Designation of Skelton Neighbourhood Area

1 Purpose of Report
1.1 This report asks the Executive to formally designate the Skelton Parish area as an area suitable for the exercising of neighbourhood planning powers.
1.2 Skelton Parish Council has applied to the council for the parish area to be designated as a ‘neighbourhood area’. As part of this process public consultation on the area has been carried out, providing an opportunity for members of the public and any interested bodies to make representations on the appropriateness of the area. The Local Planning Authority is then required to either designate the area or refuse the designation. If the decision is to refuse the area, then reasons must be given.
1.3 The application is available at Appendix 1. A proposed decision report is provided at Appendix 2.

2 Recommendation:
1 The designation of the Skelton Neighbourhood Area be approved.
2 The specified area, namely the whole of the Parish, without modification be designated as a Neighbourhood Area for the reasons set out in the application.
3 The designation decision report, available at Appendix 2, be approved, sent to Skelton Parish and publicised on our website.

3 Report Details
3.1 The power to designate an area as a Neighbourhood Area is exercisable under section 61G of the Town and Country Planning Act 1990. Under Regulation 5(1) of The Neighbourhood Planning (General) Regulations 2012 an area application has to include a map which identifies the area to which the area application relates, a statement explaining why this area is considered appropriate to be designated as a neighbourhood area and a statement that the body making the area application is a relevant body for the purposes of section 61G(2) of the 1990 Act.
3.2 Skelton Parish Council as the ‘relevant body’ submitted an application for designation of the Skelton Parish area to be designated as a Neighbourhood
Area (the submission is at Appendix 1). The specified area includes the whole of the area of Skelton Parish Council and so satisfies section 61G(3) of the Act. The application states that following designation the Parish Council may wish to then produce a Neighbourhood Development Plan or a Neighbourhood Development Order.

3.3 The application for designation as a Neighbourhood Area was publicised for a 6 week public consultation period from 3 April 2014 until 26th May 2014.

3.4 In total 8 responses were made within that timescale – 1 was in support, 1 had no objections, 2 were neutral, 4 had no comments to make, and none had objections. The representations are made available in Appendix 3, and regard has to be given to them. It should be noted that some statutory consultees provide standard responses that relate more to the contents of future neighbourhood plans rather than to the Area Designation itself.

3.5 Two further formal considerations apply when considering the designation of Neighbourhood Areas. Firstly, regard must be had to the desirability of designating the whole of the area of a parish council as a neighbourhood area as required under section 61G(4)(a) of the Act. Secondly consideration must be given as to whether the authority should designate the area as a ‘business’ area under section 61H of the Act. The purpose of this is to identify where an area is predominately made up of businesses and as such where businesses should be entitled to vote in any referendum. As this application covers the whole parish, and the Parish is not considered a business area it is not recommended that either of these considerations is applicable.

3.6 It is recommended that the application is approved. If the application is approved, then Regulation 7(1) of The Neighbourhood Planning (General) Regulations 2012 requires the designation to be publicised. If the application is refused, reasons must be given under section 61G(9) of the 1990 Act and Regulation 7(2) of the Regulations requires the decision to be publicised.

4 Policy Framework

4.1 The Council has four corporate priorities which are:

- Housing
- Quality Environment
- Economic Vitality
- Quality Council

5 Implications

5.1 Legal

5.1.1 The Council has a duty to consider and determine Neighbourhood Area applications. Any application has to be considered with regard to statutory criteria and any relevant guidance. There are no apparent reasons to refuse this application and it is recommended that it is approved.
5.2 Financial

5.2.1 Any decision to reduce or increase resources must be made within the context of the Council’s stated priorities as set out in its refreshed corporate plan.

5.2.2 The costs to the Council is officer time in administering the area application and the other associated costs. The costs of the Skelton Area Designation can be met by existing budgets. These budgets are funded through grants already received from the Department of Communities and Local Government. In the current financial year the council can also apply for grants from the Department of Communities and Local Government of £5,000 per neighbourhood area designation.

5.3 Equality and Diversity

5.3.1 The Council has to have regard to the elimination of unlawful discrimination and harassment and the promotion of equality under the Equality Act 2010 and related statutes.

No relevant considerations.

5.4 Environmental

5.4.1 The Council has to have due regard to conserving bio-diversity under the Natural Environment and Rural Communities Act 2006. The Council will work with the qualifying body to ensure that any subsequent plan or order takes biodiversity issues into account.

5.5 Crime and Disorder

5.5.1 Under the Crime and Disorder Act 1998 the Council has to have regard to the need to reduce crime and disorder in exercising any of its functions.

No relevant considerations.

5.6 Children

5.6.1 Under the Children Act 2004 the Council has to have regard to the need to safeguard and promote the welfare of children in the exercise of any of its functions.

No relevant considerations.

5.7 Risk Management

5.7.1 Risk Management is a process whereby attempts are made to identify, actively control and reduce risk to protect the council. This covers not only the traditional areas of insurable risk but also the organisational risk that the council faces in undertaking all its activities.

No relevant considerations.

6 Recommendation

6.1 To formally designate the area of Skelton Parish as an area suitable for the exercising of neighbourhood planning powers granted under the 2011 Localism Act.
Ruth Atkinson
Communities Director

**Governance Checks:**

| Checked by or on behalf of the Chief Finance Officer | ✓ |
| Checked by or on behalf of the Monitoring Officer   | ✓ |

Background Papers:  
1. Skelton Neighbourhood Area Application  
2. Designation Decision Report  
3. Summary of consultation responses

Contact Officer: Fergus McMorrow, Neighbourhood Planning Officer  
Telephone Number: 01768 212474
Area Application
for Designation as Neighbourhood Area

(see Section 61G(1) of the Town and Country Planning Act 1990 and Regulation 5 of the Neighbourhood Planning (General) Regulations 2012 SI2012/637)

If you require a copy of the form in an alternative format or language phone: 01768 212268. If you require any help with completing the form, please contact the Neighbourhood Planning Officer at Eden District Council on Telephone: 01768 212474 or Email: Fergus.McMorrow@eden.gov.uk.

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Section 1 - Applicant

1. Name of your organisation
   Skelton Parish Council

2. Address of organisation
   c/o
   Mrs Judith Naylor
   8 Poplar Place
   Penrith
   Cumbria
   CA11 9HN

3. Website (Leave this blank if your organisation does not have a website address)
   www.skeltonparish.co.uk

4. Contact person and position
   Mrs Judith Naylor Clerk to the Parish Council

5. Address (if different from Question 2)

6. Contact details
   Email judith-naylor@hotmail.co.uk
Section 2: The Proposed Neighbourhood Area

7. Area Proposed

The proposed 'Neighbourhood Area' consists of the entire parish area administered by Skelton Parish Council. The civil parish of Skelton includes the villages and hamlets of Ellonby, Lamonby, Unthank, Unthank End, Skelton Wood End, Laithes, Hutton End, Hutton Row, Braithwaite, Ivegill and Middlescueth and their adjoining rural areas within the Parish Boundary.

8. Inclusion of a Map identifying the area to which the area application relates
(Reg.5(1)(a) of the Neighbourhood Planning (General) Regulations 2012)

A map which identifies the Area to which the application relates is included and attached to this application form.

9. Statement addressing why the Area Proposed is Considered Appropriate
(Reg.5(1)(b)) of the Neighbourhood Planning (General) Regulations 2012

The Area is considered appropriate because it forms the current area of Skelton Parish Council. The powers bestowed by Neighbourhood Planning Legislation will complement and enhance the current powers of the Parish Council that apply to the same area. The Parish Council have also led the development of a Community Plan covering the same area.

The Parish Council are interested in using Neighbourhood Development Orders and Neighbourhood Development Plans. Following Designation the Parish will consider which activity will be their first priority and how they should best be applied.

Section 3 - About your organisation

10. Statement Addressing Why You Believe Your Organisation is a Relevant Body?
(Statement in compliance with Regulation 5(1)(c) of Neighbourhood Planning (General) Regulations 2012)

The body (Skelton Parish Council) making this area application, being a Parish Council, is a 'Relevant Body' (as defined in Section 61G(2) of the Town and Country Planning Act 1990) for the purposes of section 61G of the 1990 Act. The proposed area consists of the Parish of Skelton and only the Parish of Skelton.
11. When did the Applicant duly authorise this Application to be made?
(Please include date of meeting and minute number (if available) and any delegations used.)

Skelton Parish Council Meeting 11th March 2014. Minute no 13/081
A certified true copy of the minute signed by the Proper Officer is attached to this application.

12. Declaration

I confirm that this application for Neighbourhood Area Designation being made to Eden District Council has been duly authorised to be made on behalf of Skelton Parish Council, being the relevant body for Neighbourhood Planning purposes.

(Signature of duly Authorised person such as the Parish Clerk.)

<table>
<thead>
<tr>
<th>Signed</th>
<th>Print Name and Office</th>
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<tr>
<td>[Signature]</td>
<td>[Signature: Judith Naylor]</td>
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<tr>
<td>Date</td>
<td>[Date: 24/14]</td>
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The Information you have provided will be publicised to conform to the requirements under regulation 6 of the Neighbourhood Planning (General) Regulations 2012.
DESIGNATION OF SKELTON NEIGHBOURHOOD PLANNING AREA DECISION REPORT

Eden District Council under section 61G of the Town and Country Planning Act 1990 hereby designate the whole of the area of "Skelton Parish Council" as a neighbourhood area (for the purposes of section 61G(1) of the Town and Country Planning Act 1990 as amended) as it is satisfied that the Parish is appropriate to be designated as a neighbourhood area. The Council does not designate the Neighbourhood Area as a business area for the purposes of section 61H(1) of the Act as it is not wholly or predominantly business in nature.

a) Name of neighbourhood area: Skelton
b) Map of neighbourhood area: as attached
c) Relevant body: Skelton Parish Council

Dated this ................ day of ...............

P G Foote
Director of Corporate and Legal Services

On behalf of Eden District Council
Town Hall
Penrith
Cumbria
CA11 7QF
Natural England, together with the Environment Agency, English Heritage and Forestry Commission has published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans and development proposals. This is available at: http://publications.environment-agency.gov.uk/PDF/GEHO0212BWAZ-E-E.pdf

Local environmental record centres hold a range of information on the natural environment. A list of local records centre is available at: http://www.nbn-nfbr.org.uk/nfbr.php

Protected landscapes
If your neighbourhood planning area is within or adjacent to a National Park or Area of Outstanding Natural Beauty (AONB), we advise that you take account of the relevant National Park/AONB Management Plan for the area. For Areas of Outstanding Natural Beauty, you should seek the views of the AONB Partnership.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. Their boundaries follow natural lines in the landscape rather than administrative boundaries, making them a good decision making framework for the natural environment.


Protected species
You should consider whether your plan or proposal has any impacts on protected species. To help you do this, Natural England has produced standing advice to help understand the impact of particular developments on protected or Biodiversity Action Plan species should they be identified as an issue. The standing advice also sets out when, following receipt of survey information, you should undertake further consultation with Natural England.

Natural England Standing Advice

Local Wildlife Sites
You should consider whether your plan or proposal has any impacts on local wildlife sites, e.g. Site of Nature Conservation Importance (SNCI) or Local Nature Reserve (LNR) or whether opportunities exist for enhancing such sites. If it appears there could be negative impacts then you should ensure you have sufficient information to fully understand the nature of the impacts of the proposal on the local wildlife site.
Best Most Versatile Agricultural Land
Soil is a finite resource that fulfils many important functions and services (ecosystem services) for society, for example as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. It is therefore important that the soil resources are protected and used sustainably. Paragraph 112 of the National Planning Policy Framework states that: ‘Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality’.

General mapped information on soil types is available as ‘Soilscapes’ on the www.magic.gov.uk and also from the LandIS website; http://www.landis.org.uk/index.cfm which contains more information about obtaining soil data.

Opportunities for enhancing the natural environment
Neighbourhood plans and proposals may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment, use natural resources more sustainably and bring benefits for the local community, for example through green space provision and access to and contact with nature.

Opportunities to incorporate features into new build or retro fitted buildings which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes should also be considered as part of any new development proposal.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again at consultations@naturalengland.org.uk

English Heritage
The area covered by your Neighbourhood Plan includes a large number of nationally important designated heritage assets including one Scheduled Monument, six Grade I, four Grade II* buildings, fifty eight Grade II buildings as well as a Registered Park and Garden. In line with national planning policy, it will be important that the strategy for this area safeguards those elements which contribute to the significance of these assets so that they can be enjoyed by future generations of the area.

If you have not already done so, we would also recommend that you speak to the planning and conservation team at Eden District Council. They should be able to provide details of the designated heritage assets in the area together with locally important buildings, archaeological remains and landscapes. Some Historic
Environment Records may also be available on-line via the Heritage Gateway (www.heritagegateway.org.uk). It may also be useful to involve local voluntary groups such as the local Civic Society or local historic groups in the production of your Neighbourhood Plan.

English Heritage has produced a number of documents, which your community might find helpful in helping to identify what it is about your area, which makes it distinctive, and how you might go about ensuring that the character of the area is retained. You may also find the advice in “Planning for the Environment at the Neighbourhood Level” useful. This has been produced by English Heritage, Natural England, the Environment Agency and the Forestry Commission. As well as giving ideas on how you might improve your local environment, it also contains some useful further sources of information. These can be found at http://www.english-heritage.org.uk/caring/get-involved/improving-yourneighbourhood/.

United Utilities

Thank you for your consultation and seeking our views in this process.

We support growth and sustainable development within the North West and would like to build a strong partnership with you and neighbourhood groups to aid sustainable development and growth.

Our aim is to proactively share our information; assist in the development of sound planning strategies, to identify future development needs and to secure the necessary long-term infrastructure investment.

At this stage we have no comments to make on the Neighbourhood Area Application submitted by the Parish of Skelton, but wish to be included in further consultations and where necessary, the development of the Parish of Skelton’s Neighbourhood Area Plan and any Neighbourhood Development Orders or Community Right to Build Orders.

To support the development of their Neighbourhood Plan, we would like to highlight that currently, there are areas with limited or no public wastewater facilities [sewers or treatment works] within the proposed neighbourhood area application and therefore a number of properties are being served by private wastewater facilities.

Whilst the water supply is generally managed by United Utilities Water PLC, there may be properties within the proposed neighbourhood area that are being served by private water sources.

These points will need to be taken into consideration when the Neighbourhood Plan and supporting policies are being drafted. Our historical consultation responses to the Council's Local Development Framework consultations; planning applications and pre developer enquiries are still valid and should be taken into
consideration when developing the Neighbourhood Area Plan; supporting policies and any Neighbourhood Development Orders or Community Right to Build Orders.

We would like to be notified of the Council’s decision on whether to accept our comments and the future progress of the Parish of Skelton’s Neighbourhood Area application.

We would seek your support and would like to see the following comments to be taken into consideration and incorporated into your future policies and/or documents:

Water and wastewater services are vital for the future well-being of your community and the protection of the environment; when developing your future policies you should consider their impacts on the community, environment and ensure infrastructure capacity is available. If infrastructure deficiencies cannot be addressed, an alternative location and/or timescale should be sought where infrastructure capacity is available and it meets your development needs.

1. National Planning Policy Framework [NPPF]

The presumption in favour of sustainable development

Local Planning Authorities [LPA] should adopt proactive strategy priorities in their Local Plan. This should include strategic policies to deliver:

- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- the provision of health, security, community and cultural infrastructure and other local facilities; and
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

Crucially, Local Plans should:

- plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of the NPPF;
- be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;
- be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;
- indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;
- allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;
- identify areas where it may be necessary to limit freedom to
change the uses of buildings, and support such restrictions with a clear explanation;
☐ identify land where development would be inappropriate, for instance because of its environmental or historic significance; and
☐ contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.

2. Infrastructure

NPPF 162 Local planning authorities should work with other authorities and providers to:
☐ assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management, and its ability to meet forecast demands; and
☐ take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.

To ensure key sites and strategic locations are deemed sustainable, plan-led and co-ordinated, strategic solutions should be developed and defined for supporting infrastructure.

An example would be the development of a joint working group [lead by you] that identifies a strategic drainage/water supply solution/s for a Neighbourhood Plan; each key site and/or strategic location.

The joint working group will include you; EA; infrastructure providers; developers; landowners and any other key stakeholders such as Natural England etc.

The aim of the joint working group will be to develop a sustainable strategic drainage/water supply solution that:
☐ protects the existing customer and maintains their service and quality of life;
☐ protects the environment;
☐ is a robust and deliverable;
☐ proactively not reactively delivered;
☐ meets the needs of not only the Neighbourhood Plan, key sites/strategic locations but also the neighbouring Neighbourhood Groups; LPA; and
☐ is conditional for future developments within the key site and/or strategic location.

Future development must be sustainable; prevent environmental damage and preserve the quality of life for existing and future generations; therefore, developments should be delayed until infrastructure capacity is available.

We cannot confirm if capacity is available until the connection point/s, flows and completion dates are available.

If additional supporting infrastructure is required then you should
work closely with us [and other utility providers] to ensure a sustainable cross-boundary solution is identified and approved by the appropriate Regulators bodies before granting planning approval.

The scale and type of development needs to be defined so the appropriate infrastructure is in place to ensure growth is sustainable.

Where there are capacity issues; any additional developments in these and/or adjoining areas without the appropriate infrastructure solutions being implemented could result in an increased number and frequency of sewer flooding and/or water supply incidents. You should also consider the constraints [are not limited to, but include] that are outside our control and may influence the timely delivery of supporting infrastructure:

- Regulatory approval
- Environmental constraints
  - Does the receiving watercourse/environment have the capacity to accept additional flows without causing environmental damage?
  - Small river : large development
- Environmental consents and permits
  - Timescales in involved in the construction/delivery of new processes to meet new consents and/or permits
- Planning approval
  - The LDF process has not highlighted and/or specified land for infrastructure use, therefore future planning applications for future supporting utilities infrastructure may be thwarted or a prolonged process
  - Historical local resistance to the expansion of utilities assets
  - Planning application approval restrictions/conditions delay implementation of supporting infrastructure assets
- Land acquisition
  - Timescales involved in the purchased land needs
  - Land may not be available for expansion due to the encroachment of development
- Access into the highway
  - Limitations from the highway departments for road works
- Environmental restrictions
  - bird breeding and/or nesting seasons; great crested newts; badgers etc.
- Implementation and commissioning restrictions
  - Planning application approval conditions; working hours etc.
  - Environmental consents/permits conditions
  - Its psychical delivery

3. Water Resources Planning
Our Water Resources Management Plan was published in 2009, and sets out our strategy for water resources management for the
next twenty-five years and highlights areas where there is likely to be a supply deficit and what activities will be put in place to mitigate any shortfall in supply. The plan can be accessed here: http://www.unitedutilities.com/WaterResourcesPlan.aspx. We would encourage you and developers to contact us at the earliest opportunity.

4. Increased Water Capacity

The developer is required to pay for their increased capacity (up to the point of a treatment works) and they are only allowed to connect at specific points identified by us and following approval to connect. You and developer should obtain local capacity information from our Area Teams' Connections who will be able to identify areas where there is current capacity for development; this would be on a case by case basis and developers are required to pay a fee for this service (a pre development enquiry).

5. General Water Efficiency Guidance

United Utilities encourages the use of water efficient designs and development wherever this is possible. There are a number of actions developers can undertake to ensure that their developments are water efficient. The most up to date advice for water efficiency and water efficiency products can be found at Waterwise who have recently published a best practise guide on water efficiency for new developments. http://www.waterwise.org.uk/

We would encourage utilisation of the following water efficiency activities:

- Installing of the latest water efficient products, such as a 4.5l flush toilet instead of the 6l type.
- Minimise run lengths of hot and cold water pipes from storage to tap/shower areas. This minimises the amount of waste during the time the water goes from cold to hot.
- Utilising drought resistant varieties of trees, plants and grasses when landscaping.
- Install water efficient appliances such as dishwashers, washing machines.

6. Surface Water

Site drainage; ground conditions; local flooding issues; development layout; design and planning policies should be major considerations for you and developers when selecting possible development sites. The treatment and processing of surface water [storm water; rainwater] is a not a sustainable solution; the sites' current natural discharge solution should be continued and/or mimicked; if the existing surface water does not have an existing or a historical
natural solution, we would question the development of a flooded site.
Surface water should be managed at source and not transferred; if not this will only transfer the issue to another location; generally to a single pinch point, generating further problems in that location. Developments must drain on a separate sewerage system, with only foul drainage connected into the foul sewerage network. Every option should be investigated before discharging surface water into a public sewerage network. Connecting surface water to the public sewerage network is not a sustainable solution and you should discourage this practice. The priority options for the management of surface water discharges are:
☐ Continue and/or mimic the site’s current natural discharge process
☐ Store for later use
☐ Discharge into infiltration systems located in porous sub soils
☐ Attenuate flows into green engineering solutions such as ponds; swales or other open water features for gradual release to a watercourse and/or porous sub soils
☐ Attenuate by storing in tanks or sealed systems for gradual release to a watercourse
☐ Direct discharge to a watercourse
☐ Direct discharge to a surface water sewer
☐ Controlled discharge into the combined sewerage network ~ this option is a last resort when all other options have been discounted.

Development on Greenfield sites shall not discharge surface water into the public combined sewerage network and shall not increase the rate of run-off into the public surface water network ~ this statement does not replace the priority options for surface water management above.
On previously developed land, a reduction of at least 30% will be sought, rising to a minimum of 50% in critical drainage areas ~ this statement does not replace the priority options for surface water management above.
Any discharge to the public sewerage system must be via approved SuDS and will require an approved discharge rate. The following link shows examples of SuDS solutions; case studies; presentations; policy and regulatory documents relevant to the delivery of sustainable drainage etc.
http://www.susdrain.org/
The case studies section highlights numerous examples of how problematic ground conditions; topography issues can be overcome [i.e. Olympic Park, East London].
A discharge to groundwater

7. Green Infrastructure
You should seek opportunities to use developer financial and/or
resource contributions to meet common objectives.
Use green and open spaces, sports and recreation facilities to address surface water and climate change issues.
Building green infrastructure assets such as ponds, swales and wetlands will not only meet your Green Space needs but also your local existing and/or future surface water/ climate change issues.
Artificial pitches; cycle paths; play areas multi use games areas and skate parks can be used to local underground civil engineering SuDS solutions.
SuDS solutions that incorporate irrigation systems will help support and maintain your allotments, parks and garden areas.
You should identify opportunities for the installation retro fitting SuDS.

8. Infill land
You should be aware that, on occasion, gaps are left between properties; this is due to the presence of underground utility assets. We will not allow the building over or near to these assets and development will not be acceptable in these locations.

9. Development adjacent to infrastructure assets
The future expansion of infrastructure assets to meet the needs of future development and changes in legalisation could create a potential conflict with development plans; therefore developments adjacent to our assets should be discouraged by you.
Water and sewerage companies have a legal right of access to their assets; this can be for their operational and/or maintenance therefore we will not permit the building over and/or near its infrastructure assets.
To protect sensitive developments [ie residential uses] the Environmental Health Authority should be consulted if any future development is to be located adjacent to wastewater infrastructure assets. In most cases, the distance of 400 metres from the wastewater treatment facilities is used as a guide, but this can differ due to local topography, climatic conditions, size and nature of the wastewater infrastructure asset and development in question.
You must ensure we are kept informed of any waste management related development and/or planning application within 500m of a Large Diameter Trunk Main [LDTM]. Prior consent will be required from us before granting approval. It is also essential that this information is included in future planning policy.
We would seek you future support in the planning processes to protect/secure land for infrastructure use.

10. Climate change adaptation
Climate change is a major consideration on the future available capacity of sewerage and water supply infrastructure networks; treatment works and watercourses.
Planners and Developers should consider that the impacts of climate change on future development, existing infrastructures, and the environment. Developments should be designed to reduce the impacts of climatic change on the development itself, the existing infrastructure and the environment; with consideration for hotter, drier summers, greater flood risk and more severe weather events. To reduce the impacts of climate change on the existing infrastructure you should seek a significant reduction in the discharge from developments. Urban creep has a significant impact on capacity; the paving over of gardens contributes to flood risk and should therefore be discouraged.

11. Carbon impact

You should consider the total carbon impact of future developments; not only the footprint of the development but also the carbon impact for additional infrastructure assets; their associated treatment processes and their future maintenance and operation requirements. To meet future reduction targets you should considered the wider carbon impact when determining the location of future developments.

12. Greenfield Development

Generally Greenfield sites have limited or no supporting water supply and/or sewerage infrastructure assets; they may be adjacent to existing infrastructure assets that are located on the fringe/limits of the existing water supply and/or sewerage infrastructure networks which are of a small diameter and have limited capacity to support additional capacity. Providing supporting infrastructure to Greenfield development sites could result in the need to upsize the existing assets to support the additional capacity needs; therefore this may result in a need for a co-ordinated approach.

In relation to the Designation of Area for Skelton Parish, the City Council has no comment on the area to be included. We would like to note that Dalston Parish, who shares a parish boundary with Skelton Parish, is progressing with their Neighbourhood Plan. I have informed the Dalston Neighbourhood Planning Group that Skelton Parish is consulting on Designation of Area. The Dalston Group wish to be kept informed with the progress of the Skelton Neighbourhood Plan, their contact is Chris Drouet, contact details are: Mobile: 07802 92 3636; Office: 01228 712281; and Email: chris.drouet@gmail.com

For information regarding Dalston’s progress with their Neighbourhood Plan please visit:

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<thead>
<tr>
<th>Environment Agency</th>
<th>Have no comments at this time</th>
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<tbody>
<tr>
<td>Highways Agency</td>
<td>Confirm that the Highways Agency has no objection to this application going forward.</td>
</tr>
<tr>
<td>Marine Management Organisation</td>
<td>Confirmed that they have no comments to make in relation this application.</td>
</tr>
<tr>
<td>Castle Sowerby Parish Council</td>
<td>Castle Sowerby Parish Council, wish to advise that they feel that the Parish of Skelton is an appropriate neighbourhood area and support the application.</td>
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