

## **Matter 3 – Spatial Strategy and Distribution of Growth (Policies S3, S5, S6 and HG5)**

### **Issue 1 – Settlement Hierarchy – Policy S3**

#### **Q1. How was the settlement hierarchy established?**

##### **Council's response**

The settlement hierarchy has its origins in the hierarchy that was developed for the Local Development Framework. The options presented in the Issues and Options Consultation document (January 2016) (CD01) identified 5 spatial options for the distribution of development. These options were based around the established settlement hierarchy in order that they could be easily understood and people could engage in an informed manner.

The Preferred Options Consultation (October 2016) (CD02) set out a preferred option for the settlement hierarchy as part of Preferred Option 4.

The settlement hierarchy set out in policy S3 is the same as in the Preferred Options.

#### **Q2. In determining the position of each settlement in the hierarchy, has the Council taken into account sufficient factors, such as the size of each settlement and the range of services and facilities that are available?**

##### **Council's response**

The hierarchy was originally developed using a detailed assessment of the services and facilities that were available at each settlement. While some settlements have seen changes in the level of services and facilities the council has sought to reflect a wider set of factors including the size of settlements and the relationship with other settlements nearby. The council has also sought to maintain the established hierarchy.

#### **Q3. Is the settlement hierarchy consistent with paragraph 103 of the Framework, which states that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes?**

##### **Council's response**

The settlements which have a realistic choice of travel mode are limited due to the rural nature of the district. Public transport is not a realistic option for many people for day to day needs such as travelling to work as services are not sufficiently frequent and/ or do not run at times that fit with a normal working day.

Consultation and feedback during plan preparation identified strong support for an approach that would enable villages to have some development during the plan period. This has been enabled through the approach to identifying

allocations, mostly of small sites, in some villages and also through the approach taken with policy HG5 for windfall development.

**Q4. What is the justification for identifying Great Broughton as a Service Village? Does the Local Plan adequately reflect the size, scale and level of service provision in the village?**

**Council's response**

Recent changes in the level of services and facilities mean that Great Broughton no longer has a similar level as other Service Villages. The loss of a shop, post office and place of worship mean that the assessed score for the village would place it in the Secondary Village level of the hierarchy. However the settlement still has a range of services, including a primary school, and the council considers the size and scale of Great Broughton to be that of a Service Village.

**Issue 2 - Distribution of Growth**

**Q1. What is the justification for identifying key employment locations within the central transport corridor along the A1 and A19? What alternative strategies were considered in the preparation of the Plan?**

**Council's response**

The council has set out in the Economy Topic Paper (SD09) a summary of the Hambleton evolution and evidence base for the Local Plan; details of the regional and local context for economic growth and the need for employment land. Within the Spatial Distribution and Development Needs Topic Paper (SD19) the council has set out the stages of the development of the spatial distribution.

The council considered a range of strategies in the Issues and Options (CD01) stage. This identified 5 options for the future approach to development.

1. **Principal Towns** - Development focused on Northallerton and Thirsk
2. **Central Transport Corridors** - Development focused around the main road and rail links
3. **Five Towns** - Development focused on the five market towns of Northallerton, Thirsk, Bedale, Easingwold and Stokesley
4. **Five Towns and Villages** - Development dispersed across the five market towns and villages within the District, and
5. **A New Settlement** - the development of a new settlement or significant expansion of an existing settlement.

Having considered the response to the issues and options consultation the council presented its preferred approach in the Preferred Option Consultation (CD02). Set out in Preferred Option 4 the favoured approach for the spatial strategy represented a combination of Options 2 and 4 from the previous consultation stage.

Within SD19 key economic influences are identified as:

- York, North Yorkshire and East Riding Local Enterprise Partnership Strategic Economic Plan (SEP) (SD12.1);
- Hambleton A Place to Grow: Economic Strategy 2014-2024 (SD10); and
- Hambleton Inward Investment Strategy and Action Plan 2017-2022 (SD14).

The SEP in particular sets out a strategy that identifies the A1/ A19 corridor as the economic spine of the area and seeks to focus economic growth there because of its excellent north-south connections. In doing so, the SEP identifies Northallerton as a growth town and recognises the key importance of the Leeming Bar food park.

The council considers the strategy set out in these documents remains valid and represent a consistent strategy for economic development for the district and the wider area.

**Q2. Does the distribution of development in the Local Plan (including from committed schemes) adequately reflect the settlement hierarchy?**

**Council's response**

As set out in previous documents (Spatial Distribution and Development Needs Topic Paper (SD19), Housing Topic Paper (SD20), The council's response to initial questions (L001a)) the council has considered the level of development that will take place from existing commitments through the plan period when considering the level of allocations for settlements. There will be a significant level of housing development at both Northallerton and Thirsk as a result of previous allocations. Taking Thirsk as an example this housing development has been taken into account with the number and size of allocations at the town, which are relatively modest given the position of Thirsk in the hierarchy and its role in the strategy. In other areas Service Villages and Secondary Villages have extant planning permission that would lead to development during the plan period on similar levels

**New Local Plan Sites – Distribution by Settlement Type**

Settlement Type	Number of Proposed Dwellings	%
Service Centre	1,265	73.9
Service Village	176	10.3
Secondary Village	271	15.8
Totals	1,712	100.0

*Source : HDC Planning Policy*

The distribution of development is directed to the Principal Settlements/Service Centres.

**Q3. By focusing the majority of housing development in Northallerton and Thirsk, does the Plan direct sufficient growth to Bedale, Easingwold and Stokesley in order to reflect their role and function as Market Towns?**

### **Council's response**

A balance has had to be achieved taking account of a number of factors. Most recent data (see response to initial questions) shows that the existing commitments are such that to provide the amount of housing development required the plan would require only limited allocations. Factors considered included for Stokesley the views from "Duty To Cooperate", particularly from Redcar and Cleveland, regarding impact of development in Hambleton on their area and achievement of their aims and objectives. For Bedale the council considered the current issues for the town including the town centre, that the council is seeking to help address through the allocation of the car and coach park (AIB3). For Easingwold the council was aware that the town had seen a significant amount of development over recent years.

- Q4. In response to the *Inspectors' Initial Questions*, information provided by the Council states that around 75% of all new housing development will be located in the Market Towns. Considering the predominantly rural nature of the District, and the number of Villages, is the distribution of development between the towns and villages reasonable and justified?**

### **Council's response**

As indicated the market towns are considered to be the settlements which are most sustainable, accessible and where there is a realistic option to use sustainable travel modes and as such the council considers that the proportion of development that is to be located at the market towns is appropriate.

- Q5. Beyond the Market Towns, is the distribution of growth consistent with paragraph 78 of the Framework, which states that in order to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities?**

### **Council's response**

During the preparation of the plan many comments received supported some limited development in many villages. The council therefore has sought to strike a balance between these views and higher levels of development that might better enhance the vitality of rural communities. The allocations in villages are considered to be of a scale and location that will support the vitality of rural communities.

- Q6. Is the spatial strategy justified? Does the submitted Plan represent an appropriate strategy, taking into account the reasonable alternatives available?**

### **Council's response**

As set out above the council has through the preparation of the local plan considered and consulted on a range of options for the spatial distribution of development that are considered to include all reasonable alternatives. The council considers the spatial strategy is justified as it has taken account of

relevant evidence, including current strategies for economic development for the LEP area, as well as the responses from consultation. As such the council considers the spatial strategy to be an appropriate strategy.

- Q7. Does the Plan include strategic policies that set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations, as required by paragraph 65 of the Framework?**

**Council's response**

The local plan makes provision through allocations to meet the development requirements for the district. As such there is no requirement for neighbourhood plans to meet district housing needs.

The response to initial questions identified that neighbourhood plans were considered when the strategy and location of allocations was decided upon. Broadly the plan makes allocations for towns where a neighbourhood area has been designated, but the approach also considered where neighbourhood plan groups were active. For other settlements, particularly where progress is being made on neighbourhood plans the council wishes to support these communities and allow them to make decisions about the scale and location of development.

Policy S4 does not identify any development requirement for neighbourhood plans. Instead it encourages communities preparing neighbourhood plans to seek to identify what local needs are and meet them through the neighbourhood plan.

**Issue 3 – Windfall Housing Development – Policies S3, S5 and HG5**

- Q1. Policy HG5 provides further detail on windfall housing sites and permits housing development within the 'main built form' of settlements. The supporting text to Policy S5 includes a table which defines what the 'built form' will include. Is the text sufficiently clear to decision-makers, developers and local communities? Is the policy effective?**

**Council's response**

The tables are considered to give a comprehensive description of circumstances and whether they are considered to be within or outside the built form.

Since 2014 an interim policy guidance note, which allows for small scale housing proposals on the edge of villages has been effective.

- Q2. Is the definition of what constitutes the 'built form' justified?**

**Council's response**

Yes the tables at Policy S5 and justification wording including in the “Implementation guidance” at the tables provide justification for the definitions of what will be included or excluded from the definition of built form.

- Q3. What is the justification for only permitting windfall housing development adjacent to the built form of Service, Secondary and Small Villages, but not Market Towns?**

**Council’s response**

Sites for new larger developments adjacent to the built form of the market towns are to be allocated and provide for housing in the market towns in a planned and sustainable manner. Windfall housing adjacent to Market Towns may put at risk the deliverability of the allocated sites. Policy S5 allows for development on land that is not allocated in the smaller settlements.

- Q4. What is the justification for only permitting ‘minor scale development’ adjacent to villages under Policy HG5? How would a decision-maker react to a development proposal for 10 dwellings or more which met the requirements of the policy and was commensurate to the size, role and function of the village?**

**Council’s response**

Larger scale proposals may not fit with the Spatial Vision of the Plan and are less likely to meet the requirements of the policies of the plan.

The Council encourages pre-application engagement with developers. A larger scale proposal would be a departure from the Plan. A departure would be a prompt to prepare justification for why the proposal should be approved; this would be identified as the pre-application stage. If a proposal was made assessment of the application would be made on its own merits with a decision to be taken by the Planning Committee in accordance with the Constitution and Scheme of Delegation.

- Q5. What is the justification for Policy HG5(a), which requires applicants to demonstrate a sequential approach to site selection? Is this requirement consistent with national planning policy and guidance?**

**Council’s response**

A sequential approach that supports the re-use of previously developed land is appropriate and consistent with national policy including the NPPF (chapter 11) and approach to brownfield land register. Following a sequential approach would not be burdensome on landowners, developers or the Council.

- Q6. What is the justification for Policy HG5(b), which requires applicants to demonstrate the deliverability of a site? Is it clear what information is expected from applicants for planning permission? Is the policy effective?**

**Council’s response**

The Council want to ensure that sites that have planning approval can be developed, to enable scale of developments appropriate to the context and without causing harm to communities by cumulative impacts arising from unreliable supplies of housing.

The information would be likely to include landowner requirements, site constraints and developers intentions.

Developers often point to their track-record of deliverability and the Council seeks commitment to build out schemes, however this is not a part of the current policy, but a short period for commencement has sometimes been used to ensure the benefits of early delivery of a site are achieved.

**Q7. How would a decision-maker react to a development proposal in a village where there are existing, committed schemes but which have not started construction?**

**Council's response**

Investigation would be undertaken of why the committed schemes have not progressed and whether the consented scheme(s) is likely to do so within the life of the permission. This would inform the consideration of a future proposal and to assist in the assessment of potential for harmful cumulative impacts if both/all schemes were implemented.

**Q8. How will applicants for planning permission demonstrate whether or not a development proposal represents the 'organic growth' of a particular village? Is the policy effective in this regard?**

**Council's response**

Policy E1 sets a requirement for development that "should be of a high quality, integrating successfully with its surroundings..." The design tools set out at E1 will enable the developer and decision maker to complete an assessment of whether the development is 'organic'.

The Interim Policy Guidance 2014 has similar requirements and has been successful, achieving growth with broad support of communities.

**Issue 4 – Development in the Countryside – Policy S5**

**Q1. Is it sufficiently clear to decision-makers, developers and local communities whether or not land is designated as countryside for the purposes of Policy S5? Is the policy effective?**

**Council's response**

Local Plan Publication Draft (LP01) Paragraph 3.50 and 3.51 explains the extent of the countryside within Hambleton, and sets out what is excluded from the countryside. Settlements not named in the settlement hierarchy are part of the countryside. In its current form, it is considered that the policy would not secure sustainable development, and the Council wishes to propose modifications to the policy to ensure its effectiveness.

**Q2. Is the requirement to 'protect and enhance' the intrinsic beauty, character and distinctiveness of the countryside consistent with paragraph 170 of the Framework?**

### **Council's response**

Paragraph 170 of the framework requires Planning policies and decisions to contribute to and enhance the natural and local environment. It is acknowledged that there should be recognition of intrinsic character and beauty of the countryside, but in order to be fully consistent with paragraph 170 it is considered by the council that the recognition should allow for proper enhancement and protection of all elements of the natural and local environment.

#### **Q3. Is the requirement to protect the best and most versatile agricultural land consistent with paragraph 170 of the Framework?**

### **Council's response**

Yes, paragraph 170 seeks to recognise the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland. By recognising these economic benefits planning policies and decisions should contribute to and enhance, by way of protection of the best and most versatile agricultural land.

#### **Q4. Are the requirements relating to the re-use of buildings in the countryside justified, effective and consistent with national planning policy?**

### **Council's response**

The requirements for isolated homes in the countryside is set out in paragraph 79 of the framework. It is considered that S5 is not fully consistent with the requirements of paragraph 79, in that an additional test of whether the development is sustainable and essential in a countryside location is not currently included in S5. The Council seeks to make a modification to rectify this, to ensure the policy S5 is consistent with paragraph 79.

### **Issue 5 – Green Belt – Policy S6**

#### **Q1. Is Policy S6 justified, effective and consistent with national planning policy as set out in paragraphs 133-142 of the Framework?**

### **Council's response**

Policy S6 is considered justified, effective and consistent with paragraphs 133-142 of the framework.