

LIST OF CONSULTEES

Government Office for Yorkshire & the Humber
English Heritage
Countryside Agency
Environment Agency
English Nature
North Yorkshire County Council (Environmental Services)
North Yorkshire Health Authority
Transco
Yorkshire Forward
Strategic Rail Authority
NEDL YEDL
Northern Utilities
YEB
Yorkshire & Humber Regional Assembly
Harrogate Local Strategy Partnership
Nidderdale AONB
North Yorkshire County Council (Social Services)
North Yorkshire County Council (Education Services)
Hambleton District Council
Selby District Council
Ryedale District Council
Leeds City Council
Richmondshire District Council
Bradford City Council
Scarborough Borough Council
City of York Council
Craven District Council
Yorkshire Dales National Park
North York Moors National Park

CONSULTATION RESPONSES TO SITE ALLOCATIONS SCOPING REPORT

Topic	Comments	Response and Recommendation												
English Nature Appendix 2 (Baseline Data)	<p>The area of SSSI quoted in Section 8 is incorrect. The correct Area is 25,041ha. Similarly condition data for the SSSI's is omitted from section 8. It is recommended that the following information is included:</p> <table style="margin-left: 40px; border-collapse: collapse;"> <tr> <td style="padding-right: 20px;">Favourable</td> <td style="padding-right: 20px;">1,179.30ha</td> <td style="padding-right: 20px;">6.11%</td> </tr> <tr> <td>Unfavourable/Recovering</td> <td>7,719.67ha</td> <td>40.03%</td> </tr> <tr> <td>Unfavourable/No change</td> <td>9,804.54ha</td> <td>50.84%</td> </tr> <tr> <td>Unfavourable/Declining</td> <td>583.07ha</td> <td>3.02%</td> </tr> </table> <p>An obvious issue arises is that Harrogate has a large area in unfavourable condition and a very small proportion in favourable condition. The amount recovering is 40% so the trend is slightly above the national/regional average but from a low base.</p>	Favourable	1,179.30ha	6.11%	Unfavourable/Recovering	7,719.67ha	40.03%	Unfavourable/No change	9,804.54ha	50.84%	Unfavourable/Declining	583.07ha	3.02%	<p>AGREED. When the Scoping Report was published data was not available at the District level in respect of the condition of SSSI and reference instead was made to the picture at the County level. It is agreed that this section should be revised to include the condition information for Harrogate. It is further agreed that reference should be made to the condition of SSSIs in the District as a sustainability issue. The following issue should be referred to '<i>A large area of SSSIs is in an unfavourable condition with only a very small proportion in a favourable condition</i>'</p> <p>This issue was not raised during the consultation on the Core Strategy Scoping Report, nevertheless the issues have also be referred to in the appraisal of the Core Strategy</p>
Favourable	1,179.30ha	6.11%												
Unfavourable/Recovering	7,719.67ha	40.03%												
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Appendix 4 (Section 8 Objectives)	<p>Recommend that the first bullet point is not restricted only to priority habitats. Suggest deleting the word "priority"</p>	<p>Noted. The wording of the objectives is taken from the Regional Sustainable Development Framework. Whilst reference in the objective is made to priority habitats, the scope of the objective is widened by reference to 'long term management of wildlife habitats'. It is considered that this allows for the appropriate consideration to be given to habitats and species.</p>												
Appendix 4 (Section 8 Indicators)	<p>Recommend that the indicators "number/area of nature conservation site" and "area of woodland coverage" could be refined. It is suggested that the indicators are revised as follows:</p> <ul style="list-style-type: none"> • Net gain/loss of habitat, especially SINCs and ancient woodland, due to planning • Area of native woodland (rather than just woodland and/or area of native woodland within a grant scheme) <p>Suggest an additional indicator in relation to green space:</p> <ul style="list-style-type: none"> • Area of green space within xx distance of xx population 	<p>Loss of habitat due to planning is not currently monitored. It is, however recognised that more monitoring of the natural environment would be useful. An indicator on the change in habitats and species is being proposed as part of the overall monitoring framework (Refer to Core Strategy Sustainability Appraisal Report) but further work is required to put in place procedures to monitor this information. Information is now available for native woodland and this will be included in the Sustainability Appraisal Report.</p> <p>Reference was made in the baseline information to this type of indicator under objectives 2 and 5. An indicator on open space is being proposed as part of the overall monitoring framework (Refer to Core Strategy Sustainability Appraisal Report) but further work is required to put in place procedures to monitor this information. It is anticipated that work on the revised open space SPD will help to facilitate the provision of this information.</p>												

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<p>Paul Sharpe Associates (Acting for Tesco Stores Ltd) Appendix 3 (pg 36)</p>	<p>Reference to PPG6 in this section needs to be revised to reflect the publication of PPS6 Town Centres and Retail Development. Now the Government's objectives for town centres can be summarised as follows:</p> <ul style="list-style-type: none"> • Planning for growth and development of existing centres • Promoting and enhancing existing centres, by focussing development in such centres and encouraging a wide range of services in a good environment, accessible to all • Enhancing consumer choice by making provision for a range of shopping, leisure and local services, which allow genuine choice to meet the needs of the entire community, and particularly socially excluded groups • Supporting efficient, competitive and innovative retail, leisure, tourism and other sectors, with improving productivity • Improving accessibility, ensuring that existing or new development is, or will be, accessible and well served by a choice of means of transport <p>It is suggested that the "implications for the DPD" is to: "Provide a policy framework that promotes the vitality and viability of town centres and is inclusive, enhancing consumer choice by improving accessibility to existing and new development at a local level, well served by a choice of means of transport"</p>	<p>AGREED. It is the intention that the policy review section will be re-examined during the Sustainability Appraisal to ensure that it reflects the most up to date and relevant policy documents. An up dated policy review section will be set out in the Sustainability Appraisal Report to be published along side the Preferred Options Report.</p>
<p>Countryside Agency General</p>	<p>Overall it is considered that the Scoping Report is generally fit for purpose.</p>	<p>Noted</p>
<p>Section 2.32</p>	<p>The environmental/landscape information should identify as an issue access to the countryside from towns or links to the countryside via Green Infrastructure Corridors</p>	<p>AGREED. Identify in the Sustainability Issues table the following as an issue : 'Access to the countryside from towns or links to the countryside via Green Infrastructure Corridors'</p>
<p>Appendix 2 (Baseline Data)</p>	<p>Green Infrastructure Corridors and walking/cycling routes (including rights of ways and bridleways) should be included as indicators under the Culture, Leisure and Recreation objective</p>	<p>The existing proposals map already maps a number of features which contribute to Green Infrastructure (eg SSSI, Locally important sites, green corridors etc) and this approach will continue. In addition the Council is currently mapping the following open space types:</p> <ul style="list-style-type: none"> - Parks and Gardens; - Natural and Semi-Natural Greenspaces including urban woodland (e.g. wildlife areas etc); - Amenity Greenspace; - Outdoor Sports Facilities;

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		<p>- Provision of Children and Young People (e.g. playgrounds, teen play areas);</p> <p>- Allotments, community gardens and urban farms;</p> <p>- Cemeteries, disused churchyards and other burial areas</p> <p>Once this information has been mapped this will provide data on the current state of green infrastructure but further work is required to put in place procedures to monitor this information.</p> <p>Cycling routes is included in the baseline data under the transport objective and it is considered repetitive to also include it under Culture, leisure and recreation. An indicator on the availability of the cycle network is being proposed as part of the overall monitoring framework (Refer to Core Strategy Sustainability Appraisal Report) but further work is required to put in place procedures to monitor this information.</p>
Appendix 2 (Baseline Data)	Additional indicators should be considered relating to countryside quality and access to and recreation in the countryside eg Lengths of new Green Infrastructure Corridors; new or improved walking and cycling routes and paths; Countryside changes relating to Countryside Quality Counts indicators; PROW standards regarding signage etc	Noted. A single monitoring framework is being developed to encompass the various documents being prepared as part of the Harrogate LDF, focussing on the key issues facing the District. The suggested monitoring framework is set out in the Core Strategy Sustainability Appraisal.
English Heritage General	Overall the Scoping Report sets out the basis of an appropriate framework against which to assess the likely impact of the proposed DPD in respect of the historic environment	Noted
Appendix 2 (pg 27)	<p>As the Borough has one of only two World Heritage Sites in the Region then consideration should be given to an indicator along the following lines:</p> <ul style="list-style-type: none"> Impact of change on the character, appearance or setting of the World Heritage Site <p>In addition, as Harrogate contains 3 of the 7 Registered Battlefields in Yorkshire the following should also be considered:</p> <ul style="list-style-type: none"> Loss or damage to the character or setting of a Registered Battlefield 	These indicators are being proposed as part of the overall monitoring framework (Refer to Core Strategy Sustainability Appraisal Report) but further work is required to put in place procedures to monitor this information.

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Appendix 3 (pg30)	<p>For completeness the objectives contained within the following should also be reviewed:</p> <ul style="list-style-type: none"> UNESCO World Heritage Convention European Spatial Development Perspective The Government statement “<i>The Historic Environment: A Force for our Future</i>” (DCMS 2001) 	<p>AGREED. It is the intention that the policy review section will be re-examined during the Sustainability Appraisal to ensure that it reflects the most up to date and relevant policy documents. An up dated policy review section will be set out in the Sustainability Appraisal Report to be published along side the Preferred Options Report.</p>
<p>Environment Agency</p> <p>Section 2: Para 2.16-2.19</p>	<p>Reference should be made to the rivers that drain throughout the District and to the flood risk they present, as well as the opportunities, as this will be a major consideration in the determination of major allocations. The timescale for the completion of the SFRA should be clarified as this is an essential tool to be used to enable the PPG25 sequential test to be carried out prior to the allocation of sites.</p> <p>Reference should be made to the number of SINCs in the District.</p>	<p>AGREED. It is recommended that an additional paragraph is added at the end of this section to read: <i>Harrogate District includes several areas with known flooding issues from both fluvial and drainage sources. These include Masham, Shaw Mills, Bishop Monkton, Ripon, Boroughbridge, Roelcliffe, Knaresborough, Castley, Pateley Bridge, Hunsingore, Cattal, Ferensby and Scotton. The District Council has recently undertaken a Strategic Flood Risk Assessment and this will help to inform the overall development of the LDF including the Major Allocations DPD</i></p>
Appendix 2 SA Objective 11	<p>Reference is made to development on floodplains but provides no data. This could be monitored using flood zone maps, planning application forms, submission of flood risk assessments with planning applications and then number of applications where the Agency have been overruled by the LPA where an objection was lodged on flood risk grounds</p>	<p>Development in floodplain is not currently monitored. It is, however recognised that monitoring this type of information would be useful. An indicator on developments in floodplains is being proposed as part of the overall monitoring framework (Refer to Core Strategy Sustainability Appraisal Report) but further work is required to put in place procedures to monitor this information.</p>
Appendix 3	<p>Suggest that the following should be include: <i>Groundwater Directive (80/68/EEC)</i> – the key objective of this is to protect the quality of groundwater by preventing the discharge of List I substances to groundwater and limit the discharge of List II substances so as to avoid pollution. This is to ensure that future development does not result in unacceptable discharges to groundwater.</p> <p><i>River Ouse Flood Risk Management Strategy</i> – At the local level the Agency is currently carrying out the “Ouse Strategy” which will be out for public consultation at the end of 2005. In addition the Agency will also be looking to start a Catchment Flood Management Plan for the Ouse. The purpose of the strategy is to take a strategic look at reducing flood risk for all communities in the Ouse Catchment and its findings should be taken into account when developing LDF policies.</p> <p>The Swale, Ure, Nidd and Upper Ouse Catchment Abstraction Management Strategy – This provides details of how the Agency will</p>	<p>AGREED. It is the intention that the policy review section will be re-examined during the Sustainability Appraisal to ensure that it reflects the most up to date and relevant policy documents. An up dated policy review section will be set out in the Sustainability Appraisal Report to be published along side the Preferred Options Report.</p>

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Pg 12 (Sustainability Issues)	<p>manage water resources for these catchments. The purpose of the strategy is to ensure a sustainable level of water abstraction to meet the needs of the environment, economy and water users both now and in the future.</p> <p>The issues of flooding and preventing inappropriate development on floodplains should be included. In addition the Agency is aware that problems exist with the dissolution of gypsum and the presence of radon gas within the District which should be taken into consideration in the Allocations DPD. These issues should be included in the environment section of the table. The environment section should also make reference to Nitrate Vulnerable Zones which have been created due to changes in agricultural practices.</p>	<p>AGREED. Certain areas of the District are affected by flooding and as noted above and this should be reflected in the issues section. Parts of the Ripon area are affected by the dissolution of Gypsum. Suggest the following wording:</p> <p><i>Issue: Certain areas of the District experience flooding problems from fluvial and drainage sources. Implications for DPD: The Allocations DPD should seek to avoid inappropriate development in areas of flood risk and on floodplains.</i></p> <p><i>Issue: Gypsum related subsidence in the Ripon area. Implications for DPD: Need to ensure that land allocations do not place development in unstable locations without appropriate precautions</i></p>
Appendix 4	<p>The Agency recommends that there should be a new sustainability appraisal objective that relates to flood risk, which could be worded as follows: <i>“Reduce the risk of flooding to people and property”</i>. The Agency suggests that although the issue of flood risk is included within SA objective 11 it is not immediately clear that minimising greenhouse gas emissions and a managed response to the effects of climate change is relating to reducing the risk of flooding.</p>	<p>The aims and objectives of the Sustainability Appraisal have been taken from the Regional Sustainable Development Framework, a position supported by the majority of respondents to the Issues Consultation (Summer 2004). The issue of flooding is covered under SA Aims 11 and 14. Sustainable Urban Drainage is also covered under aim 14. It is considered therefore that the issue of flooding is adequately covered within the Appraisal</p>
Hallam Land Management		
General	<p>In applying sustainability appraisal to evaluate different sites care must be taken to ensure that a consistent approach is adopted. Unfortunately the Scoping Report remains silent on how any positive or negative effects or mitigation measures will be weighted within the appraisal. It would be helpful to know how the different aspects of sustainability appraisal will be weighted and that weighting applied in the decision making process. The Scoping Report should therefore include reference to the need to apply weighting to the various impacts of the development proposal options be they negative or positive and how the balance is changed by mitigation, thereby making the process more objective.</p>	<p>It is agreed that it will be important to take a consistent approach to the appraisal of different sites. It is acknowledged that guidance in “Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents” notes that <i>‘in principle, weighting and scoring can also be used to clarify the decision making process, by making explicit the preferences decision-makers place on different objectives’</i>. In making the assessment of sites proposed for major allocations it is proposed that no weighting will be given to any of the Sustainability Appraisal objectives. It is considered that this simplified approach does, provide an indication of those options that perform better in sustainability terms. It is not the role of the Sustainability Appraisal to determine the option(s) to be chosen as the basis of the preferred options. This is the role of those who have to decide which strategy is appropriate. Sustainability Appraisal can assist in the decision making by indicating the sustainability implications of each option and by putting forward recommendations for improvement.</p>

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<p>A.R.A. Dearing General</p>	<p>References within the Scoping Report to 'affordable' housing is an irrelevance within the context of the large numbers of high earners who live in Harrogate and thereby keep house prices high. The Council should be aware that there is no shame in Harrogate being an upmarket dormitory town. There is no reason therefore to try and turn Harrogate into an industrial/business centre.</p>	<p>Noted</p>
<p>Transport</p>	<p>The transport infrastructure over most of the District is a disgrace. Harrogate urgently requires a ring road and the railway line is deliberately under-funded. Harrogate is a Victorian town through which run the A59, A61 and A661, all three of which are busy highways. Any alterations to traffic flow in the town are merely sticking plaster solutions to a much bigger problem. Traffic levels could be reduced by increased investment in the rail infrastructure. Harrogate District needs (a) a huge infrastructure and rolling stock upgrade and possible electrification of the Leeds-Harrogate-York rail line and (b) a rebuilt Harrogate-Ripon line.</p>	<p>Noted. Issues of transport and accessibility will be covered in the Core Strategy Development Plan Document</p>
<p>Sport England Baseline Information (Population)</p>	<p>The Scoping Report indicates that there will be an absolute growth in population over the Plan period as a result of inward migration. It will be important to link proposals and projections through to any PPG17 assessment. It should also be related to the SPD on Open Spaces. This is important in the context of major land allocations, where it will be important to ensure the appropriate levels of open space and to ensure that the capacity of built facilities is sufficient to meet these needs or that land should be set aside to accommodate new facilities</p> <p>In terms of sport and leisure industry there are a number of issues that may be important to consider: Major Events Strategy (Sport England & RDA) Has the document identified any major capital developments and the potential for work place learning with the Learning Skills Council Has the document considered how it could meet the objectives of the White Paper on Health North Yorkshire Extreme Sports Strategy is also being developed Dept of Health is soon to produce the Physical Activity Framework. Performance indicators and targets will be developed</p>	<p>Noted. The Council is currently preparing a new SPD on Open Space which will set local standards for the provision of open space in accordance with advice set out in PPG17.</p>
<p>Baseline Information (Education, Skills & Training)</p>	<p>In terms of sport and leisure industry there are a number of issues that may be important to consider: Major Events Strategy (Sport England & RDA) Has the document identified any major capital developments and the potential for work place learning with the Learning Skills Council Has the document considered how it could meet the objectives of the White Paper on Health North Yorkshire Extreme Sports Strategy is also being developed Dept of Health is soon to produce the Physical Activity Framework. Performance indicators and targets will be developed</p>	<p>Noted. It is the intention that the policy review section will be re-examined during the Sustainability Appraisal to ensure that it reflects the most up to date and relevant policy documents. An up dated policy review section will be set out in the Sustainability Appraisal Report to be published along side the Preferred Options Report.</p>
<p>Other Plans and Programmes</p>	<p>North Yorkshire Extreme Sports Strategy is also being developed Dept of Health is soon to produce the Physical Activity Framework. Performance indicators and targets will be developed</p>	<p>Noted. It is the intention that the policy review section will be re-examined during the Sustainability Appraisal to ensure that it reflects the most up to date and relevant policy documents. An up dated policy review section will be set out in the Sustainability Appraisal Report to be published along side the Preferred Options Report.</p>

<p>Topic</p>	<p>Comments</p> <p>There appears to be gaps in the level of information in the Culture, Sport and Leisure section in terms of targets and indicators from both national and regional documents:</p> <ul style="list-style-type: none"> Game Plan (national government) 1% increase in sport until 2020 Yorkshire Plan for Sport (Sport England) – targets and indicators for sport and activity Progress in the Region 2005 (Yorkshire Futures) CPA targets and indicators – accessibility and footpaths may be of specific interest Active Places Power website – a strategic planning tool with data on facilities per 1000 population. Sport England Yorkshire Participation Survey Active People Survey (data available for Harrogate Nov 2006) 	<p>Response and Recommendation</p> <p>Noted. It is the intention that the policy review section will be re-examined during the Sustainability Appraisal to ensure that it reflects the most up to date and relevant policy documents. An up dated policy review section will be set out in the Sustainability Appraisal Report to be published along side the Preferred Options Report.</p>
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