



# North York Moors Local Plan

## **‘Current Thinking’ – Summary of Responses**

*This paper contains a summary of all the responses received to our ‘Current Thinking’ consultation on our draft Local Plan which ran from 6 October to 24 November 2017. The purpose of the consultation was to establish views on three issues of the settlement hierarchy, housing strategy and community and important undeveloped spaces. Consultation also fulfils our statutory requirements to ask for views under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.*

**February 2018**



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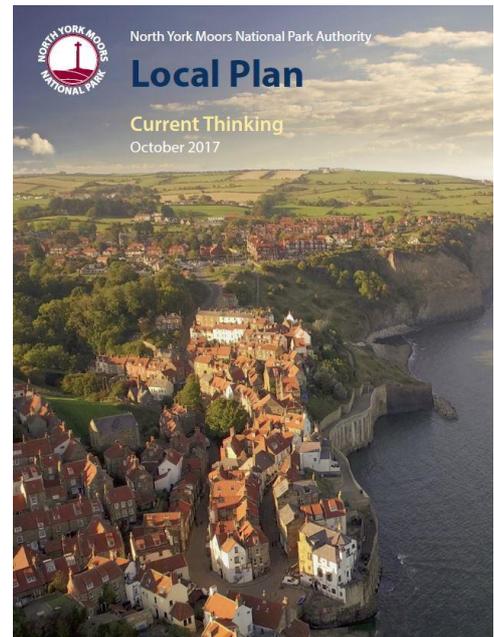
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## 1. Why have we produced this paper?

- 1.1 We are now working on the new North York Moors Local Plan. This document will direct the amount and type of new development in the National Park to the year 2035. As part of this process, and following on from the 'First Steps' consultation exercise that took place from 2 September to 18 November 2016, the National Park Authority needs to make progress on the key issues which will guide decisions on the amount, type and location of new development in the National Park.
- 1.2 As part of the continuing Local Plan progress further consultation took place on a number of key issues so that an 'early steer' from anyone with an interest in the National Park could be sought. The exercise focussed on possible approaches to the settlement hierarchy, housing strategy, Community and Important Undeveloped Spaces and also asked if anyone knew of any 'brownfield' or unsightly sites where redevelopment may be of benefit to the National Park. We will now use this information to help us write our plan. Our thanks go to everyone who took the time to respond.
- 1.3 This consultation also helps fulfil our statutory requirements to ask for views under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

## 2. What did we publish?

- 2.1 We published several documents for comment or feedback. The main 'Current Thinking' document was published in October 2017 and was aimed at a general audience but was designed to prompt those with some planning policy knowledge or interest to provide views on particular issues. The document included thirteen questions together with an opportunity to provide additional comments focussed around the main three issues of the settlement hierarchy, housing strategy and community and important undeveloped spaces.
- 2.2 Three topic papers covering the three main issues were made available on line to provide further background to the issues together with maps showing all the proposed community spaces and important undeveloped spaces. Detailed written descriptions of each important open space were provided together with lists of the proposed community spaces.
- 2.3 The consultation ran for a seven week period from 6 October to 24 November 2017. The documents were sent out to all statutory consultees and to anyone registered on our local plan database. Paper and electronic copies of all documents, together with maps and posters were sent out to all Parish Councils within and adjoining the North York Moors National Park. All documents were made available on our website, which was publicised through press releases and social media. Responses were made via an on line survey, by submitting an e mail with a completed electronic questionnaire, by e mail or by hand.



- 2.4 A request for feedback was made through an article in the 'Moors Messenger' newspaper which was distributed to all homes in the National Park the first two weeks of November 2017.
- 2.5 We also attended four drop in events at village halls throughout the National Park from 12<sup>th</sup> October to 2 November 2017 in Hutton le Hole, Helmsley, Hinderwell and Carlton in Cleveland. Officers were so invited to attend a Parish Council meeting in Sneaton, (6<sup>th</sup> December) and a meeting were held with Osmotherley Parish Council on 6<sup>th</sup> December.

## PLANNING MATTERS: Are we heading in the right direction?

WORK is continuing on the new Local Plan. This is the document the North York Moors National Park Authority will use to base its decisions on what is or isn't given planning permission in the National Park.

Initial views were sought last autumn and we would like to thank the many people who responded.

The Authority has now had a chance to think more about the direction the Plan may take and is seeking opinions on whether this is along the right lines. The Authority has just published a document called 'Current Thinking' which sets out the potential approach to three key areas of planning policy – which villages may see a limited amount of new development in the future; the amount and type of housing we wish to encourage; and which open spaces are important to the character of our town and villages and to our local communities.

Paul Fellows, Head of Strategic Policy at the North York Moors National Park Authority explains: "We are now asking for your views and local knowledge to help us produce a plan that will help look after the North York Moors in the years to come. In particular we've identified undeveloped spaces in Helmsley and E1 villages which we think are important due to the form of the settlement and their distinctive character. We are asking those who live, work and enjoy those places whether the Authority has identified the right spaces for extra protection and whether there are any more spaces that haven't been included."

Maps, as well as the main consultation document are available at [www.northyorkmoors.org.uk/currentthinking](http://www.northyorkmoors.org.uk/currentthinking). Copies have also been sent to all Parish Councils and are available at our offices in Helmsley, our Visitor Centres at Eatherly and Sutton Bank or in local libraries.

Consultation runs until 24 November 2017. Email us any thoughts at [policy@northyorkmoors.org.uk](mailto:policy@northyorkmoors.org.uk), or write to us using the address below.



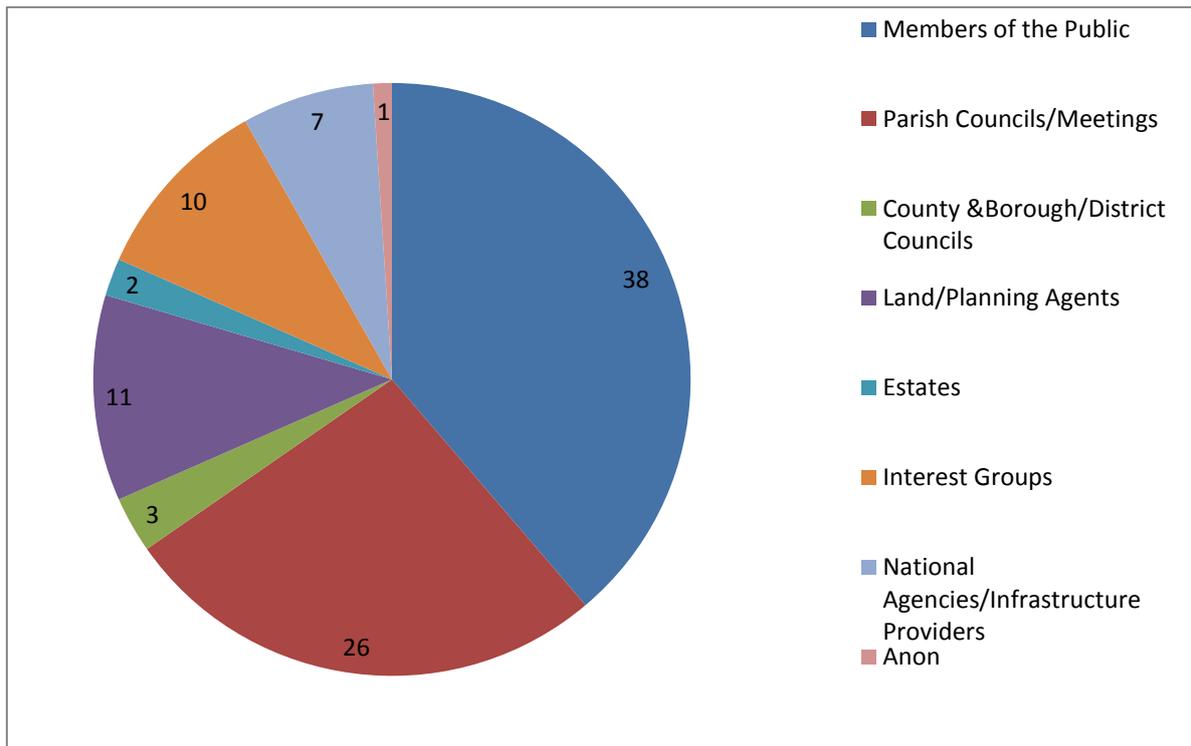
## 3. Who Provided Comments?

- 3.1 A total of 98 individual people, organisations or groups sent us comments. This is broken down as follows:

### Current Thinking Document

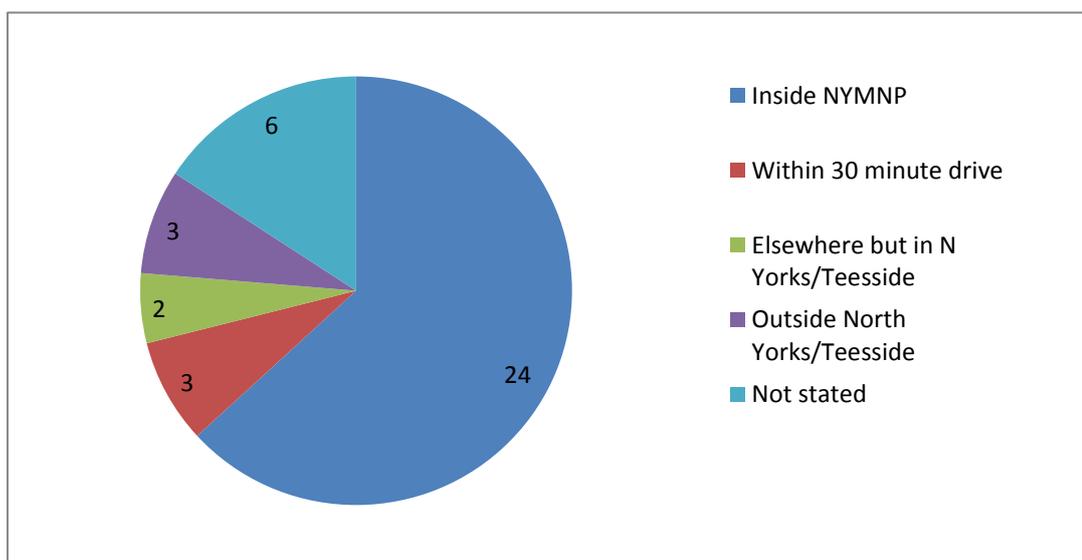
Type of respondent	Number
General Public	38
Parish Councils/Meetings	26
Borough/District Councils	3
Land/Planning Agents	11
Estates	2
Interest Groups	10
National Agencies/Infrastructure Providers	7
Anon	1
<b>TOTAL</b>	<b>98</b>

## Type of Respondent



- 3.2 Out of the 38 members of the public who responded 24 lived within the National Park (or provided an address with the National Park), 3 lived close to the National Park (roughly within a 30 minute drive), and of the rest 2 lived in North Yorkshire or Teesside and 3 lived outside. Six did not provide an address.
- 3.3 Comments were provided by different departments within North Yorkshire County Council and this was submitted as one response. Comments were also received from two different departments within Scarborough Borough Council and this shows as two different responses. The above table appears to show 3 different Borough/District/County responses this relates only to NYCC and SBC.

## Location of Respondent – General Public



- 3.4 Only 26 of those that completed the questionnaire stated their age and 72 of the respondents skipped this question. 42% of those that stated their age are in the 35 – 59 age range and 46% are in the 60 – 74 age range. 4% of respondents are 75 or over and 8% are in the 17 – 34 age range. With only 26 of respondents providing this information it is considered that there is insufficient data for this to be considered relevant.

## 4. What Views Were Expressed?

- 4.1 **Appendix 1** gives a more detailed breakdown of the comments made against the 13 questions we asked in the ‘Current Thinking’ document and the further comments area. Where individuals provided a general response rather than responding to specific questions these responses have been attributed to a question using a ‘best fit’ method to make sure all responses are logged and considered and it should be noted that not all respondents completed all of the questions in the questionnaire and in some cases their comments have been included in the ‘further comments’ section if their response did not naturally sit within a particular question.
- 4.2 We have not generally included any comments referring to activity outside the remit of the Local Plan. The exception is that we have included numbers of comments opposed to hydraulic fracturing (fracking) as this issue generated several comments which are recorded in the ‘further comments’ section. A policy on fracking is being developed through the separate Minerals and Waste Joint Plan.

### Summary of Responses

- 4.3 The following section summarises the main point of relevance, in the opinion of officers:

**Q1. Question Q1 “Do you agree with the proposed 3-tier settlement hierarchy? If not, please give your reasons and tell us which alternative you would prefer.**

**Responses:** 65

#### **Main Points:**

Almost half of the respondents were in agreement with the proposed 3-tier settlement hierarchy, and a further 19 expressed views but did not clearly state whether they were in favour of the proposal or disagreed with it. The remaining 12 respondents expressed clear disagreement with the proposal. The most common reason for disagreeing with the proposed 3-tier settlement hierarchy was the desire to see larger service villages as distinct to other smaller villages when considering the potential for new development. Some respondents considered that the merging of the tiers does not recognise that some villages within the National Park beyond Helmsley, hold a broader range of services which are worthy of protection and support. Some respondents provided an alternative hierarchy based on size of settlement and facilities (Option 3 - which includes Helmsley, Larger and Smaller villages and Open Countryside). Whether respondents were in favour or against the proposal, there was a general feeling that open market housing should be developed throughout the Park in place of the proposed policy of 100% affordable (except Helmsley). Some of those who supported the proposal, or didn’t give a view either way, felt that flexibility to assess opportunities for housing on an individual case by case basis was particularly important. While streamlining the hierarchy was seen as a general positive by some,

several respondents were concerned that the proposed approach risked being prescriptive or broad brush and several respondents also commented that mixed communities, including new housing, are required to support and maintain services and to ensure sustainable villages. Several respondents commented that the proposed hierarchy would result in the further decline of services in the existing larger villages.

**Q2. Question Q2 asked: “Do you agree with the overall approach to housing policy we are proposing? If not, please give your reasons and tell us what alternatives you would prefer.**

**Responses:** 66

**Main Points:**

21 of the respondents positively agreed with the overall approach to housing being proposed. 12 respondents disagreed with the approach and many of those provided very detailed reasons to explain why they disagreed and suggested alternative approaches. Many respondents neither agreed nor disagreed but instead provided general comments on the approach to housing. Those who supported the proposed overall approach to housing agreed that the policy approach will meet local needs, support local employment opportunities and key services whilst conserving the existing landscape, character, uniqueness and tranquillity of the Park. Those that disagreed were concerned that the approach will lead to the decline of village populations and services and to ensure that there are thriving economic and sustainable communities, there needs to be growth and that the policy is too restrictive. Those who disagreed considered that a policy which allowed local needs housing across the Park particularly in the larger settlements would be more appropriate. There were concerns raised in relation to the number of second homes and concerns expressed that there is little provision made for first time buyers or the elderly.

**Q3. Question Q3 asked: “Do you have any views on the amount of housing that we should be looking to allow in the coming years?”**

**Responses:** 65

**Main Points:**

Just over a third of the respondents agreed that the amount of housing being proposed by the proposed policy approach is appropriate i.e. 29 houses per year. Just over a third of the respondents however disagreed for a number of reasons. Generally those that disagreed considered that this was a very low rigid figure and that it is wrong to settle on one figure for such a long time as circumstances change. Many of those who disagreed pointed out that if an average of 37 houses per annum have been successfully completed since 2008 and this has failed to halt, let alone reverse, the decline in population and the range of services available in the various settlements around the National Park, it is unlikely that a target figure of 29 housing completions per annum will do anything other than increase the tension between managing population growth and the retention of services that support sustainable communities. This will result in the decline of settlements as they become unviable and unsustainable. There were comments submitted in relation to the size of dwellings, the provision of smaller affordable homes, more flexibility in relation to conversions, occupancy rates, the idea of primary residence and second homes. Some respondents questioned whether the Woodsmith Mine and the need for housing for the workforce had been taken into account.

**Q4. Question Q4 asked: “Do you agree that new open market housing development should be limited to Helmsley and not permitted in any of the Villages? If not, please give your reasons and tell us what alternative you would prefer.”**

**Responses:** 63

**Main Points:**

Approximately 30% of the respondents agreed that open market housing should be limited to Helmsley and not be permitted in any of the villages on the basis that this approach will ensure that new housing will meet local needs and new open market housing should be concentrated in the place with good services and connections although some did point out that Helmsley should have better services to meet the demands of the new development and that there is a danger of Helmsley becoming over urbanised resulting in the loss of its character. Almost 40% of the respondents disagreed with the proposed policy approach and many of those who disagreed provided very detailed explanations. The general tone was that the proposed policy approach is too restrictive and curtails all open market housing outside Helmsley. It is considered by these respondents that open market development should instead be spread throughout all the villages in the Park although a high proportion of respondents considered it would be more appropriate to allow open market housing in the larger villages to meet local and family needs and this would help to support local services and local schools keeping communities sustainable and vibrant. There was a concern that this approach could contribute to the loss of essential services, including schools, within the villages and that what is needed instead is a more balanced approach which would support appropriate levels of housing within local villages where there is a need to maintain their sustainability and services and where it would not conflict with the overall statutory purpose and aspirations of the National Park. Such an approach could seek to permit limited open market housing where there is an identified need with a proportion being allocated for local needs housing. Respondents also considered that the proposed approach may restrict the market resulting in increasing house prices.

**Q5. Question Q5 asked: “Do you agree that the existing affordable housing exception site policy should be continued? If not, please give your reasons and tell us what alternative you would prefer.”**

**Responses:** 61

**Main Points:**

Almost half of the respondents positively agreed with the existing affordable housing exceptions policy, and several of the respondents suggested changes to the way the current policy operates. Those who agreed considered that it was an important policy that ensures that local needs are met within the rural areas and small settlements essential to support key sectors of the local economy. 10% of respondents strongly disagreed and considered that there should be the potential to provide mixed open market homes and affordable houses on these development sites.

**Q6. Question Q6 asked: “Do you have any views on whether we should apply local occupancy restrictions and if so on our suggested way forward? Please give your reasons or tell us what alternative you would prefer.”**

**Responses:** 61

**Main Points:**

14 of the respondents agreed with the imposition of local occupancy conditions and the proposed amendments. 7 respondents disagreed with the principle of local occupancy conditions and therefore disagreed with the proposed amendments. Those who agreed with the imposition of local occupancy conditions, and with the proposed amendments, agreed on the basis of the cost of housing in relation to average household incomes and because of the high demand for second and holiday homes in the National Park. They consider that it is important that affordable housing is available for those who live and work in the area and that it is a good way to sustain local services. Several respondents agreed with the suggested amendments as this would enable a more flexible approach and would bring the Park more in line with adjacent Authorities. Some respondents however suggested different restrictions to either broaden the criteria or restrict it further and a number of respondents suggest the imposition of 'primary residence' in place of Local Occupancy as a way of achieving long term occupancy to support local services and communities. Those who disagreed did so largely on the basis that the National Park needs to attract new people and new businesses into the area as all communities benefit from an influx of new people at some time, and restrictions should not prevent increasing prosperity in the National Park. Some stated that local occupancy criteria can create issues relating to the marketing and saleability of properties, including accessing mortgages, which can have implications for site's viability and delivery.

**Q7. Question Q7 asked: “Do you agree that there should be size restrictions for new local needs housing and that large extensions should be resisted? Do you agree with the proposed limits? If not, please give your reasons and tell us what alternative you would prefer.”**

**Responses:** 59

**Main Points:**

This question was answered either jointly, covering both issues, or respondents separated the two issues out. A third of respondents supported the proposal to restrict new local needs housing to a specific size (93sqm) but an almost equal number of respondents strongly disagreed with this policy approach. With regards to the proposal to restrict the size of new extensions 16 respondents agreed with this approach and 15 disagreed. Those who agreed with both proposals concluded that restricting the size of new local needs housing and extensions will help to ensure the availability of housing of an appropriate size to meet the identified needs. Those who disagreed or expressed concern with both proposals considered that each application should be taken on its own merits, taking into account the character of the area, and that such a policy may impinge on lifestyles and choices and furthermore that larger extensions and larger houses will free up smaller homes as people move into them. With regards to the proposal to restrict the size of extensions there was a strong feeling that extensions should be determined on their own merits on a case by case basis, there is already control on extensions through the design guide and that extensions should be allowed to reflect changing family situations.

**Q8. Question Q8 asked: “Do you agree that we should introduce some more flexibility to policy on conversion of rural buildings so that they don't have to be historic and can be used for local occupancy housing? If not, please give your reasons and tell us what alternative you would prefer?”**

**Responses:** 65

**Main Points:**

Over half of the respondents positively supported the introduction of more flexibility in the conversion of redundant buildings for local occupancy as they see this as a way of providing a use for a wider range of buildings and as a way of bringing forward more homes for local people although some commented that this is still too restrictive and policy should allow for farm buildings, whether traditional or not and irrespective of location to be converted to new homes for sale or rent, without occupancy conditions and to tourism and business uses. Some respondents were concerned to ensure that the policy should only relate to buildings of historic merit which make a positive contribution to the National Park and that proposals should only be allowed if the design and materials are appropriate so that the special qualities of the National Park are not harmed.

**Q9. Question Q9 asked: “Do you agree with the approach to infill development that we are suggesting? If not, please give your reasons and tell us what alternative you would prefer.”**

**Responses:** 61

**Main Points:**

Almost half of the respondents had no objections or positively supported the amended approach to infill development mainly on the basis that it makes sense to have a more flexible policy and to make better use of some of the spaces available for infill. This approach would also result in a better mix of dwellings. Some respondents who were supportive said care was needed to ensure that development should be appropriate in terms of scale; design and open spaces should be maintained. Respondents pointed out that infill can make a positive contribution to achieving sustainable local communities and maintaining local services, facilities and economic activity. Many of those who were not supportive of the approach considered that infilling should not be restricted by what they saw as an arbitrary, artificial, unnecessary number and the policy lacks flexibility. Each application should instead be determined on its own merits with the effects of the development being the key consideration.

**Q10. Question Q10 asked: “Are you aware of any sites that are either previously developed or ‘brownfield’ or where redevelopment would improve the character and appearance of the National Park?”**

**Responses:** 53

**Main Points:**

Respondents generally agreed with the Brownfield Land Register and the redevelopment of sites that are ‘eyesores’ and a number of sites were suggested which respondents considered could be used for a variety of uses.

**Q11. Question Q11 asked “Do you agree with the types of land that we are proposing to identify as ‘Community Spaces? If not, are there any types that you would like to see added or removed?”**

**Responses:** 68

**Main Points:**

There was broad agreement for the identification of Community Spaces with 26 of the respondents stating their positive support for the approach and agreement for the types of land. Some requested that school playing fields, village halls, land adjacent to

footpaths, registered common land, wooded areas adjacent to villages and the Cinder Track should also be included and several Parish Councils requested the extra designations on specific sites. Some respondents requested that certain types of land be excluded including amongst others private gardens, school playing fields and agricultural land.

**Q12. Question Q12 asked “Do you support the identification of Important Undeveloped Spaces? Do you have any views on the criteria we have used or whether others may be more suitable?”**

**Responses:** 77

**Main Points:** There was general support for the proposed policy with over 40% of the respondents supporting the approach and the spaces identified. Overall those who were in support thought that this policy will ensure that the Park’s special character is not harmed. Some respondents (11) however, including some individuals and land agents/planning agents strongly objected to the approach as they considered the approach will rule out most potential development sites and it is effectively a ‘blanket ban’ on any infill development. Those who objected stated that the designation seems inconsistent, arbitrary and open to interpretation and subjectivity and they consider that the current LDF approach where each application is considered on its own merits, is sufficient and there are enough current safeguards to manage inappropriate development. The approach could also result in pushing development further out to the edges of settlements and this was not thought to necessarily be the best option. There were specific objections to individual IUS.

**Q13. Question Q13 asked “Have we identified the right areas? Have we missed any?”**

**Responses:** 43

**Main Points:**

9 of the respondents confirmed that right spaces had been identified, 2 stated that the spaces were not right. There were several requests from individuals and Parish Councils for additional Important Undeveloped Spaces to be designated.

**Further Comments**

**Responses:** 54

Respondents used this part of the questionnaire to reinforce their overall comments and provide further comments on a number of new topics including; the consultation process, the planning service, fracking, tourist accommodation, Botton, the Cinder Track, further general housing comments, the possible allocation of land in Swainby adjacent to the Caravan Park for housing, the splitting of villages with the Park boundary and other local issues.

## Appendix 1 – Detailed Breakdown of Comments Made

**Q1 Do you agree with the proposed 3-tier settlement hierarchy? If not, please give your reasons and tell us which alternative you would prefer.**

Type of respondent	Number
General Public	24
Parish/Town Councils and Meetings	15
Borough Councils/County Council	2
Land/Planning Agents	10
Estates	2
Interest groups	7
National Agencies (e.g. Natural England)	4
Anon	1
<b>Total</b>	<b>65</b>

### Main Points

26 of the respondents were in agreement with the proposed 3-tier settlement hierarchy, and a further 19 expressed views but did not clearly state whether they were in favour of the proposal or disagreed with it. The remaining 12 respondents expressed clear disagreement with the proposal and some of the main comments provided are set out below. The most common reason for disagreeing with the proposed 3-tier settlement hierarchy was the desire to see larger service villages as distinct to other smaller villages when considering the potential for new housing development. Whether respondents were in favour or against the proposal, there was a general feeling that open market housing should be developed throughout the Park in place of the proposed policy of 100% affordable (except Helmsley). Some of those who supported the proposal, or didn't give a view either way, felt that flexibility to assess opportunities for housing on an individual case by case basis was particularly important. While streamlining the hierarchy was seen as a general positive by some, several respondents were concerned that the proposed approach risked being prescriptive or broad brush and several respondents also commented that mixed communities, including new housing, are required to support and maintain services and to ensure sustainable villages. Several respondents commented that the proposed hierarchy would result in the further decline of services in the existing larger villages. A numbers of respondents also commented that public transport should not be seen as a pre-determinant of service village status, since the primary mode of transport in the National Park is the private car.

- NYCC commented that that the use of a settlement hierarchy is beneficial in planning for the infrastructure and service needs of the Park's communities. This is considered by NYCC to be particularly important when there are limited resources available that need to be prioritised. The approach taken within the settlement hierarchy, in combination with the Housing Strategy will significantly shape how the Park will evolve over the next 15 years. In adopting the proposed approach NYCC comment that care will need to be taken to ensure that the approach adopted does not result in a loss of vital services. It may be appropriate therefore to heighten the status of settlements where there is available infrastructure capacity or where growth is required to maintain services.
- Scarborough Borough Council (SBC) comments that there is no distinction in the proposed approach between the differing scales of villages, the services they have and the roles they play. In SBC's opinion this does not align well with the stance of

neighbouring authorities and it is questioned whether this is too simplistic. At the very least SBC state that the Plan should recognise the service villages of neighbouring authorities where they cross boundaries. This would apply to areas such as Ayton and Sleights in Scarborough Borough and Thornton le Dale in Ryedale. The different take on Scalby is noted and its suburban setting, which encroaches into the NP, should not be expanded.

- The North Yorkshire Moors Association is concerned that removing the use of service provision in assessing a settlement's suitability for new development could result in settlements with no services being developed while settlements with services fall into decline. The NYMA would prefer to see the hierarchy include the safeguarding of settlements with a history of services. Community First Yorkshire comments that the clustering of settlements should also take account of community buildings which communities have access to.
- York Diocesan Board of Finance acknowledge that Helmsley remains the National Park's Main Service Centre, but that development (commensurate to the size of each settlement) should still take place in the smaller sustainable settlements throughout the National Park to meet identified needs and demand. York Diocesan Board of Finance considers that to be the hierarchy should be amended so that it is based on the size of the settlements and their associated services and facilities and therefore Option 3 is supported. A planning agent similarly states this view and that the justification for not identifying Service and Local Service Villages due to possible changes in the presence of key services is not considered a strong enough reason to remove a tier from the hierarchy and states that settlement reviews on a biannual basis can be carried out.
- A further planning agent states that the proposed settlement hierarchy would result in the merging of the Service Village, Local Service Village and Village tiers and that this does not recognise that some villages within the National Park beyond Helmsley, hold a broader range of services which are worthy of protection and support. The planning agent believes that the settlement hierarchy should be based on services rather than size or population, with settlements arranged in accordance with the level and range of services. This view is shared by a Parish Council who considers that the criterion of 35 addresses is too crude a measure as the characteristics of the second tier villages are not uniform and their individuality needs to be recognised and reflected in all aspects of the planning process. One resident states that Thornton le Dale is very different to the much smaller moorland villages of Lockton and Levisham and Goathland, a larger village is very different to Egton. This respondent acknowledges that it would not be possible for there to be a bespoke policy for each village neither does it seem appropriate than one planning position can be appropriate for so many very different villages. A planning agent in disagreeing with the proposed approach states that this 'is seen as a backwards step' which is not in accordance with the NPPF and a policy in favour of market housing in sustainable villages should be advocated instead. One resident and a Parish Council consider that the existing (LDF) hierarchy is preferable on the basis that services should be taken into account when deciding which villages should be developed. A further Parish Council states that the present (LDF) hierarchy is well understood and recognised whereas the proposal 'for effectively no hierarchy is less immediately legible and understandable'.
- A further resident is concerned there is a vast difference between the level of services available within the most well provided 10 or so villages and the very limited or zero level of services available in the presently defined small villages. Therefore, the policies of restraint need to be more effective in the presently defined small village category and perhaps a little easier in the large village category.
- There was broad agreement that that Helmsley is a sustainable location for future development. However, some respondents believed that development should be

more equally spread across the Park. Helmsley Estate, in acknowledging that Helmsley is the main service centre for the Park notes that it is a long way from much of the Park and is not central to the Park area. In this respect the Estate consider that the availability of services in villages should not necessarily be the main driver for housing planning applications - people are much more mobile these days and whilst that is not necessarily sustainable it has to be acknowledged that most residents in the Park have cars and therefore do not rely on services within their immediate surroundings.

- A further Planning agent states that some villages are much more 'sustainable' than others and what additional residential accommodation they can potentially provide and who should be allowed to live in it should reflect that so as to avoid more unsustainable schemes/occupancy. He further comments that the less sustainable villages should only provide modest local needs infilling of one or two houses with the local occupancy criteria drawn very tightly to relate to the parish concerned. Larger settlements, especially those with reasonable public transport and some facilities/services so as to be more sustainable for meeting a wider geographical local need in the Park could do just that with the level of new development assessed on its merits and not limited to small scale infill. Some larger schemes, if appropriately located, could provide for the more general Park-wide local needs housing which will have been otherwise reduced by the more restrictive (limit to the Parish) approach taken in the less sustainable villages. He states that the larger settlements with potential to accommodate more than just one or two dwellings as infill could include: Helmsley, Sleights, West and East Ayton, Thornton le Dale, Castleton, Ampleforth, Glaisdale, Goathland, Robin Hood's Bay, Egton, Osmotherley, Lealholm, Easington, Guisborough, Scalby, Fylingthorpe, Hinderwell, Osmotherley, Lythe, Runswick Bay, Staithes, Swainby. A further planning agent shares this view on the sustainability of services and their dependent communities and comments that placing 'a straightjacket on opportunity' through a restrictive application of policy relative to the proposed settlement hierarchy will serve neither to provide for local need nor guarantee the future of services and the settlements and communities of which they are a part. One resident cites Osmotherley as an example of this and states that consideration is required so that villages such as Osmotherley remain sustainable villages that attract visitors without killing the very thing that makes them attractive i.e. a living and sustainable community with a viable economy for sustaining services. A local councillor comments that development should be sustainable in terms of reducing the need to travel.
- Mulgrave Estate provides detailed comments on the proposed hierarchy and suggests changes to make it more acceptable. As currently presented the hierarchy is not supported, but could be with changes. The Estate accepts that Helmsley is the National Park's largest settlement and is therefore suitable for accommodating major development. The Estate however, strongly suggest that villages should continue to have a very important role to play in accommodating sustainable growth, which is partially but not fully recognised in the proposed Settlement Hierarchy, including a more overt role in providing suitable 'market' housing sites, particularly in those villages at the Park's periphery, such as Lythe which are close to other service centres outside of the Park and other settlements/clusters of settlements with a range of services and facilities. Some villages are more appropriate locations for market housing than others, the approach could be achieved within a three-tier hierarchy, alongside suitable criteria based policies on determining appropriate locations. The Settlement Hierarchy also needs to recognise that the main means of travel of any distance is the private car and this will remain so over the lifetime of the next Local Plan. The Park's 'open countryside' should be protected for its own sake, and therefore only limited development is suitable, such as that needed in relation to agriculture, forestry, tourism, in exceptional circumstances affordable housing; and the conversion, re-use, adaptation and extension of existing buildings, including

those currently not in use. The Park should not seek to exclude small villages (i.e. those under 35 address points) from the definition of Village – they should not therefore, be treated as Open Countryside in Planning terms.

- Mulgrave Estate further considers that a hierarchy based on size of settlement and facilities (Option 3) is more a more suitable and sound approach and suggest that Helmsley remains as the Principle Service Centre. The next tier would be Rural Service Centres including larger villages i.e. Ampleforth, Goathland, Hinderwell, Lythe, Osmotherley, Sleights, Staithes, Thornton le Dale, West and East Ayton, plus Esk Valley Group (Castleton, Danby, Egton, Glaisdale, Lealholm). The next tier would then comprise Villages as set out in Option 3 with the final tier being Open Countryside. The Estate suggest that in the Rural Service Centres market and affordable housing, where it is of an appropriate scale, would be supported as would development on brownfield land together with other development to support the local economy and services. In Villages the Estate suggests that small scale development should be supported where it does not detract from the character of the village including a single infill dwelling for local needs or affordable housing or market housing under special circumstances, conversion of buildings for residential use under specific criteria, conversions for economic/tourism/community uses, replacement dwellings, local services and other economic development. In the Open countryside the Estate considers that conversion of buildings for residential and economic uses should be supported under specific criteria, together with replacement dwellings and other dwellings satisfying an essential need as well as other equine, recreation, community facilities and tourism development.
- Mulgrave Estate also state that should the Authority progress with a the proposed 3 tier approach, the definition of ‘Village’ in the proposed Settlement Hierarchy should include all villages; and not seek to classify the 20 ‘small’ villages as Open Countryside.
- Two planning agents and a Parish Council also request more flexibility and state that individual sites should be looked at on their merits no matter where they are. In this respect there should be the possibility of small scale sensitive developments in all existing villages in order that services and community continue to exist in these places. This development will then assist with services, such as small schools, shops and pubs that will have a greater catchment.
- There are also a number of respondents including a Parish Council, two planning agents and residents who request that specific villages be re assessed in the proposed settlement hierarchy including East and West Barnby, Darnholm, Fryup, Fylingthorpe and Robin Hoods Bay, Goathland, Ingleby Arncliffe/Ingleby Cross, Kettleless, Thimbleby, Ugglebarnby.
- Yorkshire Wildlife Trust questions whether the proximity to European sites has been taken into account in the proposed hierarchy. YWT state that for example an increase in the amount of development close to Special Protection Areas (SPA) could increase pressure on breeding birds. Similarly Special Areas of Conservation (SAC) might be affected by increased nearby development.

**Q2 Do you agree with the overall approach to housing policy we are proposing? If not, please give your reasons and tell us what alternatives you would prefer.**

Type of respondent	Number
General Public	25
Parish/Town Councils and Meetings	14
Borough/County Council	2
Land/Planning Agents	9
Estates	2
Interest groups	9

National Agencies (e.g. Natural England)	4
Anon	1
<b>Total</b>	<b>66</b>

21 of the respondents positively agreed with the overall approach to housing being proposed. 12 respondents disagreed with the approach and many of those provided very detailed reasons to explain why they disagreed and suggested alternative approaches which will be précised below. Many respondents neither agreed nor disagreed but instead provided general comments on the approach to housing and these will be generally summarised below.

Those who supported the proposed overall approach to housing agreed that the policy approach will meet local needs, support local employment opportunities and key services whilst conserving the existing landscape, character, uniqueness and tranquillity of the Park.

- NYCC state that the provision for additional housing to meet local needs, avoid population decline, support local services and employment opportunities is welcome.
- Some of the respondents, including one Parish Council, a number of residents and one non-resident who were mainly supportive of the approach requested more scope for flexibility and more assistance to retain young local workers and families in villages. Respondents, including a planning agent and a resident commented that the overall numbers are acceptable but that housing should be spread out over the Park rather than concentrating on Helmsley or a reduced number of centres and a further resident pointed out that more housing may be needed to accommodate Woodsmith mine workers.
- Community First Yorkshire whilst agreeing overall stated that the policy misses the following points; the need for social housing - Multi-occupancy accommodation, housing people from across the age range, to ensure a mix of communities - New ways of funding social housing such as Community Housing Schemes, enabling communities to invest in housing for meeting local needs - Housing for essential workers, e.g. teachers and care workers, enabling people to live more closely to their work.
- One resident comments that it appears to be assumed that new house building is essential but no justification for this is provided. The first priority should instead be making better use of existing provision. The respondent states that some of the approved developments in the past have been totally inappropriate and have had a negative impact on settlements. One resident comments that the Authority appears to appreciate the fact that many National Park villages have an increasingly aged population with little or no opportunity for younger people to move in. The respondent states that previous planning policy has exacerbated this problem and has led to the decline of many rural services and amenities.
- One non-resident commented that this new approach should reduce the amount of empty homes and reduce the amount of luxury homes which pushes prices up and reduces the number of young people in the area.

Those that disagreed were concerned that the approach will lead to the decline of village populations and services and to ensure that there are thriving economic and sustainable communities, there needs to be growth and that the policy is too restrictive. Those who disagreed considered that a policy which allowed local needs housing across the Park particularly in the larger settlements would be more appropriate. Many respondents, including many residents in the Park and Parish Councils, highlighted their concerns about the number of second homes in the Park and some commented that these houses do little to support local services. One resident comments that the ‘danger is that we end up with a

village which looks attractive, but has actually ceased to function as a community and is nothing more than a holiday complex.’ Many commented on the lack of suitable affordable provision for first time buyers and for elderly persons and one planning agent comments that there is no new purpose built accommodation for that age range and that bungalows are not recognised as being an attractive building design by the Authority and as a result two storey houses are supported.

- York Diocesan Board of Finance and a planning agent comment that whilst new housing in the Park during the Plan period is supported, it is essential that emerging plan policies do not impact on delivery. Attention they state should be paid to Paragraph 173 of the NPPF relating to the viability of schemes. The respondents therefore consider that housing policies within the Plan should not be overly restrictive as such they consider that market housing, local occupancy housing and affordable housing should all be supported as part of the emerging Local Plan.
- One planning agent considers that concentrating housing growth around one key settlement and preventing the opportunity for market housing in other locations runs the risk of narrowing choice across the National Park in such a way that sustainable settlements will become threatened with decline. The housing policy as suggested will prove inflexible and be incapable of responding to changing circumstances, with the result that settlements fail to retain or increase the critical mass of population necessary to sustain local services and facilities. In this respect the respondent suggests that more new housing should be allowed across the Park, subject to criteria that will ensure it is appropriate in terms of sustaining the viability and vitality of communities without harming the essential quality of the National Park. Without this broader view the respondent considers that the new Plan will not achieve the objective of fostering economic and social well-being by delivering housing of appropriate tenure which meets local needs and supports communities and services. In addition the respondent further comments that a combination of market and affordable housing throughout the Park should be the basis for future plans for sustainable growth and development. An additional Planning agent considers that three important areas of housing policy should be considered; the quality of the housing stock; the suitability of the housing stock for an ageing population; and the capacity for a good housing stock to support economic development and thereby the prosperity of those who live and work in the Park.
- Mulgrave Estate considers that the proposed approach is overly restrictive is not sound, not in line with the NPPF, and this approach will be to the detriment of the Park, its businesses and its local communities. It will stifle the ability of the Park, its business and communities to grow sustainably and maximise their potential to thrive and flourish. The Estate has difficulty in employing staff mainly due to being unable to find suitable accommodation and other businesses are facing these problems. The Local Plan should meet current and future housing needs and to help address the Park’s population decline, particularly amongst young working people. The current proposed approach will not do enough to ensure sufficient housing of the right type in the right place is provided at the right time. The Estate considers that 29 homes is insufficient for the reasons set out in question 3 below and that the Authority should recognise that household formation may change over the next Local Plan period and that contingency provisions will be needed to meet the need for more/different homes now and in the Local Plan. The Estate consider that policy contingency measures, for instance to have ‘reserve’ flexibility in housing policy to allow a less restrictive application of standards, occupancy and numbers etc., rather than requiring a formal full Local Plan review to address changes in housing need, during the next Local Plan period. In addition the Estate comment that the Park’s housing need should not take account of new homes derived from conversions, particularly as it is almost impossible to quantify the number of conversions that may come forward over the

next Local Plan period. The Estate also considers that the proposed restriction of infill sites to only two dwellings is artificial and arbitrary as there may be instances where appropriate infill of more than 2 homes will be deliverable without impacting on village character. The Estate considers that infill applications and what constitutes a suitable number should be done on case by case basis and that the proposed settlement hierarchy should be reconsidered as set out in question 1 above so that there is a more balanced distribution of market and affordable housing across the most sustainable settlements with the larger sites allocated in Helmsley. The Estate provides an alternative hierarchy based on size of settlement and facilities for consideration.

- One Parish Council considers that the policy does not provide protection for overzealous developers and it might encourage more speculative housing in the Park and deliver sustainable development.
- One Parish Council states that local needs housing should not be restricted to infill sites. Such sites are minimal in number and availability; they alone will not fully meet the needs of the existing population. Instead it is suggested that small undeveloped but available and deliverable sites within or on the edge of existing settlements should be considered for local needs housing.

Further comments;

- Highways England does not have any particular concerns as the total number of proposed dwellings (522 between 2016 and 2035 i.e. 29 homes each year) is a relatively low number when considering the vehicle trip generation from these dwellings in relation to the capacity of the Strategic Road Network that serves the National Park. Furthermore, the plan ensures that the dwellings are spatially distributed which minimises the traffic impact at any single location. Although half of these dwellings are proposed at Helmsley, from the anticipated vehicle trip generation from these and the distance from the first point of contact with the Strategic Road Network, this is not expected to be a significant issue for Highways England.
- Natural England has no specific comments to make regarding the overall approach however it is advised that the approach should be assessed in and informed by the findings of the Sustainability Appraisal and Habitats Regulations Assessment. The plan area has significant landscape and biodiversity constraints which should be carefully considered in relation to the strategy for housing.
- Yorkshire Wildlife Trust comments that development in some villages could have more impact than in other villages, depending on proximity to European sites, SAC and SPA.
- NFU would like Local Planning Authorities to have a better understanding of farming and the functioning of a modern farm and state that there will still be a need for additional rural dwellings to be built to support farming businesses.

### Q3 Do you have any views on the amount of housing that we should be looking to allow in the coming years?

Type of respondent	Number
General Public	25
Parish/Town Councils and Meetings	14
Borough/County Council	2
Land/Planning Agents	10
Estates	2
Interest groups	8

National Agencies (e.g. Natural England)	4
Anon	1
<b>Total</b>	<b>65</b>

22 of the respondents agreed that the amount of housing being proposed by the proposed policy approach is appropriate i.e. 29 houses per year. 24 of the respondents however disagreed for a number of reasons. Generally those that disagreed considered that this was a very low rigid figure and that it is wrong to settle on one figure for such a long time as circumstances change;

- The CNP agreed with the amount of housing and considered that this number will meet local need while taking account of the constraints on the amount of housing that can be delivered in the National Park.
- The NYM Association also support the proposal to deliver 29 homes per year which they consider will meet local need over the coming years while taking account of the qualities of both the built and open landscape the National Park.
- NYCC comment that it is important to ensure that there is the appropriate provision of housing within the villages to help reduce further population decline. Whilst it is recognised that there is a need for smaller housing of one and two bedrooms there is also a need to ensure that the balance and mix of housing meets the full needs of society.
- One Parish Council indicates that they would like to see a limited amount of all three types of housing noting that a balance of open market housing should recognise the fact that retired and professional people are generally very supportive of a community and bring money into the National Park and its businesses.
- One resident considers that the balance is just right and that the policy has come at a good time.
- Three residents, and one planning agent comment that housing provision should include some specific assessment of different areas of need, notably those arising from the increasing ageing population in the Park who may need to move to single storey accommodation to extend the time they can live in their own home. They consider that if such housing were to be limited to those with a local need (i.e.; those with at least three years residence in the Park) the provision of homes within the Park suitable for the retiring/older/less able would in effect release larger/family homes with the National Park so adding to housing supply.

Those that disagreed did so for the following reasons;

- Scarborough Borough Council is concerned that there appears to be no potential housing near to the Scarborough Borough boundary and that this could put additional pressure on SBC Planning Area to pick up housing numbers. (The Borough also notes that OAN does cover the NP but only in respect of the demographic element of the OAN.)
- One Planning agent stated that additional housing schemes should not be refused if the local plan target has been met, especially if a scheme would meet local needs housing.
- Some respondents, including Helmsley Estate considered that the figure was too low and that more housing is needed to prevent the population decline, to prevent an increasingly ageing population and to ensure future economic growth in the National Park.
- Helmsley Estate further considers that the Park should not only encourage new dwellings for local people but should adopt policies which positively encourage incomers to the area.

- Some respondents suggest that by building more retirement homes that this would assist in freeing up larger family homes which would in turn help to reverse these trends.
- Helmsley Town Council agrees that 29 homes is too low a figure when there is such a national shortage of homes.
- Several respondents including a Planning agent and York Diocesan Board of Finance noted that if an average of 37 houses per annum have been successfully completed since 2008 and this has failed to halt, let alone reverse, the decline in population and the range of services available in the various settlements around the National Park, it is unlikely that a target figure of 29 housing completions per annum will do anything other than increase the tension between managing population growth and the retention of services that support sustainable communities. This will result in the decline of settlements as they become unviable and unsustainable. In this respect the respondents suggested that Option 2, which continues to meet past delivery rates since 2008, should be adopted.
- Wharfedale Homes overall comment that they are supportive of this increase but are concerned that this approach does not sufficiently respond to the housing needs of the existing community of the National Park nor is sufficiently responsive to the wider strategic context to provide for a suitably sustainable strategy. They comment that the failure of the Local Plan to address these issues now could lead to significant social and economic issues which adversely affect some of the key characteristics which help to define the qualities of the National Park. It is further commented that it remains unclear how the proposed housing requirement of 29 dwellings per year relates to the planned Woodsmith Mine, and what effect if any a failure to respond to this will have on house prices in the area. Wharfedale Homes consider that an assessment of this should be carried out ahead of the preferred options stage and that there is likely to be justification for an increase in the housing requirement above 29 dwellings per year. The exact level of this increase should be based on a reassessment of need undertaken through an addendum of the SHMA to assess the housing need required to maintain the level of active working population and families within the National Park, and have regard to the Potash Investment.
- The House Builders Federation comment that it is important that the National Park retains its vitality and places due weight upon its duty to; 'seek to foster the economic and social wellbeing of local communities'. The HBF also consider that consideration should be given to the viability of other housing scenarios, not covered in the 2016 SHMA, which seek to address this loss of working age population over the period of the plan and that a figure greater than 37dpa is required to stem population decline. The HBF conclude that the suggested figure of 29 will fail to foster the economic and social wellbeing of communities and condemn them to economic decline and to a lack of housing opportunities.
- Mulgrave Estate also agree that the figure is too low and point out that around half of the new homes are already accounted for, which does little for choice. It is further added that there is no proposed contingency should those identified/allocated sites not come forward as expected. This the Estate say could undermine the Authority's overall housing strategy and result in housing needs not being met, which would be contrary to national planning policy. The Estate comments that additional sites should be spread between Helmsley and the villages to allow for choice. The Estate further point out that receipts derived from the sale of land/property for development/redevelopment will help to fund the maintenance and preservation of the Estate's considerable number of important heritage assets. They further add that if the rate of delivery continues as it has done recently there will be very little new houses being built in the latter years of the Local Plan period, which will affect the pipeline of supply for local builders. A higher figure will help to address the population imbalance and should slow down the house and rental prices. The Estate favour

Option 2 with an increase to at least 36/37 homes per year and comment that if the Local Plan has more flexibility in terms of conversions there could be many more unused buildings that could be converted to address the need. The Estate also comment that they are interested to know if the Park and the adjoining Districts met the area's OAN and whether the current assumption that adjoining districts continue to assume that none of their identified need will need to be delivered within the Park's boundaries, is still valid as this may affect the amount of homes needed in the Local Plan.

- Helmsley Estate and a Parish Council comment that lack of employment in the Park is key to population decline and now that settlements such as Helmsley have fast broadband more opportunities should be provided for business space where working people can live and work in the area.
- Other respondents comment more generally that what is needed is smaller affordable homes for first time buyers.
- Several respondents commented that there should be more flexibility to convert redundant buildings to small dwellings for rent in preference to additional holiday lets and that better use of the existing housing stock should be considered.
- Some commented on the occupancy rates and considered that it is better to ensure that new houses are occupied as sole or primary residence as this should ensure that anyone wishing to live and work in the area can do so and some were concerned at the number of second homes in the Park.

Further comments;

- Highways England has no objection to the level of housing that is currently proposed, and has no preference for any particular type of housing as this does not affect the Strategic Road Network. If any deviations from this policy were to occur whereby a large volume of housing was proposed that could potentially generate traffic to such a level that compromises the operation or safety of the SRN, this would be of concern and an impact assessment would be required.
- Northumbrian Water recommend that the capacity of critical infrastructure, including water and sewerage services, is considered at the earliest possible stage as development proposals are considered, including consultation with infrastructure providers
- The NFU welcomes proposals to change the way local housing need is calculated, if this results in a more accurate assessment of rural housing need, and more joined-up working between local authorities. The NFU specifically asks for this process to include an assessment of the needs of the rural community, including farmer family and rural workers' needs.

**Q4 Do you agree that new open market housing development should be limited to Helmsley and not permitted in any of the Villages? If not, please give your reasons and tell us what alternative you would prefer.**

Type of respondent	Number
General Public	25
Parish/Town Councils and Meetings	14
Borough/County Council	2
Land/Planning Agents	9
Estates	2
Interest groups	6
National Agencies (e.g. Natural England)	1
<b>Total</b>	<b>63</b>

20 of the respondents agreed that open market housing should be limited to Helmsley and not be permitted in any of the villages. 24 of the respondents disagreed with the proposed policy approach and many of those who disagreed provided very detailed explanations, which are précised below. Of those who agreed with the proposed policy approach 14 stated that they agreed with no further comments, this group included 3 Parish Council, 2 non-resident respondents and 9 residents. Of the remaining supporters additional comments were provided.

- Council for National Parks stated that this approach will ensure that new housing development in the villages is delivering affordable housing required to meet local needs.
- The North Yorkshire Moors Association supports the proposed approach and states that this will restrict new housing development in villages to the kind of housing which will meet local needs, provided that Helmsley can absorb this amount of development.
- One non-resident respondent agreed on the basis that development should be concentrated in places with good services and connections, to reduce travel by private vehicles.
- A Parish Council and one resident agreed but stated that if this is where open market housing is to be concentrated Helmsley should have better facilities, additional parking and a broad retail structure to match its growing population.
- A further resident commented that high quality accessible housing for older residents should be provided to free up existing open market housing stock.
- Wharfdale Homes support the Authority's proposal to continue to allow for open market housing in Helmsley. This approach they indicate is supportive of the settlement's scale and function within the National Park and wider area, and recognises the scope and capacity for further development at this location. Wharfdale Homes question the decision not to allow further allocations in Helmsley as this would serve to extend the plan period. They state that the existing Helmsley Plan provides for a plan period of 2012 to 2027. However, the National Park Local Plan will extend this to 2035. The failure to identify further sites in the settlement through this process means that the location of new development in the settlement from 2028 will be restricted to only infill and rural exceptions sites. Wharfdale Homes state that this places a significant restraint on development in Helmsley and the capacity of the settlement to meet housing needs. They further add that this would leave a Policy gap of around 8 years. The allocation of further housing land at Helmsley will provide certainty in securing the development of housing in response to evidenced housing need, especially affordable housing this may as a result place pressure on the development of land in less sustainable locations and could see the Local Plan fail to meet housing needs in full. Wharfdale Homes query the counting of housing in Ryedale and state that a site they are promoting on Carlton Road is available, suitable and deliverable for housing now, and if allocated through the Local Plan, would be completed prior to the end of the plan period in 2035.

Those who disagreed with the proposed approach to housing tended to disagree strongly and provided very detailed comments. The general tone was that the proposed policy approach is too restrictive and curtails all open market housing outside Helmsley. It is considered by these respondents that open market development should instead be spread throughout all the villages in the Park although a high proportion of respondents considered it would be more appropriate to allow open market housing in the larger villages to meet local and family needs and this would help to support local services keeping communities sustainable and vibrant. One Parish Council and a Planning Agent point out that this mixed

approach would also allow for the viable provision of discounted local needs housing encouraging land owners to release land for housing. Respondents considered that the proposed approach would restrict the market resulting in an increase in house prices and local people will not then be able to afford them. This approach could also result in the over urbanisation of Helmsley resulting in the loss of its present character. These views were shared by Helmsley Town Council, Walkers are Welcome, one other Parish Council, 6 residents, one non-resident and a Planning agent. A further Planning agent simply stated that 'this is a recipe for stagnation' and one resident stated that this approach seems to present the idea that 'only Helmsley can be considered worth making sustainable.'

- NYCC commented that in adopting an approach which prevents open market housing in locations other than Helmsley there is the potential to contribute to the loss of essential services within the villages. The County Council would be supportive of a balanced approach which would support appropriate levels of housing within local villages where there is a need to maintain their sustainability and services and where it would not conflict with the overall statutory purpose and aspirations of the National Park. Such an approach could seek to permit limited open market housing where there is an identified need with a proportion being allocated for local needs housing. NYCC further commented in relation to school provision that the proposed hierarchy limits the opportunities for housing developments in the villages within the Park. Many of these villages have schools that are small and their finances are sensitive to reductions in pupil numbers. Falling rolls because of changing demography in rural areas, due partly to a lack of affordable housing for young families, means small schools face very tough financial challenges. For this reason the County Council also takes every opportunity to remind planning authorities like the National Parks and district councils that if village schools are to survive then communities themselves must remain sustainable through a range of housing provision.
- Helmsley Estate comments that open market housing should not be restricted to Helmsley alone. The policy should allow the opportunity to provide for open market housing where this would offer the potential to improve the vitality of settlements and the viability of the services which they contain. The Estate further comments that open market housing should be allowed in appropriate locations in villages, the Estate suggest that a policy whereby they were not permitted to be second homes could be introduced, so new housing was occupied. The Estate considers that local occupancy brings no new blood to an area and this results in communities with limited opportunities for new initiative or employment generating ideas. The Estate considers that the current LDF policy is accurately reflected by the declining population.
- A further resident similarly disagreed with the proposed policy approach and agreed that open market developments should be spread around the Park, but with a primary residence restriction. The respondent considers that this would help to keep villages economically viable. If no open market houses are allowed then the price differential between the Park and surrounding areas will only increase and this would not be a positive development as it will further distort the population of the Park.
- A Parish Council close to the Woodsmith Mine development points out that economic growth will stimulate the need for housing. Workers and their families should be encouraged to live in the National Park preferably near the mine and spend their money here, not commute from Teesside or West Yorkshire.
- York Diocesan Board of Finance and a local land owner similarly comment that in order to meet housing needs across the Park, it is essential that a variety of types and tenures of dwellings are supported during the Plan period. Restricting new homes in villages to affordable units only would limit new homes coming forward as landowners need a scheme to be viable to release land for development. York

Diocesan Board of Finance and the local land owner support a range of homes coming forward (including local occupancy dwellings) across the Park. Villages should not be restricted to affordable homes only, particularly to address the declining population since 2001 and the ever aging population present in the Park.

- A Planning agent comments that the fact that the majority of housing completed in recent years has been affordable or for local needs is seen as a successful outcome of recent planning policy, this does not however appear to have been effective in stemming the decline of local services such as schools, shops and public houses. The planning agent further comments that even though the policy of allowing cross-subsidy between open market and affordable housing is suggested to have been ineffective in promoting significant development, it should not be discarded as a tool to stimulate appropriate interest in particular locations or circumstances. It should be part of a spectrum of policies that will deliver housing creatively in locations that can accommodate development without harming the essential character of the Park.
- The House Builders Federation considers that in order to provide a balanced mix of opportunities and the potential to attract in-migrants to improve the economy and social wellbeing a more flexible approach to policy is required. Whilst the HBF considers that it appears reasonable to focus the majority of market and affordable provision within the larger settlements it is considered limited opportunities should also be provided within smaller settlements.
- Mulgrave Estate strongly disagrees with the suggested restriction of no open market housing in any of the Villages. The Estate considers that the Local Plan needs to provide choice and that the Option 2 or 3 should be adopted to allow for limited market homes in Villages, including 'starter homes' and 'build to rent' homes. The Estate comment that the Authority's stance of not allowing starter homes because only 20% of people could afford them, is not a sufficient reason not to include them in the policy and believe that there are still 20% of people who would benefit from a starter home, and if more were to be provided they are likely to become more affordable. The Estate sees merit in some market homes being tied as 'principle residence homes', on schemes where market homes cross-subsidise affordable housing but suggests it does not need to be exclusive, and a policy of allowing some open market houses, as well as principle residence houses to cross-subsidise affordable housing should be included.
- Mulgrave Estate further considers that assessing Lythe as one of the 61 'villages' is unsound and a list of the services/transport links/employment opportunities that it provides to a wide area is set out. The Estate suggests that the proposed approach is unsound and that this fundamentally undermines Lythe's current role as an important rural service centre as a result it should be categorised as a Rural Service Village at least. To do otherwise will exert a significant harmful effect on the vitality and viability of the local community over the next Plan period. The Estate considers that the Local Plan should accommodate this need by allowing the allocation of small scale market and affordable housing development within the village. Furthermore the Estate adds that the Settlement Hierarchy and supporting Policy should not predetermine that there should be no market housing whatsoever in these key rural service centres. The Estate urges that more flexibility is given to allow small scale developments within well serviced villages such as Lythe in order to provide support for the future vitality of these villages given the current ageing population within the NYMNP. The Estate believes that this will support the vitality of settlements by accommodating new families and younger people, prevent migration and result in schemes that are viable, it will also help to improve the setting of heritage assets by enabling redundant farm buildings to be redeveloped. The Estate considers that current and proposed policy is sterilising development in otherwise well serviced villages such as Lythe and this should be reassessed.

## Further comments

- Yorkshire Wildlife Trust comment that there may be some villages where larger developments will have less impact on wildlife and biodiversity and this should also be taken into account.

**Q5 Do you agree that the existing affordable housing exception site policy should be continued? If not, please give your reasons and tell us what alternative you would prefer.**

Type of respondent	Number
General Public	23
Parish/Town Councils and Meetings	14
Borough/County Council	2
Land/Planning Agents	8
Estates	2
Interest groups	7
National Agencies (e.g. Natural England)	4
Anon	1
<b>Total</b>	<b>61</b>

28 of the respondents positively agreed with the existing affordable housing exceptions policy, 6 strongly disagreed and several of the respondents suggested changes to the way the current policy operates. Those who agreed

- The CNP and the North York Moors Association stated that if exception sites were to be used for general market housing it would drive up the price of land and limit the NPA's ability to deliver the kind of affordable housing required to meet local needs and therefore supported the housing exception site policy.
- One Parish Council stated that affordable housing is critical for those poorly paid who are essential to the culture and economy of the area, support for them is important and the Authority should ensure that these needs are met.
- NYCC responded that the provision of affordable homes is a key issue across North Yorkshire and is essential in helping to support key sectors of the local economy. The new Local Plan can contribute to delivering the York, North Yorkshire and East Riding Housing Strategy, particularly by ensuring that local needs are met within the rural areas and small settlements. A significant proportion of affordable housing has been delivered through the affordable housing exception policy and the County Council would support it being taken forward in the new plan.
- The NFU states that establishing exceptions sites through the Local Plan can add certainty to the process and allow land owners to plan their businesses.
- One resident urged the construction of two storey affordable dwellings and refers the Authority to National Guidance which states that affordable homes should be the main focus, but not exclusively and that other issues such as conservation and sustainability are also key areas of concern.
- Other respondents who supported the policy suggested that exception sites should be restricted to larger villages which can support and service further development and one Parish Council stated that the Woodsmith mine should be taken into account.
- One Planning agent supported the policy but urged that occupancy should be strictly limited to local people (usually from within the Parish) and should not be to meet more general housing needs or make unsustainable provision for people with their family and social networks and employment well away from the dwelling.

A number of additional general comments were submitted relating to homes on exceptions sites;

- One Parish Council, speaking from their own experience and a separate resident agreed with the principle of exceptions sites but commented that sites on the edges of villages away from facilities and amenities can create practical difficulties and can be more difficult to socially integrate with the community. (The same Parish Council also commented that some of the IUS in their area would conflict with the future delivery of housing.)
- Walkers are Welcome comment that affordable housing, either for rent or subsidised purchase, should not mean that it is less attractive or in a less suitable area and a mixed housing development is preferable.
- One resident responded that exceptions sites should be built alongside affordable housing to secure modest developments in the larger villages to help retain schools and the future economic viability of local services. This should be a truly mixed but modest development offset by a small element of open market housing and government grant.
- A further resident states that in small villages 'affordable housing' is met with opposition, it is suggested by the resident that the definition of 'affordable housing' should encompass the small private developer who is prepared to build small houses available to rent or buy at a discounted price. The respondent considers that such developments would be more likely to meet with acceptance in small villages. On a similar point a further resident states that the proposed 100% affordable on exceptions sites is too strict and further states that housing associations and builders are not interested in small sites and these sites should also include self-build houses.

Those who disagreed made the following comments;

- Mulgrave Estate do not agree with the proposal that just 100% affordable housing schemes are the only acceptable larger schemes outside of Helmsley and believe that the Authority's reasoning for not including cross-subsidy schemes is flawed. The lack of schemes coming forward in the past should not be a reason for not including it as an option in the next Local Plan, which after all is intended to have an end date of 2036. The viability of cross-subsidised schemes could increase, if other policies in the next Local Plan are more flexible, for instance the occupancy condition policy. Furthermore the Estate comments that the next Local Plan cannot ignore the Government's emerging definition of Affordable Housing. The Estate considers that the Local Plan should include a provision to enable market homes to help cross subsidise the delivery of affordable homes; and that the Local Plan should reflect the Government's emerging definitions of Affordable Housing.

This is a key theme of several of the responses many believe that there should be the potential to provide mixed open market homes and affordable houses on these development sites.

- One planning agent agrees that affordable housing exception sites should be retained as part of a palette of policies aimed at stimulating housing provision. He further adds that it has clearly been successful in generating housing numbers but has not necessarily produced tangible benefits in terms of halting the decline of village services fundamental to the vitality and viability of settlements and communities. This viewpoint is shared by a further planning agent who believes that a better approach would be to build a range of housing types and condition and that these that these houses may not be used as the basis from which to build extensions

and therefore larger homes, in this way people will have to move as their families grow.

- One resident comments that a balanced supply of housing is needed and the current policy is skewing that balance.
- One further planning agent supports the policy but commented that it should also incorporate an allowance for enabling development (open market housing) which secures the delivery of the affordable homes.
- Scarborough Borough Council also responded in a similar way and stated that that whatever method is taken forward it should accord with the NPPF and therefore allow some form of private development where scheme viability is an issue. Viability has become an increasing issue in the development of affordable housing; especially given rural housing tends to be more expensive to develop, in the first place, for a variety of reasons. In addition, build costs have increased by approximately 30% in the last 4-5 years. Whilst the Current Thinking paper states that the 100% affordable housing policy has been working in the delivery of affordable housing in the Park since 2008, this hasn't necessarily been the case in the last 2-3 years. RP's have stated that they are struggling to deliver small 100% affordable rural schemes recently and across the whole of the sub-region, the majority of affordable housing being delivered in rural areas in now through S106 schemes rather than 100% affordable schemes. As an example of the difficulties faced, a scheme at Aislaby for 6 affordable houses had to be abandoned 2 years ago, as it simply could not be made viable even with Borough Council putting in extra money from commuted sums to support it. If 1 or 2 open market homes had to be included in the scheme, it would probably have made the scheme viable and ensured the delivery of 4-5 affordable homes to meet local housing need.
- Helmsley Estate agree that the principle of exception sites is good but there needs to be more economic sense for landowners to promote land as there is currently little incentive to bring forward land for exceptions sites.

**Q6 Do you have any views on whether we should apply local occupancy restrictions and if so on our suggested way forward? Please give your reasons or tell us what alternative you would prefer.**

Type of respondent	Number
General Public	23
Parish/Town Councils and Meetings	14
Borough/County Council	2
Land/Planning Agents	8
Estates	2
Interest groups	7
National Agencies (e.g. Natural England)	4
Anon	1
<b>Total</b>	<b>61</b>

14 of the respondents agreed with the imposition of local occupancy conditions and the suggested amendments. 7 respondents disagreed with the principle of local occupancy conditions and therefore disagreed with the proposed amendments.

Those who agreed with the imposition of local occupancy conditions include;

- The NYM Association and the CNP who consider that the restrictions are essential, with the amendments suggested, given the cost of housing in relation to average household incomes and the high demand for second and holiday homes in the

National Park. They consider that it is important that affordable housing is available for those who live and work in the area.

- One resident comments that the National Park does not need new unaffordable housing built to satisfy those who wish to retire here and a further respondent states that it should be a case of 'local homes for local people'.
- Community First Yorkshire stated that if the occupancy conditions are in place this can help sustain other local services, the retention and attraction of young families in particular might mean that the local school, shop and clubs for young people are supported.
- One planning agent suggested that local occupancy should be applied in a more sustainable way differentiating between the smaller, less sustainable villages and the larger more sustainable ones.
- Two Parish Councils and two residents support the introduction of a Principle or Permanent Residence restriction, in place of occupancy conditions in order to get local people back into local housing.

There was general agreement from those who were supportive of the imposition of local occupancy conditions for the suggested amendments to the local occupancy criteria.

- NYCC consider that the amendments will enable a more flexible approach that will assist the local labour force and more broadly support the well-being of local communities.
- Scarborough Borough Council supports the reduction to 3 years as this aligns with their proposed criteria for local connection test for self-build.
- A planning agent and the York Diocese (Board of Finance) welcome the amendments as this they state would be more flexibility to live and move around the National Park and would be more in line with other Councils/Authorities across the County.
- A further Parish Council supports the amendments.

Whilst there was general agreement from those who were supportive of the imposition of local occupancy conditions there were a number of respondents who suggested either that the criteria should remain the same or suggested further amendments;

- Two residents suggested that the current 5 year restriction should be retained and not reduced.
- One Parish Council however considers that the definition of "local" needed to be narrower than simply "someone that lives in the National Park". They favoured changing the definition to local as being within a certain distance of the parish rather than being within the National Park boundary.
- A further Parish believes that local occupancy restriction should include those who are working in towns just outside, or as in Whitby's case, totally surrounded by the National Park, who although they do not work in the National Park, they still serve the population of the Park, e.g. teachers at secondary schools in Whitby, hospital staff at Brotton and Guisborough. Those in the buffer zone should be included in the local occupancy criteria.
- A planning agent considers that the criteria discriminates against families who live in villages such as Scalby, Sinnington or Felixkirk close to the Park boundary who cannot be considered for new dwellings or conversions which might be in Hackness, Hutton le Hole or Boltby. At the same time, someone living in Osmotherley can be considered for a property in Hackness at the opposite end of the Park. He questions whether the definition of local should be within a certain distance of the property rather than within the Park boundary and further states that if occupancy conditions

are to be continued in to the Local Plan local should mean local in the true sense of the word.

- One resident considers that the criteria should be broadened to include those that have previously been employed in the National Park or those who own land together with those who have lived in the same District or County.
- Walkers are Welcome are concerned that the criteria do not encourage anyone to move into the area to meet employment needs unless they can afford the house prices on the open market and this creates an insular community. They state that if a person is working in the area surely they should be eligible.
- Mulgrave Estate acknowledge that the reduction to three years is preferable to the current criteria and state local occupancy conditions can be used as an alternative to economic reuse of redundant buildings in the open countryside or smaller villages but should not be necessary within their proposed Rural Service Centres as a blanket approach. Mulgrave Estate support the approach as a method of delivering housing for an identified local need outside of the Service Centres and larger settlements but do not believe it is necessary within the sustainable settlements as this is sterilising development and restricting the introduction of families and those wanting to live and work in the more sustainable villages such as Lythe. Mulgrave Estate generally supports the continued principle of Local Occupancy Condition in the right locations.

Those who are opposed to the imposition of local occupancy conditions disagree largely on the basis that the National Park needs to attract new people and new businesses into the area as all communities benefit from an influx of new people at some time, and restrictions should not prevent increasing prosperity in the National Park. The following comments were received;

- One resident pointed out that reviews of Local Occupancy in the UK National Parks and other places found that it did not achieve the objectives and that it restricted development and made mortgages difficult to obtain. In this regard the preferred way to reduce second homes was to adopt permanent residency or main residence which was not so unfair and restrictive of movement.
- The HBF state that the National Park is losing population and to stabilise this and maintain the vitality of the Park alternative methods of delivery are needed. They recommend that the eligibility criteria and 'cascade' allow for a flexible approach and that exceptions to local occupancy may be appropriate in certain circumstances. The HBF further state that inappropriate local occupancy criteria can create issues relating to the marketing and saleability of properties, including accessing mortgages, which inevitably have implications for site viability and delivery.
- Mulgrave Estate concur with this view and state that occupancy conditions are negatively impacting on the viability of some development schemes. The Estate further state that this approach is stifling sustainable development; and is part of the cause of some of the problems that Park is suffering from, namely the lack of lack of sufficient suitable homes particular for young people. This approach they state also makes conversions economically unviable. They consider that it should be replaced with a requirement that an appropriate proportion of new market housing should be for Primary Residences only. If retained it should not have an existing continual resident requirement and there should be no time requirement for employment i.e. those who have permanent seasonal jobs should not be excluded.

On a wider issue one Parish Council considers that local needs housing should not be restricted to infill sites. Such sites are minimal in number and availability; they alone will not fully meet the needs of the existing population. Small undeveloped but available and deliverable sites within or on the edge of existing settlements should be considered for local need housing.

**Q7 Do you agree that there should be size restrictions for new local needs housing and that large extensions should be resisted? Do you agree with the proposed limits? If not, please give your reasons and tell us what alternative you would prefer.**

Type of respondent	Number
General Public	21
Parish/Town Councils and Meetings	14
Borough/County Council	2
Land/Planning Agents	9
Estates	2
Interest groups	7
National Agencies (e.g. Natural England)	4
Anon	1
<b>Total</b>	<b>59</b>

This question was answered either jointly, covering both issues, or respondents separated the two issues out. There were 20 who supported the proposal to restrict new local needs housing to a specific size (93sqm) but 19 respondents strongly disagreed with this policy approach. With regards to the proposal to restrict the size of new extensions 16 respondents agreed with this approach and 15 disagreed. Those who agreed with both proposals concluded that restricting the size of new local needs housing and extensions will help to ensure the availability of housing of an appropriate size to meet the identified needs.

- The North Yorkshire Moors Association agreed that it is important to have size restrictions and to meet the need for smaller homes giving a range of flexibility for affordable homes.

Those who disagreed or expressed concern with both proposals considered that each application should be taken on its own merits, taking into account the character of the area, and that such a policy may impinge on lifestyles and choices and furthermore that larger extensions and larger houses will free up smaller homes as people move into them.

- Scarborough Borough Council fear that such a policy may mean that expanding families may be pushed out of the National Park over time if they cannot find accommodation or extend their home. Scarborough Borough Council suggests that the status quo of considering on an individual basis is a better option.
- One resident comments that what is needed is flexibility to reflect changing population movements, work opportunities and demographic needs, and that the NYM should not be a 'Museum'.

Specific comments were made in relation to the proposal to restrict the size of local needs dwellings.

- One resident considered this approach to be heavy handed however the overall feeling was that there should be flexibility to allow different sizes of dwellings to come forward to be accommodated by families giving them the opportunity to access suitably sized homes to meet their needs whilst staying in the National Park.
- Wharfedale Homes stated that the size of housing should not be restricted up front within the Local Plan but be based on up-to-date evidence or needs, and reflect site conditions and the character of the surrounding area.
- The Home Builders Federation commented that the Authority will need to ensure that the proposed limits do not limit the aspirations of local people, or limit the potential for new younger residents to provide or take up economic opportunities within the National Park, particularly in relation to appropriately sized family homes. It is

therefore recommended by HBF that if a policy is provided which restricts the size of local needs housing there should be some form of flexibility built in.

- Mulgrave Estate consider that the proposed policy should not be taken forward but if it is it should only be used alongside a primary residence policy in lieu of/instead of a local occupancy policy.
- One resident commented that the market needs as defined by a Parish Survey should set the size and mix to cater for families as well as young single people and older people too.
- One Parish Council did not agree with the small size of the restriction on affordable housing as this does not form an attractive settlement having all houses huddled together and this would be out of character with the settlement.
- Walkers are Welcome states that housing sizes should not be restricted and limiting the size of houses ‘leads to miserable lives, conflict, lack of hobbies and laziness.’

Turning to the proposed restriction on the size of extensions some strong views on this were received. There was a strong feeling that extensions should be determined on their own merits on a case by case basis. The following responses were received;

- One respondent states that in some cases this might mean no extension should be permitted; in other cases more than 30% might be acceptable.
- A further resident comments that large extensions to any property need to be considered against the size and scale of the host building. As such there may be nothing wrong with a large extension on a large farmhouse or detached dwelling but this would not be the case on a terraced cottage which will destroy the character of that host building. Planners should not actively seek to depress the local housing market by preventing owners from extending their properties. If there are insufficient properties of a particular size, more of them should be permitted for construction.
- York Diocesan Board of Finance and a Planning Agent conclude that it is important that the Park plans provide a mix of different sizes of dwellings in accordance with the needs identified in the SHMA and extensions can help to address the variety of need.
- Two Parish Councils comment that extensions should be flexible to allow changing family situations e.g. ‘Granny flats’ and other multi-generational needs.
- One Estate strongly disagrees and comments that design guide already controls the design of extensions successfully, and this would impose a double restriction again stating that each application should be taken on its own merits.
- One resident considers that there should be stronger restrictions.

Further comments;

- Natural England advises that design should be carefully considered for new dwellings and extensions in relation to landscape and visual impacts. The plan should set out clear policies on design in relation to landscape character.
- Yorkshire Wildlife Trust states that some areas may be less sensitive to larger developments than others due to proximity to sensitive sites.

**Q8 Do you agree that we should introduce some more flexibility to policy on conversion of rural buildings so that they don’t have to be historic and can be used for local occupancy housing? If not, please give your reasons and tell us what alternative you would prefer?**

Type of respondent	Number
General Public	25

Parish/Town Councils and Meetings	14
Borough/County Council	2
Land/Planning Agents	9
Estates	2
Interest groups	7
National Agencies (e.g. Natural England)	5
Anon	1
<b>Total</b>	<b>65</b>

37 of the respondents positively supported the introduction of more flexibility in the conversion of redundant buildings for local occupancy as they see this as a way of providing a use for a wider range of buildings and as a way of bringing forward more homes for local people. The following general comments were received;

- NYCC welcomed a more flexible approach provided there is adequate infrastructure; the development supports the needs of the community, avoids impacts on local employment opportunities and makes a positive contribution to the character and appearance of the area.
- Campaign for National Parks urges that any conversion should contribute to the special qualities of the NP and that significant alterations/extensions which would have visual impacts should not be allowed. The priority they state should be for delivering affordable housing for local people and they support conversions for owner occupation.
- Several residents and one Parish Council considered that the tourism market was saturated and that as the holiday season is short this can lead to empty properties and that therefore allowing conversions for local people at a time when population figures are declining is a better way forward.
- One resident stated that conversion for local occupancy is better than for sale on the open market as it ensures long term use for local needs.
- Many including planning and land agents who generally supported the proposed policy stated that the housing should not just be for local occupancy and that the homes should be available for sale on the open market.
- One agent commented that the local occupancy criteria are in any case too restrictive.
- One agent agreed with the local occupancy criteria and said the homes should be for those in the same parish.
- Several respondents including the York Diocesan Board of Finance, NFU, land agents and residents commented that as the cost of conversions is higher than new build the imposition of local occupancy conditions will mean that some of these conversions may not go ahead without additional funding and the buildings will deteriorate further making future conversions even more unlikely. All conversions need to be viable in accordance with the NPPF.
- The NFU further commented that homes should be available for people with local connections and those seeking work in the locality they also commented that policy should also be in line with the new Historic England advice on the repair and re-use of historic buildings. They further confirmed that they are asking the Government to change PD rights to allow tourist accommodation to be changed to rural workers dwellings and requesting that farm houses should be able as PD to be divided these measures would in their opinion help to improve the supply of rural homes.
- Mulgrave Estate supports the proposed flexibility but feel the policy is still too onerous. The policy should allow for farm buildings, whether traditional or not and irrespective of location to be converted to new homes for sale or rent, without occupancy conditions and to tourism and business uses. It should also allow for greater flexibility in terms of openings/materials to allow them to be brought back into

use. Unless more flexibility is allowed redundant buildings will be left to rot and go beyond the ability to be re used.

A number of respondents expressed concern about the proposed policy;

- Several residents, a planning agent, a parish council were of the opinion that conversions should be limited to buildings of historic merit which make a positive contribution to the National Park and that any proposal should only be allowed if the design is appropriate and traditional materials are used.
- One resident comments that conversions of Dutch barns are tantamount to rebuilding.
- One resident went further and said that this flexibility could be used to proliferate housing in the open countryside and change the character of farms and villages.
- One Parish Council commented that too much flexibility can lead to ‘planning creep’.

The following further comments were received;

- Historic England commented that a robust set of criteria will need to be set out in order to minimise the potential harm to the special qualities of the National Park and regard should also be had to the cumulative impact of such conversions on the landscape character. PD rights should also be removed to control the impact of the conversions on the landscape.
- The NYM Association commented that conversions should contribute to the special qualities of the National Park. In addition as long as priority is given to delivering affordable housing for local people they support conversions for owner occupation as well as renting.
- One resident commented that provision should be made for continued or alternative accommodation for bats, barn owls, swifts, swallows and all other wildlife.

**Q9 Do you agree with the approach to infill development that we are suggesting? If not, please give your reasons and tell us what alternative you would prefer.**

Type of respondent	Number
General Public	23
Parish/Town Councils and Meetings	14
Borough/County Council	2
Land/Planning Agents	8
Estates	2
Interest groups	6
National Agencies (e.g. Natural England)	5
Anon	1
<b>Total</b>	<b>61</b>

28 of the respondents had no objections or positively supported the amended approach to infill development mainly on the basis that it makes sense to have a more flexible policy and to make better use of some of the spaces available for infill. This approach would also result in a better mix of dwellings. Some respondents who were supportive said care was needed to ensure that development should be appropriate in terms of scale; design and open spaces should be maintained. Respondents pointed out that infill can make a positive contribution to achieving sustainable local communities and maintaining local services, facilities and economic activity.

Many of those who were not supportive of the approach considered that infilling should not be restricted by what they saw as an arbitrary, artificial, unnecessary number. Each

application should instead be determined on its own merits with the effects of the development being the key consideration. The following comments were received;

- One Estate commented that there will be instances where the infill of more than 2 homes will be appropriate and deliverable without impacting on the character of a village. In addition if the Authority is seeking to increase the amount of small homes coming forward in the Park, artificially restricting the ability of an infill site to deliver a maximum of only 2 homes may not make the best and most efficient use of available land; may render schemes unviable and may be counter-productive in terms of the aim to deliver more smaller homes. In this respect infill should be related to the size of the gap as opposed to the number of dwellings.
- A further Estate commented that there should be more potential in the larger/more sustainable settlements for a larger scheme as long as the new housing is for local needs only, these schemes should be judged on their own merits and should be developed in the most effective and efficient manner.
- The HBF concur and whilst the proposed approach is considered by them to be an improvement on the existing policy they consider that it still appears rather arbitrary and lacks the flexibility required to deal with the wide range of sites which may come forward and provide valuable sources of housing supply. The HBF further suggest that an amended definition of infill could be read 'a small gap within a continuously built up frontage within the main built-up area of the settlement'. This definition would also be more in keeping with Policy H2 of the recently adopted Helmsley Local Plan.
- Some planning/land/agents and a Parish Council consider that the designation of IUS would hinder any development opportunities on land which under any other circumstance, could help accommodate some future small scale residential development in sustainable locations throughout the Park. As such it has been suggested that these designations (IUS) and emerging housing policies are in direct conflict.

With regards to the definition of 'infill' the following comments were received;

- Historic England has commented that it will be necessary to set out a robust policy framework against which applications might be considered in order to ensure that this policy does not result in the loss of areas which ought to remain undeveloped. In this respect they consider that further Conservation Area Appraisals will be needed to assist in providing context for development proposals.
- One Land Agent also commented that infilling should include development within clusters of buildings not within just established frontages and one planning agent suggested that there are some agricultural development/building complexes where the wider community would benefit from them being developed for housing.
- One Parish Council considers strongly that there is a need for infill sites to be developed in their village with open market housing as otherwise they will not be developed.

**Q10 Are you aware of any sites that are either previously developed or 'brownfield' or where redevelopment would improve the character and appearance of the National Park?**

Type of respondent	Number
General Public	18
Parish/Town Councils and Meetings	13
Borough/County Council	1
Land/Planning Agents	9
Estates	2

Interest groups	6
National Agencies (e.g. Natural England)	4
Anon	1
<b>Total</b>	<b>53</b>

Respondents generally agreed with the Brownfield Land Register and the redevelopment of sites that are 'eyesores'. The following comments were received;

- The NFU and Land agents request that consideration should be given to including redundant farmyards on the BLR and to the redevelopment of land adjacent to farmsteads for exceptions housing to increase opportunities for development in rural areas. They further state that many farmsteads are empty and not fit for modern agricultural purposes and whilst not aligning with the definition of brownfield land they are opportunities to improve the appearance of the National Park. The Local Plan needs more flexibility to allow the conversion of these buildings to housing (primary residence), tourism and business uses. Not all conversions can be for business use and some flexibility is needed.
- One Parish Council stated however that development of any 'brownfield' or agricultural building site must be appropriate.
- A further Parish Council requested that each Parish Council should be able to review its own housing needs to maintain a thriving community, development should be an important part of this whether brownfield or greenfield land.
- One Parish Council suggested that the time limit for commencement of development on planning permissions should be reduced to 2 years and then reduced to one year then be totally removed.
- A separate Parish Council commented that some of the potential redevelopment sites have been identified as Important Undeveloped Spaces without consultation and the knowledge of the land owners.
- Specific sites/land has been identified by Parish Councils, individuals and land agents identified as brownfield land in the following locations; Osmotherley, Coxwold, Ingleby Arncliffe, Battersby, Castleton, Fylingthorpe, Faceby, Goldsborough, Boltby, Sneaton, Egton, Hinderwell, Glaisdale, Lealholm, Egton, Castleton all of which could be re used for housing, business uses, car parking or community uses.

**Q11 Do you agree with the types of land that we are proposing to identify as 'Community Spaces? If not, are there any types that you would like to see added or removed?**

Type of respondent	Number
General Public	24
Parish/Town Councils and Meetings	19
Borough/County Council	2
Land/Planning Agents	8
Estates	2
Interest groups	7
National Agencies (e.g. Natural England)	5
Anon	1
<b>Total</b>	<b>68</b>

There was broad agreement for the identification of Community Spaces with 26 of the respondents stating their positive support for the approach and agreement for the types of

land. Some requested that school playing fields, village halls, land adjacent to footpaths, registered common land, wooded areas adjacent to villages and the Cinder Track should also be included. The following comments were received;

- Yorkshire Wildlife Trust commented that areas which are important for biodiversity should be included and an individual also requested that sites that act as community nature reserves should also be included.
- Natural England stated that the designation and protection is welcomed as green spaces are important and these areas could have multifunctional opportunities for recreation, preserving landscape character and biodiversity.
- Community First Yorkshire commented that narrow strips of land either side of public footpaths could be included within Community Spaces to retain 'views' and to widen access, create space for seating and for maintenance purposes, They further state that footpaths are part of Pathways to Health initiatives taking place across the county and an increase use of paths can be anticipated.
- NYCC confirmed that access to open space is important for public health and community well-being.
- Some Parish Councils and individuals requested the addition of extra designations on specific sites in Battersby Junction, Carlton in Cleveland, Cloughton, Coxwold, Egton, Ingleby Greenhow, Levisham, Osmotherley, Staithes, Thornton le Dale, Wass,
- Some respondents requested that the following types of land should not be included; private gardens, schools or school playing fields, agricultural land, land used as a pet cemetery.
- A Parish Council pointed out that some flexibility may be needed with playing fields as a sport facility may no longer be needed in the future.
- There was strong opposition to the inclusion of private allotments and facilities that are available by private arrangement between a land owner and a sports club.
- One respondent queried why spaces outside the National Park mentioned when these are beyond the control of the Authority.
- Sport England provided detailed comments on the need for the policy approach to protect, enhance and provide sports facilities based on need.
- A Land agent commented that care should be taken as landowners may be reluctant to offer other sites in the future for community uses if the land is to become sterilised in the future for any other purpose.
- One individual considered that some of the sites could be redeveloped to enhance the character and appearance of the National Park and that some of the spaces identified could be redeveloped and good design and landscaping could enhance their appearance. Car parks for residents and visitors could be created in these areas. Protecting all the spaces within villages means that the only way a village can developed is through an extension beyond its limits which is less desirable. These areas should not be a 'no go' for development and a neighbourhood plan is needed with gradual release of sites and this should not be restricted by designation.

**Q12 Do you support the identification of Important Undeveloped Spaces? Do you have any views on the criteria we have used or whether others may be more suitable?**

Type of respondent	Number
General Public	29
Parish/Town Councils and Meetings	21
Borough/County Council	3
Land/Planning Agents	10
Estates	2

Interest groups	6
National Agencies (e.g. Natural England)	5
Anon	1
<b>Total</b>	<b>77</b>

There was general support for the proposed policy with 33 of the respondents supporting the approach and the spaces identified. Overall those who were in support thought that this policy will ensure that the Park's special character is not harmed. The following comments were received;

- Historic England supports the proposed approach and the criteria that will be used to identify Important Undeveloped Areas. The inclusion within the Local Plan of a policy framework to safeguard such areas will help to ensure that this element of the Park's special character is not harmed.
- Natural England welcomes the criteria.
- Several respondents made the point that open spaces are an important aspect of any built environment and that this policy will help to ensure that these areas are properly defined and relevant to the community.
- One Parish Council requested that consideration be given to an additional space being designated as an IUS or CS.
- One individual commented however that care must be taken so as to avoid a presumption that land undesignated as Important Undeveloped Spaces has less protection from development.
- Yorkshire Wildlife Trust stated that an additional criterion could be added if the space is important for providing connectivity for wildlife and Green Infrastructure in the settlement.

Some respondents (11) however, including some individuals and land agents/planning agents strongly objected to the approach as they considered the approach will rule out most potential development sites and it is effectively a 'blanket ban' on any infill development. The following general comments were received;

- The designation seems inconsistent, arbitrary and open to interpretation and subjectivity.
- The current Local Development Framework approach, where each application is considered on its own merits, is sufficient and there are enough current safeguards to manage inappropriate development.
- Individuals and land/planning agents considered that protecting spaces for their openness alone runs the risk of eliminating opportunities to positively enhance the character of settlements and maintaining thriving communities with affordable housing.
- The approach could also result in pushing development further out to the edges of settlements and this was not thought to necessarily be the best option.
- A number of respondents considered that some of the spaces identified should be developed carefully with appropriate landscaping and creative design and that this would have a more positive impact than the retention of an open space.
- Scarborough Borough Council and a Parish Council considered that some of the IU Spaces should be developed for affordable housing.
- The NFU indicated that some land owners are concerned about the impact of designations on their businesses.
- Several respondents, including several Parish Councils strongly requested that consultation should have taken place with land owners before spaces were identified.

- Specific objections were received from Land agents/Borough Council/Parish Councils and individuals to IUS in Carlton in Cleveland, Castleton, Egton, Fylingthorpe, Ingleby Greenhow, Helmsley, Lockton, Lythe, Sneaton.

### Q13 Have we identified the right areas? Have we missed any?

Type of respondent	Number
General Public	18
Parish/Town Councils and Meetings	13
Borough/County Council	1
Land/Planning Agents	5
Estates	0
Interest groups	3
National Agencies (e.g. Natural England)	2
Anon	1
<b>Total</b>	<b>43</b>

9 of the respondents confirmed that right spaces had been identified, 2 stated that the spaces were not right.

- There were several requests from individuals and Parish Councils for additional Important Undeveloped Spaces to be designated in Egton, Coxwold, Oswaldkirk, Eskdaleside cum Ugglebarnby, Aislaby, Ravenscar, Lastingham.
- Two members of the public, three including the one in question 12 above considered that the Cinder Track should be identified as an IUS so that its natural beauty and recreational value is protected from development.
- One respondent stated that wider views over the Park should be included like the views from Sutton Bank. One Parish Council requested that Village Halls should be included as Community Spaces.

### Further Comments

Type of respondent	Number
General Public	19
Parish/Town Councils and Meetings	11
Borough/County Council	1
Land/Planning Agents	8
Estates	2
Interest groups	6
National Agencies (e.g. Natural England)	6
Anon	1
<b>Total</b>	<b>54</b>

Respondents used this part of the questionnaire to reinforce their overall comments and provide further comments on a number of new topics and the following comments were made;

- The Coal Authority states that at this early stage they have no specific comments to make but wish to continue to be consulted. Highways England states that it has no particular concerns regarding the proposed housing policies as the total number of dwellings proposed is a relatively low number when considering the vehicle trip generation from these dwellings in relation to the capacity of the Strategic Road Network that serves the National Park and their spatial distribution will minimise traffic implications at a single location. Even taking into account the number of dwellings in Helmsley due to the anticipated vehicle trip generation from these and

the distance from the first point of contact with the Strategic Road Network, it is anticipated that this will not be a significant issue for Highways England. Should any changes to this policy be proposed which would potentially generate traffic to such a level that compromises the operation or safety of the SRN, this would be of concern and an impact assessment would be required.

- NYCC (Strategic Policy and Economic Growth) refer to the Council Plan 2017-21 which sets out the key ambition that 'North Yorkshire is a place with a strong economy and a commitment to sustainable growth that enables our citizens to fulfil their ambitions and aspirations.' NYCC set out their priorities which include;
  - Creating high quality places and increased housing provision – in partnership with District Councils, National Parks, Local Enterprise Partnership and Local Nature Partnership – by supporting the delivery and development of housing and employment sites, and the regeneration of town centres;
  - Enhancing the environment and developing tourism and the green economy – by promoting and improving the county's environmental, ecological and heritage assets to deliver a high quality natural and built environment, and by supporting low carbon energy generation and the development of economically, socially and environmentally sustainable local communities.

NYCC state that the National Park is a key asset for North Yorkshire not only in terms of the environment and natural capital but for the contribution it makes to the local economy through tourism, recreation and leisure. NYCC also comment that working on a catchment basis enables natural capital solutions to be delivered within the Park which have the potential to mitigate flooding issues and increase resilience of places, communities and economies further downstream. NYCC look forward to further opportunities to engage as the Plan progresses.

- Community First Yorkshire (CFY) request that that the Local Plan should take account of a number of changes and opportunities across the Park and give examples of the use of ICT in health and wellbeing support and installation of ICT communication in homes and communities, measures to help sustain and bring services to settlements, enterprise growth and home working opportunities. CFY also state that the consultation makes no reference to meeting the needs of older people, climate change, rural deprivation and the extra costs of living in a rural area. CFY also comment that the 3 tier hierarchy should be a basis for sustaining and developing the integration of services, and the National Park should consider what steps and procedures the National Park can take, working with local authorities and town and parish councils, to work with providers of facilities in 'local service centres' to ensure they are retained and sustained. The National Park is asked to Rural Proof the plans in accordance with the Government's Rural Proofing policy paper.

New topics raised by respondents related to the nature of the consultation process, the planning service, fracking, tourist accommodation, Botton, the Cinder Track, further general housing comments, the possible allocation of land in Swainby adjacent to the Caravan Park for housing, the splitting of villages with the Park boundary and other local issues. The following very briefly summarizes these issues;

- Consultation process – Two residents and one Parish Council considered that there was insufficient time given to read and respond to the consultation particularly given the length of the on line documents, one resident considered that some of the documents were biased in terms of the focus on affordable housing and two residents considered that the document was not published widely enough. One Parish Council felt that the questions were difficult to address and they were not able to reach a consensus as such individual councillors were asked to respond individually. One Parish Council considers that the proposed policies are a subtle relaxation of planning regulations and that the consultation exercise is being used as

a rubber stamp to justify the predetermined positions of the NYMNP. One resident wished to congratulate the Park on the quality of the documentation.

- Planning service – The NFU asks that the Authority ensures that planning departments and statutory consultee services are sufficiently resourced to promptly deal with planning applications and offer quality pre-application advice. The NFU would recommend that pre-application fees should be deducted from a future planning application cost to encourage this to inform the planning application process.
- Fracking – A number of respondents stated that fracking is the biggest threat to the Park's economy, flora and fauna and should be dealt with robustly. Respondents stated that it should not be allowed in the Park or in the surrounding area. FFR look forward to the opportunity to comment further in the following stages of consultation.
- Tourist Accommodation – One resident/business owner comments that there should be no more caravans/log cabins and prefab homes allowed as these are not sustainable have a limited lifespan and are detrimental to the landscape. Any new buildings should be of traditional materials. The respondent considers that there should be more housing attractive for the full spectrum of buyers and this would be better for the local economy.
- Botton – One resident responded that Botton is not specifically mentioned and assumes that it is to be considered as 'Open Countryside'. Given recent changes the respondent considers the lack of any special policy consideration to be appropriate.
- The Cinder Track – One non-resident requests that the Cinder Track be included in the Plan so that its potential as a recreation, educational and environmental resource may be realised.
- General housing comments - A number of respondents reaffirmed the need for housing for the elderly, stressed the importance of maintaining the viability of rural communities, and requested measures to reduce second homes, increase opportunities for generating employment in the larger settlements and to create spaces for people to work at home with increased use of ICT and the digital economy thereby reducing the need to travel. One resident states that permanent residency is preferred by mortgage companies in preference to local occupancy.
- Land at Swainby adjacent to the Caravan Park – One planning agent requests that an area of land adjacent to the Caravan Park in Swainby be considered suitable for housing development as in his opinion the land appears to be in accordance with housing objectives being relatively affordable, having minimal impact on the character of the village/National Park and it would specifically contribute to the supply of a much needed form of housing for occupancy by the over 45/50s at a time when there is a great need to increase the supply of such properties. The Planning agent states that there should be acknowledgment of residential mobile homes by way of Clause 124 of the Housing and Planning Act 2016 which recognises such units as having a role in contributing towards the supply of housing.
- Additional localised comments – One resident questions why some villages are split with the National Park boundary, meaning that different policies apply. Villages should be either in or out the National Park. One resident comments that Sleights' butchers and bakers have been missed from the list of facilities. One Parish Council questions whether an IUS should be within the Conservation Area and a further Parish Council query the correct name for a dwelling in the village. One resident expressed concerns regarding increased traffic and increased commercialisation of shooting in the Park.

**If you would like further information, please contact us:**

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The text of this document can be made in large print. Please contact the Planning Policy team using the contact information above.



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