

RYEDALE
DISTRICT
COUNCIL



Ryedale Strategic Housing Land Availability Assessment:

Schedule of Responses and Actions

October 2009

Schedule of Responses to the S.H.L.A.A Consultation

<u>Respondent</u>	<u>Comments</u>	<u>Roger Tym response</u>	<u>Action</u>
Andrew Hutton for Smiths Gore on behalf of Fitzwilliam (Malton Estates)	<u>Site 208 – Land north of Castle Howard Road, Malton</u> Category 1 – 476 dwellings Site performs well against the three criteria <i>This appraisal is supported</i>	Noted	No action
	<u>Site 239 – Land south of Castle Howard Road, Malton</u> Category 1 – 253 dwellings Site performs well against the three criteria <i>This appraisal is supported</i>	Noted	No action
	<u>Site 236 – Malton Tennis Club</u> Category 1 – 58 dwellings Site performs well against the three criteria <i>This appraisal is supported</i>	Noted	No action
	<u>Site 512 – Coronation Farm and former Highways Depot, Old Malton</u> Category 1 – 20 dwellings Site performs well against the three criteria <i>This appraisal is supported</i>	Noted	No action
	<u>Site 235 – Land south of Highfield Road, Malton</u> Category 2 – 67 dwellings <i>Has been noted</i>	Noted	No action
	<u>Site 485 – Land north of Dickens Road, Malton</u> Category 2 – 72 dwellings <i>Has been noted</i>	Noted	No action
	<u>Site 486 – Site south of Westgate Lane and north of Green Lane, Malton</u> Category 2 – 258 dwellings <i>Has been noted</i>	Noted	No action
	<u>Site 487 – Land west of Hunter’s Hall and south of Westfold, Malton</u> Category 2 – 31 dwellings <i>Has been noted</i>	Noted	No action
	<u>Site 587 – Land north of Pasture Lane, Malton</u> Category 2 – 123 dwellings <i>Has been noted</i>	Noted	No action
	<u>Site 198 – Thackray’s Yard, Old Malton</u> Category 2 – 18 dwellings <i>It is considered that there are no suitability constraints in respect</i>	In relation to site ref. 198, Andrew advised in his representation that discussions with the County Council have resolved the main	We have updated the database to reflect this information and accordingly the site now falls into Category band 1.

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	<p><i>of this site. Discussions with the County Council have resolved the access arrangements and an application should be submitted shortly. It is considered that this site should be in Category 1.</i></p> <p><u>Site 2 – Former Gas Works, Sheepfoot hill, Malton</u> Category 3 – 36 dwellings <i>It has been noted</i></p> <p>General comments on the categorisation of sites at Malton and Norton It is noted that this assessment is primarily concerned with the site itself, constraints and its immediate surroundings. In particular it does not appear to take account of key sustainability factors such as the proximity to services, jobs etc. It is clearly a matter for the District Council to use this information to determine which sites should be proposed for development in the ‘Facilitating Development DPD.’ It is clear however from Regional Guidance and the contents of the earlier proposed Core Strategy that the majority of development will take place in Location Types 1 and 2 within and adjoining the Principal Service Centres.</p> <p>Distribution of Category 1 sites at Malton and Old Malton In addition to the three sites listed above that are owned by the Estates there are three further Category 1 sites with a capacity of 76 dwellings. Of the Category 1 sites at Malton/Old Malton with a capacity of 883 dwellings a total of 807 could be on the Estate’s land</p> <p>Distribution of Category 1 sites at Norton Rather surprisingly it is noted that Norton is assessed as having a total potential capacity of 1049 dwellings in Category 1 largely made up of various sites adjoining Welham Road. This compares with the identified capacity of only 883 in Category 1 at Malton and Old Malton.</p> <p>Distribution of Category 1 sites between Malton/Old Malton and Norton Whilst the conclusions in respect of the Categorisation of the Malton and Old Malton sites are generally welcomed there are concerns about the number of Category 1 sites identified at Norton. Appendix 3 – Residential market Commentary paper – acknowledges that there is greater market demand at Malton than there is at Norton for the following reasons:-</p>	<p>access constraints affecting the site.</p> <p>Noted</p> <p>Andrew also made various observations/comments in relation to the roles of Malton and Norton will need to be considered by the Council through the plan-making process, rather than in the SHLAA.</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>	<p>No action</p> <p>No action</p> <p>No action</p> <p>No action</p>
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	<p>between the two towns should be avoided.</p> <p>The fact that Malton and Norton are always viewed as one settlement in Planning Documents has the following unfortunate consequences:-</p> <ol style="list-style-type: none"> 1. The two towns are viewed as having the same locational advantages in terms of new housing whereas Malton/Old Malton has significant advantages over Norton particularly in respect of the range of services, facilities, etc and general accessibility. 2. There is a tendency to seek to distribute housing development evenly between Malton and Norton which is not the most sustainable approach to the location of housing. <p>The approach in the previous draft Core Strategy of allocating 50% of all new housing to Malton and Norton is supported subject to the proviso that in the LDF process further consideration should be given to the proportions of development being allocated to Malton and Norton reflecting the concentration of facilities and employment opportunities at Malton and the application of sustainability criteria.</p> <p>The specific advantages of concentrating development at Malton can be summarised as follows:-</p> <ul style="list-style-type: none"> • Malton has a much wider range of facilities – particularly in the Town Centre – that could be accessed on foot from future housing developments. It is therefore a more sustainable location for housing development than Norton where all the proposed green field housing sites are a significant distance from facilities. The Category 1 housing sites at Malton would be within walking/cycling distance of such facilities. The Category 1 housing sites at Norton would be at a much greater distance from existing facilities at Norton and would clearly be even further from facilities at Malton. • The majority of employment opportunities are located at 	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>	<p>No action</p> <p>No action</p> <p>No action</p> <p>No action</p>
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	<p>Malton with further key developments proposed including the re-development and re-location of the Cattle Market and further retail and employment developments.</p> <ul style="list-style-type: none"> In terms of accessibility from the A64 there are major advantages in locating housing development at Malton/Old Malton where access is available from both the York Road/A64 junction and the Pickering Road roundabout. The development of proposed housing sites at Norton would require significant highways infrastructure and would still result in major increases in the amount of traffic moving from Norton to the wider range of facilities at Malton. <p>The provision of further major housing and employment developments at Norton would simply increase the amount of traffic moving between Malton and Norton via Railway Street and Castlegate with obvious consequences for the existing road network. It is accepted that decisions on where housing, employment and retail development are to be located should be made on the basis of criteria assessing the advantages of the locations in terms of sustainability, accessibility, etc. In this respect Category 1 sites within and adjoining Malton are always likely to score more highly than those at Norton. There are significant opportunities to locate the majority of new development in Malton on land owned by the two Malton Estates – The Fitzwilliam Malton Estate and the Fitzwilliam Trust Corporation. This provides the opportunity for a comprehensively planned and co-ordinated approach to future development.</p> <p>Summary In conclusion the Fitzwilliam (Malton) Estate generally welcomes and supports the Categorisation of the Estate's sites at Malton and Old Malton. The Estate has reservations about the Categorisation of so many green field sites at Norton as Category 1.</p> <p>It is considered that in interpreting the findings of the SHLAA further consideration should be given to the significant advantages</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>	<p>No action</p> <p>No action</p> <p>No action</p> <p>No action</p>
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	<p>in locating new housing at Malton/Old Malton rather than at Norton. It should be recognised that Malton/Old Malton and Norton have different characteristics, ranges of facilities and accessibility.</p> <p>The starting point should be to redress the imbalance in new housing built at Malton/Old Malton and Norton in recent years which has resulted in new housing being located at significant distances from Malton's facilities and in relatively unsustainable locations. It is considered that there is no justification for an approach that would seek to distribute housing evenly between Malton/Old Malton and Norton.</p>	Noted	No action
Andrew Moss for Ward Hadaway	<p>I do not agree that catchup should be as proposed in para 4.4, namely a catch up over a 10 year period. Government guidance is quite that any deficiency should be caught up over the following 5 years amongst other things to secure sufficient delivery.</p> <p>I would ask that the draft SHLAA be amended to take account of the above.</p>	<p>Andrew asserts that the shortfall of 278 dwellings which occurred between 2004 and 2008 should be apportioned to the first 5-year period, rather than over the first 10 years. However, we do not agree with Andrew that the PINS guidance (referred to in paragraph 4.2 of our report) requires the shortfall to be apportioned to the first five year period; paragraph 5 i) of that guidance merely advises that LPAs should use provision figures in adopted development plans, '<i>adjusted to reflect the level of housing that has already been delivered</i>'. Moreover, we maintain that given the current economic climate, it is more appropriate to spread the shortfall over a longer period, particularly given that the shortfall is significant in the Ryedale context.</p>	No action
Paul Butler Architects Ltd	<p>We would raise the question as to the cut off land area as being 0.40 ha.</p> <p>Would it not be more relevant to rural affordable housing provision to enable smaller (more deliverable) sites to be allowed rather than relying on the larger schemes.</p>	<p>The main point made by Paul Butler is that a lower site size threshold than 0.4ha should have been used. However, the Regional Practice Guide advocates using a site size threshold of 0.4ha, describing this as a 'suitable minimum'. Therefore, in order to</p>	No action

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	<p>Smaller sites can often provide the necessary solutions, especially for rural affordable schemes (S106 sites, RSL schemes etc.), without causing a big impact (such as 0.4 ha sites) on the smaller rural communities/settlements - which is where many of the affordable housing needs are. These schemes are often more controllable in design terms so as to 'fit in' to the local vernacular far more sensitively and less intrusively, to both the existing built environment and the open landscape. Ryedale is typical of such settlements.</p> <p>Our question raises the sub-geographical displacement of people away from the rural home settlement and into the larger population settlements - latterly experienced during the industrial revolution! If larger sites, more often located within or adjacent to the larger settlements are the only sites adopted, then the risk of this displacement would surely increase?</p> <p>I do honestly believe than many people would choose to stay in their rural village where they have family connections, than move to a larger town for affordability or simply because that is where the authority chooses to supply the additional housing stocks. Is this not worth considering now?</p> <p>I have much experience of being an architect for large scale and small scale housing developments (including mixed use) in the south east of England, many utilising CABE design guideline principles. It is not an understatement to say how challenging it is to negate the long range visual impact of larger sites, especially in the more rural areas. But where there are rural housing needs, it is much easier to deliver some really attractive, but economically viable, residential schemes which deliver on many different levels, especially socio-economically. Also, this organic approach to housing provision is more in keeping with the natural history development of rural England, where we see evidence in the existing attractive villages dotted throughout rural Ryedale. This is what makes Ryedale such an attractive landscape.</p> <p>I fear reading through this report, that it is the large scale developers and landowners that will reap the benefit of this paper, and not the small business or landowner, which represent the bigger number of businesses in Ryedale. Would the council not wish to be seen to assist the smaller local businesses or is it that the cartel of</p>	<p>ensure consistency with other SHLAAs in Yorkshire and Humber, we agreed with the Council that it was appropriate to adopt a site size threshold of 0.4ha for the purpose of the study. Moreover, sites above 0.4ha will collectively contribute the overwhelming majority of the District's future dwellings.</p> <p>We do accept, however, that some development inevitably continue to occur on sites that are below the 0.4ha minimum threshold. It is of course the case that appropriate schemes on small sites can still be viewed favourably, subject to compliance with normal development control considerations.</p> <p>Noted</p> <p>Noted</p>	<p>No action</p> <p>No action</p> <p>No action</p>
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	<p>the large developers already have a hold?</p> <p>I would push for more smaller sites to be considered in the smaller rural settlements, where it is seen that there is a housing need.</p>	Noted	No action
Ian Sagers for Helmsley Estate	<p><u>Site No. 435 - Helmsley SE - South of Riccal Drive</u> The northern part of this site is owned by Forward Development Ltd after an initial purchase in 1988 from the Estate and a subsequent conveyance & exchange in 1991. In both conveyances the use of such land is restricted to light industrial & agricultural or B1 & B8 of the Use Classes Order.</p> <p>I would suggest that this site faces significant availability constraints because as things stand at present Forward Development Ltd cannot use the land for housing.</p>	<p>It has not been straightforward to identify the specific areas of land which are being referred to in the documents submitted. However, it does appear that the northern part of the site is subject to a covenant restricting the use of the land to light industrial and agricultural uses, as asserted by Mr Sagers.</p> <p>I would note in passing that the restrictive covenant is not necessarily an absolute constraint; covenants can be overcome through negotiation, and this appears to have happened in relation to the residential development to the immediate north west of the site at Storey Close.</p>	We have changed the availability rating for the site from B to F, and consequently the site now falls within Category band 3.
Micheal Barry of Carter Jonas	<p>We are concerned that within the SHLAA sites with an area below 0.4ha have not been included within the assessment on the basis that; reflecting guidance they are too small to make strategic contributions to the District's housing requirement. While we accept this should be the case in large urban authorities where housing targets are far greater, we query whether it is appropriate in Ryedale – a rural authority where housing requirements are low and high proportion of it's population is based rurally.</p> <p>In context what is strategic for Ryedale is not strategic, say, for a West Yorkshire Authority. Consequently we consider that in Ryedale the threshold whereby a site is launched in the SHLAA should be lowered. This reflects the guidance in the April 2008 SHLAA Regional Practice Guidance which states in paragraph 8.3: <i>'The lower site size threshold might be reasonably set marginally lower than 10 dwellings/0.4 ha especially where the housing requirements is relatively low and smaller sites could be considered as making a significant contribution'</i></p> <p>We should consider that the SHLAA threshold should be reduced, to perhaps as low as 0.2ha. The SHLAA should not look to</p>	<p>The first point made by Carter Jonas is that a lower site size threshold than 0.4ha should have been used. However, the Regional Practice Guide advocates using a site size threshold of 0.4ha, describing this as a 'suitable minimum'. Therefore, in order to ensure consistency with other SHLAAs in Yorkshire and Humber, we agreed with the Council that it was appropriate to adopt a site size threshold of 0.4ha for the purpose of the study. Moreover, whilst it is inevitable that some development will continue to occur on sites below 0.4ha, sites above 0.4ha will collectively contribute the overwhelming majority of the District's future dwellings.</p>	No action

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	<p>preclude sites and we are concerned that the approach been used in Ryedale may result in the contribution of many suitable sites being over looked inappropriately. At the very least there should be an acknowledgement and record of all sites submitted to the SHLAA but which may fall below the threshold, as depending on the outcome of the Core Strategy these may have an important role contributing to the fulfilment of the District's vision.</p> <p>As a part of the LDF evidence base the SHLAA must reflect the characteristic and issues relevant to Ryedale and we are concerned that the Council's mooted approach fails to do so. Consequently the absence of any regard to site's excluded on the basis of them being smaller than 0.4ha could harm the capacity of the SHLAA to undertake the important essential role.</p> <p>We are also somewhat concerned about the Council's approach to the categorisation of sites in terms of their location, in particular the reference to the Core Strategy's preferred settlement hierarchy. The Core Strategy remains at a relatively early stage in its development and has yet to be tested by an Inspector. In this context we are concerned that the SHLAA, an evidence base to aid the development of the Core Strategy is having too much regard to the envisaged content of the Core Strategy.</p> <p><u>Cattle Farm, Thorpe Bassett;</u> We object to SHLAA's decision to exclude this site. Presumably because it fails to cover 0.4ha (although close). As such we now resubmit details of the site with a revised site boundary, this now incorporating the land to the south which is now in development limits (also submitted but too excluded from the SHLAA). The site is now comfortably within the SHLAA 0.4ha threshold.</p> <p><u>Site 471, Land East of Old School, Wintringham;</u> Has been identified as a Category 2 site in the basis that there is 'no existing road access to the site'. We object to the comment. The site has a large road side elevation with good views in both directions along the road. Safe access to the highway can be achieved either direct from the side to the road or via that on the adjacent site to the east which is also owned by our client. Consequently we consider the SHLAA's comments with respect to this site should be reconsidered and recognised as a Category 1 location.</p>	<p>Noted</p> <p>Michael expresses concern with what he says is our '<i>approach to categorisation of sites in terms of their location</i>'. For the avoidance of doubt, location is not one of assessment criteria; we have merely presented details of the potential dwelling supply from various 'Location Types'. Thus, a site will not be scored down simply because it is in a particular Location Type; each site's categorisation is based on its performance against the agreed suitability, availability and achievability criteria.</p> <p><u>Cattle Farm, Thorpe Bassett;</u> Carter Jonas refers to a site at Cattle Farm, Thorpe Bassett, which was not assessed in the SHLAA because its site area is smaller than the agreed threshold of 0.4ha. We are unable to consider the site because of its size, although we would note that the fact the site is not included in the SHLAA in no way pre-determines whether the site could be allocated or granted planning permission for residential use.</p> <p><u>Site 471, Land East of Old School, Wintringham;</u> We have taken on board the submission by Carter Jonas that a safe access to site ref. 471 can be achieved.</p>	<p>No action</p> <p>No action</p> <p>No action</p> <p>We have accordingly improved the score for the 'access' criterion. As a result site 471 is now within Category band 1.</p>
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<p>David Boulton of Carter Jonas on behalf of Hovingham Estate</p>	<p>Concerned that the site's with an area below 0.4ha have not been included within the SHLAA on the basis that they are too small to make a significant contribution. While we accept this should be the case in larger urban authorities where housing targets are far greater, we query whether it is appropriate in Ryedale a rural authority area where housing requirements are low. Consequently we consider that in Ryedale the threshold whereby a site is included in the SHLAA should be lowered or at least the sites which are below the threshold be acknowledged within the document. This reflects the guidance contained in para 8.3 of the April 2008 SHLAA Regional Practice Guidance.</p> <p>Site 536: Has been grouped amongst Category 2 site apparently on the basis that it is partly located on land within flood zone 2. In response we wish to revise the site plan. The revised site plan means a far greater portion of this site is not considered at risk of flooding and on this basis can be redesigned a Category 1 site</p>	<p>Carter Jonas comment a lower site size threshold than 0.4ha should have been used. However, the Regional Practice Guide advocates using a site size threshold of 0.4ha, describing this as a 'suitable minimum'. Therefore, in order to ensure consistency with other SHLAAs in Yorkshire and Humber, we agreed with the Council that it was appropriate to adopt a site size threshold of 0.4ha for the purpose of the study. Moreover, whilst it is inevitable that some development will continue to occur on sites below 0.4ha, sites above 0.4ha will collectively contribute the overwhelming majority of the District's future dwellings.</p> <p>Site 536: Carter Jonas also requests that the boundary for site ref. 536 be amended. Unfortunately, it is too late in the process for us to update our assessment, which would involve more than simply amending the boundary. An alternative boundary can of course be used as and when the SHLAA is updated.</p>	<p>No action</p> <p>No action</p>
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	<p>Once again I get the sense that the council is not even considering the needs and requirements of the people who it has been elected to serve.</p> <p>The council has designated our site as “Available” . The fact that the site already has a tenant and a use (a use which goes back over a hundred years) would suggest to me that the site is anything but available for residential development. This is another example of the council failing looking at the land it is including in its strategies in detail. It is wrong, clearly wrong, to designate our site as “Available”.</p> <p>The future of a thriving club with excellent facilities is at stake and this club does not have now, nor has it at any stage of these plans, anyone who it can liaise with regarding its concerns and objections to the LDF & the SHLAA.</p> <p>The council has a duty to safeguard green-belt land as well as develop sites for a range of uses. It would in my opinion be neglect of the council to allow the planned development of our site to go any further and I call on it to remove it with immediate effect. If it is not prepared to remove the site from its plans could the council please tell me where I can go next to further register my profound objections to its strategy for the rejuvenation of Ryedale, particularly with regard to the Malton Tennis, Bowls and Squash club site.</p>	<p>This site was initially submitted by SmithsGore in the Call for Sites exercise, and so we would normally assume that the landowner was willing to make the site available for development. Accordingly, the site was able to achieve an overall Category 1 rating in our draft SHLAA.</p> <p>However, in the light of the representations from the users of the site, it is clear that the site faces some availability constraints.</p> <p>Noted</p>	<p>We have noted the availability constraints and accordingly the site is now within Category band 2.</p>
<p>Kevin Waters on behalf of MHA</p>	<p>The flexible approach to assess the adequacy of housing provision (4.48 – 7.67) is welcomed. However, the combinations considered in Tables 4.9 and 4.10 are biased towards ‘a sites’ (less than 10ha), only including ‘b options’ (above 10ha) in later permutations of 15 and 20 year supply options.</p> <p>This approach implies that small sites are intrinsically better than larger sites. This is not the case; large sites can often facilitate community infrastructure which smaller sites are less capable of providing. This is a matter that should be reserved for consideration during the LDF process.</p> <p>Further consideration of individual site factors will need to be undertaken as part of the Facilitating DPD; we will look to</p>	<p>We note comments in relation to the classification of sites below and above 10ha. We do not consider that small sites are intrinsically better than larger sites.</p>	<p>To help clarify our approach, we have updated the text in the report, as follows (the new text is highlighted in yellow): (Para 4.57): <i>The 10, 15 and 20-year dwelling targets can, however, be met by using a combination of Category 1a sites in Location Types 1 and 2 (i.e. sites located <u>within and adjoining</u> the existing Development Limits of settlements proposed in the Core Strategy Settlement Hierarchy which are under 10ha). It is important to emphasise that this is just one</i></p>

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	<p>undertake analysis of completing sites and submit this in due course. Given the enhanced sustainability credentials of some larger sites, these will be needed to ensure delivery during the plan period.</p> <p>In terms of informing LDF policy and with particular regard to the phasing of housing supply, the SHLAA should positively recognise the potential for larger 'b sites' to adopt phased development programmes, alongside the shorter build times of smaller sites (e.g. a large site may need to start delivering dwellings in year 3 to ensure the full quantum required is delivered by year 10. this will ensure greater certainty of supply and delivery of new housing and associated benefits, delivering the mix of types and tenures required to serve the local communities.</p> <p>The most sustainable sites to come forward in each of the 5 year periods will be a mixture of 'a' and 'b' sites. This scenario should be considered within the permutations of the SHLAA tables.</p> <p>The titles on the maps in Appendix 8 appear misleading. The various 'scenarios' appear to map the 5 'Locational Types' discussed in Chapter 4. Terminology should be used consistently throughout the document.</p> <p>More detailed background information should be included within the appendices of the final SHLAA to ensure the conclusions reached on individual sites are open to scrutiny. This should include mapping at a scale which allows each site and its boundaries to be identified and a replacement of the generic 'Reasons and Categorisation' in Appendix 12 with brief notes outlining the site specific factors used to determine categorisation.</p>	<p>Noted</p> <p>Mr Waters requests more detailed background information in the Appendices regarding the specific factors used to determine categorisation. The database incorporates a function which allows detailed PDFs to be produced for each site. The Council will of course be provided with the database and so it will be able to produce individual PDFs as and when</p>	<p><i>permutation and it does not preclude appropriate sites over 10ha coming forward and being viewed favourably by the Council. The Council might decide to allocate some sites over 10ha, once it has taken account of the sort of factors referred to in paragraph 4.17'.</i></p> <p><i>(Para 4.65) 'Again, it is important to emphasise that the permutations referred to above are examples of how the dwelling targets could be reached. The Council will undertake further work to determine which sites to bring forward as allocations in the Facilitating Development DPD, taking account of the sort of factors referred to in paragraph 4.17. Through that process it is possible that the Council might decide to allocate some of the larger sites over 10ha and/or sites in Location Types 3, 4 or 5, , but in the interests of brevity we have not sought to include all of the numerous permutations in our tables'.</i></p> <p>We have updated the titles of the plans in Appendix 8 to 'Location Type XXX', as requested by Mr Waters</p> <p>No action</p>
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	<p><u>Site 109, Land off Malton Road, Pickering;</u> The inclusion of this site within Category 1 is welcomed. Additional preliminary feasibility work was undertaken to enable the site to be presented at the LDF Summer Consultation Exhibition in Pickering. This work suggests that of the 18.6ha gross site, around 12.5ha will be developable. Further to this, our aspirations include the provision of CCRC accommodation within the residential mix. As the CCRC use proposed falls within Use Class C2 these units would not be included within the housing figures. The land take for the CCRC element is estimated to be circa 4ha. This results in less than 10ha developable for C3. The site should therefore be considered as an 'a site' within the SHLAA.</p>	<p>required, or alternatively the Council could choose to publish all of the PDFs. However, we don't usually include these PDFs in the Appendices, which would then become huge (and they are already voluminous)</p> <p>Mr Waters refers to recent feasibility work which indicates that site 109 could accommodate a mixed-use development including residential and Use Class C2 uses. The net residual area that is expected to be available for residential development is around 8.5ha. We have therefore amended the net residual area in the database down to 8.5ha, which gives a revised yield figure of 379 dwellings. The site remains within Category band 1 and will now be treated as an 'a' site (i.e. below 10ha).</p>	<p>We have therefore amended the net residual area in the database down to 8.5ha, which gives a revised yield figure of 379 dwellings. The site remains within Category band 1 and will now be treated as an 'a' site (i.e. below 10ha).</p>
<p>Ian Sagers for Helmsley Estate</p>	<p><u>Site 585, Carlton Road, Helmsley;</u> I am surprised that under reasons for categorisation this site is assessed as facing some availability constraints. The entire site is currently owned by the "Estate" and overwhich Wharfedale Homes Ltd have an option to purchase when and if planning permission for residential development is granted. In view of this I would suggest that there is no availability constraint</p>	<p>The site remains in Category band 3, as it is located within the National Park. This does not necessarily imply that the site cannot or should not be developed; instead, the site's overall classification reflects the reality that because it is within the National Park the site faces more constraints than those that are not.</p>	<p>We have updated the site details to reflect the position that the site has a willing owner, meaning that the site is available</p>
<p>David Stovell on behalf of Mr. G. R. Hull</p>	<p><u>Site 503, Land North of Meadowfield Close and West of Low Lane, Swinton;</u> The SHLAA has designated the above site as Category 3. Whilst the site performs well against the availability and achievability criteria, it is considered that it faces significant suitability constraints. The SHLAA acknowledges that it is outside the scope of the study to assess physical constraints in</p>	<p>We have accepted this information that access would be upgraded as part of the site's development (in the process providing improved access to other local facilities).</p>	<p>We have upgraded the site's score in relation to the access criterion, and the site now falls into Category band 2.</p>

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	<p>depth. We believe that the approach does not properly assess the performance of the site in regard to suitability constraints.</p> <p>Appendix 2 of the SHLAA identifies the suitability constraints as physical problems and environmental conditions.</p> <p>We attach our initial statement in support of the site which addresses some of the points raised under the suitability constraints:</p> <ul style="list-style-type: none"> • The site is outside the present development limits but is immediately adjacent to the northern boundary and on the ground there is development to the east. The northern boundary of the site would reflect the boundary of developed land already established to the east. • The site is served by an existing access that also serves the sports field, indoor sports centre, sports clubhouse and business uses to the north and east of the site. This is a well used access that we accept is sub-standard. It seems to us however that there is no prospect of an improvement to the present unadopted road which serves important community facilities as well as business uses unless a proposal such as this is advanced. To that extent rather than being a constraint on suitability the proposal would realise positive benefits. A similar situation no doubt exists with the drainage. The site is part of the settlement which is served by poor road infrastructure and service provision. The proposal would improve the road infrastructure and service provision of this part of the settlement to the benefit of all the existing users. We believe this should be reflected in the assessment • Ground conditions are good and the area is not a flood risk zone. There would not seem to be any environmental considerations. • Taken together we believe the suitability of the site is in the benefits that it would provide to the existing infrastructure and the form of the settlement. We do not recognise this as a constraint but a benefit. • As well as general improvements to Low Lane, the site could bring forward the delivery of affordable housing on land close to the sports ground and play facilities. The extension of the development limits to include the site 	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>	
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	<p>would reflect what occurs on the ground</p> <ul style="list-style-type: none">• The proposal would provide the opportunity of significant improvements to Swinton which we do not feel is properly reflected in the assessment provided within the suitability constraints.	Noted	
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	<p>In their assessment as to the availability of this site for development, I do not think sufficient weight has been placed on the valuable social, community and leisure contribution this site makes to the communities of Malton and Norton and surrounding villages. Rather than a Category A, it should have been a Category D. The fact that the freeholders of the site are willing to consider residential development on the site should not override the benefits of retaining the site for its existing use and the fact the Club have a current leasehold interest in the site.</p> <p>The Club, as leaseholder, is a crucial stakeholder in the future of the site and should be consulted on all matters to do with the future of the site. I am not aware of them attending the Stakeholder Seminar in April 2009.</p> <p>Given the large number of less contentious, alternative development sites in the Report, I do not think to remove the site from the list, or re-categorise it, will be detrimental to Ryedale delivering sites to meet their housing objectives over the next 15 years</p>	<p>landowner was willing to make the site available for development. Accordingly, the site was able to achieve an overall Category 1 rating in our draft SHLAA. In the light of the representations from the users of the site, it is clear that the site faces some availability constraints.</p>	
<p>Richard Simpson for the Malton Lawn Tennis Club</p>	<p>Site 246 Malton Tennis, Squash and Bowls Club: I wish to express my concern that the existing site of Malton Tennis, Bowls and Squash Club has been included in the SHLAA as a Category 1 site.</p> <p>It is completely ignoring the fact that the club offers a fantastic recreational and leisure facility to the communities of Malton, Norton and the surrounding areas, including thriving junior membership (ages 5 – 18).</p> <p>Why destroy an existing facility when there are many other potential redevelopment sites in the Ryedale area – brown field sites too?</p> <p>I believe that the site should not be included in the SHLAA list of sites at all... and certainly not as a Category 1 site – re-categorise.</p>	<p>This site was initially submitted by SmithsGore in the Call for Sites exercise, and so we would normally assume that the landowner was willing to make the site available for development. Accordingly, the site was able to achieve an overall Category 1 rating in our draft SHLAA. In the light of the representations from the users of the site, it is clear that the site faces some availability constraints.</p>	<p>We have noted the constraints and the site is now within Category band 2.</p>
<p>David Stovell on behalf of Mr. K Grinham</p>	<p>Site 51 Pecketts Yard, Church End, Sheriff Hutton: The SHLAA has designated the above site as Category 1 which performs well against suitability, availability and achievability criteria. We believe this correctly reflects the merit of the site.</p> <ul style="list-style-type: none"> Reference is made in the schedule that 80% of the site is covered by greenfield. We understand that it is outside the strategic nature of the study to assess such matters in 	<p>Noted</p>	

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	<p>depth. We would wish however to question this percentage. We believe that it is misleading to use an 80% figure. This implies that the site is dominated by greenfield land uses when it is dominated by the joinery and building businesses.</p> <ul style="list-style-type: none"> We believe the whole site could be described as previously-developed land (PDL). In this case there would be 0% covered by greenfield. PDL includes the curtilage of the developed land (PPS3). The planning use of the site is a joinery/builders depot. We understand that when planning permission was granted for the use, the planning unit covered the area of the proposed layout. It is acknowledged that some of this is presently in grass but operationally it has formed part of the recognised area of the workshop which the operators would use if business demanded. It follows that it should be defined as PDL for the purpose of the study. For your assistance we attach the illustrative proposal which provides for seven dwellings located in a “courtyard” turning head Even if the curtilage issue is ignored and only the land presently used by the two businesses is taken into account, it seems to us that the split is more like 50-50. We believe that one of the attractions of this site is not only that it performs well with the strategic criteria adopted by the SHLAA but it also performs well in terms of its existing PDL use and the benefits to the village that would be realised from its redevelopment for houses 	<p>We have acted on his information that the part of the site we had deemed greenfield was actually within the curtilage of the developed land. Accordingly we have treated the whole site as PDL. All other details for the site remain unchanged.</p> <p>Noted</p> <p>Noted</p>	<p>Accordingly we have treated the whole site as PDL. All other details for the site remain unchanged</p> <p>No action</p> <p>No action</p>
E Inman	<p><u>Northside Works, Malton Road, Leavening:</u> the works are rented from myself form Mr Edward Green in order to conduct his business in metalwork and construction. No plans are at the moment under consideration to change this situation and his tenancy will be renewed for the next 3 years on Dec 31st 2009. when any change takes place a consideration for change of use may be possible.</p>	<p>We have investigated and this site was not included in the SHLAA as it fell below the agreed minimum site size threshold of 0.4ha.</p>	<p>No further action</p>
Simon Miller for Persimmon Homes	<p><u>Site 548, Firthlands Road, Pickering:</u> Regarding achievability criteria I disagree with your classification of the site as a ‘D’ for ‘desirability of immediate area’ and suggest this is changed to ‘B’. The reasons for this are as you will see below the sewage works</p>	<p>The main constraints facing his site concerned its proximity to the sewage works; however, Simon has provided evidence which indicates that Yorkshire</p>	<p>Accordingly, we have assigned a discount to the site to take account of this bad neighbour constraint</p>

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	<p>and industry will be fully screened and completely disassociated from the sites environs.</p> <p>Yield for specified land types Yorkshire Water are prepared to remove their objection to the principle of residential development on the site. This is on the proviso however that at the planning application stage we ensure on any future layouts no houses within the development will be situated within 250m of the boundary of the nearby waste water treatment works. Under certain circumstances housing may be permitted closer to the works, depending on site layout and the operational requirements of Yorkshire Water. This requirement is easily achievable by relocating the area of open space to the north west corner of the site as part of any future design. The modified design would also consider detailed landscaping, fencing and levels.</p> <p>I would therefore suggest that the 'Yield for specified land type' is changed to 380 dwellings from 114 as the table demonstrates is achievable at an average density of 35dph.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 70%;"></th> <th style="width: 15%; text-align: center;">ha</th> <th style="width: 15%; text-align: center;">ac</th> </tr> </thead> <tbody> <tr> <td>Gross Site Area: 12.56 Ha</td> <td style="text-align: center;">12.6</td> <td style="text-align: center;">31.0</td> </tr> <tr> <td>Long Acres Site: 0.3Ha</td> <td style="text-align: center;">0.3</td> <td style="text-align: center;">0.7</td> </tr> <tr> <td>Garages to be replaced: 0.15 Ha</td> <td style="text-align: center;">0.15</td> <td style="text-align: center;">0.4</td> </tr> <tr> <td>Net Developable</td> <td style="text-align: center;">12.1</td> <td style="text-align: center;">29.9</td> </tr> <tr> <td>Open Space Provided: 1.16 Ha</td> <td style="text-align: center;">1.2</td> <td style="text-align: center;">2.9</td> </tr> <tr> <td>Net developable</td> <td style="text-align: center;">11.0</td> <td style="text-align: center;">27.1</td> </tr> <tr> <td>Density</td> <td style="text-align: center;">35.0</td> <td style="text-align: center;">14.2</td> </tr> <tr> <td>Dwellings</td> <td style="text-align: center;">383</td> <td style="text-align: center;">383</td> </tr> </tbody> </table>		ha	ac	Gross Site Area: 12.56 Ha	12.6	31.0	Long Acres Site: 0.3Ha	0.3	0.7	Garages to be replaced: 0.15 Ha	0.15	0.4	Net Developable	12.1	29.9	Open Space Provided: 1.16 Ha	1.2	2.9	Net developable	11.0	27.1	Density	35.0	14.2	Dwellings	383	383	<p>Water will not object to the application subject to a 250m buffer being provided in which no houses are built.</p> <p>Simon has also provided details of the number of dwellings he expects to be developed on the amended site area; this equates to a density of 35 dwellings per hectare, which we consider to be acceptable. We have therefore used the new specified yield figure in the database.</p>	<p>Accordingly, the site remains within Category 1, but the yield is now 383.</p>
	ha	ac																												
Gross Site Area: 12.56 Ha	12.6	31.0																												
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<p>Mrs P.M Blackburne Maze</p>	<p><u>Site 16, Land west of Beech Cresent and North of Breadycroft Lane.</u> We do not consider that this site falls into the Category 1 (deliverable) sites and is not suitable for development. The site is unsuitable for development as the existing lanes are not adequate.</p> <p>It would be environmentally a loss for the village. The benefit of the high landscape value of the views to the North Yorkshire Moors would be lost to the village. This site is the only open space where the uninterrupted landscape views can be appreciated in the village.</p>	<p>Mrs P. M. Blackburne-Maze asserts that site ref. 16 is unsuitable for development as the lanes are not adequate, and that the site should accordingly not achieve a Category 1 rating in the SHLAA. I would note that the site is currently given a B rating for access ('Existing road access may require upgrading'), and we maintain that this rating is appropriate. Site ref. 16 could be accessed via Breadycroft Lane, as is the case with housing to the immediate east of the site.</p> <p>Mrs P. M. Blackburne-Maze also refers to the need to protect important landscape. We do, of course, fully endorse the need for all developments across the District to be appropriate in the local context; any scheme that came forward for this site would be subject to the usual development control considerations.</p>	<p>No action</p> <p>No action</p>
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<p>England and Lyle</p>	<p>The general approach adopted in the report is considered appropriate subject to the following comments:</p> <p>Reference in Paragraph 2.26 to the fact that Table 12.1 of the RSS states that housing figures are not ceilings is welcomed. This reiterates guidance in the DCLG Advice Note on the calculation of the five year housing land supply. However we would also point out that the Housing Green Paper states that a rolling five year housing land supply “<i>should act as the starting point for a decision about a planning permission not as a maximum limit to prevent it...</i>”. On this basis therefore the net housing land supply identified for Ryedale in RSS should be seen as the minimum that the District Council Plans for in its LDF.</p> <p>We disagree with the decision made in Paragraph 4.4 to spread the shortfall of 278 dwellings resulting from the low level of completions’ 2004-2008 across the next 10 years of the LDF period rather than the first five. The guidance in the DCLG’s Advice Note referred to in paragraph 4.2 is quite clear on this matter i.e. that any shortfall should be addressed in the following five years. Failure to plan on this basis will unreasonably perpetuate an identified shortfall in housing supply in the District contrary to the aims of RSS and the LDF.</p> <p>We are unclear as to why the consultants have sought to differentiate in their site assessments and calculations between sites >10ha and sites <10ha. The explanation for this in paragraph 4.17 is that “a decision to or approve development would have to be based on wider policy considerations than is the case for smaller sites”. Elsewhere in the report however the consultants have been clear to point out that planning policy considerations e.g. green belt/ AONB have played no part in their assessment. Why is this artificial distinction about site size relevant, and why is the cut off pitched at 10ha? This is important as towards the end of the report the conclusions specifically refer to Category 1a of Category 2a</p>	<p>This submission is supportive of our approach to the SHLAA and the study findings, and does not ask us to make any changes or updates. We are pleased that this is the case.</p> <p>Noted</p> <p>England & Lyle asserts that the shortfall of 278 dwellings which occurred between 2004 and 2008 should be. We do not agree with England & Lyle that the PINS guidance (referred to in paragraph 4.2 of our report) requires the shortfall to be apportioned to the first five year period; paragraph 5 i) of that guidance merely advises that LPAs should use provision figures in adopted development plans, ‘<i>adjusted to reflect the level of housing that has already been delivered</i>’. Moreover, we maintain that given the current economic climate, it is more appropriate to spread the shortfall over a longer period, particularly given that the shortfall is significant in the Ryedale context.</p> <p>We note England & Lyle’s comments in relation to the classification of sites below and above 10ha.</p>	<p>No action</p> <p>No action</p> <p>Accordingly, we have updated the text in the report, as follows (the new text is highlighted in yellow):</p> <p>(Para 4.57): The 10, 15 and 20-year dwelling targets can, however, be met by using a combination of Category 1a sites in Location Types 1 and 2 (i.e. sites located <u>within and adjoining</u> the existing Development Limits</p>
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	<p>sites as being important in future housing land supply with no reference to Category 1b or 2b despite such sites apparently being equally deliverable/developable This distinction appears arbitrary and inappropriate and should be removed to ensure consistency of approach.</p> <p><u>Site 549, Land east of Broughton Road, Malton:</u> As you are aware England & Lyle, together with our clients Taylor Wimpey North Yorkshire have, have for 2 years been in negotiation with the District Council concerning this site as a</p>	<p><u>Site 549</u> we have amended the ‘Access’ score so that it achieves the intermediate rating (please note that we have now amended the codes in the database so that they are consistent with the Site Assessment</p>	<p>of settlements proposed in the Core Strategy Settlement Hierarchy which are under 10ha). It is important to emphasise that this is just one permutation and it does not preclude appropriate sites over 10ha coming forward and being viewed favourably by the Council. The Council might well decide to allocate some sites over 10ha, once it has taken account of the sort of factors referred to in paragraph 4.17.</p> <p>(Para 4.65) Again, it is important to emphasise that the permutations referred to above are examples of how the dwelling targets could be reached. The Council will undertake further work to determine which sites to bring forward as allocations in the Facilitating Development DPD, taking account of the sort of factors referred to in paragraph 4.17. Through that process it is possible that the Council might decide to allocate some of the larger sites over 10ha and/or sites in Location Types 3, 4 or 5, , but in the interests of brevity we have not sought to include all of the numerous permutations in our tables.</p> <p><u>Site 549</u> The effect of the change to the access constraints is that the site now achieves an overall Category 1 rating.</p>
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	<p>potential residential development site. In Appendix 12 of the SHLAA Site No 549 is identified as a Category 2 site i.e. developable in 5-10 years. Whilst appreciating that the SHLAA does not provide a definitive guide on whether sites are deliverable or developable, and that there are many other factors that will influence the Council's judgement as to which sites will be allocated in the LDF and the phasing of the delivery of those sites once allocated, we are at a loss to understand why this site has been identified by the consultants in Category 2 and not Category 1. Particularly when bearing in mind those alternative sites that have been identified as Category 1.</p> <p>From the comments associated with this entry in Appendix 12 we understand that, in the consultant's view, Site 549 performed well against the availability and achievability criteria (and we agree with this assessment and consider it would score A against both criteria) However Appendix 12 also states that the "Site faces some suitability constraints". These constraints are not identified in the SHLAA report or its appendices. It is for this reason that we assume the site has been included in Category 2</p> <p>The Note on Criteria Used to Assess Sites' Potential for Housing in Appendix 2 of the report identifies a range of potential suitability constraints and 'scores'</p> <p>Table 1 below provides our assessment as to how Site 549 performs against these criteria. This assessment is based on information that Taylor Wimpey has available in relation to this site as a result of various studies already undertaken including: access, FRA, drainage and Site Investigation:</p> <p>Table 1</p> <table border="1" style="margin-left: 20px;"> <thead> <tr> <th style="text-align: left;">1a Physical Problems or Limitations</th> <th style="text-align: center;">Score</th> </tr> </thead> <tbody> <tr> <td>Access Infrastructure Constraints</td> <td style="text-align: center;">B</td> </tr> <tr> <td>Drainage Infrastructure Constraints</td> <td style="text-align: center;">A</td> </tr> <tr> <td>Ground Condition Constraints</td> <td style="text-align: center;">A</td> </tr> </tbody> </table>	1a Physical Problems or Limitations	Score	Access Infrastructure Constraints	B	Drainage Infrastructure Constraints	A	Ground Condition Constraints	A	<p>Criteria Note, so that the three possible ratings are A, C and F. For the avoidance of doubt, site ref. 529 now achieves an Access rating of C). We have not amended the 'Drainage' rating (site ref. 549 achieves the intermediate rating of C),but we have added the following comment to the database: '<i>We understand from the site's promoter that an agreement is now in place with Yorkshire Water</i>'.</p>	
1a Physical Problems or Limitations	Score										
Access Infrastructure Constraints	B										
Drainage Infrastructure Constraints	A										
Ground Condition Constraints	A										

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<table border="1"> <tr> <td>Ground Condition Constraints</td> <td>A</td> </tr> <tr> <td>Impact on Flood Risk Areas</td> <td>A</td> </tr> <tr> <td colspan="2">1b Environmental Constraints</td> </tr> <tr> <td>Bad Neighbour Constraints</td> <td>A</td> </tr> <tr> <td>Overall Assessment of Suitability</td> <td>A</td> </tr> </table>	Ground Condition Constraints	A	Impact on Flood Risk Areas	A	1b Environmental Constraints		Bad Neighbour Constraints	A	Overall Assessment of Suitability	A		
	Ground Condition Constraints	A										
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Overall Assessment of Suitability	A											
<p>The studies undertaken by Taylor Wimpey demonstrate that the site scores A in terms Flood Risk (the key asterisked criterion), Drainage (agreement in place with Yorkshire Water), Ground Conditions and 'Bad Neighbour' constraints. It is acknowledged that the site will require some off-site highway works but these can be readily addressed and are not a material constraint on the suitability of the site for residential development. However we do not regard this as a significant constraint, as these works can be readily achieved. As a result we have sought to 'score' Site 549 as a B rather than a C. We consider that the scoring regime for this issue should be amended to allow for a more refined assessment than is currently allowed by restricting the scores to A, C or F</p> <p>All large scale housing sites on the edge of Malton/Norton will give rise to some highway issues and the probable need for off site highway improvements including those sites identified as being Category 1 e.g. Site Nos. 49, 184 208, 239. If Site 549 is classified as being Category 2 solely because of this existing development limits of Malton/Norton should also score the same. The fact that they do not suggests that the consultants have not been consistent in their scoring of similar sites on this issue.</p> <p>On the basis of the 'scores' detailed in Table 1 above, it is clear that Site. 549 should be identified as a Category 1 sites not Category 2 as it has an average overall score of 'A'. across all three deliverability/developability criteria Table 4.1 - Summary of Site Categorisation Methodology contained in Appendix 2 of the SHLAA states that sites that score A or B in terms of Suitability,</p>												

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	Availability and Achievability are Category 1 sites. In the light of the above we would request that Site 549 is included as a Category 1 sites in the finalised SHLAA.		
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<p>Mr A Metcalfe</p>	<p>Site 17, Land south of Ebberston: I realise that nothing is going to be done in the short term but I still wish the land to be considered at the appropriate stage for the type of housing in demand and in keeping with the local area. The density of housing in the report for this site does not seem well above the current village density so may not be achievable at the planning stage</p>	<p>Mr Metcalfe considers that the density used for site ref. 17 is high in the Ebberston context. I would note that the net density rate we have applied in the SHLAA for site ref. 17 (of 30 dwellings per hectare) is theoretical; moreover, it is the national minimum figure advocated by the Government and so we were unable to use a lower rate. We do, of course, fully endorse the need for all developments across the District to be appropriate in the local context; any scheme that came forward for this site would be subject to the usual development control considerations.</p>	<p>No action</p>
<p>Hazel Cleather</p>	<p>It would appear from the report that our site for consideration lies outside the scope of the assessment. This is because we are a private household which has requested a slight movement of the existing development line in our garden. This will allow us, subject to planning permission, to build a retirement home for our own use. I note that our site does not seem to have received a visit in February/March 2009 as mentioned in the SHLAA and is almost certainly less than 0.4ha.</p> <p>I would comment as follows on our behalf:</p> <ol style="list-style-type: none"> 1. The local plan for Sheriff Hutton has identified the need for more, smaller houses as starter and retirement homes. Our proposed development meets this requirement and fulfils the Practice Guidelines (2007) from CLG to "provide sufficient land for the Community need for more homes." 2. Provision of a retirement home allows "appropriate economic diversification". 3. Use of existing garden space, wholly owned by ourselves, is in line with several recent developments in the village using "infill" sites. 4. Our initial planning application received the support of our Parish Council although we subsequently voluntarily withdrew it to allow archaeological assessment. 5. Although the location is adjacent to the grounds of Sheriff Hutton Castle, there are already stable buildings extending to the boundary in a nearby garden. In addition archaeological assessment has already been done on a neighbour's plot on which 2 new houses now stand. Planning permission has already been given for a new 	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>	<p>No action</p> <p>No action</p> <p>No action</p> <p>No action</p> <p>No action</p> <p>No action</p>

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	<p>build on the same strip of land, albeit further from the castle boundary.</p> <p>6. The requested adjustment to the development line will allow a more rural style of housing to be built. This has been requested by Ryedale Planning Department and is perfectly acceptable to ourselves.</p> <p>In summary I conclude that, had our site fallen inside the scope of the assessment, it would become a Category 1 site. It is "suitable, available and achievable" and, with the alteration requested, would be deliverable within 5 years.</p>	<p>Noted</p> <p>Noted</p>	<p>No action</p> <p>No action</p>
Mr D Cockerill	<p>The SHLAA appears sound but it is based on the existing dogma of the Core Strategy Settlement Hierarchy.</p> <p>The dogma could and should change to take account of:</p> <ul style="list-style-type: none"> a) The need to protect high quality agricultural land for food and biofuel production. b) The need to give greater protection to Green Belt land and A.O.N.B c) The disastrous social consequences if all villages are not allowed to expand <p>National and Regional policies may well change in view of the items listed above and because of the dramatic changes in the national financial situation over the past two years. E.g. building on stilts on flood plains could be encouraged to protect Greenfield sites from development.</p> <p>A proper assessment of the number of remaining undeveloped 'windfall' sites would seem to be needed, covering the entire district.</p> <p>Landowners would only have submitted sites for development which were financially viable at the time. Changing financial and other circumstances over this long drawn out planning process could result in significant submissions being withdrawn.</p>	<p>We are pleased that the submission is supportive of the SHLAA's findings and does not ask us to make any changes or updates.</p> <p>Mr Cockerill does refer to the need to afford appropriate protection to the Green Belt and AONB, which we fully endorse.</p> <p>Noted</p> <p>Noted</p> <p>We acknowledge that 'windfall' developments will invariably continue to come forward, particularly given that a minimum site size threshold has been applied in the SHLAA.</p> <p>Noted</p>	<p>No action</p> <p>No action</p> <p>No action</p> <p>No action</p> <p>No action</p> <p>No action</p>
Jennifer Hadland for Smiths Gore on behalf of Mr K Storey	<p>Our client owns the land in and surrounding Settrington. Some of this land was put forward during the 'Call for Sites' and has been identified in the Roger Tym study as being suitable, achievable and available for residential development on the basis that there are no known technical constraints. Our client supports this assessment.</p>	<p>Noted . I am pleased that the submission is supportive of the SHLAA's findings.</p>	<p>No action</p>

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	<p>secure the use of the other local facilities by enabling younger households to continue to live locally.</p> <p><u>Site 580, land east of Becksid and west of Church Lane Settrington & Site 581, land east of Church Lane and north of All Saints, Settrington:</u> Our client supports the future allocation of this site as being suitable, achievable and available. Especially as they have already got previous development on the land.</p> <p><u>Site 582, Land south and west of Back Lane:</u> Our client does not agree with the report that the site ‘may’ face some suitability constraints.</p> <p>Our client therefore believes further consideration should be given to development in Settrington especially with regard to sites 580, 581 and 582.</p>	<p>Noted</p> <p>SmithsGore does not agree with our assessment that site ref. 582 faces some suitability constraints. We have rated the site B in terms of access (‘Existing road network may require upgrading’) and C in terms of drainage (‘Significant drainage infrastructure likely to be required.’) We maintain that these ratings are appropriate given the nature, size and location of the site. Nevertheless, the site has been placed within Category band 2 overall and so the need for access and drainage improvements does not mean that the site cannot be developed.</p>	<p>No action</p> <p>No further action is necessary from Roger Tym and Partners at this stage</p>
<p>Nathaniel Litchfield and Partners on behalf of Barrett Homes</p>	<p><u>Site 141 land south of Thornton Road and east of Eastgang Lane:</u> In respect of the site Suitability assessment undertaken, Barrett Homes is in agreement that: a safe convenient access to the site is achievable from Thornton Road. Although some new drainage infrastructure will be required, there are no insurmountable drainage constraints associated with the development of the site for housing, there are no ground condition constraints, there are no ‘bad neighbour’ constraints and the development of the site would not give rise to use conflicts and over 90% of the site lies within Flood Zone 1 and there are no flood risk constraints associated with the development of the site for housing. These comments are informed by a Transport Assessment, a Noise Survey, a Flood Risk and Run-off Assessment, and a Geoenvironmental study, carried out by specialist consultants on behalf of Barrett Homes.</p> <p>In respect of the Availability Criteria, the site is being promoted for housing development by Barrett Homes and a planning application has been submitted.</p> <p>In regard to Achievability Criteria, we can confirm Barrett Homes has assessed the viability and deliverability of housing development at the site and can confirm that there are no known</p>	<p>Noted. We are pleased that the submission is supportive of the SHLAA’s findings and does not ask us to make any changes or updates. Accordingly, no further action is necessary.</p>	<p>No action</p>

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	<p>physical constraints or expected exceptional costs associated with developing the site for housing.. the desirability of the market demand for new housing in the area is good and Barrett Homes is confident that the prospect of selling houses in this location are excellent, and, based in the information currently available, we are not aware of any significant factors that would undermine the deliverability of housing units at the site. We consider that the site could be developed out by Barrett in approx 3 years following commencement on site.</p> <p>In summary, Barrett Homes agrees with the draft SHLAA that site 141 is suitable, available and achievable for housing development and that it could be delivered within 5 years. The inclusion of the site within Category 1 is supported.</p>	Noted	No action
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	<p>Furthermore, it is noted that the site is identified as being located outside any area of sensitive landscape. Again, this assessment is agreed and supported.</p> <p>With regard to the assessment of the identified supply of sites assessed in the SHLAA, it is noted from paragraph 4.43 that the supply from sites within the development limits of the District's largest settlements (Location Type 1) will not be sufficient to meet long term dwelling targets. However, there is a greater potential supply from Location Type 2 sites (paragraph 4.4), which includes Cheesecake Farm.</p> <p>In this regard, paragraph 4.66 indicates that dwelling targets can be met if Location Type 2 sites adjoining the 15 largest settlements are taken into account, although the location of some sites in Green Belt or other sensitive areas may be a factor.</p> <p>These assessments are supported, and Shepherd Homes Ltd would re-emphasise that site ref. 277 is (a) located adjacent to the largest settlement in the hierarchy, where the greatest proportion of future housing development will need to be accommodated, (b) is not subject to Green Belt or landscape constraints and (c) is deliverable in the short term.</p> <p>No doubt the relative merits of the site will be considered further through the LDF allocations process, but at this stage the Council's approach to it in the draft SHLAA is supported. Both the site-specific and more general assessments should be retained in the final version of the document.</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p>	<p>No action</p> <p>No action</p> <p>No action</p>
<p>Mary Spiesberger for The Land and Development Practice</p>	<p><u>Site 240 Livesotck Market site, Malton & Site 128 Land east of Westfield Way, Norton:</u> The identification of these sites in the SHLAA is supported. The development of these sites would help to achieve sustainability targets and to achieve RSS housing targets over the period of the LDF.</p>	<p>This submission is supportive of the SHLAA's findings and does not ask us to make any changes or updates.</p>	<p>No action</p>
<p>J. B Farquhar</p>	<p>The draft SHLAA shows that Ryedale should have no difficulty in meeting the housing targets prescribed in the RSS - indeed they could be met in full on category 1 sites if some Location Type 2 sites are added to Type 1. However this would leave important sites in Category 2 undeveloped - for example the Cattle Market and Wentworth Street Car Park which are highlighted in the Council's adopted proposals for the centre of Malton. Sites such as the</p>	<p>In response, it should be reiterated that the SHLAA forms part of the Local Development Framework evidence base, along with a range of other technical studies, and therefore does not have a policy steer. The SHLAA does not in any way prejudice decisions to be taken by the District Council in relation to preferred directions of growth, site identification in</p>	<p>No action</p>

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	<p>Woolgrowers in Norton, in Category 3, identified in the River/Rail Corridor study, would presumably not be considered at all. We believe that the Core Strategy should pay great attention to the policies of "Brownfield First" and "accessibility on foot or by cycle" already set out in the approved RSS, and that the Core Strategy should make it clear that no peripheral greenfield sites will be considered until these admittedly less-attractive sites within town centres have been developed. Otherwise developers will ignore these in favour of easier sites - the current application by Persimmon Homes on the eastern fringe of Norton is a case in point - if approved it would account for nearly half of the towns' 5-year programme, and so make the development of the town centre less attractive. The "Facilitating Development Plan Document" which will presumably identify sites for which permission would be granted in the first and second five-year periods should therefore include these sites, and exclude peripheral greenfield sites. Let it be made crystal clear that development in Ryedale will be "plan-led", not "developer-led", and that the future shape of our market towns will not be decided by developers' profit.</p> <p>Thus still leaves a big question mark over the provision of affordable housing - 40% of 200 is only 80 dwellings, whereas the Housing Needs Survey indicates that well over 200 dwellings a year are needed. As things stand any extra affordable housing can only be provided on "exceptions sites" <i>outside</i> the development limits of settlements as defined in the saved Local Plan. We would argue that the relevant PPS does not rule out affordable housing on sites <i>within</i> the settlement, so that we see no reason why the "Facilitating Development" document should not identify sites for affordable housing only, although we deprecate the re-creation of the old-style council estate and would much prefer mixed development</p>	<p>Development Plan Documents or the determination of planning applications. We do, however, endorse the desirability seeking to direct development to previously developed land wherever possible (although of course some development on greenfield land will also be needed), and this principle will no doubt be reflected in the LDF. It is also worth pointing out that it is not necessarily the case that no development of Category 3 sites can take place; as we explained in the report, proposals for development at these sites might still be viewed favourably if there are firm assurances that the constraints affecting those sites can be overcome.</p>	
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<p>Linda Craggs</p>	<p>Site 236 Malton Tennis, Bowls and Squash Club: I wish to express my concerns that the site 236 has been included in the SHLAA as a Category 1 site.</p> <p>As a member of this club, I find it remarkable that you wish to remove a thriving sports facility that has such wonderful surroundings and excellent access from the community.</p> <p>The site should definitely NOT be considered as "available" and I would certainly criticise the criteria that has been used in that you do not recognize or put sufficient weight on the value the site has in social and community terms for its existing use.</p> <p>The Tennis, Bowls and Squash Club is a "stakeholder" on this site and should be consulted and its view taken into account - which they have not. It would seem very unfair NOT to have included the club's officers in any deliberations and/or stakeholders meetings that have also been held. There are far too many empty properties in and around Malton both residential and commercial without the need to build more.</p> <p>I trust you will remove this site from the SHLAA lists and let the club continue.</p>	<p>This site was initially submitted by SmithsGore in the Call for Sites exercise, and so we would normally assume that the landowner was willing to make the site available for development. Accordingly, the site was able to achieve an overall Category 1 rating in our draft SHLAA. In the light of the representations from the users of the site, it is clear that the site faces some availability constraints.</p> <p>Noted</p>	<p>We have noted the constraints and the site is now within Category band 2.</p> <p>No action</p>
<p>J & AM Craggs</p>	<p>From a strategic perspective it is felt that the proposed focus on 15 main settlements is unsustainable. By allocating development sites in larger settlements on larger sites the cost of infrastructure will be higher and will require significant pump priming investment which may not be affordable in current market conditions. The additional strain on roads, sewers, schools and health services will cause concerns to local residents, many of whom will object to growth which will affect their amenity and the balance of the community.</p> <p>A better strategy would be to adopt smaller scale development in a wide range of popular villages. The main reasons for this alternative approach are:</p> <ul style="list-style-type: none"> • Additional homes would help to address the ageing population profile in many Ryedale villages. • Additional housing supply could address the need for affordable homes for young villagers many of whom have had to move away due to the lack of available 	<p>The issues raised by Derek Rowell are beyond the scope of the SHLAA, and will need to be considered by the Council as part of the LDF preparation process</p>	<p>No action</p>

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	<p>homes.</p> <ul style="list-style-type: none"> • Smaller sites for these reasons would be more likely to gain the support of village communities. • The scale of additional infrastructure would be minimal. • An improved age profile and small increases in numbers would enhance the sustainability of local health services. • Smaller sites could be allocated purely as affordable homes for residents and retiring farmers who would maintain important community links across the generations. • Additional homes in these locations would improve the viability of existing shops and schools. • Smaller scale sites would be suitable for development by local builders and could help to sustain the supply and training of local skills vital to the well-being of local communities. • The economic value of development by small builders is far higher than by volume builders, as the development profits would return to local rather than national cost centres. • Developments within villages would empower Parish Councils and communities to agree where sites fulfil a local need and blend into the village scene over a period of time. <p>On this alternative strategic basis, your plans would more readily allow the natural extension of existing settlements and develop opportunities for community cohesion which is put at risk by the current plans.</p> <p>Site 17, land south of 120 - 144 Main Street – Category 2 allocation was wholly rejected at a village meeting which was called during the consultation period of your plans. A development of this scale would be out of keeping with the village and its needs for housing in the plan period. It would spoil the unique rural character of the village cricket field and its surrounds which provide a very popular locally supported amenity. I would recommend that you seek the views of the Parish Council before proceeding with this categorisation.</p>		
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	<p>The analysis which came to the conclusion that 118 homes would be suitable in this location is unsound and must call into question the appropriateness of the advice you have received from urban planning consultants based in Manchester.</p> <p>In contrast to the large scale proposal, the site put forward by my relatives was sensitively considered as providing a natural extension to the village. A larger scale development could have been suggested on the adjoining land holdings, but my relatives feel this would be wholly out of character with the village. As a final point the site has been put forward on the basis that it would provide additional land for affordable homes which is likely to meet with the needs of the local community as assessed by the Parish Council.</p>		
<p>Jeremy C Woolf on behalf of Mr Rodney Brewis – Norton Grove Stud Farm, Norton</p>	<p>We agree with the scope of the planning policy documents listed in Section 2 of the draft SHLAA which provide the background context against which the document has been prepared in particular PPS3 (2006) and DCLG’s SHLAA Practice Guidance (July 2007).</p> <p>We also agree with the study methodology set out in Section 3 of the draft SHLAA, which confirms that the document has been prepared in accordance with the requirements of DCLG’s SHLAA Practice Guidance. As set out in paragraph 3.31 to 3.35 of the draft SHLAA, we support the placing of sites into three category bands as giving a useful indication of the deliverability and potential timing of a site’s development and its suitability for inclusion as an allocation in the LDF. In particular, we agree with Paragraph 3.35, which highlights that the assignment of a site to a higher category band should not be taken to represent a recommendation that it should be allocated in the LDF. Similarly, we agree that a site assigned to a lower category band cannot come forward or be allocated for development but that it would need to be demonstrated that the site’s constraints could be overcome in order to secure its deliverability. It is considered that the placing of sites into the 3 category bands as part of the SHLAA exercise should be an indication of their deliverability and suitability and that the final assessment should be made on a site-by-site basis according to</p>	<p>Jeremy’s comments are generally complimentary and supportive of our work.</p> <p>Noted</p>	<p>No further action</p> <p>No action</p>

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	<p>is concluded that this can be met through the development of the following options:</p> <ul style="list-style-type: none"> - Category 1, Location Type 2 Sites - Category 1, Location Types 3 and 4 Sites - Category 2, Location Types 1 and 2 Sites - <p>We support and encourage a flexible approach to meeting the regional housing requirements for the District. As indicated above, we suggest that the Local Authority should adopt a site by site approach to the assessment of sites based on individual circumstances. Sites should be assessed on their sustainability merits and ability to overcome any constraints to development and not just on their Category rating. E.g. Category 2 sites in Location Types 1 and 2 may be more appropriate and sustainable in development terms than Category 1 sites in Location Types 3 and 4.</p> <p>In addition we do not consider it appropriate or justified for the Local Authority to eliminate strategic sites ('large sites' with a gross area of 10ha or above, outside the settlement boundary) as unnecessary in order to meet the housing requirements for the District during the Plan period. As above, it is considered that these sites should be assessed on an individual basis having regard to their ability to provide for sustainable, comprehensive developments, to include mixed use (residential and employment) schemes.</p> <p>Site 128, Land East of Westfield Way, Norton: We note the identification of our client's site in Appendix 6 as a Category 2 Site.</p> <p>This means the site is identified as having a limited level of constraints such that it is likely to be available for delivery after the first 5 years of the Plan period and, as a 'developable' site, may be suitable for development depending on individual circumstances and on specific measures being proposed to overcome the constraints. In addition, the site is identified as representing Location Type 2 – the site adjoins the existing development limits of one of the settlements proposed in the emerging Core Strategy settlement hierarchy in Norton.</p> <p>We generally support this assessment of our client's site as an accurate reflection of it's development potential to meet the</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>-</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>	<p>No action</p> <p>No action</p> <p>No action</p> <p>No action</p> <p>No action</p> <p>No action</p> <p>No action</p>
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	<p>District's housing requirements/needs.</p> <p>The site is considered to represent an appropriate location for an urban extension to Norton to provide approximately 150 dwellings on 5ha of land (gross), including landscape buffers. It lies in a sustainable location within walking/cycling distance of schools and facilities, together with major employment areas served off Parliament Street and Hugden Way. There is a good bus service on Scarborough Road close to the site and the site can be easily integrated with the existing highway network which has adequate capacity to serve the same. The existing estate access junction with Scarborough Road can be closed (and replaced with a revised access using Westfield Way) which has potential benefits in terms of highway safety.</p> <p>The development of the site can be achieved whilst ensuring that the setting of Norton Grove Stud Farm is protected, including the Listed Building. The site is well-contained by existing landscape features and will not adversely affect the setting of the town or impact upon the rural area beyond. The scheme would avoid any development within area liable to flood and would be acceptable in terms of landscape, ecological and archaeological issues.</p> <p>Development on the site is considered viable and deliverable, with all necessary land under control to enable the delivery of the scheme.</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p>	<p>No action</p> <p>No action</p> <p>No action</p>
<p>Barton and Wilmore on behalf of Wharfedale Homes Ltd.</p>	<p>Our client has two sites in Helmsley both of which have been prooted previously. We are therefore very concerned that one of the sites has not been included within the draft SHLAA and the other has an incorrect boundary. The site to the north west of Helmsley which has been excluded from the draft SHLAA document is a triangular shaped piece of land to the north of Beckdale Road and west of Baxton's Sprunt. Given that this site has been previously put forward by the Council identifying its potential as a housing opportunity, our client requests that the Council assesses the site before issuing a final SHLAA.</p> <p>Furthermore in respect of the land to the north east of Helmsley, this site has been assessed against an incorrect boundary. The SHLAA has assessed the site based on a much smaller boundary and does not include land to the south and north. Therefore our client believes that their site has not been assessed correctly as this</p>	<p>Mark Jones refers to a site located to the North West of Helmsley (within the National Park) which was not assessed in the SHLAA. We were not asked to assess the site in question and it is too late for us to do so now. The Council could, of course, decide to include the site when the SHLAA is updated. Accordingly, at thus stage, we are unable to make any further comments in relation to that site.</p> <p>Mark also asserts that we have assessed site ref. 585 (to the north east of Helmsley) using the wrong site boundary. In response, we assessed the site using the boundary that was supplied to us and it is too late for us to re-do our assessment based on an alternative boundary. Again, however, the site could be assessed</p>	<p>No action</p> <p>No action</p>

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	<p>has a significant consequence on the categorisation of the site in the SHLAA, which we explain in more detail below.</p> <p>Paragraph 1.6 of the main report incorrectly states that the Council has considered the sites that were submitted through the various call for sites exercises which have been conducted over the last couple of years.</p> <p>Paragraph 1.6 also refers to the stakeholder involvement that has been undertaken, however it does not list the range of external stakeholders or local estate agents. In order to identify whether the SHLAA consultation took place with ‘appropriate stakeholders’, our client believes that a list of stakeholders and local estate agents involved in ensuring that the study outputs are as robust as possible should be identified. As the promoter of two sites out of four in Helmsley in partnership with Duncombe Estate, the largest landowner in Helmsley, it appears appropriate that any stakeholder engagement should involve our client.</p> <p>We refer to paragraph 12 of the DCLG SHLAA Practice Guidance which states that key stakeholders should be involved at the outset of an Assessment so that: <i>‘they can help shape the approach taken. In particular, house builders and local property agents should provide expertise and knowledge to help the partnership to take a view on the deliverability and developability of sites, and how market conditions may affect economic viability.’</i></p> <p>The output of SHLAAs should ensure that sites are available, suitable and achievable as required by paragraph 54 of PPS3. We would contend that key private sector stakeholders such as our client must play a role in the preparation and implementation of the SHLAAs if the requirements of Policy 54 of PPS3 are to be achieved and implemented.</p> <p>The approach taken by Ryedale District Council appears contrary to paragraph 19 of the DCLG SHLAA Practice Guidance (July 2007), which sets out a clear approach for managing the SHLAA. We also note that there does not appear to be a partnership or working group set up to inform how to take the SHLAA forward. The stakeholder seminar in April 2009 appears to have been held "very late in the day", and as such the results/assessment of the sites have already been</p>	<p>using the amended boundary when the SHLAA is reviewed.</p> <p>Mark requests a list of the stakeholders and local estate agents that were consulted during the course of the study. We can confirm that we propose to add such a list to the rear of existing Appendix 11 (‘Statement of Stakeholder Involvement’).</p> <p>Noted</p> <p>Noted</p>	<p>No action</p> <p>No action</p> <p>No action</p>
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<p>made without the input of local house builders and consultants. Given that no evidence is provided to demonstrate that developers and agents were consulted in respect of the SHLAA process, it could be considered that the Ryedale SHLAA does not comply with government guidance.</p> <p>Therefore given the omission of our client's sites, along with the apparent lack of stakeholder involvement through the formulation of the draft SHLAA, this does raise serious concerns regarding the reliability and credibility of this document as the evidence base for Ryedale's Core Strategy and Site Allocations DPD.</p> <p>Study methodology (chapter 3 Main Report) Study area - Our client supports the study area chosen by the Council, in that site's within or adjacent to Helmsley, part of which falls within the National Park Authority, are considered within the SHLAA. The footnote at the bottom of page 9 of the main report states the following: <i>"We considered three sites that are immediately adjacent to the existing built up area of Helmsley, two of which are within the National Park, namely site ref. 585 (to the north east of Helmsley) and site ref. 586 (to the north west of Helmsley)."</i></p> <p>We agree that Helmsley should be looked at as a whole settlement to ensure that a realistic and pragmatic approach is taken forward for the settlement of Helmsley, given its identification as one of three Local Service Centres in Ryedale, and, the only Service Centre in the National Park Authority. However, following a detailed review of the draft SHLAA it is clear that:</p> <ul style="list-style-type: none"> - The Council has failed to assess the correct site for site 585 (North East of Helmsley) - The Council has failed to assess our clients site to the North West of Helmsley. <p>Please note that there is an inconsistency in referencing of site 586, which is also referenced as to the "North of Helmsley".</p> <p>In order for this to be resolved we consider the Council needs to:</p> <ul style="list-style-type: none"> - Reassess the correct site boundary of the site ref 585 	Noted	No action
	Noted	No action
	Noted	No action
	Noted	No action
	Noted	No action
	Noted	No action
Noted	There is an inconsistency in referencing of site 586; we can confirm that we have remedied this by referring to the site as 'North of Helmsley' in the report.	Refer to as 'North of Helmsley'
Noted	No action	No action

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	<p>- Assess our client's site at 'Land to the north west of Helmsley'</p> <p>- Ensure the site references are consistent throughout the document to avoid confusion, as is the case for site 586.</p> <p>Stage 2 – sources of potential housing sites: As we note above, our client has previously brought its site's to the attention of Ryedale and would request that they are both assessed correctly.</p> <p>Stage 3 – Desktop review of existing information: Paragraph 3.15 states that the Council compiled a list of around 580 sites, and shortened the list by removing all those sites affected by SSSI's and Flood Zone 3b, thereby reducing the number of sites to 209.</p> <p>Neither of our client's site's are within a SSSI or Flood Zone 3b, therefore there would appear to be no justification to explain why only one of them has been considered.</p> <p>Stage 5 – Carrying out the Assessment: We note that the Council in paragraph 3.20 states the following: <i>"It is important to emphasise that in a strategic study like this, it is not possible to assess physical constraints, availability and deliverability/viability in particular detail."</i></p> <p>We are concerned in respect of this statement given that the very purpose of completing a SHLAA is to identify the potential of all sites for housing and to test availability, suitability and viability. If the Council is applying a broad brush approach without assessing any detailed issues, it could potentially be missing key housing land opportunities. We would question the credibility of the consultants approach given that they have qualified their work with such a disclaimer.</p> <p>We note at this point that our client has completed its own assessment of its sites in Helmsley. As part of this work, a Flood Risk Assessment Level 1 accompanies these</p>	<p>Mark rightly observes that across all three sites there is an inconsistency between the labels allocated to sites in Appendix 2 of the report and those in the database – for example, the description attached to the description 'Some new drainage infrastructure likely to be required' is C in the criteria note and B in the database. This has now been corrected in the database. For the avoidance of doubt, this is simply a labelling issue and doesn't affect any of the categorisation</p> <p>Noted</p>	<p>Has been corrected</p> <p>No action</p>
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	<p>representations to demonstrate that the site "North East of Helmsley (585)" is suitable for housing.</p> <p>Study findings (Chapter 4 Main Report): The Council has identified that between 1st April 2004 and 31st March 2008 it delivered 642 net additional dwellings leaving a shortfall of 278 dwellings when compared to the RSS target. Our client is concerned that the Council does not consider it appropriate or realistic to apportion the shortfall of 278 dwellings wholly to the first five year period (i.e. 2008 to 2013) and instead believe that the loss should be allocated over a 10 year period. RSS makes no provision for simply rolling forward and under provision. On the basis of historic delivery rates, it is unlikely that Ryedale would ever make up such a shortfall. Such a proposition appears contrary to the very thrust of PPS 3 and RSS.</p> <p>PPS3 advises Local Planning Authorities to maintain a rolling five-year supply of deliverable land for housing and our client believes that any shortfall should be addressed in the short term. To address this issue the most appropriate step is to ensure enough deliverable land is released to ensure that this shortfall is "made up" in the short term. In respect of our client's land holding, both of these are in single ownership with no ownership issues (unlike other sites in Helmsley). We therefore can assist the Council in meeting its acute housing land supply needs.</p> <p>In assessing the amount of land to be released, Wharfedale Homes has taken on board advice from the HBF and in particular refer to their letter of the 7th April 2008 addressed to GONE, which addresses average build out rates for sites, and states: <i>"HBF would point out that the average completion rate for housing on a single site by a single builder ranges between 25</i></p>	<p>Mark makes various observations regarding our decision to spread the shortfall of 278 dwellings which occurred between 2004 and 2008 across the first 10-year period, rather than apportion it to the first five year period. However, Mark's comments are not consistent; on the one hand he states that <i>'...it is unlikely that Ryedale would ever make up such a shortfall'</i>, but then he says in the following paragraph that <i>'...any shortfall should be addressed in the short term.'</i> In our assessment the PINS guidance (referred to in paragraph 4.2 of our report) does not require the shortfall to be apportioned to the first five year period; paragraph 5 i) of that guidance merely advises that LPAs should use provision figures in adopted development plans, <i>'adjusted to reflect the level of housing that has already been delivered'</i>. Moreover, we maintain that given the current economic climate, it is more appropriate to spread the shortfall over a longer period, particularly given that the shortfall is significant in the Ryedale context.</p> <p>Noted</p>	<p>No action</p> <p>No action</p>
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	<p><i>and 35 dwellings per annum. Where flats or apartments are involved the average completion rate ranges between 35 -50, as a consequence of how they are constructed.</i></p> <p><i>For large sites where two builders are involved, or where a builder operates the sites as 2 sites (i.e. one producing houses, the other flats) it is reasonable to double the output. Sites in the hands of an individual builder, even with a mix of houses and flats, very rarely exceed 50 dwellings per annum as output and never get to 100. This calculation, however, does not continue to exist where 3 or more builders become involved, as demand will limit take up" (letter from the Regional Policy Manager (Northern Regions) Home Builders Federation - 7 April 2008).</i></p> <p>We believe this to be a sound basis for assessing the phasing and delivery of development proposals. We believe the Council has failed to take into consideration the following key activities and timescales in its calculations of phasing and land release:</p> <ul style="list-style-type: none"> • Preparation of Planning Application and technical surveys - typically 6 months; • Submission and Determination - typically 3 months; • S106 Agreement to engrossment- typically 6-12 months; • Reserved matters applications (if original was outline, including preparation, submission and determination) - typically 6 months; • Discharge Conditions including written approval of Council - typically 3 months; • Service Installation - typically 3 months; • Start Construction; and 	<p>Noted</p>	<p>No action</p>
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	<p>limit designation in the North York Moors National Park, sites should be assessed against their relationship with the built up area of a settlement. Such an approach would be consistent with both Councils commitment to consider Helmsley in a holistic manner.</p> <p>As we have already identified, the use of the incorrect site boundary for site 585 has significant issues of categorisation of "location type. Site 585 is adjacent the development limits of Helmsley but the site plan used to assess the site was incorrect. Therefore the site (based on previous site locations plans submitted to the Council) should have been classed as a Location Type 2 site. We would be grateful if the Council corrects this error and reissues the SHLAA accordingly.</p> <p>The site at "Land to North West of Helmsley" which was omitted from the SHLAA lies directly to the north of built development which is located between High Street and Beckdale Road. Therefore the site lies adjacent the main development of Helmsley and as a result, our client believes that it should warrant Location Type 2 status.</p> <p>Paragraph 4.42, 4.43, 4.49, 4.53</p> <p>Paragraph 4.42 states that the supply from location type 1 sites is "rather limited" at 911 dwellings. Furthermore of the 911 dwellings from Location Type 1, only 659 from Category bands 1 and 2. Paragraph 4.43 goes on to state that: <i>"It is clear therefore that the potential supply from within the existing Development Limits of Ryedale of Ryedale's largest settlements will not be sufficient to meet the Districts long term targets".</i></p> <p>The consequence is that land adjoining the existing settlement limits will be needed to meet the districts housing requirements.</p> <p>Paragraph 4.49 of the main report also implies that Category</p>	<p>Mark makes the point that 585 should be deemed to be in Location Type 2 rather than Location Type 5. We have looked at this and agree with him; the reason it initially fell into Location Type 5 was because it was around a quarter of a mile from the nearest part of the settlement boundary that was not inside the National Park. In this case, it is more appropriate to consider the entire settlement boundary of both halves of Helmsley, and so we have updated the site to be in Location Type 2.</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>	<p>Update site 585 to Location Type 2</p> <p>No action</p> <p>No action</p> <p>No action</p>
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	<p>and deliverable supply of land is needed in Ryedale to help meet is housing targets in the short term. This includes land adjoining existing settlements, such as our client's "Land to the North East of Helmsley (site 585)" and "Land to the North West of Helmsley"</p> <p>Criteria Used to Assess Site's Housing Potential (Appendix 2) Our client accepts that the Council has broadly assessed sites on suitability, availability and achievability as recommended in PPS3 and the SHLAA Practice Guidance. We provide our comments on each below. However, we are concerned that the Council's consultant has also identified that its assessments is based on a strategic study and that it has not thoroughly assessed physical constraints availability and deliverability / viability in any detail (para' 3.20 of the Main report), this in itself raises concerns about the accuracy and reliability of the study findings.</p> <p>Suitability Criteria - We note that for 'Access Infrastructure Constraints' and 'Drainage Infrastructure Constraints' there are only three score choices (A, C and F), however some sites have been granted a score of B. There is no explanation or description to show what warrants a B status or how this is indeed possible given the set categories. Our client is therefore concerned about the assessment of the sites given that scores not included within the criteria scoring have been used. This would suggest that the whole assessment of sites is fundamentally flawed and that all sites should be re-assessed in accordance with a clear and precise scoring system.</p> <p>Availability Criteria Given the comments in paragraph 3.20 of the main report regarding the study's lack of detail on availability, our client wishes to note its concerns on how this scoring has actually been undertaken. It appears that the</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p>	<p>No action</p> <p>No action</p> <p>No action</p>
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	<p>scoring in this category is entirely subjective and not based on any evidence.</p> <p>Achievability Criteria Again, given the comments in paragraph 3.20 of the main report regarding the study's lack of detail, our client wishes to note its concerns on how this scoring has actually been undertaken. The achievability criteria do set out scores against physical constraints, where as para 3.20 clearly states that no detailed assessment of physical constraints has actually been undertaken.</p> <p>Regarding overall assessment scoring we are unclear why the Council has not provided overall scores for the sites.</p> <p>Summary The unclear scoring method and lack of evidence has an impact on the overall assessment and site categorisation. Therefore the overall scoring and hierarchy of site selection is fundamentally flawed.</p> <p><u>Barton Willmore Assessment of Helmsley Sites</u> In order to provide an understanding of the consistency and accuracy of the Council's assessment of individual sites, Barton Willmore has undertaken its own assessment of the potential development sites in Helmsley identified within the SHLAA. We have also undertaken an assessment for the omitted site 'Land to North West of Helmsley' which is the missing site.</p>	<p>Noted</p> <p>Mark also comments in each case that no average score is stated. However, we have consciously tried to steer clear of scores and averages; the site assessment is more complex than simply finding an average score to come up with a categorisation. This methodology is set out clearly in Appendix 2 and (with the exception of the mislabelling noted above) the assessments are consistent with this. We also suspect Mark has slightly misunderstood the assessment approach – on one site he comments that one of the sites is categorised as C against one of the criteria and therefore can only achieve an overall score of C, but this is only the case against the specified core criteria (such as flood risk).</p> <p>Noted</p>	<p>No action</p> <p>No action</p> <p>No action</p>
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	<p>The assessment goes alongside the Council's own assessment in the same format, and gives a more accurate site appraisal based on our site knowledge and technical assessments.</p> <p>We would be grateful for the reassessment of each site accordingly. Using the Council's own assessment methods detailed in the SHLAA, Wharfedale Homes has carried out its own assessment regarding the deliverability of each site in Helmsley:</p> <p>Site 585: Council assessment Category 3 site yet Barton Willmore assessment Category 1 site.</p> <p>Site is within National Park, however this should not be treated as a constraint. Both Councils has agreed to consider all sites given that there is a need to provide a sustainable settlement pattern – this does not face significant suitability constraints. Sustainable location.</p> <p>Our client has carried out negotiations with the land owner. The site is held by a willing land owner and is available now</p> <p>Site 585 should be given an A rating for site access constraints;</p>	<p>Site 585 remains in Category band 3, however, solely because it sits within the National Park and, treating the study area as a whole, it therefore clearly faces significant additional constraints when compared to similar sites elsewhere in the District that are outside of the National Park. This should not necessarily be taken to mean that development is completely ruled out; clearly the District Council and the National Park each have to decide where to focus development, and if it is decided that development is necessary within the National Park then it might be decided that this major planning policy constraint can be overcome and that the site could therefore be a candidate for residential development. These are issues which the District Council and the North York Moors National Park Authority will have to consider as part of the plan-making process.</p> <p>Mark has also provided information (which has been provided elsewhere by the Duncombe Park Estate) that the site is in the hands of a willing own</p> <p>Mark has asserted site 585 be given an A rating for site access constraints; having reviewed the site, we agree with him.</p> <p>Site 586 (North of Helmsley) Mark makes the point</p>	<p>Updated accordingly</p> <p>No action</p> <p>Updated the availability information to reflect</p> <p>Updated accordingly</p> <p>No action</p>
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	<p><u>Site 586 (North of Helmsley)</u> Site is within National Park, faces significant suitability constraints</p> <p><u>Site 435 Helmsley South East</u> Industrial uses adjacent the site Industrial uses on site, therefore some form of treatment will be required</p> <p>Multiple ownership and random strip</p> <p>Site lies in part within an Area of High Landscape Value</p> <p>Using the Council's own assessment methods detailed in the SHLAA, Wharfedale Homes has carried out its own assessment regarding the deliverability of each site in Helmsley. On the basis of our assessment the scores regarding suitability, availability and achievability accordingly reflect the constraints and deliverability issues associated with each site. According to Wharfedale Homes assessments Helmsley sites</p>	<p>that this site falls within the National Park. Again, as with site 585, this is the major constraint that this site faces, but it should not necessarily be taken to preclude development, for the reasons given above</p> <p><u>Site 435</u> - Mark claims that there is industrial use on part of the site (from which he infers that ground treatment is required) and that there are 'heavy industrial uses' along the western boundary of the site. From our observations, the site was almost entirely greenfield and while industry existed beyond the western boundary, it is doubtful whether it is enough to constitute a bad neighbour. However, we have compromised from our initial assessments and applied a 20% discount to the site to allow for any part of the site which may be impacted either by the neighbouring uses or by ground treatment; this allows us to treat the remaining site as a uniformly greenfield site without bad neighbours.</p> <p>Mark also claims that the site is in particularly complex ownership with ransom strip issues, but there does not appear to be any evidence that this is the case. He cites the fact that the land has been allocated in the local plan without coming forward, but this is not necessarily for ownership reasons. He also notes that the land is in an Area of High Landscape Value, but as you know, this was not one of the criteria we used to categorise sites.</p>	<p>No action</p> <p>Applied a 20% discount to the site to allow for any part of the site which may be impacted either by the neighbouring uses or by ground treatment.</p> <p>No action</p> <p>No action</p>
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	<p>should therefore be placed in the following categories:</p> <p><u>Deliverable Sites</u> Category 1 - <u>Land North East of Helmsley (site 585) & Land North West of Helmsley</u></p> <p><u>Developable Sites</u> Category 1 – None Category 2 – None Category 3 – None</p> <p><u>Not currently Developable Sites</u> Category 1 – <u>Land North of Helmsley</u> Category 2 – <u>Helmsley South East (site 435)</u> Category 3 – None</p> <p>In terms of location type, we have identified that all sites in Helmsley should be Location Type 2, as all sites within Ryedale District Council include land adjacent to the development limits of Helmsley and all sites within the North York Moors National Park (which does not have designated development limits) lie adjacent the existing built up area of Helmsley. Therefore all four sites should be treated as Location Type 2 sites.</p> <p>In light of the evidence produced in these representations, our client believes that site 585 should be considered as a deliverable site as it can provide housing in the first five years of the LDF. Land to the North West of Helmsley, which was omitted from the SHLAA, should also be considered as a deliverable site as it can provide housing in the first 5 years of the LDF.</p> <p>Conclusion Wharfedale Homes consider that the Ryedale SHLAA can not currently be considered a robust and credible element of the Ryedale LDF evidence base. This is due to a number of issues identified in these representations, namely:</p> <ul style="list-style-type: none"> • The Council's methodology and scoring of sites is inconsistent; • The scores for a number of sites do not accord with 	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>	<p>No action</p> <p>No action</p> <p>No action</p> <p>No action</p> <p>No action</p> <p>No action</p> <p>No action</p> <p>Action (if any) already stated for</p>
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	<p>the Council's scoring criteria.</p> <ul style="list-style-type: none"> • One site being promoted by our client has been omitted; • One site included within the SHLAA was considered against an incorrect site plan and therefore the site has been wrongly assessed against the Council's criteria; <p>As stated in our response to earlier sections of the SHLAA, the Council has wrongly omitted one of our client's site', wrongly assessed a number of sites (including Wharfedale Homes land interest to the "North West of Helmsley" by using an incorrect site boundary plan) and the inclusion of inaccurate information within the site assessment as stated previously.</p> <p>We have identified that our clients sites, land North East of Helmsley (585) and land North West of Helmsley can deliver housing in the first five years of the LDF. Information on flooding has been provided for the site to the North West of Helmsley to prove that the site is suitable for housing development.</p> <p>Recommendations</p> <p>In light of the above information, we would request the following:</p> <ol style="list-style-type: none"> 1. That the Council include our client's site (Land North West of Helmsley) in the SHLAA and that an assessment is undertaken. 2. That the Council re-assesses our client's site 585 based on the correct site location plan. 3. That the Council takes into consideration, those sites which lie within the North York Moors National Park because there are no development limits relating to settlements. 	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>	<p>each site Action already stated</p> <p>Action already stated</p> <p>Action already stated</p> <p>No action</p> <p>No action</p> <p>Action already stated</p> <p>No action</p>
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	<p>Therefore the Council should take a pragmatic approach and categorise sites based on whether they are adjacent the built up area of a settlement.</p> <p>4. The Council re-addresses the identified flaws regarding the scoring of site's.</p> <p>Overall, given the inconsistency, inaccuracy and omission of sites in the SHLAA, the document can not be considered a robust and credible element of the Council's LDF evidence base. In light of this, Wharfedale Homes recommend that the Ryedale SHLAA be updated following the correct re-assessment of sites and inclusion of all previously promoted sites.</p>	<p>Noted</p> <p>Mark asserts that our assessment criteria are not sufficiently robust. We disagree; the criteria are consistent with the assessment factors set out in the CLG's SHLAA Practice Guidance of July 2007. Furthermore, the Council agreed to the criteria, which were well-received at the stakeholder seminar during the summer. We therefore maintain that our assessments are appropriate, consistent and robust.</p>	<p>Action already stated</p> <p>No action</p>
<p>J.B Slatcher</p>	<p>Site 46, Paddock Grange Farm, Marton, Sinnington: Can someone please tell me why this site (my site) has not been</p>	<p>We have investigated and this site was not included in the SHLAA as it fell below the site size threshold</p>	<p>No action</p>

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<p>G Woodall on behalf of Cundalls, James F Stephenson on behalf of Boulton & Cooper Stephensons and Pat Foxtan on behalf of the Hauliers</p>	<p>included in the draft SHLAA</p> <p>Having seen the categorization in the draft SHLAA we feel the need to remind all those representing the people that the future of Ryedale's only livestock market must continue to be of paramount importance.</p> <p>You will all be aware that the best and possibly only practical alternative site for a new Market is on the site of the area of land that runs between Broughton Road and the Showfield in Malton, and that this whole area has now been put into Category 2, placing it on the shelf for another 5 – 10 years.</p> <p>Pat Foxtan's petition is now heading towards 5000 signatures and there is very real support for keeping our Market.</p> <p>In order to do so the Broughton Road land needs changing to Category 1 and any enabling development should be required to contribute to building the new premises.</p> <p>We recall Councillor Knaggs' own words in the summer of 2008 when he said the retention of a Market in Ryedale has to be a priority.</p>	<p>of 0.4ha.</p> <p>We have reviewed your additional information in relation to recent discussions concerning access to sites 549 (Broughton Road) and 587 (Pasture Lane).</p>	<p>For both sites, we have amended the accessibility scores so that they both achieve the intermediate rating ('Existing access may require upgrading'). This results in site 549 being promoted to Category band 1. Site 587 remains in Category and 2, however, because of its location adjacent to the Showfield Lane Industrial Estate (which means it achieves a rating of B for the bad neighbours criterion, i.e. 'Bad neighbour with potential for mitigation').</p>
<p>Paul Beanland on behalf on Malton Revitalisation Group</p>	<p>We express our objection to the inclusion of the land between Broughton Road and Showfield Lane, Malton, owned by the Holgate Hospital Trust and the Fitzwilliam Trust Corporation (previously referred to your Council and registered with your Authority) as a Category 2 site in the draft SHLAA report prepared by Roger Tym and Partners. The Revitalisation Group believes that this site should be placed in Category 1 and we would ask the Authority to do so.</p> <p>When this land was first proposed for development a major principal of the submission was to facilitate the relocation of the Livestock Market, removing it from the town centre to a location acceptable to the Livestock Auctioneers, and enabling the vacated market site to be redeveloped in a manner appropriate to that location. At the time the Authority was appraised of the position, negotiations had been opened with interested parties and subsequently part of this land is under option and the remainder is</p>	<p>We have reviewed your additional information in relation to recent discussions concerning access to sites 549 (Broughton Road) and 587 (Pasture Lane).</p>	<p>For both sites, we have amended the accessibility scores so that they both achieve the intermediate rating ('Existing access may require upgrading'). This results in site 549 being promoted to Category band 1. Site 587 remains in Category and 2, however, because of its location adjacent to the Showfield Lane Industrial Estate (which means it achieves a rating of B for the bad neighbours criterion, i.e. 'Bad neighbour with potential for mitigation').</p>

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	<p>in the process of being ratified by legal agreement. The developers concerned and their representatives, have since been liaising with your planning department with a view to developing the land following the submission and approval of suitable planning applications. Such development would confer great benefits to Malton and Norton, particularly if it were to include a connection(s) to the By-Pass.</p> <p>In other words the developers are shaping up to commence development (if authorized) sooner rather than later.</p> <p>I understand that under current Law and Guidance LPA's are required to keep a rolling five year supply of residential building land and any shortfall would be contrary to the objectives of the RSS and the LDF. Indeed, we feel that this land area and the anticipated benefits it would provide to the economic, social and environmental well-being of the town are of such strategic importance that its development should not be deferred.</p> <p>In the recently published draft this site has been identified as falling in Category 2 that is developable in 5 – 10 years. This Group believes that it should fall in Category 1, to be developed in 0 – 5 years, bearing in mind our comments and particularly when compared with the other sites identified as Category 1.</p>		
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