

November 2008

HAMBLETON DISTRICT LOCAL  
DEVELOPMENT FRAMEWORK  
SUSTAINABILITY APPRAISAL OF  
ALLOCATIONS DPD SUBMISSION DRAFT

**Non-Technical Summary**

Prepared for  
Hambleton District Council  
by Land Use Consultants





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LOCAL DEVELOPMENT  
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## INTRODUCTION

1. The Hambleton District wide Local Plan is being replaced by a Local Development Framework, incorporating Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs), in line with the Government's new format for development plans. The DPDs and SPDs included in the Local Development Framework need to be subject to sustainability appraisal (SA), under the Planning and Compulsory Purchase Act 2004. The SAs conducted must also meet the requirements for Strategic Environmental Assessment (SEA) in accordance with European Directive 2001/42/EC (also known as the SEA Directive).
2. Land Use Consultants (LUC) was appointed by Hambleton District Council (HDC) in January 2004 to undertake the SA of Hambleton's Core Strategy DPD, Development Policies DPD and Allocations DPD. The SA of the Allocations DPD has been carried out jointly between HDC and LUC.
  - LUC developed the methodology for appraising sites against SA objectives, overall assumptions to be applied and factors to be considered in determining the significance of effects.
  - HDC planning officers have used this methodology to undertake an appraisal of sites, including alternatives.
3. The results of the appraisals have been summarised by LUC in Chapters 5 & 6 of this SA Report and reflect HDC's own appraisal of sites. Conclusions and recommendations in Chapter 7 are based on LUC's review of the SA.
4. The report constitutes the SA Report for the Hambleton District Council Allocations DPD. It takes account of the aims and requirements of SA and the SEA Directive and sets out the findings to date of the Sustainability Appraisal of the Allocations DPD. The report is supplemented by a number of appendices forming an accompanying report. **Appendices 1 and 2** set out the review of plans and programmes and **Appendix 3** shows the baseline information collected. **Appendix 4** sets out comments received about the SA Report following the Preferred Options consultation and lays out how these have been addressed. **Appendix 5** gives a summary of the alternative sites considered. **Appendix 6** provides a summary of the effect of changes made since the Preferred Options stage and **Appendix 7** gives the detailed appraisal matrices of sites appraised by HDC (Submission Sites).
5. The production of the Allocations DPD was preceded by the production of the Core Strategy DPD. This was adopted on 3rd April 2007 and was accompanied by an SA Report<sup>1</sup> showing how policies were developed and tested through the SA process. The Development Policies DPD has also been prepared and was adopted on 26<sup>th</sup> February 2008, it too was accompanied by an SA Report.<sup>2</sup> The Allocations DPD will need to be in conformity with policies of the Core Strategy and Development Policies DPD.

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<sup>1</sup> Hambleton Local Development Framework Sustainability Appraisal. Sustainability Appraisal of Core Strategy Development Plan Document (Land Use Consultants, December 2005)

<sup>2</sup> Hambleton Local Development Framework Sustainability Appraisal. Sustainability Appraisal of Development Policies Development Plan Document (Land Use Consultants, February 2008)

## **OVERVIEW OF SUSTAINABILITY APPRAISAL AND SEA**

6. The purpose of SA is to promote sustainable development through the better integration of sustainability considerations into the preparation and adoption of plans. It should be viewed as an integral part of good plan making involving ongoing iterations to identify and report on significant effects of the plan and the extent to which sustainable development is likely to be achieved.
7. Under the Planning and Compulsory Purchase Act 2004, SA is mandatory for Regional Spatial Strategies, DPDs and SPDs. When preparing DPDs and SPDs, planning authorities must also conduct an environmental assessment in accordance with the SEA Directive. The objective of the Directive is 'to provide for a high level of protection of the environment and contribute to the integration of environmental considerations into the preparation and adoption of plans....with a view to promoting sustainable development'.
8. ODPM guidance on SA<sup>3</sup> explains the difference between environmental assessments required under the SEA Directive and SA of development plans as required by the UK Government<sup>4</sup>. There are many parallels but also some differences, and the guidance clearly shows how assessment to comply with the SEA Directive can be integrated with current practice on SA. Simply put, SA includes a wider range of considerations, extending to social and economic impacts of plans, whereas SEA is more focussed on environmental impacts. The SA guidance describes how it is possible to satisfy both requirements through a single appraisal process undertaking a joint SEA/SA. Throughout this report the term 'SA' refers to Sustainability Appraisal incorporating the requirements of Strategic Environmental Assessment.

## **METHODOLOGY**

9. The SA guidance introduces the SA process and explains how to carry out SA as an integral part of the plan-making process. The table on the following page sets out the main stages of the plan making process and shows how these link to the SA process.

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<sup>3</sup> *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents*. ODPM, November 2005

<sup>4</sup> As set out in the Planning and Compulsory Purchase Act 2004

# Corresponding stages in plan-making and SA

(from SA Guidance, ODPM 2005)

<p>Figure 5 – Incorporating SA within the DPD process</p>	
<p><b>DPD Stage 1: Pre-production – Evidence Gathering</b></p>	
<p>SA stages and tasks</p>	
<p><b>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</b></p> <ul style="list-style-type: none"> <li>• <b>A1:</b> Identifying other relevant policies, plans and programmes, and sustainability objectives.</li> <li>• <b>A2:</b> Collecting baseline information.</li> <li>• <b>A3:</b> Identifying sustainability issues and problems.</li> <li>• <b>A4:</b> Developing the SA framework.</li> <li>• <b>A5:</b> Consulting on the scope of the SA.</li> </ul>	
<p><b>DPD Stage 2: Production</b></p>	
<p>SA stages and tasks</p>	
<p><b>Stage B: Developing and refining options and assessing effects</b></p> <ul style="list-style-type: none"> <li>• <b>B1:</b> Testing the DPD objectives against the SA framework.</li> <li>• <b>B2:</b> Developing the DPD options.</li> <li>• <b>B3:</b> Predicting the effects the DPD.</li> <li>• <b>B4:</b> Evaluating the effects of the DPD.</li> <li>• <b>B5:</b> Considering ways of mitigating adverse effects and maximising beneficial effects.</li> <li>• <b>B6:</b> Proposing measures to monitor the significant effects of implementing the DPDs.</li> </ul>	
<p><b>Stage C: Preparing the Sustainability Appraisal Report</b></p> <ul style="list-style-type: none"> <li>• <b>C1:</b> Preparing the SA Report.</li> </ul>	
<p><b>Stage D: Consulting on the preferred options of the DPD and SA Report</b></p> <ul style="list-style-type: none"> <li>• <b>D1:</b> Public participation on the preferred options of the DPD and the SA Report.</li> <li>• <b>D2(i):</b> Appraising significant changes.</li> </ul>	
<p><b>DPD Stage 3: Examination</b></p>	
<p>SA stages and tasks</p>	
<ul style="list-style-type: none"> <li>• <b>D2(ii):</b> Appraising significant changes resulting from representations.</li> </ul>	
<p><b>DPD Stage 4: Adoption and monitoring</b></p>	
<p>SA stages and tasks</p>	
<ul style="list-style-type: none"> <li>• <b>D3:</b> Making decisions and providing information.</li> </ul>	
<p><b>Stage E: Monitoring the significant effects of implementing the DPD</b></p> <ul style="list-style-type: none"> <li>• <b>E1:</b> Finalising aims and methods for monitoring.</li> <li>• <b>E2:</b> Responding to adverse effects.</li> </ul>	

## **Stage A: Setting the Context and Scope**

10. This stage was completed by LUC in two parts. The Stage I Report was conducted in February 2004<sup>5</sup> and involved the following main stages:
  1. Inception meeting
  2. Review of plans, strategies and studies
  3. Characterisation
  4. Development of SA objectives and appraisal framework
  5. Consultation workshop
  6. Assessment of Vision and Spatial Strategy and alternatives considered
11. In February 2004 LUC facilitated on behalf of Hambleton District Council a stakeholder workshop to discuss sustainability issues in the District to help develop the characterisation and develop the sustainability objectives, which will be used for the SA of the Local Development Framework.
12. Following completion of this work, the new Planning and Compulsory Purchase Act, which came into effect in September 2004, introduced a statutory requirement for undertaking SA. At the same time the ODPM produced draft guidance on SA. The SEA Directive also came into force in July 2004, introducing new requirements for environmental assessment of spatial plans. The Stage I Report was therefore reviewed with these changes in mind and a SA Scoping Report was prepared.
13. The additional work, completed in March 2005, involved updating the list of relevant plans, programmes and sources of baseline information and undertaking further reviews of new and updated plans where necessary. This information was used to update and further develop the characterisation/key sustainability issues and framework of sustainability objectives.
14. During March and April 2005 the Scoping Report was sent to the four SEA 'Consultation Bodies' (i.e. the Countryside Agency, English Heritage, English Nature, Environment Agency), those involved in the stakeholder consultation group in Stage I, plus the Government Office, Regional Assembly and neighbouring authorities for a five week consultation. Responses to this consultation were received from:
  - The Countryside Agency
  - English Nature
  - English Heritage
  - Environment Agency
  - Yorkshire Forward

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<sup>5</sup> Integrated Sustainability Appraisal/Strategic Environmental Assessment of Hambleton Local Development Framework. Stage I Report: Vision and Spatial Strategy (Land Use Consultants, February 2004)

- Government Office Yorkshire and Humber
- Darlington Borough Council

Comments from the responses received have been taken into consideration and addressed where appropriate in this report and may be viewed by request at Hambleton District Council's offices.

### **Stage B: Developing and Refining Options**

15. The purpose of the Allocations DPD is to allocate sites that will help to deliver the Core Strategy of Hambleton's LDF. The Core Strategy sets out an overall vision, spatial strategy and 12 overarching strategic objectives that apply to the whole of the LDF, including the Allocations DPD. These were tested and refined against the SA framework as part of the SA of the Core Strategy.
16. The Council's approach to site selection set out in Annex 1 of each of the five Sub-Area Plans demonstrates how the step-by-step process considered all alternative sites to those selected as Preferred Options. A number of sites were discarded as they are contrary to the spatial strategy set out in the adopted Core Strategy DPD. All other alternative sites above a minimum size threshold of 0.3ha were considered alongside the Preferred Options and were subject to SA. As part of the appraisal, consideration was also given to whether alternative land uses on each site would be likely to result in more sustainable outcomes.
17. The framework of SA objectives used to appraise policies of the Core Strategy and Development Policies DPDs was used to appraise site allocations. A number of SA objectives and/or criteria within the SA framework are dependent upon successful implementation of development policies and cannot be used for appraising the sustainability effects of different locations. These were removed from the framework and an explanation provided, as set out in **Table 3.4** of Chapter 3 of the SA Report.
18. **Table 3.4** also sets out factors likely to contribute to significant effects in order to clearly demonstrate how judgements were made when predicting and assessing effects and to encourage consistency within the appraisal. The table also includes key sources of data and information to be drawn upon as evidence to justify significant effects recorded. This draws on information compiled for the Scoping Report; the review of plans, programmes and baseline information was updated following the scoping consultation exercise. **Table 3.4** was used by planning officers at Hambleton District Council when appraising sites against the framework of SA objectives.
19. Where significant effects were recorded an explanation was included and consideration was given to whether opportunities are likely to exist to maximise beneficial effects or mitigate adverse effects. The need for monitoring of significant effects is discussed in Chapter 8 of the report.

### **Stage C: Preparing the Sustainability Appraisal Report**

20. The SA Report provides the results of the appraisal of the Allocations Preferred Options and the process undertaken.

### **Stage D: Consultation on Preferred Options and SA**

21. The Preferred Options Allocations DPD along with the SA report was subject to consultation for a statutory six-week period in October-November 2007. This consultation was designed to comply with the Statement of Community Involvement and requirements of the SEA Directive. Responses that made reference to the SA report were received from English Heritage and Natural England. Comments have been taken into consideration and addressed where appropriate and can be seen in **Appendix 4**.

### **Stage E: Updating the Sustainability Appraisal Report to incorporate changes to the Plan**

22. Following the consultation period, Hambleton District Council have prepared the Submission Draft of the Allocations DPD. Significant changes to the DPD as a result of public consultation have been appraised and comments on the SA taken into account in this updated SA report. The Allocations DPD and this revised SA Report will be submitted to the Secretary of State in May 2009 for Examination.

### **Stage F: Monitoring Implementation of the DPD**

23. This SA Report sets out recommendations for monitoring significant adverse sustainability effects of the Allocations DPD.

## **CHARACTERISATION OF HAMBLETON AND KEY SUSTAINABILITY ISSUES**

24. Hambleton is one of the largest Districts in England. It is essentially rural in character and includes part of the North York Moors National Park. Northallerton and Thirsk are the main towns in the District, and are supported by three other market towns of Bedale, Easingwold and Stokesley. 51% of the 86,500 population live in these five, historic, market towns dispersed across the District. The remaining population is scattered throughout the District in villages and agricultural settlements. There are over 130 villages in the District, with nearly a third (30%) containing less than 100 people. Outside the settlements land use is almost wholly agricultural, and this is a dominating influence on the landscape. The Vales of Mowbray and York form the lowland landscape which dominates the District, with their fertile and intensively farmed arable land. To the east a steep escarpment gives way to the upland landscape of the North York Moors National Park. To the south east the more gentle landscape of the Howardian Hills is designated as an Area of Outstanding Natural Beauty (AONB).
25. The District is relatively prosperous, with unemployment levels roughly half the national average. There are low levels of deprivation, with the District ranked in the bottom quartile of districts in terms of indices of deprivation in the UK. To the north are the urban areas of Teesside and Darlington, and to the south are Harrogate and the City of York. These large urban centres have a significant socio-economic influence on the District. The most southern point of the District encompasses a section of the York Green Belt, which surrounds the settlement of Shipton.

26. Key environmental, economic, social, transport and access issues are summarised in the table on the following page.

**Key environmental issues for Hambleton include:**

- Need to protect existing high quality landscape and enhance lower quality landscape
- Relatively low nature conservation value due to deteriorating effect of agricultural activities
- Need to improve the number and diversity of biodiversity sites
- Need to conserve the historic environment for future generations
- High quality built environment under pressure from development
- Re-use of land within settlements to avoid sprawl
- Noise pollution and its potential to increase with airfield expansions
- Impacts of climate change
- Potential risk of flooding
- Potential to develop appropriate forms of renewable energy in the right locations to offset greenhouse gas emissions

**Key economic issues in Hambleton include:**

- Provision of a suitable range of employment land and premises
- Provision of training to improve skills
- Renaissance of market towns
- Diversification of the rural economy
- Reducing out-commuting
- Diversity of employment including more manufacturing and knowledge based employment and higher quality jobs
- Need to address the digital divide (those with/without broadband access)

**Key social issues in Hambleton include:**

- Fear of crime
- Needs of young people e.g. affordable housing, local jobs
- Need for affordable housing for local residents
- Ageing population
- Education and skills/training to support local employment
- Rural service provision
- Need to speed up the roll-out of broadband
- Need for community-led social enterprises

### Key transport and access issues for Hambleton

- Need to address transport and access barriers faced by elderly and young people, people with disabilities and the socially/economically disadvantaged.
- Heavy dependency on the private car
- Poor provision of public transport particularly in rural areas
- Reverse commuting between Hambleton and surrounding urban areas

## CONSIDERATION OF ALTERNATIVE SITES

27. There has been a long and detailed process of considering alternative sites and their sustainability implications that have led up to the development of the Submission sites laid out in the Allocations DPD Submission Draft. This process, along with the reasons for choosing certain sites over others and the effect this has had on the predicted significant effects of the plan is detailed in Chapter 5 and Appendices 5 & 6 of the SA Report.

## LIKELY SIGNIFICANT EFFECTS OF THE ALLOCATIONS DPD SUBMISSION DRAFT

28. Below is a summary of the key likely significant positive and negative effects of the Hambleton Allocations DPD identified in the SA and recommendations for strengthening the DPD and its policies. These are summarised in **Table 6.1** in Chapter 6 of the SA Report.

## SIGNIFICANT & CUMULATIVE POSITIVE EFFECTS

29. Summary **Table 6.1** provides a guide as to how the development of Submission sites taken together may result in cumulative effects in relation to certain sustainability objectives. It also shows that many more significant positive effects are predicted than significant negative effects. Significant positive effects are recorded for all SA objectives apart from Objective B: **'To protect and enhance the diversity and abundance of flora and fauna and geological interests'**. The lack of certainty about the effects of development on biodiversity, flora and fauna and the need for further site specific survey to help determine effects is likely to explain this.
30. The SA identified several sites where development was predicted to have significant positive effects on maintaining and enhancing **landscape and townscape quality** (Objective A). Most of the predicted effects are a result of the redevelopment of brownfield sites and the opportunities this presents to improve the quality of development on the sites themselves, as well as the appearance of the sites from their surrounding locality.
31. The SA predicted that the majority of sites would have significant impacts on choice of **sustainable locations appropriate to settlement character** (Objective D). Most of these predicted significant effects are positive and relate to the criteria from

the SA framework – the choice of brownfield sites which are in accessible locations, reducing the need to travel, and developing on sites that are not at risk of flooding.

32. Site selection avoided the need to develop on greenfield land as far as possible (although the overall target for development on brownfield land will not be met) and should reduce the need to travel, thereby potentially reducing reliance on fossil fuels, which in turn will encourage the positive effects of **prudent use of natural resources** (Objective E).
33. A small number of sites in Easingwold and Northallerton are expected to have a significant positive effect on **providing services for the economy** (Objective J) as a result of employment land proposals.
34. The SA predicted that several of the preferred sites would have significant positive effects on **providing housing to meet local needs** (Objective R). These are mainly proposals for residential development on large sites presenting opportunities for the provision of high levels of affordable housing.
35. The location of the majority of sites in close proximity (walking distance) to facilities means that several of the preferred sites are predicted to have significant positive effects on improving **access to a range of services and facilities** (Objective T).

## **SIGNIFICANT & CUMULATIVE NEGATIVE EFFECTS (INCLUDING MITIGATION PROPOSALS)**

36. There are a few significant negative effects (which are also cumulative effects) predicted to result from the development of the Submission sites. These effects are predicted to be seen in relation to:
  - Landscape & townscape
  - Historic environment
  - Location & character
  - Climate change
37. Nine sites are predicted to have a significant negative effect in these areas; BCI, EMI, NE2, SE1, SH4, TM2A, TM2B, TM2C & TM2D. Mitigation and best practice measures are presented on the following page for each of these sites.

Submission Site	Significant Negative Effect	Mitigation Proposals
BCI- Gateway Car and Coach Park, Bedale	This site could have a significant adverse effect on the adjacent Bedale Conservation Area (SA Objective A).	Suitable landscaping and design using natural materials and resources could lessen the impact on the Conservation Area and the setting of the listed buildings whilst retaining and enhancing the views when approaching Bedale from the west.  A Conservation Area Appraisal should be produced to help ensure that the scheme preserves and enhances the area's character.
EMI- Stillington Road /York Road, Easingwold. Mixed housing /employment	The site is Greenfield and visible on a main approach to the town. (SA Objective D).	High quality and substantial landscaping will reduce the visual impact on development in this open area.
NE2 – Yafforth Road / Finkills Way, Northallerton. Employment	This site is identified in the Strategic Flood Risk Assessment as being liable to flooding and therefore may not be in the most sustainable location. (SA Objective F)	Flooding could be overcome by constructing any new building at a higher level or diverting the beck. It may be possible to mitigate the effects of flooding through the design of the development.
SE1 – East of Stokesley Business Park. Employment	The northernmost part of the site lies in the Functional Flood Plain. (SA Objective F)	No built development should be allowed in the flood plain and more land is allocated to meet land supply requirements and allow for this area to be avoided.
SH4 – Cleveland Lodge, Great Ayton. Housing	Development on this site would involve the loss of park land that is locally recognised to be of historic and landscape interest. (SA Objective C & D)	The impact on the historic landscape could be mitigated through careful layout and design and high quality landscaping of the development.
TM2A – Westbourne Farm, Thirsk. Housing	Residential development in this location, at this scale, will be prominent in the landscape and alter the character. (SA Objectives A & D)	Structural landscaping and high quality design and layout will combine to make this development an attractive and sustainable urban extension to Thirsk.
TM2B – Cocked Hat Farm, Thirsk. Employment	Employment development in this location, at this scale, will be prominent in the landscape and lessen its open character. (SA Objectives A & D)	Structural landscaping and high quality design and layout will combine to make this development an attractive and sustainable urban extension to Thirsk.
TM2C – Topcliffe Road, Thirsk. Neighbourhood Centre (comprising retail, leisure and associated uses)	Development in this location, at this scale, will be prominent in the landscape. (SA Objectives A & D)	Structural landscaping and high quality design and layout will combine to make this development an attractive and sustainable urban extension to Thirsk.
TM2D – East of Topcliffe Road, Thirsk. Primary School	Development in this location, will be prominent in the landscape. (SA Objective A)	Structural landscaping and high quality design and layout will combine to make this development an attractive and sustainable urban extension to Thirsk. In particular, a new school offers an opportunity for an attractive building in a landscaped setting.

## CONCLUSIONS AND RECOMMENDATIONS

38. **Table 6.1** shows that the majority of predicted significant effects are positive. This largely results from the adoption of a Core Strategy DPD which has already been subject to SA and is based on sound spatial principles and sets the framework for the Allocations DPD. Development has therefore been steered towards settlements in the District that are most likely to present opportunities for sustainable development – over half of new housing development will take place in the Principal Service Centres of Northallerton and Thirsk for example.
39. In addition, the site selection methodology undertaken is successful to the extent that it concentrates development within urban areas in the first instance (on brownfield sites), helping to reduce the need to travel to reach services and facilities and reducing the need to develop on greenfield sites which may be to the detriment of local countryside character. The Council has also been largely successful in avoiding new development in areas that are susceptible to flooding – a key local issue for the District and global issue in the context of adaptation to the effects of climate change.
40. Overall, housing and employment land targets set out in the Core Strategy and RSS are met. This should go some way towards bringing about more sustainable living patterns in the District, particularly if affordable housing targets can be met and higher quality employment opportunities can be provided. The Allocations DPD also includes a number of community infrastructure proposals such as footpaths and cycle ways, improvements to transport interchanges and parking facilities, new and expanded schools and recreation land which should help towards improved quality of life in the District.
41. Although the individual site appraisals are generally positive, taken together there are some outstanding issues that need to be considered.
- Meeting brownfield targets
  - Avoiding an increase to the risk of flooding
  - Minimising reliance on cars
  - The provision of sufficient affordable housing
  - Uncertainties of effects on biodiversity
42. These issues were raised at the Preferred Options stage. Changes made to the plan since Preferred Options stage have addressed the issues to a certain extent, although some uncertainties remain as discussed below.

### **Meeting brownfield targets**

43. The Council's intention has been to identify sufficient brownfield land to meet the target in Policy DPI2 of the Development Policies DPD (55% of all housing development to be on brownfield land). The amount of housing to be provided on brownfield land through the Allocations DPD Submission Draft averages 45%. This is a significant improvement on the 38% figure achieved at the Preferred Options stage,

particularly given that sufficient allocations have now been identified to meet the housing figures set out in the adopted RSS, which represent nearly a 25% increase on housing figures set out in Policy CP5 of the adopted Core Strategy.

44. However, the amount of housing to be provided on brownfield land still falls well short of the Development Policies DPD target. Given the detailed nature of the site appraisal and selection process, this may suggest that the 55% target is set too high, although the Annual Monitoring Report<sup>6</sup> shows that planning permissions have been consistently above 75% brownfield land over the last four years and at 88% in 2006/7. **Given the recognised need nationally to protect greenfield land we would recommend that the 55% target is retained for the time being and delivery against the target continues to be closely monitored. The Council will need to review site availability through its Strategic Housing Land Availability Assessment, and should consider how opportunities presented by windfall sites may help to meet the target, whilst avoiding negative effects against other sustainability criteria.**

#### **Avoiding an increase to the risk of flooding**

45. The site selection process has gone a long way towards avoiding new development in areas liable to flooding. Some Submission sites are at risk of flooding however albeit that only those parts of the sites which are not at risk from flooding would be developed. Care should be taken to ensure that development of part of the site does not increase the risk of flooding by reducing the amount of permeable ground and therefore increasing run-off. Such development would conflict with Policy DP43 of the Development Policies DPD. **Where development is dependent on mitigation to control the risk of flooding, the Council should ensure this is enforced through the application of Policy DP43 including the use of developer contributions where necessary.**

#### **Minimising reliance on cars**

46. The outcome of the site selection process needs to be assessed in the context of overall development strategy for each sub-area and existing live-work patterns of the District's population. The proposals for the relief roads to the north of Northallerton and north of Bedale would seem to be contrary to Core Strategy Strategic Objective 2 and Policy CP2 which aim to reduce the need to travel. Whilst the relief roads are focussed on reducing localised congestion, coupled with the location of new development e.g. housing to the north of Northallerton and upgrades to other routes e.g. the A1, the relief roads may exacerbate current trends of high levels of car ownership and use and out-commuting to employment opportunities in Middlesbrough and Darlington to the north. This may undermine attempts to encourage higher-value local employment opportunities on land proposed for employment uses in the Allocations DPD.
47. In the case of development to the north of Northallerton, it should be noted that 965 houses or two-thirds of the total housing requirement for the Sub-Area is

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<sup>6</sup> Local Development Framework and Hambleton District Wide Local Plan Annual Monitoring Report (Hambleton District Council, December 2007)

proposed in the northern development area, a considerable increase on that proposed at the Preferred Options stage, although employment and community facilities to be provided alongside the road link may help to reduce out-commuting to some extent.

48. **Although the proposed relief roads to the north of Northallerton and north of Bedale may relieve congestion in the short term, it is questioned whether they represent the most sustainable long-term solution for the District. There is a need to encourage alternatives to the use of the car and a range of employment types alongside new housing development to avoid exacerbating out-commuting trends.**

#### **The provision of sufficient affordable housing**

49. There is significant uncertainty in relation to the delivery of affordable housing in Northallerton Sub-Area to meet the 40% target of Core Strategy Policy CP9. The conclusions and recommendations of the viability and financial appraisal report on the Northern Area Masterplan (presented in Annex 7 of the Preferred Options DPD) suggested that 20% affordable housing is the maximum that could be achieved without any grant support. The Sub-Area plan for Northallerton recognises the uncertainty of affordable housing delivery given the cost of implementing the link road (£11m – to come from all new homes developed in Northallerton) but states that there is potential for the Housing Corporation to support any shortfall in provision which may occur.
50. It should also be noted that flood alleviation measures will be required in the northern development area, some of which (but not all) will be delivered alongside the construction of the road link, implying a further cost consideration.
51. **The Council should clearly demonstrate whether realistic alternatives to the northern relief road exist to relieve congestion problems in Northallerton. If it is established that no realistic alternatives exist, alternative means of funding the relief road or affordable housing (e.g. Housing Corporation grant) should be agreed to avoid reducing the level of affordable housing provision in the Sub-Area.**

#### **Uncertainties of effects on biodiversity**

52. In addition to the points raised above, it should be noted that whilst unlikely to be significant, many of the effects on flora, fauna and geological features remain uncertain. This might be expected as detailed site assessment is reliant on further ecological survey which may be required as a result of Environmental Impact Assessment but the cumulative impacts of development will also need to be considered. Additionally, whilst there are no Natura 2000 or Ramsar sites within the District, the Allocations DPD will be subject to Screening for Habitats Regulations Assessment in order to establish whether indirect effects such as increased recreational pressure or increased water abstraction have the potential to significantly affect Natura 2000 and Ramsar sites adjoining or in close proximity of the District boundary.

## MONITORING

53. The final section of the SA Report sets out the framework for monitoring implementation of the Allocations DPD. The key effects to be monitored are the suitability of development locations (including flooding) and effects on settlement character and the effects of the plan on climate change and its effects on the population. As a result of the outstanding issues identified, it is also suggested that car travel and patterns of commuting and levels of affordable housing provision are closely monitored, along with biodiversity due to the uncertainty of likely effects. A range of indicators and sources of information are identified in **Table 8.1**. An on-going dialogue with the statutory environmental consultees and other stakeholders is also recommended to agree the significant effects to be monitored and the information to be collected, including who will collect the information and when.

Land Use Consultants

November 2008

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