

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

Our ref: Hambleton/Final Responses/Planning Conformity/Hambleton Site Allocations Preferred Options Nov 2007

20 November 2007

Graham Banks  
Planning Policy Team Leader  
Hambleton District Council  
Civic Centre  
Stone Cross  
Northallerton  
DL6 2UU

Dear Graham

**Hambleton District Council Local Development Framework  
Allocations Development Plan Document Preferred Options Consultation**

The Yorkshire and Humber Assembly welcomes the opportunity to comment on the Hambleton Allocations 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 Allocations 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. Paragraph 4.19 of PPS12 makes it clear that an RSS under preparation gathers more weight as it passes through its preparation process. It states that

“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 the final RSS is expected to be published in Spring 2008.

### **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 therefore welcome the explanation of the need for ‘general conformity’ between the RSS and the LDF at the start of each of the Sub Area Allocations papers. This helps to demonstrate the need for strong links between the LDF and the RSS and also helps to clarify the significance of any references to the RSS throughout the Allocations documents.

In addition, it would be helpful if the dates and status of the current and draft RSS were explained in 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 Secretary of State’s Proposed Changes were published on 28 September 2007. The Yorkshire and Humber Plan is due to 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 scale and distribution of new development proposed by the DPD, which is supportive of the settlement hierarchy set out in the Core Strategy and draft RSS.

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

- Full consideration is given to the accessibility criteria of the RSS
- Delivery of housing on brownfield sites achieves the district target of 55%
- Provision is made for Gypsy and Traveller accommodation

These points are expanded on in Annex A.

I trust that these comments are helpful to you as you prepare the Allocations DPD for submission. 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 Strategy*

Draft RSS identifies two Principal Service Centres for Hambleton (Northallerton and Thirsk) and this is confirmed by the Secretary of State's Proposed Changes. It should be noted the Proposed Changes introduces new terminology and renames Principal Service Centres as Principal Towns.

The settlement hierarchy of Hambleton's Core Strategy supports the core approach of draft RSS by identifying Northallerton and Thirsk as Principal Service Centres and Bedale, Stokesley and Easingwold as additional or Local Service Centres. Policy CP6 of the Core Strategy requires that at least 51% of new housing development in the Hambleton district should be concentrated in the Principal Service Centres. The Allocations DPD directs 53% of all housing to Northallerton and Thirsk. The Assembly is therefore pleased that the Allocations DPD supports the overall settlement strategy of the Core Strategy and draft RSS.

Policy YH8 (A) of draft RSS requires that a sequential approach be followed when determining the location of development. Part A of the policy prioritises firstly the Regional and Sub Regional Centres; followed secondly by the Principal Service Centres and finally by the Local Service Centres. Policy YH8 (B) provides guidance on the allocation of specific sites and places first priority on the re-use of previously developed land and buildings and the more effective use of existing developed areas within centres; second priority on other suitable infill opportunities within centres and third priority on planned growth areas on the periphery of or well related, in public transport terms, to centres. Finally, Policy YH8 (C) requires local authorities to adopt a transport-orientated approach when identifying sites for development.

The Assembly notes that in allocating sites for new development, the DPD takes a view on the scale and distribution of sites within each sub area and the acceptability and suitability of individual sites. It is noted that one factor considered in this assessment is Policy YH8 of the RSS and the Assembly welcomes this. It should be noted that the Proposed Changes makes alterations to Policy YH8 but maintains the focus on adopting a sequential approach. The Assembly is pleased that in determining site allocations, Hambleton Council has followed the approach set out in Policy YH8.

In considering specific site allocations, the DPD also lists accessibility as a key factor in assessing site acceptability and sustainability. 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 draft RSS amends Policy YH8 of

the core approach to reinforce and further strengthen this requirement. The Assembly would therefore expect to see the Allocations DPD referring to and giving full consideration to the accessibility criteria of the RSS.

### *Housing*

The Overview paper of the Allocations DPD sets out the housing targets of the Council's adopted Core Strategy and the amount of housing that can be provided by the sites identified in the DPD. Draft RSS and the Council's Core Strategy sets a target of 320 new dwellings (net) per annum between 2004 and 2011, 290 between 2011 and 2016 and 260 between 2016 and 2021. The Assembly notes that the Allocations DPD provides for a scale of housing that is in line with the targets and phasing of the Core Strategy and draft RSS. It should be noted that the Secretary of State's Proposed Changes to draft RSS brings forward the step-down in housing numbers to 260 dwellings per annum from 2011 to 2008. In addition, the numbers in the Proposed Changes run for longer, to 2026.

Both current and draft RSS (Policy H4) set out guidance on housing mix. Draft RSS requires Local Authorities, Sub Regional Housing Partnerships and developers to ensure the provision of homes for a range of size, type and tenure of household that reflects the needs of the area. Work currently being undertaken by Ecotec on behalf of the Assembly and Government Office on Strategic Housing Market Assessments will provide further evidence on the mix of housing required in Hambleton.

The Assembly notes that the Northallerton paper (page 50) of the Allocations DPD proposes to provide a mix of dwellings in Northallerton including flats, starter homes and larger family homes. The Assembly supports this approach to providing a mix of housing to meet an identified local need in Northallerton and would support a similar approach being adopted for the other centres in the district where appropriate. It is important that where such an approach is utilised, it is justified by robust and up-to-date local evidence such as a recently completed Local Housing Needs Assessment or a new Strategic Housing Market Assessment.

Paragraph 3.7 of the Overview document states that the Preferred Options Allocations would be likely to result in a district-wide proportion of housing development on brownfield land that is just over 38%. The Assembly recognises that the Allocations DPD does not include any allowance for windfall developments and that windfall sites will continue to come forward for development and will most likely be brownfield rather than greenfield sites. However, the proposed site allocations will fail to achieve the draft RSS district target for Hambleton of 55% and the region-wide target of 65% set out in the Proposed Changes to draft RSS. The Assembly would prefer to see the Allocations DPD achieving delivery on brownfield sites at a rate at least equal to the draft RSS district target of 55%.

Finally, it should be noted that the Proposed Changes to draft RSS requires the Region to meet housing needs of Gypsies and Travellers to address an overall shortfall of at least 255 pitches across the region. The Proposed Changes requires North Yorkshire to address a shortfall of at least 57 pitches by 2010. It is not clear whether the Allocations DPD makes provision for Gypsy and Traveller accommodation.

### *Employment*

Finally, for Hambleton, draft RSS forecasts a net change of 5 to 16 hectares in total employment land to 2016. The Proposed Changes gives a figure for industrial and storage/distribution land, which for Hambleton is 20 hectares to 2021. The Assembly notes that the Allocations DPD seeks to provide for a scale of employment land in line with the Council's adopted Core Strategy (75 hectares) and the Assembly assumes that this figure is based on up-to-date and robust local evidence.