></p> <p>The policy should also refer to the need to ensure that development in the setting of the National Park <b>does not have a negative impact on the statutory purposes.</b></p> <p>The footnote 19 should be amended to: The National Park Authority will decide whether a proposal constitutes “major development” in relation to this policy. That decision will have regard to scale, nature, setting, local precedent and a judgement on whether it would have a significant adverse impact on National Park purposes <b><i>or special qualities.</i></b>”</p>
<p>CP 9 -Spatial Strategy and Housing Land Target</p>	<p>It would be helpful to clarify whether the target of 50 new dwellings (850 dwellings between 2023 and 2040) includes <b>new build and conversions</b> per year.</p> <p>Given that the Annual Monitoring Report (2021-2022) reports the target of 50 was comfortably exceeded (albeit following a number of under target years), the cumulative target may be achieved before the end of the Local Plan period (2024), requiring the target to be amended downwards. We would like the Local Plan to include a statement as to over or under achievement of targets.</p> <p>We recommend that the intention to deliver the majority of this target be amended to highlight delivery through the completion of sites with <b><i>existing planning consent</i></b>, and secondly through the development of allocated sites on the edge of larger settlements.</p> <p>The closing sentence should be rephrased so that “development that would adversely affect the setting of the National Park <b>should not be permitted</b>; if given permission then it should be sensitively located and designed to avoid or minimize adverse impacts on the designated area.”</p>
<p>P20 – Settlement Hierarchy Table</p>	<p>It would be helpful to explain through a footnote the status of settlements written in italics (presumably those partly outwith the National Park boundary), and be consistent throughout the document in terminology eg small settlements v small villages.</p>

AC1 – Infrastructure needed to support development	<p>The <b>Sandford Principle</b> should be referred to under the Objectives at the head of this section.</p> <p>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 and other impacts.” This is in line with the presumption against roadbuilding as set out in the National Policy Statement on National Networks.</p>
AC2 – New/improved infrastructure	<p>We recommend that this policy be strengthened by including a reference explaining that where the applicant for a development is a relevant authority (in terms of S62 of the 1995 Environment Act) they shall <b>have a duty to have regard to national park purposes</b>. It would be helpful to include reference to the section that explains that if it appears that there is a conflict between those purposes, they shall attach <b>greater weight</b> to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area comprised in the National Park.</p>
AC3 – Walking, cycling, pedestrian travel	<p>We strongly support this policy especially the requirement for schemes generating high levels of movement to link to <b>public transport</b>.</p>
AC4 – Railway related development	<p>In the first sentence we recommend, to clarify intent, that “and <i>support</i> new economic, business and tourism uses” is changed to “<b>and permit</b>”.</p> <p>It would be helpful if the plan document explained what is meant by the “<b>Settle/Carlisle corridor</b>” – to indicate how wide the corridor reaches, whether sections in between stations are included and so on.</p> <p>The Aim makes a broad statement about supporting the reuse of former railway routes. It would be helpful if the <b>type of new uses</b> preferred was indicated.</p>
AC5 – Vehicle movements	<p>We strongly support the obligation on development proposals that generate vehicle movements to contain adequate provision for connection for <b>public transport</b>.</p>

<p>AB1 - Archaeology</p>	<p>We strongly support the policy in particular that failure to provide accurate information (heritage assessment) about the potential impact will <b>lead to refusal</b>.</p> <p>We support the requirement for applicants seeking to develop non designated heritage assets (which includes most traditional farm buildings) to <b>demonstrate</b> they understand the significance of the heritage asset and the impact of their proposals.</p>
<p>AB2 – Buildings, Conservation Areas, Historic Parks and Gardens</p>	<p>We are supportive of this policy.</p> <p>However, with respect to non designated assets (such as barns or industrial structures without formal designation) we expect <i>the weighing of the scale of harm</i> to include recognition of their value to the <b>overall cultural heritage</b> and their contribution to the wider historic landscape.</p> <p>In the table of Historical Landscapes, it would be helpful to identify the two Registered Historic Parks and Gardens.</p>

<p>B3 – Conversion of Traditional Buildings and acceptable uses</p> <p>AND</p> <p>AB4 – Conversion of Traditional Buildings – building treatment</p>	<p>These are two important linked policies so we will respond to them <b>jointly</b>.</p> <p>We welcome the fact that the policy under which barn conversions are considered continues to be a <b>conservation policy</b> 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.</p> <p>We welcome the continued restrictions on which buildings can be converted according to their <b>location</b>. However, there should be a stricter definition of what constitutes a roadside location. The phrase in Footnote 33 which explains on what basis a building can be considered roadside by saying "in close proximity" (to a specified type of road or track) is too vague and is wide open to interpretation, thus leading to unhelpful arguments.</p> <p>Instead, we suggest this is limited to locations <b>within 20m</b> 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 National Park.</p> <p>In addition, we would also like to see the inclusion of controls to restrict the <b>cumulative impact</b> of multiple barn conversions and to avoid the risk of ribbon development along roads between settlements.</p> <p>We recommend there should be a <b>limit on the floor area</b> of barn conversions and also a restriction on any subsequent <b>extensions</b> to ensure that such conversions are delivering the kind of housing which meets local needs. Such a limit could be phrased as "extensions are expected not to exceed 25%". 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.</p>
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	<p>We are concerned about the statement concerning proposals for the change of use of <b>isolated traditional buildings</b> to low intensity uses. This concerns development in open countryside. It should be made clear in the policy that approval of change of use of isolated traditional farm buildings removes permitted development rights. Some of the examples given as low intensity uses such as light industrial uses and commercial storage are likely to be very difficult to monitor and enforce particularly for vehicle movements and unauthorised development of the curtilage. Other low intensity uses such as barn pods, camping barns, equestrian and agricultural uses will potentially be more aligned to the special qualities of the National Park and support farm diversification (but may still have adverse impacts).</p> <p><b>To assist clarity</b> This is an important policy and likely to be referred to by a wide range of stakeholders. As such it is important that it is clearly set out and terminology is explained.</p> <p>Terms used in this policy such as <b>continuous occupation</b>, <b>permanent residency</b> and <b>short stay letting</b> are used without definition and inconsistently. These leaves them open to misinterpretation.</p> <p>To help clarity, we suggest the addition of a linking “AND” between the two prime criteria to be met for the <b>change of use of traditional buildings</b> – namely that “the building is an asset worth conserving” AND “that the location is within an existing settlement, building group or suitable roadside location”.</p> <p>We also suggest that specific points needing to be met to enable <b>change of use to a holiday let</b> would benefit from highlighting the “or” and “and” options. Such criteria will be used to determine applications so it would be helpful to have this more clearly set out.</p>
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AB5 – Demolition and alteration of traditional farm buildings	We support the condition that proposals to demolish or alter a traditional farm building for non-agricultural purposes will need to be <b>informed by a structural survey and a heritage assessment</b> .
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C1 – Housing in Towns and large Villages	<p>We are strongly supportive of the condition that all new housing will be restricted to <b>principal residency only</b>, and we suggest that it should be made clear that this is <b>in perpetuity</b>. We suggest that the statement on single plot sites be strengthened to <b>restricted</b> to local occupancy and First Homes. We support the table of the proportion of affordable dwellings (as defined in the National Policy Planning Framework) in different areas of the National Park.</p> <p><b>To assist clarity</b> This is an important policy and likely to be referred to by a wide range of stakeholders. As such it is important that it is clearly set out and terminology is explained.</p> <p>The definition of <b>principal residency</b> as “permanently occupied (not a holiday property)” open to misinterpretation. A clearer definition is needed to ensure the policy is understandable and robust.</p> <p>Other terms - <b>permanent occupancy, principal occupancy, continuous occupancy</b> – are used interchangeably and without full definition. These leaves them open to misinterpretation.</p>
C2 – Housing in Small Villages	<p>We suggest that the statement on sites with up to two new building dwellings within small settlements be strengthened to <b>restricted</b> to local occupancy and First Homes.</p> <p>NB the policy should be renamed Housing in Small Settlements for consistency.</p>
C3 – Rural Exception Sites	We are supportive of this policy, however we recommend additional wording to make it clear that <b>local occupancy</b> criteria would apply.
C4 – Rural Workers’ Housing	We are supportive of this policy.
C5 – Sub division, Replacement, Residential Caravans	No comment on this policy.
C6 - Elderly and Vulnerable	No comment on this policy.
C7 – Community Facilities	No comment on this policy.
C8 – Important Local Space	We are supportive of this policy.

C9 – Waste Management	We are supportive of this policy.
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E1 – Business Development sites	To strengthen the policy we suggest that expansion of existing employment and business uses is <b>only permitted</b> where there is capacity to do so <b>without adverse impacts</b> on the local landscape.
E2 – Rural land based Enterprises	<p>We are supportive of this policy and welcome the link to the National Park Management Plan.</p> <p>We support the conditions on new development on land based enterprises being restricted to those that support farm produce, nature recovery, conservation of heritage, water quality, woodland management and climate adaptation and <b>eco-tourism</b> but suggest that a clear definition is given for that last category as it is open to misinterpretation. Eco tourism that relates to the special qualities of the National Park should be the priority.</p>
E3 – Reuse existing buildings and brownfield land	No comment.
E4 – High Street and Retail	No comment.
E5 – Safeguarding existing employment and tourism uses	No comment.
E6 – Rural Estate Plans	<p>We are unclear as why this policy is included in the Local Plan. Any proposals for development of land and buildings for new employment and business-related uses on rural estates will need to go through the normal development control process.</p> <p>We recognise that rural estates and the Authority may find it mutually helpful to establish a formal link so that an estate's development needs can be discussed in advance of an application being submitted. We accept that process may help identify how proposals meet the requirement of the Local Plan and support delivery of the National Park Management Plan. However there seems <b>no need to include that process as a policy with the Local Plan.</b></p> <p>In addition, the definition provided of a whole estate plan is unhelpful. It implies that the rural estate will determine what evidence and what stakeholder engagement is required rather than these being set out by the Authority.</p>
E7 – Home working	We support this policy.
E8 – New Build Live/Work	We support this policy.

<p>E9 – Campsites and E10 Touring Caravan Sites</p>	<p>We support the ambition of these policies to increase the opportunity for affordable overnight stays in the National Park, on appropriately managed and screened sites. Unfortunately the impact of overnight stays outwith approved sites, for example on roadsides and private land, and the relationship to the 28 day permitted development rule is not addressed in these policies.</p> <p>The policies lack clarity as terms such as “camper van” and “motor homes” are used without definition. In practice a very wide range of vehicles are now adapted or designed for overnight accommodation, so a clear definition is needed. The suitability of an existing car park is not defined – for example whether or not this depends on provision of waste management, toilets, supervision and so on.</p>
<p>E11 – Sustainable Self catering Visitor Accommodation</p>	<p>It is hard to judge the appropriateness of this policy as <b>no definition or examples are given of sustainable self catering</b> visitor accommodation, including what is meant by “reversible”.</p>
<p>E12 – Facilities for enjoying the Park</p>	<p>The <b>Sandford Principle</b> should be re-iterated in this policy.</p> <p>The examples given of new visitor facilities are wide ranging in terms of impact and scale. They range from low impact facilities such as wildlife hides, up to high impact facilities such as new car and coach parking. There is <b>no recognition of the differing impact</b> these have on the special qualities of the National Park or how they assist enjoyment.</p> <p>The examples given of facilities that utilise natural resources in a “<b>sustainable</b>” way is also wide ranging and includes watersports facilities. Motorised boats, sailing and other water sports which can have a <b>highly detrimental effect on aquatic ecology</b>, breeding birds and associated land habitats, and impact on tranquility and the experience of the special qualities of the area.</p>

E13 Visitor facilities	<p>This policy states that new small scale indoor visitor facilities will be permitted on existing settlements, sites, diversification schemes or sites allocated for business or tourism. This is a very broad definition of sites.</p> <p>The examples given are equally wide including small hotels, cafes, restaurants, pubs, swimming pools and so on – it is <b>difficult to see how these can be defined as “small scale” and these facilities are likely to have significant impact.</b></p> <p>We welcome the mention of <b>public transport</b> facilities.</p> <p>Special mention is made of part of the Bolton Abbey Estate, namely the Core Visitor Area. This is referred to as the area between Barden and Bolton Bridges, ie a stretch of the River Wharfe.</p> <p>The policy does not clearly explain what is meant by permitting development that “<b>secures the future cross boundary management of the heritage assets</b>”. Some of the examples given – new visitor accommodation and indoor facilities – have considerably <b>higher impact</b> than others – such as new cycling and walking routes. We welcome the requirement that proposals must be supported by <b>improved public transport</b>.</p> <p>If proposals here are of the type listed are to be assessed against the wider policies of the Local Plan, it would be helpful to explain why <b>special mention</b> is made here.</p>
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L1 – Crushed Rock Quarrying	<p>We support this policy but suggest that for clarify the policy should make it clearer that <b>extensions in time, area or depth should only be permitted</b> “when <b>all</b> the following criteria are met”. This could be done by inserting “and” between each criterion.</p>
L2 – Building Stone	<p>We support this policy but suggest it is made clear the policy refers to <b>existing sites</b>.</p>
L3 – Reworking Mineral Waste	<p>We support this policy.</p>
L4 – The Open Land	<p>We strongly support the aim of this policy to protect the special qualities of tranquility, remoteness and solitude. We assume that this policy refers to '<b>Open Upland</b>', and in which case the policy should be named as such.</p> <p>We also assume the area remains as defined in previous Local Plans and relates to:</p> <p>“extensive areas of relatively wild open country, predominately of semi-natural upland vegetation where human influence is limited. ...include contiguous stretches and mosaics of upland</p>

	heath, grass moor, blanket peat, bare rock and mineral soils. Areas of rough pasture and moorland allotments have been included where they have similar qualities of remote wilderness. ...much of which is common land and designated access land..."
L5 – Mineral Safeguarding	We are concerned that the inclusion of this policy appears to imply that future extraction (of high polished stone value gritstone and high purity carboniferous limestone) will be permitted. This is <b>counter to the presumption against future quarrying</b> in the National Park.
L6 – Dark Night Skies	We suggest that the terms <b>Core Area and Buffer Area should be fully defined</b> in the policy, and recognition be given to the status of the entire area as an <b>International</b> Dark Sky Reserve.

NE1 – Wildlife Sites, Species and Networks	We strongly support this policy.
NE2 – Protecting irreplaceable habitat, trees, hedgerows and walls	<p>We support this policy, but recommend that the examples given of irreplaceable habitat be extended to include long established <b>species rich grassland</b> (pasture and meadow).</p> <p>We also recommend that greater recognition should be given to the irreplaceability of the habitats of such grasslands, ancient woodlands, ancient and veteran trees, hedges and drystone wall. It is not adequate to state that replacement or mitigation is acceptable where the loss is "unavoidable". This should be strengthened to indicate this is <b>only in the last resort and when the applicant has provided the sufficient evidence</b> as to an option avoiding destruction of the habitat cannot be undertaken.</p> <p>We also recommend that the term "<b>adequate space</b>" around <b>trees</b> to prevent future loss should be clearly defined as being determined by the Authority on a case by case basis.</p>
NE3 – Safeguarding Water Environment	<p>We support this policy but believe it does not go far enough to safeguard the water environment as no mention is made of <b>pollution from agricultural sources</b> and reducing nitrate and phosphate run off into water courses.</p> <p>We are very concerned to see the inclusion of <b>offsetting</b> being permitted in respect of pollution into the River Eden Special Area of Conservation or its tributaries. This <b>does not reduce</b> the overall level of pollution in this sensitive catchment. <b>We recommend this phrase is removed from the policy.</b></p>

<p>Appendix 1 – Basic Biodiversity Enhancement</p>	<p>The examples given of <b>basic biodiversity requirements</b> which are expected to be delivered on smaller scale developments are <b>unambitious, unrelated to the scale of the development and will have negligible or no impact</b> on the biodiversity crisis in the National Park.</p> <p>For example, to meet the enhancement criteria in full an applicant carrying out the conversion of a redundant farm building would only need to provide <b>one bee brick or one bird box</b>. Development sites up to 5,000 m<sup>2</sup> are only required to provide “multiple” enhancements from the same list – ie perhaps two bird boxes. Enhancements of this type and quantity are <b>entirely inadequate in the designated area of a national park</b>.</p> <p>The Authority should require enhancements that make a <b>significant difference to biodiversity</b> and which are related to the particular species and habitats which are part of the special qualities of the national park.</p>
<p>Appendix 2 – Housing Value Areas</p>	<p>No comment</p>
<p>Appendix 3 – Affordable Housing</p>	<p>We support the definition and criteria.</p>
<p>Appendix 4 – Local Occupancy Housing</p>	<p>We welcome the fact that the wording of criterion (ii) has been amended to replace ‘full-time employment’ with ‘permanent employment’ of <b>at least 16 hours</b> as this ensures the policy reflects trends in the patterns of employment with more people now working part-time.</p> <p>We’re extremely disappointed that the period during which the property can only be marketed to those meeting the basic local occupancy criteria <b>has not been extended</b> from 12 weeks to 6 months in order to increase the chances of the properties being sold to people with strong local connections. We have evidence that at least one agent has advised a potential purchaser who doesn’t meet the local occupancy criteria to wait until the criteria are relaxed and then make an offer.</p>