

HARROGATE DISTRICT LOCAL DEVELOPMENT FRAMEWORK:

Sites & Policies DPD: Sustainability Appraisal: Scoping Report: Summary of Consultation Responses from 4th December 2009 – 15th January 2010.

Respondent / Topic	Summary of Response	Officer Response
Broadway Malyan		
Table 3.1	<p>The table identifies key sustainability issues. One issue identifies access to services as a local concern. The responding 'Implication for LDF' explains that,</p> <p style="padding-left: 40px;">'Need to promote development that contributes to socially inclusive communities and to seek to locate new development in locations which are accessible for all to jobs and services.'</p> <p>We suggest acknowledging the benefits of larger scale sites and the ability to accommodate community facilities as part of a mixed use scheme. As such we recommend the following addition,</p> <p style="padding-left: 40px;">'... or have the ability, through their scale, to accommodate new jobs and services that will add value to the host settlement.'</p>	<p>Table 3.1 'Sustainability Issues' represents a preliminary stage of identifying Sustainability Issues, our responding 'Implication for LDF' would not, at this early stage, be required to include exceptions that would apply to some sites. Situations where large sites may have the ability to incorporate community facilities as part of a mixed scheme will be considered in Appendix 4 Assessment Rationale.</p>
English Heritage		
General	<p>In terms of the historic environment the scoping report has identified the majority of plans and programmes, established appropriate baseline information and a reasonable set of objectives to monitor the likely significant effects.</p> <p>We therefore consider that it sets out an appropriate framework to assess the likely impact of the policies and proposals upon the historic environment.</p>	Noted.

	General	Advise that the Council's conservation staff and County Heritage Unit need to be closely involved in the preparation of the SA. This is to utilise knowledge on local historic environmental issues, data, minimising potential adverse impacts and possible mitigation measures.	The Council's Conservation and Design Team have been involved in providing information to support the production of the SA.
	Para 3.2 & Appendix 2	For completeness the following should be added to the list of other strategies, plans and programmes. <u>International & European Context</u> <ul style="list-style-type: none"> • UNESCO World Heritage Convention • European Landscape Convention <u>Local Context</u> <ul style="list-style-type: none"> • Fountains Abby/Studley Royal World Heritage Site Management Plan 	Documents will be added to Paragraph 3.2 / Appendix 2 and will feature in the subsequent amended version of the Sustainability Appraisal.
	Para 3.3	As part of the seventh bullet point, there is also a requirement in national policy to safeguard the setting of historic assets.	Suggested addition will feature in the subsequent amended version of the Sustainability Appraisal.
Environment Agency			
	General	We find no reason to disagree with your conclusion that an Environmental Assessment is required.	Noted
	Appendix 4	Overlap between objectives 11 and 14 in terms of flood risk. Recommend a new objective relating to flood risk be developed 'Reduce risk of flooding to people and property'. This would remove the need for duplication in the indicator section for both objectives.	It is considered that objectives 11 and 14 deal with slightly different issues. Flood risk is considered as part of objective 11, and inappropriate development on floodplains is considered as part of objective 14. An additional objective is not required.
	Para 3.2 & Appendix 2	EA are producing Catchment Flood Management Plans (CFMP) they give an overview of the flood risk across each river catchment and estuary. CFMP should be taken into consideration when developing LDF policies/SA.	Noted. Consideration will be given to the content of the CFMP as to whether it is to be included in Para 3.2 & Appendix 2. Data obtained from the Environment Agency regarding Flood Zones is currently used in the SA process.

Hallam Land Management Ltd		
Para 3.2 & Appendix 2	<p>The SA as proposed by the scoping report will not consider the unsustainable patterns of commuting into and out of Harrogate District. In the Harrogate District Local Economic Overview February 2006 it states that the Council is keen to reduce the net commuting outflow of 6526, the same figure as quoted in paragraph 3.23 of the SA Scoping Report.</p>	<p>A key component of the SA process is the assessment of accessibility and this is covered under objectives 6 & 10 with those sites that reduce the need to travel, scoring better than those that do not achieve this.</p> <p>Harrogate is part of the Leeds City Region and as such there are cross boundary linkages which are important to maintain and develop. Harrogate offers some niche activities relative to the mainstream Financial and Business service sector, many of which occupy new premises on key sites. The adopted Core Strategy makes provision for additional employment land and provides support for business growth in important sectors of the District's economy.</p> <p>Objectives 15 and 16 of the SA look to assess the impact of policies and proposals on business success and economic growth and in this way can look to support the desire to reduce an element of commuting by making sure that proposals where appropriate contribute to strengthening the diversity of employment opportunities within the District.</p> <p>It is considered there that the approach taken in the SA goes as far as practicable in terms of addressing the issue of commuting</p>
General	<p>The next census is planned for 2011 and it will be interesting to see whether the restrictive development policies adopted by HBC will have reduced or increased the levels of inward and outward commuting.</p>	<p>Noted.</p>

	Table 4.2	Reference is made in the 'Options' column to the 'Policy Scope' of SG9 to 'small scale rounding off'. This term is ambiguous and unhelpful as there is no clarity on what 'small' means. The use of 'small' may be overly restrictive, should not include adjectives that may frustrate sites coming forward.	Policy SG9 cross refers to the Settlement Growth chapter of the Core Strategy DPD. The Settlement Growth chapter within the Core Strategy makes reference to the term 'small scale'. The Core Strategy has been the subject of multiple community/stakeholder consultations. The Core Strategy was adopted in February 2009 after Secretary of State examination process, no issues were raised by the inspector regarding the use of the term 'small scale'.
Local Government Yorkshire and Humber			
	General	On this occasion these are not documents Regional Planning Body wishes to comment on.	Noted.
Natural England			
	Para 3.2 & Appendix 2	Additional documents to add to list, <ul style="list-style-type: none"> • Supplement to PPS1: 'Planning and Climate Change', • Regional Biodiversity Strategy (Yorkshire and Humber Biodiversity Forum). 	Documents will be added to Paragraph 3.2 / Appendix 2 and will feature in the subsequent amended version of the Sustainability Appraisal.
	Table 5.1	Reference to English Nature should be changed to Natural England.	Noted.
	Appendix 5	Suggestion to include impacts on Regionally Important Geological Site and SSSI's. In addition objective SA8 should incorporate consideration of biodiversity opportunity areas.	SSSI's are already included within the SA process and are identified in Table 3.1. There are currently no Regionally Important Geological Sites (RIGS) that have been designated. If such sites are designated in the future they will be incorporated in the SA. It is considered that sustainability objective 8 (Appendix 4) provides appropriate protection for biodiversity.
	Appendix 4 - Objective 10	In relation to the Assessment Rationale, proximity to a Public Right of Way may not always represent a positive score, such as where a noisy and unattractive industrial site is allocated. As such we recommend the following amendment to the wording, 'views from and access to the rights of way would be enhanced / would not be compromised'.	It is acknowledged that development may not always have a positive effect on a PROW, however the proximity of a PROW is being used as a measure of "increasing enjoyment to the natural environment" rather than the impact of development on the PROW itself. This would be assessed as part of a site assessment.

	Appendix 4 - Objective 8	The SA should make it clear how effects on 'local distinctiveness and countryside character' is to be assessed. Natural England would consider constraints such as 'within or clearly visible from an AONB, National Park or National Trail' as significant. We advise utilising Harrogate's Landscape Character Assessment.	A comprehensive assessment of all appropriate sites will be conducted by the Council's Landscape Architect. The results of the assessments will then be used to determine the impact.
The Coal Authority			
	General	The Harrogate area contains limited coal reserves. The Coal Authority would seek prior extraction of coal if development were to sterilize these reserves. Prior extraction would remove potential land stability problems. If development intersects land contaminated by coal then written permission from The Coal Authority may be required.	Noted.
	Para 3.2 & Appendix 2	Support the identification of PPG14 within the list of relevant national guidance.	Noted.
	Table 3.1	The following key issue should be expanded to include reference to the coal mining legacy, 'Gypsum related subsistence is an issue in the Ripon area... and coal mining activities have taken place in the west of the District.'	Key issue in Table 3.1 will be altered to include the suggested amendment.
	Table 4.2	Fully support the option of including a policy that addresses issues of land stability. The option to include such a policy performs better than the alternative option of not including such a policy.	Noted.
Yorkshire Forward			
	General	The appraisal process should be a balanced approach, giving sufficient weight to economic aims as well as social and environmental objectives. We would therefore welcome the addition of a new economic objective, 'Strong visitor economy which maximises the opportunities presented by conferences, culture and major events.'	Conferences, culture and major events represent an important part of the Harrogate District economy, as identified in the adopted Harrogate District Core Strategy Policy JB2: Conference & Business Tourism. It is considered that sustainability objectives 15 & 16 (Appendix 4) are appropriately worded to encompass the issues that have been raised.

	Para 3.2 & Appendix 2	Additional document to add to list, <ul style="list-style-type: none">• Regional Visitor Economy Strategy 2008-2013	Documents will be added to Paragraph 3.2 / Appendix 2 and will feature in the subsequent amended version of the Sustainability Appraisal.
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