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Our ref: Harrogate/40b – Planning Conformity/Final responses/Harrogate Core Strategy Submission Oct 07

17 October 2007

Tim Richards
Head of Planning Services
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Dear Tim

**Harrogate Local Development Framework
Consultation on the Core Strategy Development Plan Document:
Submission Draft**

Further to your letter of 6 September 2007, I am pleased to confirm the Assembly's opinion that the Harrogate Core Strategy Development Plan Document, as submitted to the Secretary of State on 7 September 2007, is in general conformity with the existing and draft Regional Spatial Strategy and the Secretary of State's Proposed Changes to the Regional Spatial Strategy (RSS).

Paragraph 4.19 of PPS12 (Local Development Frameworks) makes it clear that an RSS under preparation gathers more weight as it passes through its preparation process. It states "Where the regional spatial strategy... has been through an Examination in Public, and the Proposed Changes have been published, considerable weight may be attached to that strategy because of the strong possibility that it will be published in that form by the Secretary of State". The Assembly has therefore referred to the Proposed Changes to the Draft RSS (published at the end of September 2007) in this response but would like to make it clear that the Assembly will be commenting on the Proposed Changes and that final RSS is expected to be published in Spring 2008.

At this stage in the document's development, the Assembly would wish the following comments to be taken into account.

Need for General Conformity

The RSS has an important role in providing a strategic policy context for local policies. The Assembly's response to the Preferred Options for the DPD stressed that the submitted Core Strategy should highlight the need for there to be 'general conformity' between the RSS and the Core Strategy at the beginning of the document, to ensure that the two strands of the development plan are mutually supportive. The introduction refers in general to national and regional policies and the need to justify local policy variations. However, this section could more explicitly refer to the RSS and the need for 'general conformity'.

Appendix 1 (Glossary of Terms) includes the RSS but it is not clear whether this refers to current or draft RSS. The Core Strategy draws on draft RSS throughout the document. It would be helpful if the dates and status of the current and draft RSS were explained in the introduction of the DPD. For clarification, current RSS was published in December 2004 and draft RSS was published in December 2005. The Panel Report of the Examination in Public of the RSS was published in May 2007 and the Government's Proposed Changes were published on 28 September 2007. The Yorkshire and Humber Plan is due to be published in early 2008.

Key Diagram

The Yorkshire and Humber Assembly welcomes the Key Diagram, which has not been included in previous versions of the Core Strategy. The Key Diagram is a useful tool for illustrating the policies of the Core Strategy, particularly the distribution of development across the Borough, transport connections and cross-boundary linkages. Labelling the settlements by name, particularly the Group A settlements, could make the diagram clearer. In addition, the meaning of the terms in the legend, for example 'areas of search for growth' could be explained, either in the legend or through cross-references to the Glossary (Appendix 1).

Settlement Growth

The Assembly's response to the Core Strategy Preferred Options welcomed the use of a settlement hierarchy and supported the overall approach for the broad location of development. The proposed spatial strategy reflects the principles of the RSS.

The draft RSS identifies Harrogate as a Sub-Regional Centre and Knaresborough and Ripon as Principal Service Centres. The Proposed Changes refers to these as a Sub-Regional Town and Principal Towns respectively. These settlements are identified in the Core Strategy as Group A settlements and are the primary focus for new development. Group B settlements combine the Local Service Centres

identified by the Settlement Study that fed into the preparation of the draft RSS and 16 other large villages that have been identified using criteria including their accessibility and access to services and employment. The settlements are to maintain their role as local rural centres and provide the focus for new housing in the rural areas of the District. This approach was supported in the Assembly's response to the Preferred Options consultation.

However, in the Assembly's responses to the Core Strategy Preferred Options DPD and the Development Control Policies Issues and Options DPD, concerns were raised regarding the identification of 36 Group C settlements. The Core Strategy Submission Draft has a larger number of Group C settlements than those listed in the Preferred Options document. It is proposed to allow limited growth and rural exception sites for affordable housing provision in these villages.

The criteria used and the number of Group C settlements identified, coupled with the desire to have a spread of affordable housing across the District, could raise concerns about the extent to which there will be continued dispersal of development across the District that would not help to meet sustainable development objectives. The Assembly is not in a position to comment on the actual villages identified within Groups B and C, as this is a matter for local determination. However, the Assembly would suggest that the criteria used to identify the Group C settlements is tightened to reduce the number of settlements in this category of the hierarchy and to ensure that the principles of sustainable development and the Core Approach of draft RSS (which is followed through in the Proposed Changes) are adhered to.

Policy YH8 of draft RSS focuses the majority of new development on the Regional and Sub Regional Centres (Towns); followed by the Principal Service Centres (Towns) and finally the Local Service Centres. The Proposed Changes to draft RSS do not change this focus. The implementation of the Core Approach of draft RSS could be undermined if the release of land in the Group C villages were to dilute the focus on the Sub Regional Centre (Town) of Harrogate, and the Principal Service Centres (Towns) of Knaresborough and Ripon.

From Policies SG1, SG2, SG3 and SG4, it is still not clear how the Core Strategy is avoiding a dispersal of development. Policy SG1 could helpfully clarify which 'villages' it is referring to. The Assembly would wish to see these 'villages' being those in Group B, but currently, this is not clear. Development in the Group C villages and open countryside would then be restricted to rural exceptions only.

Homes for Local People

The Regional Housing Strategy 2005 identifies affordable housing need in the North Yorkshire districts as high. In addition, Harrogate Borough Council's 2006 Housing Needs Assessment identifies an annual need of 830 additional affordable

homes in the District 2006-2011. The emphasis on affordable housing in the Core Strategy DPD is clearly justified in view of this high level of need and the tenor of this section is supported. The Borough Council aims to provide 400 new homes per annum for the District of Harrogate. Draft RSS set a slightly lower target of 390 homes per year and The Secretary of State's Proposed Changes maintains this annual figure.

Jobs and Business

Draft RSS establishes a context and methodology for Local Planning Authorities to undertake employment land reviews. The Proposed Changes reinforce this requirement (Policy E3). Having an up-to-date and robust evidence base is vital for informing and justifying the policies of the Core Strategy. Harrogate Borough Council should therefore be commended for publishing an Employment Land Review in February 2006.

For Harrogate, draft RSS forecasts a change of 12-32 hectares in total employment land to 2016. The Proposed Changes gives a figure for industrial and storage/distribution land, which for Harrogate is 20 hectares, to 2021. The Core Strategy seeks to provide 45 hectares of employment land, which differs from draft RSS and the Proposed Changes. However, as Harrogate Council has recently published an Employment Land Review, the Assembly assumes that the Core Strategy figure is based on up-to-date and robust local evidence.

Both draft RSS and the Proposed Changes provide guidance on the portfolio of employment land required in each District across the region. In both documents, Harrogate is described as requiring an employment land portfolio that is based upon small to medium high quality specialist sites located in accordance with the RSS Core Approach. The Assembly therefore welcomes Policy JB3 (part d) of the Core Strategy, which seeks to ensure adequate provision for small and medium sized enterprises.

The proposed approach set out in paragraphs 5.18 to 5.25 positively supports the settlement hierarchy and economic objectives of the draft RSS, which are carried through in the Secretary of State's Proposed Changes. It would be helpful to refer explicitly to the sequential approach to the allocation of employment sites, in line with Policy YH8 of draft RSS. It should be noted that minor changes to this policy are put forward in the Proposed Changes to RSS.

Travel

The identification of a Key Bus and Rail Network (Appendix 7) is helpful in reinforcing the use of accessibility criteria as a key component of the spatial strategy. The Assembly welcomes the inclusion and use of the accessibility criteria in Appendix 8. Both current (Policy T2) and draft RSS (Policy T3) include

accessibility criteria. Policy T3 (d) of draft RSS states that Local Authorities should use the public transport accessibility criteria, as set out in Tables 16.8 and 16.9, to guide the allocation of sites in development plans. The Secretary of State's Proposed Changes to the RSS amends policy YH8 of the Core Approach to reinforce and further strengthen this requirement. The Assembly therefore welcomes part 1 of the Core Strategy accessibility criteria, which draws on those in RSS. The Assembly would like to see all of the criteria in the Core Strategy reflect the criteria in the RSS.

Environment and Quality of Life

The Yorkshire and Humber Assembly supports Policy EQ1 which seeks to reduce resource consumption, waste production and car use and consequential risks for climate change and environmental damage. In particular, the Assembly welcomes the requirement for developments to meet recognised sustainable construction standards such as CLG's Code for Sustainable Homes (2006) and BREEAM ratings for commercial buildings. Draft RSS Policy ENV5 sets an indicative renewable energy generation target for Harrogate of 17.2MW to 2010. Part D of the Core Strategy policy should refer to this target. The Proposed Changes to RSS sets a target of 17MW to 2010 and 70MW to 2021. The Core Strategy already refers to the need to ensure that 10% of energy to be used in sizeable developments comes from on-site renewable sources. This is in line with draft RSS Policy ENV5. It should be noted that the Proposed Changes removes the 10% target from the RSS but requires Development Plan Documents to set an appropriate local target for on-site renewable energy generation.

Communities

The Assembly welcomes the reference in paragraph 8.22 to the work currently being undertaken across the region into provision for gypsies and travellers. The Proposed Changes sets a requirement for additional provision to meet the housing needs of Gypsies and Travellers to address an overall shortfall of at least 255 pitches across the region. For North Yorkshire, the Proposed Changes sets a requirement to address a shortfall of at least 57 pitches by 2010 and states that in parts of North Yorkshire, it may be appropriate to promote rural exceptions sites to deliver additional provision. The Proposed Changes also requires local authorities to carry out an assessment of the housing needs of Gypsies and Travellers by July 2008.

Measuring Success

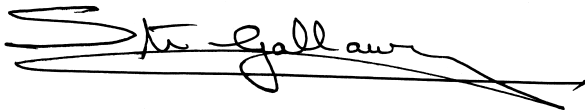
In the Assembly's response to the Core Strategy Preferred Options, we emphasised the importance of monitoring the distribution of development across the District so that early reviews of the settlement hierarchy and identification of villages can be carried out if necessary. We therefore support the inclusion of the indicator 'Net

additional dwellings completed per annum in Group A, B and C settlements (local output)'. The Assembly also welcomes the indicators for completions of affordable housing, subsidised rented dwellings and low cost homeownership properties which will be essential for reviewing Core Strategy policies on the provision of homes for local people.

At this stage, the Assembly would be happy for the points made here to be dealt with by written representations at the Examination of the Harrogate Core Strategy DPD. We are happy to have discussions with you if this would help to clarify any issues prior to the Examination of the Core Strategy DPD.

If you have any queries about these points, please do not hesitate to contact Jenny Poxon on 01924 331 555.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Stephen Galloway', with a long horizontal flourish extending to the right.

Cllr. Stephen Galloway
Chair, Regional Planning Board