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Peter Stockton
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Dear Peter

**Yorkshire Dales Development Framework
Housing Development Plan Document: Issues and Options**

The Yorkshire and Humber Assembly welcomes the opportunity to comment on the Yorkshire Dales Housing 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 Housing 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 Local Development Framework 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 expanded upon 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 the helpful 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 inclusion of references to the RSS throughout the Housing DPD
- The recognition of the sequential approach of the RSS in determining where future development should be located in the Spatial Strategy section
- The objective to pursue high quality design, improve energy efficiency and renewable energy generation in new housing developments

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
- The distribution of housing within the National Park is focused within the Local Service Centres
- Provision is made for the delivery of affordable housing and a suitable mix of housing to meet local needs without compromising the approach of overall strategic restraint in the Remoter Rural sub area as set out in the draft RSS

These points are expanded on in Annex A.

I trust that these comments are helpful to you as you prepare the Housing 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 Local Development Framework.

Regards



Jenny Poxon
Head of Planning Delivery and Conformity

Annex A

Housing Strategy

The Assembly welcomes the reference to the draft RSS and its Core Approach on page 6 of the DPD. Of particular relevance to the Yorkshire Dales is Policy RR1 of the draft RSS which adopts an approach of overall strategic restraint in the Remoter Rural Sub Area. For clarity, 'rural service centres' should be referred to as 'Local Service Centres' in line with the terminology of the draft RSS.

Affordable Housing Target

The Assembly welcomes the references to the RSS on pages 13 and 14. Policy YH7 Vibrant Rural and Coastal Areas of the draft RSS seeks to meet locally generated housing need. Policy YH8 Location of Development allows a limited amount of development in the Local Service Centres to meet local needs for affordable housing and economic diversification. Recommendation 5.11 of the draft RSS Panel Report states that Policy H3 on affordable housing should be reviewed to give indicative total need in numbers for each local authority or housing market area and an indication of how much might come from a proportion of market housing developments, and how much will be needed from other sources.

Delivering Affordable Housing

Option A appears to be the most sensible option and would help to deliver affordable housing and a better mix of housing, helping to contribute to the creation of sustainable communities. Option A combines opportunities for new affordable housing from windfall sites, rural exception sites and new site allocations. It is important that new sites for housing are allocated in line with the sequential approach of draft RSS Policy YH8 Location of Development.

Spatial Strategy

The Spatial Strategy of the DPD should be in line with draft RSS, which states that within the Remoter Rural sub area and the National Park, new development should be limited and restricted to the Local Service Centres. The draft RSS identifies four Local Service Centres within the National Park which are Sedburgh, Hawes, Leyburn and Grassington. Policy RR1 Remoter Rural Sub Area provides for small-scale development, mainly within the Local Service Centres, to address local affordable housing needs, provide some new job opportunities and assist in promoting long term economic and social sustainability. Any review that identifies settlements suitable for new housing should comply with the settlement hierarchy and sequential approach set out in Policy YH8 of the draft RSS.

Local Needs

No comments

Housing Development Boundaries

Development boundaries are useful to provide clarity both for developers and members of the public. In the case of the National Park, the boundaries can also be helpful in restricting the release of windfall sites for housing where the site is not sustainable located or where housing targets are already being met through sites allocated at a strategic level by planning policies. It may be appropriate, in particular local circumstances, to review the current development boundaries (Option B) to accommodate new site allocations and minor windfall sites, in order to meet local need for affordable housing. However, any review of the development boundaries must be logical and supported by a robust evidence base.

Housing Density, Size and Type

The Yorkshire and Humber Assembly welcomes the reference to the RSS on page 31 of the DPD. Both current and draft RSS provide guidance on housing mix. Policy H4 of current RSS states that the current mix of housing stock in the region needs to change to support the creation of more sustainable communities and requires local plans and strategies to ensure that a range of homes in terms of size, type and tenure of household that reflects the needs of the area is provided for.

Design and Sustainability

Policy S6 of the current RSS provides guidance on energy efficiency, sustainable construction, water use, waste management and renewable energy generation. Policy ENV5 of the Draft RSS requires at least 10% of the energy to be used in sizeable new development to come from on-site renewable energy sources. If the National Park were to adopt this policy for smaller developments, that approach would be welcomed by the Assembly as it would contribute more positively to achieving the targets set out in the Regional Energy Infrastructure Strategy and would represent a clear commitment to the approach of the draft RSS.

Housing in Open Countryside

New housing development should be focused within, or on the edge of, the Local Service Centres, in line with the Core Approach set out in Policies YH1-YH9 of the draft RSS. New housing in the open countryside should continue to be strictly controlled.