

Jenny Poxon
Head of Planning Delivery and Conformity
01924 331601
jenny.poxon@yhassembly.gov.uk

Our ref: General/40b – Planning Conformity/Final responses/Harrogate Core Strat Pref Options Jul 06

20 July 2006

Tim Richards
Head of Planning Services
Department of Development Services
Harrogate Borough Council
Knapping Mount
West Grove Road
HARROGATE
HG1 2AE

Dear Mr Richards

Harrogate Core Strategy: Preferred Options Consultation June 2006

Thank you for consulting the Yorkshire and Humber Assembly on the Harrogate Core Strategy: Preferred Options. We must apologise for the lack of any comments from the Assembly on the Core Strategy: Issues and Options consultation published in September 2005. This was due to a severe lack of resources at the Assembly during a time when the preparation of the Regional Spatial Strategy was at a critical stage.

The Yorkshire and Humber Assembly now welcomes the opportunity to comment on the Core Strategy: Preferred Options and to continue its involvement in the development of a coherent spatial planning framework for the region. The comments offered in this letter are intended to be within this spirit of continued and productive joint working.

At this stage, the Assembly's response to the consultation document is a set of officer comments. The aim is to highlight where issues related to general conformity with the Regional Spatial Strategy might arise. When the Core Strategy is submitted to the Secretary of State a formal Assembly view on its general conformity with the Regional Spatial Strategy will need to be given.

The following officer comments are made in relation to the existing Regional Spatial Strategy for Yorkshire & the Humber (based on the selective review of RPG12 issued in December 2004) and the Draft Regional Spatial Strategy – the Yorkshire and Humber Plan (submitted to the Secretary of State in December 2005).

The comments place emphasis on the draft Regional Spatial Strategy (RSS), which reinforces and develops the general thrust of existing RSS; furthermore it is more up to date and has significant "weight" in its own right. The weight attached to the draft RSS will increase as it passes through its Public Examination (September and October 2006) and once the Panel's Report is received (expected Summer 2007) before it is issued by the Secretary of State (expected late 2007).

Regional Spatial Strategy

It is clear that the Core Strategy has been prepared within the context of the RSS and the summary of relevant RSS policies (from draft RSS) in Appendix 6, as well as the regular references to the RSS throughout the document, is very helpful. It will be important in the submitted Core Strategy to highlight the need for there to be 'general conformity' between the RSS and the Core Strategy, to ensure that the two strands of the development plan are mutually supportive.

The aim of existing RSS (December 2004) is to guide development to sustainable locations and to focus development in main urban areas, market and coalfield towns (Policy P1). This key strategic approach is reinforced in the Yorkshire and Humber Plan (Draft RSS December 2005), which is more specific about the desired location of development in Policies YH1 to 9. These clearly provide a policy context and direction that emphasises the need to concentrate development in Regional and Sub-Regional Centres (including Harrogate), provide for sufficient development in Principal Service Centres (including Knaresborough and Ripon) for them to fulfil their important role and to allow limited development in Local Service Centres (initially identified in the Regional Settlement Study as Boroughbridge, Masham and Pateley Bridge), primarily to meet local need for affordable housing and to enable economic diversification. Paragraph 5.18 of draft RSS states "A slower pace and scale of growth, compared to urban areas, forms an overall approach of strategic restraint in rural areas". Paragraph 5.23 of draft RSS refers to the Regional Settlement Study as "the starting point for any further work at local level to establish which smaller settlements have an important service role for local communities".

The Core Strategy: Preferred Options document certainly reflects the key principles set out in the RSS. The draft strategic objectives (with the proposed amendments) could perhaps be boosted by one that explicitly sought to minimise the need to travel (as this underpins several of the objectives currently set out and is still relevant in a predominantly rural District such as Harrogate). The need to reverse the dispersal of development and identify the most sustainable locations for growth has been reflected and the overall 'direction of travel' of the spatial strategy is to be supported. The identification of villages that have an important service role is a helpful starting point for aiming to achieve a less dispersed pattern of development than is currently occurring in the District.

Our main reservations at this stage relate to the number of 'Group C settlements' identified (and their selection criteria), the provision of housing to meet identified local needs, some of the messages emerging from the sustainability appraisal and the phasing of land release. We would also wish to attach importance to the need for the monitoring of development patterns to lead to early policy reviews if it were shown that the implementation of the key locational principles was being undermined. These points are explored further below under the relevant policy sections.

Policy SG: Settlement Growth

Reflecting the principles set out in the RSS, the proposed spatial strategy and settlement hierarchy (paragraphs 4.72 to 4.81) is based on the desire to change the current dispersed pattern of development across the District. The importance of Harrogate's role is clearly recognised and the Principal Service Centres of Knaresborough and Ripon are grouped together with Harrogate as Group A settlements, providing a focus for growth in the District. There are then 14 Group B settlements identified which are a combination of the Local Service Centres identified through the Regional Settlement Study and 11 other large villages. In addition, there are 33 'Group C' settlements where it is proposed that sites for a combination of affordable and open market housing will be provided. In the open countryside, exceptions would be made to provide affordable, or occupancy-related, housing.

The concept of such a hierarchy does follow the principles set out in draft RSS and its Core Approach in Policies YH1 to YH9. The 'Group B' settlements have been identified using criteria that include their accessibility and range of services and employment. This is helpful. Whilst we would perhaps encourage greater differentiation between the settlements identified as Local Service Centres in the Regional Settlement Study and those identified here, we can see why the Council has taken the approach that is set out here.

The Assembly has some concerns, however, about the seemingly quite loose application of the criteria for identifying the 'Group C' villages and the fact that this has led to 33 such settlements being identified. This, coupled with the desire to have 'pro-rata distribution' of affordable housing across the District (paragraph 4.72), almost starts to suggest that the distribution of development is being driven by a 'need to disperse' rather than being justified in terms of sustainable development objectives. We therefore suggest that the justification for some of the distribution of development needs to be clarified, along with a tightening up of the criteria used to identify the Group C villages. Clearly the Assembly is not in a position to comment in any more detail on the actual villages identified as this is rightly a matter for local determination.

The consideration of **urban extensions** (paragraphs 4.73 to 4.74) and the need to keep this policy under review reflects policies in RSS (see YH8 B).

The **re-use of suitable rural buildings** (paragraph 4.80) appears to have been the subject of useful debate. We would agree that economic use of an existing rural building might well bring sustainability gains. However it is surprising that option SG2e has not been favoured given the particularly buoyant market in the area. It is also surprising that the Council has decided "not to pursue the option of restricting new-build market homes for occupation by local people" (paragraph 4.44, p14) – see below for our comments on Homes for Local People.

Sustainability Appraisal

We think it is worth commenting that there are a number of surprising findings from the Sustainability Appraisal (SA). It is not necessarily clear that the potential benefits of urban concentration have been fully recognised in the SA. Whilst the SA appears to recognise the potential benefits to rural areas and market towns of dispersing development, it does not seem to recognise, or take account of, the 'opportunity cost' in the urban areas – ie will opportunities be lost in the urban areas if development is spread more thinly across the wider rural area?

Equally, it is surprising that options that increase development in villages produce an 'uncertain impact' in relation to SA objectives relating to pollution levels, transport network and greenhouse gas emissions. Even if it were assumed that development were only to be permitted in villages with a reasonable level of service provision, employment opportunities and public transport access (which not all of the Group C settlements can claim), it is inevitable that development in villages will generate more journeys (for employment, leisure and higher order services) and that these would have a negative impact on these SA objectives.

It is also perhaps surprising that the SA is not more helpful in considering the issue of urban extensions and that the outcomes of the appraisal for an urban extension in Ripon are similar to that for Harrogate.

Policy MRHL: Managed Release of Housing Land

Paragraphs 4.68 and 4.69 record concerns that have been raised about the proposed approach to the release of housing land (set out in paragraphs 4.82 to 4.85) and whether it will undermine the implementation of the RSS. The implementation of the RSS would be undermined if the release of sites in the smaller centres led to the focus of growth and development in Harrogate and then Knaresborough and Ripon being lost. Referring back to our earlier comments, we would suggest that it is therefore the settlement hierarchy of the Core Strategy and the policies guiding the overall distribution of development that needs to be tightened up rather than this policy on the managed release of land.

It appears that, subject to further land availability reviews, there may be sufficient previously developed land in Harrogate and Knaresborough to meet their needs. It is perhaps surprising that the SA favours the early release of housing land in the market towns. Once again, the appraisal has perhaps identified the positive impacts on the market towns but has not taken account of the 'opportunity cost' ie the foregoing of such a benefit in the larger centres.

Policy HLP: Homes for Local People

The emphasis on providing affordable housing in the Core Strategy is clearly justified in view of the high level of identified need in the District. The general thrust of the Council's approach is therefore supported. It will of course be for the Council to finalise detailed policies and arrangements for delivery.

In view of the Council's views as expressed in paragraphs 5.12 and 5.13 about viability, it is surprising that the SA (in paragraph 5.6) does not view Option HLP1c more favourably. As regards targets, it is surprising that the SA (in paragraph 5.20) gives such a clear-cut result considering the uncertainties of the market and the negotiating process.

With regard to the consideration of **Locals Only Market Housing** (Preferred Option 14), it is once again surprising that there is no relationship between the result of the SA and the Council's preferred Option. Whilst it is recognised that enforcement of a "locals only" policy would be difficult and that positive measures to deliver affordable housing could help address concerns about local needs, the Assembly would encourage the Council to keep this issue under review and monitor the operation of policies elsewhere.

Policy JB: Jobs and Business

The RSS establishes a context and methodology for local planning authorities to undertake employment land reviews. The draft RSS does not include targets for the provision of employment land but gives an indicative employment land forecast (the change in total employment land in use 2006 – 2016) in table 14.6. This is 12 to 32 ha for Harrogate. The Council should be commended for publishing an Employment Land Review in February 2006 and for considering whether sites can be put forward for release as part of this process.

The proposed approach in paragraphs 6.45 to 6.47 positively reinforces the settlement hierarchy and the economic objectives of draft RSS. This approach could be boosted by explicit reference to a sequential approach to seeking optimum sites for employment – in line with Policy YH8 of draft RSS.

Policy TRA: Travel

The identification of a Key Bus and Rail Network for the District will help to reinforce the use of accessibility criteria as a key component of the settlement strategy. This will be helpful.

It is probably worth highlighting again the need for Sustainability Appraisals to take account of the impact of all the additional journeys generated by development (however limited it is to be) in the villages of the District. Whilst individual impacts may be negligible, cumulative impacts may be significant having regard to the number of villages identified for development.

Policy ENV1: Environmental Improvements and Policy ENVP: Environmental Protection

The policy approach outlined (in paragraphs 8.63 to 8.64) will need further detail adding to it but it is in principle supportive of RSS policies.

The cross-cutting issues related to **climate change and greenhouse gas emissions** (paragraphs 8.3 to 8.7) must be reflected in the Core Strategy and in related Development Plan Documents.

It is pleasing to see the issue of **renewable energy** covered (paragraphs 8.9 to 8.13). It will be important for the Core Strategy to reflect policy ENV5 A and B and the indicative targets for renewable energy set out in draft RSS (Table 15.12), which for Harrogate is 17.2 MW to 2010. The Core Strategy already refers to the need to ensure that 10% of energy to be used in sizeable developments comes from on site renewables (draft RSS Policy ENV5 B(iii)).

The Assembly is pleased that a **joint SFRA** has been commissioned. The proposed approach is supported and the findings of the SFRA will need to inform future site allocations.

With regards to **waste management**, it is important that draft RSS policies ENV 12, 13 and 14 are all reflected in the Core Strategy.

Policy RCIC: Inclusive Communities

It would be helpful to include a reference to the work currently being undertaken across the region into provision for **gypsies and travellers**, the results of which should feed into the preparation of the revised Core Strategy before it is submitted to the Secretary of State.

Measuring Success

The Assembly supports liaison between local authorities to help to develop consistent indicators that can start to enable sub-regional and regional analysis of issues.

It will be particularly important for the Council to monitor the distribution of development across the District so that early reviews of the settlement hierarchy and identification of villages can be carried out if necessary. Monitoring the provision of affordable housing to meet local needs will also be essential if the need for a 'local occupancy' condition is to be kept under review.

At this stage, we will not be commenting further on the site allocations DPD. We are working on the assumption that these allocations will have to be made in conformity with this Core Strategy and that our comments on the settlement hierarchy will therefore have an impact on the number and distribution of sites for development that are identified in the villages across the District.

I hope that these comments are helpful to you. Please do not hesitate to get in touch if anything is not clear. We look forward to working with you as you prepare your Core Strategy for submission and examination.

Regards



Jenny Poxon
Head of Planning Delivery and Conformity