



North Yorkshire County Council

Contact: Mark Rushworth

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Mrs Rachael Balmer
Planning Officer – Forward Planning and Conservation
Ryedale District Council
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Dear Mrs Balmer,

Sites Consultation – Local Plan Sites Document

Thank you for consulting North Yorkshire County Council (NYCC) on the Ryedale Local Plan Sites Documentation. NYCC values the opportunity to engage with Ryedale District Council (RDC) on the selection of potential development sites and considers this to be part of our Duty to Co-operate. NYCC officers from across our service teams have reviewed the consultation documentation and, based on the current situation, have the following comments:

Strategic Policy & Economic Growth

In addition to the selection of development sites being in accordance with the adopted Local Plan Strategy in terms of the overall scale and distribution of growth, priority should generally be given to sites that will maximise the efficient and effective use of existing infrastructure. Site selection should take an integrated approach that considers the range of sites available in relation to the overall package of infrastructure needs for the locality, the need for new or improved infrastructure that each site generates and the ability of the sites to contribute to meeting infrastructure needs. Where additional infrastructure capacity is required, the selection process should maximise the potential to achieve efficient and effective delivery and use of the new infrastructure.

One of the priorities for the North Yorkshire Community Plan 2014 – 2017 is to facilitate the development of key housing and employment sites across North Yorkshire by delivering necessary infrastructure investments through partnership. As agreed, NYCC officers will work with Ryedale District Council to develop an Infrastructure Delivery Statement that will help to achieve this.

In the light of the infrastructure implications arising from site selection, consideration should be given to an early review of the CIL Regulation 123 list. This will help to support the Local Plan

during its examination stage, and will ensure that funding is available to address the demand for new or improved infrastructure arising from the selected sites. NYCC would be seriously concerned if there is a lag between sites being brought forward for development and developer contributions for essential infrastructure, such as schools and highways, being secured. NYCC officers welcome the opportunity to work with Ryedale District Council to ensure that the Regulation 123 list is appropriately targeted.

Malton and Norton

The allocations for retail and employment uses appear sound. It is noted that in light of the Cattle Market (site 250) being identified as mixed use and having a consent for food retail it appears that the Wentworth St Car park (site 452) would be allocated a non-food retail use. This is welcomed in terms of the need to maintain a balance between smaller independent retailers and larger multiples in the town particularly in respect of food retailing. However, it will also be important to ensure that the market is not stifled and that there is scope for a breadth of offer at both ends of the market in order to support the retention of local trade.

Kirkbymoorside

The relocation and expansion of the Micro Metalsmith business within Ryedale or even North Yorkshire is welcome however this should not result in the loss of employment land in Kirkbymoorside. Within the existing allocations site 622 is identified as additional employment land which would potentially mitigate the loss of the Micro Metalsmith site however it is not clear if this site is developable due to flood risk and therefore some further clarification in respect of this is required or an alternative site identified. On this basis the allocation of the Micro Metalsmith site for housing seems acceptable although there is nothing to ensure that the company remains within the area. The loss of this business in Kirkbymoorside would change the nature of the town in terms of the balance between employment and housing and it is not clear that alternative employment opportunities would be created in Kirkbymoorside in the future. The future expansion of the Micro Metalsmith business should be supported however.

Pickering

Support the employment proposals at site 650.

Children and Young People's Service

Given the level of additional housing proposed it is entirely likely, dependant on allocation decisions, that a new school site would be required for Malton, Norton and Pickering. We have no specific comments to make over the benefits of one site over another however we would generally expect that the larger sites would have greater potential to deliver land for education. We would therefore support a single larger site approach rather than a dispersed model of allocations.

Highways

North Yorkshire County Council as the Local Highways Authority welcomes the opportunity to contribute to the site methodology. The LHA has provided site specific advice regarding accessibility opportunities and access. It should however be noted that each site will still be required to demonstrate their access requirements and transport evidence through the planning application process. Applicants will be required to submit detailed Transport Assessment / Transport Statements and Travel Plans.

Ryedale District Council has acknowledged the need to consider the cumulative impact of site choices and has commissioned consultants to assess the impact of site on the Local Highway network. As key consultees in the Local Planning process the LHA will continue to work with RDC officers and their consultants to ensure the impact on the Highways networks is acceptable.

Health and Adult Services

The information below in relation to replacement of existing Elderly Persons' Home (EPH) facilities is of a sensitive nature so needs to be carefully managed now and in the future where that information/documentation would come into the public domain as part of this process.

The Housing Needs Analysis completed in 2011 to support the future development of extra care identified a need for additional extra care schemes in Ryedale. These schemes will provide a replacement solution for an existing NYCC Elderly Persons' Home (EPH). The locations for these schemes have been identified as:

- Malton
- Kirbymoorside

Comments have been provided in relation to each location below to support the work being completed with Ryedale regarding sites. It is difficult to comment on all the individual sites at this stage but hope that the comments below do provide a clearer idea of our requirements.

Malton

We have an identified need for an extra care scheme in Malton to replace our existing EPH there.

Where replacing an EPH, our aspiration is that the existing EPH should remain operational until the replacement extra care scheme is opened. As such, ideally we would be seeking the identification of a site/part site of approximately 2 acres which could be used to build a new extra care scheme as the replacement for our EPH. Transfer of the existing EPH site at reduced or nil value by the County Council to a registered provider can be considered to support the development of the new scheme and wider strategic objectives (e.g. development of affordable housing). However, if this is not achievable the fall-back position (whilst not our aspiration) for Malton would be to look at the phased development of the extra care scheme on our existing EPH site.

Whilst not being able to provide feedback on all the different sites for Malton, general feedback in terms of a site for extra care housing would be that it should ideally be in a location that is fairly central and has good access to local amenities, public transport etc. Ideally it would also be in a location where a three storey build could be supported.

Kirbymoorside

Again we have not commented on the individual sites identified for Kirbymoorside, but we would be seeking the identification a site/part site of approximately 2 acres which could be used for a new extra care scheme. Ideally this would be in a fairly central location and with good access to local amenities, public transport etc. Ideally it would also be in a location where a three storey build could be supported.

In terms of CIL, our aspiration would be that this sits outside of the requirements for CIL otherwise if it was applied the development may not stack up. Extra care schemes are a community resource and not just pure residential units.

Heritage Service

The historic environment of Ryedale should be a key consideration when producing the plan. This should include the impact of development upon physical remains and their settings.

From an ecological perspective, we agree with the methodology that has been used in order to 'sift' submitted sites. The Habitat Regulations Screening report provides a good account of the potential impacts upon European designated sites, including whether any impacts would be considered significant or not. Site allocations in Malton and Norton that have close proximity to the River Derwent SAC will need careful assessment at the planning application stage, but we would agree that they should not be discounted from the Plan at this stage.

We have briefly reviewed the preferred sites within the service villages and cannot see any strategic ecological issues that would prevent the sites from being included as allocations. There is one site at Sherriff Hutton that lies within close proximity of a Site of Importance for Nature Conservation (SINC) known as Sheriff Hutton castle. Whilst this does not prevent the site from being included as an allocation, any potential impacts upon the site would need careful consideration.

We do not have any landscape comments to make on individual preferred sites that have been identified as potential options for sites in the Market Towns, other than that many are greenfield sites within or near sensitive landscapes and will continue to need careful assessment, and high standards of design if developed. Some sites are already considered to be not suitable, although no decisions have yet been taken. We are not able to suggest further or alternative sites for consideration.

The site selection methodology appears to be appropriate and thorough, taking existing landscape-related evidence into account. Place-specific issues relating to landscape and green infrastructure have been picked up in the Sustainability Assessment (SA). A slight discrepancy is noted – page 85 of the SA under Landscape Character states that 50% of the area is covered by landscape designations, whilst on page 87 under Landscape Designation it says that two thirds of the district is protected. It is unclear what is meant by either statement. In any case landscape character is not the same as landscape designation. The Vale of Pickering is considered on page 11, paragraph 3.17 to be a local area of high landscape value, however it is the 'Fringe of the Moors' area of northern Ryedale that is of high landscape value. The Vale of Pickering is a significant landscape but for its historic and archaeological value.

The Sustainability Assessment does not mention the European Landscape Convention in its list of relevant policies, plans and programmes (Appendix 2). The broad Nature England green infrastructure mapping (2011) has been used in the study – there does not appear to be a district level GI strategy but perhaps this is under consideration.

Further notes on the landscape evidence base are appended to this letter.

Minerals & Waste

When assessing the current proposed sites and when considering future sites within Ryedale District account must be taken of the draft emerging policies relating to safeguarding of the

Minerals and Waste Joint Plan (MWJP). The MWJP is currently undergoing a consultation on 'Preferred Options' and contains draft policies in relation to the safeguarding of minerals resources and Waste Management Infrastructure.

The Preferred Options consultation is available from www.northyorks.gov.uk/mwjointplan

Chapter 8 of the consultation contains the Safeguarding Policies and Appendix 2 provides the detailed locations of waste management infrastructure proposed for safeguarding. The draft policies map (Mineral resource safeguarding maps 10,11, 12, 13, 14 and 15) contains details of the mineral resources proposed for safeguarding in the Ryedale area within the MWJP.

Public Health

It is important that the local narrative reflects the 'need' resulting from an assessment of the data to determine the health wellbeing of the community, the future demographics and the social care requirement of that community as well as the wider health determinants (such as education; employment; housing etc.). It is also important to mention working in partnership with other public sector bodies to deliver this plan.

Specific things which might come out of such analytical work might include:

- Developing education and skills and learning around Health and Social Care sector Jobs (to keep young people in the area and sustain jobs in sectors where there are recruitment difficulties)
- Building homes that are insulated and warm (to reduce excess winter deaths and avoid hospital and social care admissions)
- Creating 'hubs' for building on the greatest assets in communities to make them sustainable (to avoid our rural communities dying out)
- Designing healthy environments and building green spaces, shared spaces, safe neighbourhoods (to create social connectedness and wellbeing)
- Linking neighbourhoods and communities to improve access (to reduce the impact of rurality i.e. access poverty)
- Increasing the links between health partners and planning (to anticipate and prepare for new 'health' facilities to meet future need).

With respect to our Changing demographic - Older people and other vulnerable groups:

- The preferred option for developing supported accommodation would be to carry out targeted housing needs and local data analysis to determine the requirement of that community. Alternative models of accommodation will be considered where it is believed that a traditional extra care scheme may either; not be financially viable; or the number of units required for that community is limited. We need to ensure that people are able to stay

in their local communities, where it is possible to do so, by exploring different options and investigating the financial viability of such accommodation.

- Supported accommodation, such as extra care, will offer safe and secure level access accommodation built to Lifetime Home Standards with a mix of accommodation styles such as apartments, 1 and 2 bed, bungalows, small units of accommodation, for example, for people with learning or physical disabilities, as well as being mixed tenure, where possible, so that the accommodation is accessible and affordable for those who need it.
- North Yorkshire County Council is keen to work with CCGs, local health partners and locality commissioning teams where a 'community hub' model is a possible option for specific communities. This will enable commissioners to maximise the use of the on-site facilities by offering a variety of services to local people where they need it as well as financially supporting the development of the scheme.
- The County Council is keen to work with the District Council and other partners to maximise land availability and usage.

The above comments from the County Council's service areas have not been prioritised and reflect the views of Officers from the individual services. We would encourage RDC to continue to engage with NYCC to develop and refine the Local Plan Sites Document as work progresses.

If you have any queries about any of the above comments please contact me.

Yours sincerely,

Mark Rushworth
Senior Policy Officer

General comments on Landscape Evidence Base

The landscape evidence base for future Ryedale local planning could be updated in some respects. There are several existing local landscape character assessments that cover parts of Ryedale though some are not in a very accessible format:

- The Landscapes of Northern Ryedale 1999
- The Howardian Hills AONB LCA 1991
- The Hambleton and Howardian Hills Landscape Partnership Area LCA 2007
- Our Landscape Today for Tomorrow, North and South Humber 1995, (regional scale, including Yorkshire Wolds and Vale of York areas).
- The North Yorkshire & York LCA 2011, which identifies broad generic county scale landscape types and provides an up to date background, including guidelines for managing landscape change.
- Natural England's National Character Area profiles 2013-14 provide broad and very up to date information on landscape condition, trend and opportunities together with consideration of ecosystems services and functions. However a more recent possible force for change that is not mentioned but is relevant to Ryedale is oil and gas exploitation through hydraulic fracturing. Consideration may need to be given to a landscape sensitivity and capacity study though ideally this would be done on a county-wide basis.

The existing district level landscape character evidence base can be confusing as LCAs may overlap or not match at borders, and can leave gaps. A Special Qualities Study of Ryedale's Market Towns was carried out in 2010, and this involved a partial review of the area's Landscape Character Assessment, consolidating existing information that was available and relevant to the review. It took into account what residents valued about their local landscapes, and also looked at green infrastructure. Visually Important Undeveloped Areas in settlements are referred to in the SA but we did not manage to locate the study that these were derived from. Perhaps it was The Ryedale Plan: Local Plan Strategy Examination document Reference DDH20 – Settlement Analysis (2012) that was referred to somewhere in the SA but which we could not see on the website.

It is recommended that consideration is given to the preparation of a district scale LCA in accordance with current methodology that covers the district and identifies or confirms areas of rural and urban landscape that are locally distinctive. It could provide a consistent baseline against which the effects of local plan policies could be evaluated, and form a basis for future sensitivity and capacity studies. The current study has taken the NYCC Historic Landscape Characterisation into account, and relevant information from this could also be integrated into a future district scale LCA.

