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05 September 2007

Tim Richards  
Head of Planning Services  
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Harrogate Borough Council  
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Dear Tim

**Harrogate District Local Development Framework  
Development Control Policies: Issues and Options Consultation**

The Yorkshire and Humber Assembly welcomes the opportunity to comment on the Harrogate Development Control Policies Development Plan Document (DPD) 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 the 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 Development Control Policies DPD 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. It is also more up to date and is gathering 'weight' as it passes through the preparation process. The Panel Report of the Examination in Public of the Yorkshire and Humber Plan has now been published (May 2007). This contains recommendations to Government that may or may not be reflected in the Proposed Changes to the Plan that are due to be published for consultation in the autumn. The Panel Report backs the Plan's overall approach and strategy. It also includes recommendations for changes or additions to policies. Any points from the Panel Report that are particularly relevant to this response are noted within the following paragraphs.

### **General Conformity with the Regional Spatial Strategy**

As you know, the Planning and Compulsory Purchase Act 2004 introduced mechanisms to help ensure that Development Plan Documents (DPDs) drawn up by local authorities as part of the Local Development Framework (LDF) are in general conformity with the Regional Spatial Strategy (RSS). The intention is to ensure that DPDs are contributing to the delivery of the RSS and that the two strands of the Development Plan for an area (the RSS and DPDs) are mutually supportive and not in conflict.

We would therefore find it useful for the RSS and the latest Panel Report figures to be accurately reflected in the DPD. It will be important in the submitted DPD to highlight the need for there to be 'general conformity' between the RSS and the DPD to ensure that the two strands of the development plan are mutually supportive. We therefore think it would be helpful if this need for general conformity were explained at the start of the document as this demonstrates the need for a strong link between the LDF and the RSS. It will also help to clarify the significance of any references to the RSS that are made throughout the document.

In addition, 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. It will also be helpful to note that the Panel Report of the Examination in Public of the Yorkshire and Humber Plan has now been published (May 2007). The Yorkshire and Humber Plan should be published in early 2008.

### **Summary of comments**

Overall, the DPD reflects the policy direction of current and draft RSS. In particular, the Assembly supports:

- The approach to settlement growth and the overall settlement hierarchy
- The use of local evidence to deliver a mix of housing to meet local needs
- The approach to employment, retail, leisure and tourism in the town centres

The Assembly would wish to see changes to the DPD to ensure that:

- The need for general conformity between the RSS and the LDF is highlighted
- There is clarity about the roles and classification of the Group C settlements
- Detailed guidance on waste management and renewable energy is provided
- Consideration is given to delivering suitable sites for gypsies and travellers

These points are expanded on in Annex A.

I trust that these comments are helpful to you as you prepare the Development Control Policies DPD for submission to the Secretary of State. If you wish to discuss any of the points made here please do not hesitate to get in touch. We look forward to continuing to work with you on your DPD.

Regards

A handwritten signature in blue ink, appearing to read 'Jenny Poxon', written in a cursive style.

Jenny Poxon  
Head of Planning Delivery and Conformity

## **Annex A**

### **Settlement Growth**

The Assembly welcomes the reference to the draft RSS in Appendix 3 of the DPD. It would be useful if the need for general conformity between the RSS and the LDF were explained at the start of the DPD to clarify the significance of this and any other references to the RSS throughout the document. We would also find it useful for the latest Panel Report figures to be accurately reflected in the DPD. Recommendation 5.1 of the Panel Report supports the draft RSS in allocating Harrogate a net annual housing provision figure of 390 dwellings 2004-2021 (see Table 5.3 of the Panel Report).

The Core Approach of the draft RSS set out in Policies YH1-YH9 seeks to focus new housing development within, or on the edge of, the Sub-Regional, Principal and Local Service Centres. New housing in the open countryside should continue to be strictly controlled. The Assembly would therefore welcome the use of development and infill limits to identify areas where development is acceptable and where it is to be controlled.

The Yorkshire and Humber Assembly welcomes the use of a settlement hierarchy and supports the overall approach for the broad location of development. The draft RSS identifies Harrogate as a Sub-Regional Centre and Knaresborough and Ripon as Principal Service Centres. We therefore support the identification of Harrogate, Knaresborough and Ripon as Group A settlements and the primary focus for new development. The DPD then identifies 19 Group B settlements which are a combination of the Local Service Centres identified through the Regional Settlement Study and recognised in draft RSS and 16 other large villages. These Group B settlements have been identified using criteria that include their accessibility and range of services and employment and this is helpful.

There are now 36 Group C settlements (there were previously 33 in the July 2006 Core Strategy consultation) where it is proposed that rural exception sites for 100% affordable housing will be allocated. We suggested in our previous comments that the distribution of development should be more clearly justified and the criteria used to identify the Group C villages should be tightened. We are hopeful that these comments will be reflected in the submission draft of the Core Strategy and the Preferred Options for this DPD.

### **Homes for Local People**

The emphasis on affordable housing in the DPD is clearly justified in view of the high level of identified need in the District. The Regional Housing Strategy 2005 identifies affordable housing need in the North Yorkshire districts as high. It should be noted that both current and draft RSS provide guidance on housing mix.

Recommendation 5.9 of the draft RSS Panel Report amends Policy H4 of draft RSS and requires local plans and strategies to provide for a range of homes in terms of size, type and tenure of household that reflects the needs of the area. The Assembly therefore welcomes the use of a district-wide Strategic Housing Market Assessment to inform the Preferred Options of the DPD.

## **Jobs and Business**

The Assembly welcomes the Council's publication of an Employment Land Review in February 2006 and the evidence-based approach to preparing the LDF and site allocations. 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. For Harrogate, this forecast is 12-32 hectares. It should be noted, however, that the Panel Report has recommended changes to Policy E3 and Table 14.6 of the draft RSS.

Draft RSS Policy E5 requires Local Development Frameworks to define criteria or areas where it is considered necessary to protect designated employment sites. The proposed approach to safeguarding employment sites positively supports the settlement hierarchy and economic objectives of the RSS. The criteria could be enhanced by explicitly referring to a sequential approach to allocating land uses and seeking optimum sites for employment, in line with Policy YH8 of draft RSS.

Policy E2 sets out the RSS' approach to town centres and states that city and town centres should be the focus for retail and shopping uses. The Assembly would welcome a continuation of the existing Local Plan approach in the Development Control Policies DPD that permits shopping development within, or as an extension to, existing shopping centres. Policy E2 also states that town and city centres should be the focus for leisure uses (including hotels).

Policy E6 of draft RSS recognises tourism as an integral contributor to the economy. Tourism is identified in the 2006-2015 Regional Economic Strategy (RES) as one of 11 regional clusters and key sectors of regional significance. Tourism is therefore a key asset for the region's economy, particularly in the coastal and rural areas. The proposed policy of protecting hotel room space, particularly in Harrogate town centre, supports the objectives of the draft RSS and the RES and is welcomed by the Assembly.

## **Travel**

It would be helpful for the DPD to reflect Policy T2 on parking and the accessibility criteria contained in Tables 16.8 and 16.9 of the Regional Transport Strategy, found in the draft RSS. The Assembly would support the protection of sites where there are firm proposals for new transport infrastructure and routes. The protection of cycle and pedestrian networks and the provision of a transport interchange in

Harrogate will help to achieve the shift to transport modes with lower environmental impacts envisaged by Policy T1 of the Regional Transport Strategy, within the draft RSS.

## **Environment and Quality of Life**

The Yorkshire and Humber Assembly supports the proposed approach to natural heritage and designations, which is in line with national policy (PPS9 Biodiversity and Geological Conservation). Draft RSS Policy ENV8 seeks to safeguard and enhance the Region's ecology and ensure it functions as an integrated network of connected corridors and buffer zones. Draft RSS contains a map of key areas for habitat enhancement (Figure 15.5). Table 15.19 sets out the approach that local policy should take for the different types of habitat enhancement areas.

The Assembly agrees that applications affecting the District's nationally designated heritage assets can be determined through the use of national planning policy and that additional local development control policies are not required. An evidence-based approach to Conservation Areas, to be informed by a review and incorporated into a Supplementary Planning Document, is considered to be appropriate and is welcomed by the Assembly. Policy ENV9 of draft RSS provides regional guidance on safeguarding and enhancing the historic environment and the region's cultural heritage.

The Assembly welcomed the Core Strategy Preferred Option for renewable energy. Draft RSS Policy ENV5 sets an indicative renewable energy generation target for Harrogate of 17.2MW to 2010. The draft RSS Panel Report does not amend this target but does recommend providing a target to 2021. It was pleasing that the Core Strategy already referred to the need to ensure that 10% of energy to be used in sizeable developments comes from on-site renewable sources. Similarly, the Assembly welcomed the suggested Core Strategy approach to waste management. The Development Control Policies DPD provides a good opportunity for the Council to expand upon the Core Strategy approach and provide detailed guidance for developers and the public to ensure effective implementation.

## **Communities**

The preparation of detailed guidance on developer contributions in the form of Supplementary Planning Documents is an appropriate approach. The Council should be commended for its preparation and approval of two Supplementary Planning Documents on developer contributions for open space and village halls.

It would be helpful for the Development Control Policies DPD to consider the work on provision for gypsies and travellers currently being undertaken across the region and to set out guidance, where appropriate, on the delivery of suitable sites.