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Our Ref: Planning Conformity\022- North York Moors\Local Development Frameworks\Final Responses

21 February 2008

Sarah Housden
Policy Manager
North York Moors National Park Authority
The Old Vicarage
Bondgate
Helmsley
York
YO62 5BP

Dear Sarah

**North York Moors National Park Authority – Core Strategy and
Development Policies Submission Version**

Further to your letter of 8 January 2008, I am pleased to confirm the Assembly's opinion that the North York Moors Core Strategy and Development Policies Development Plan Document, as submitted to the Secretary of State, is in general conformity with the existing and draft Regional Spatial Strategy and the Secretary of State's Proposed Changes to the Regional Spatial Strategy (RSS).

Status of RSS

Paragraph 4.19 of PPS12 (Local Development Frameworks) makes it clear that an RSS under preparation gathers more weight as it passes through its preparation process. It states "Where the regional spatial strategy has been through an Examination in Public, and the Proposed Changes have been published, considerable weight may be attached to that strategy because of the strong possibility that it will be published in that form by the Secretary of State". The Assembly has therefore referred to the Proposed Changes to the Draft RSS (published at the end of September 2007) in this response but would like to make it clear that the Assembly will be commenting on the Proposed Changes.

Need for General Conformity

The RSS has an important role in providing a strategic policy context for local policies. The Assembly's response to the Preferred Options for the DPD stressed that the submitted Core Strategy should highlight the need for there to be 'general conformity' between the RSS and the Core Strategy at the beginning of the document, to ensure that the two strands of the development plan are mutually supportive. The introduction refers to the RSS forming part of the Development Plan for the area and that the RSS will form a material consideration when determining planning applications. The Assembly also welcomes references to RSS Policies throughout the document in association with each Core Policy.

Appendix 1 (Glossary of Terms) includes the RSS but it is not clear whether this refers to current or draft RSS. The Core Strategy draws on draft RSS throughout the document. It would be helpful if the dates and status of the current and draft RSS were explained in the introduction of the DPD. For clarification, current RSS was published in December 2004 and draft RSS was published in December 2005. The Panel Report of the Examination in Public of the RSS was published in May 2007 and the Government's Proposed Changes were published on 28 September 2007. The Yorkshire and Humber Plan is due to be published in May 2008.

Key Diagram

The Assembly welcomes the Key Diagram as a useful tool for illustrating the policies of the Core Strategy, particularly the distribution of settlements across the National Park, transport connections and cross-boundary linkages. The Assembly is pleased to see the retention of RSS settlement hierarchy terminology in "local service centres".

The Assembly also welcomes the recognition of settlements outside of the plan area that may have an impact on the Park. The Assembly would welcome a diagram (not necessarily the key diagram) which reflects that Whitby, Malton, Northallerton and Thirsk are Principal Towns, and that Scarborough is a Sub Regional Town and York is a Sub Regional City, so as to relate more clearly the potential pressures likely to arise given the level of settlement within the regional hierarchy.

Spatial Strategy

The Assembly's response to the Core Strategy Preferred Options raised an issue that the National Park should spell out more clearly their relationship with those local authorities with whom the National Park share a settlement/boundary. The Assembly is pleased to note in paragraph 3.7 that the National Park will consider the production of joint DPDs for larger settlements or where there are cross boundary issues that require a joint approach. The Assembly is also pleased to see that the settlement hierarchy section sets out how the local service centre and service villages relate to their local authorities.

That said, the Assembly is of the opinion that the Core Strategy may benefit from more detail as to what these cross boundary issues might potentially be, which policies they may impact upon and why they are best dealt with in a lower order DPD. The National Park Authority may, for example, note how messages from the Strategic Housing Market Assessments of Local Authorities support the approach to housing outlined in the Core Strategy.

The Assembly's response to Preferred Options also noted the absence of an overall sequential policy approach to the location of development in the Core Strategy. Core Policy B adopts an approach based on the needs of settlements. While the Assembly supports this approach in general, which reflects the absence of regional housing and employment land targets in the National Park, we believe that this should be supplemented by a requirement that directs the greatest proportion of development to Helmsley, the local service centre, prior to other settlements. This proposed approach would better align with Policy YH7 of Proposed Changes to Draft RSS (2007), which establishes the role of local service centres in providing accessible centres for extensive catchments. It would also better align with Policy YH8 of Draft RSS (2005), which establishes a sequential approach to determining the distribution of development to the level of local service centres.

It should be noted that Proposed Changes to Draft RSS (2007) removed reference to Policy YH7 from the policy but retains a reference in the reasoned justification. The Assembly has assumed that this is a drafting error, since no reasons have been given for the omission, and has made a representation to the Secretary of State on this point asking for the reference to be re-instated.

Housing Provision and Affordable Housing

The Assembly welcomes references to the RSS with regards to housing provision and is satisfied that there will be no impact upon the wider delivery of housing in the region in line with agreed targets.

The Assembly also welcomes the inclusion of a policy on exceptions sites where all housing will be affordable.

Climate Change

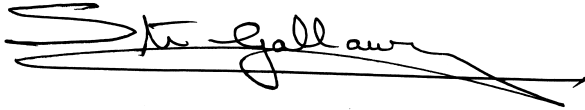
The Assembly welcomes Core Policy D, which seeks to generate at least 10% of energy on-site and the contribution that this will make to meeting RSS sub-regional renewable energy targets.

At this stage, the Assembly would be happy for the points made here to be dealt with by written representations at the Examination of the North York Moors Core Strategy and Development Policies DPD. We are happy to have discussions with

you if this would help to clarify any issues prior to the Examination of the Core Strategy DPD.

If you have any queries about these points, please do not hesitate to contact Martin Elliot on 01924 331 294.

Yours Sincerely

A handwritten signature in black ink, appearing to read "Stephen Galloway". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Cllr. Stephen Galloway
Chair, Regional Planning Board