# North Yorkshire Council Local Plan Consultation

## Response by:

## Eskdaleside-cum-Ugglebarnby Parish Council

# North Yorkshire Council Local Plan Consultation

## Vision

Feedback on the Vision as published in the “How to Respond” document.




STRENGTHS
High-quality natural environment, varied landscapes and strong rural character.
Distinctive towns, villages and heritage assets that support local identity and sense of place.
Strong visitor economy, tourism offer and emerging cultural provision.
Established SME base, agricultural strengths and diversifying economic sectors.
OPPORTUNITIES
Growth can help deliver affordable and specialist housing, new communities and better place-making.
Development could support improved infrastructure, stronger connectivity and better access to wider economic centres.
Opportunities for renewable energy, climate mitigation and adaptation, and integrating nature-based and water-related features into new developments.
Emerging high-value sectors such as agritech, tourism and higher education offer future economic potential and skills opportunities.
WEAKNESSES
Limited public transport, poor east-west connectivity and high reliance on private car travel.
Ageing population, a relatively low working-age population and loss of younger people due to limited higher education and employment opportunities.
Dispersed settlements and a large geography make service access, infrastructure planning and strategic communication more difficult.
Rural digital connectivity remains uneven, affecting access to services, business productivity and remote working opportunities.
THREATS
Government housing requirements may exceed local infrastructure and delivery capacity without external investment.
Climate change, flood risk, overheating and coastal erosion pose significant long-term risks.
Economic uncertainty, inflation, labour shortages and viability challenges could affect delivery.
Failure to maintain sufficient mineral supplies and growing waste generation may create pressure for additional waste management capacity.

Figure 6 Key priorities




Question 1

Do you think there are any other key priorities we have missed? Y/N (If your answer is yes, please explain why)

**Question 1**
**DO YOU THINK THERE ARE ANY OTHER KEY PRIORITIES WE HAVE MISSED? Y/N (if your answer is No, please explain why)**

**No, some clarification is needed.**

**General points**

The consultation is well planned, and it is clear that a lot of time and money has been spent to deliver the utopian idea of the plan. If these proposals could be followed it would be a great document. However, the government is pushing for an immense building program regardless of the damage it could do to North Yorkshire.

Whitby and Sleights are in a unique situation. They are cut off from other centres by the North Yorkshire Moors National Park. This leads to significant separation from other urban centres e.g. Pickering and Malton, Scarborough and Guisborough with lengthy journeys and travel times. While there are bus services and a train service to Middlesbrough the majority of this travel is done in car and by road.

The main local industries in our area are tourism, agriculture and fishing related businesses. Both settlements have limited space and distinctive characteristics that make them special. Before any additional development is considered there should be clear evidence that roads, healthcare, schools, drainage and other infrastructure can cope. We note that these are identified separately as questions within the consultation and have responded more fully in the relevant sections.

Any future development should prioritise genuine local needs and affordable homes rather than simply increasing the number of properties, in particular building homes that are only used as second homes or holiday lets/Air B&B properties would only worsen the existing issues.
New homes are currently being built in this area but are not selling well.

The river Esk is in the Parish is prone to flooding as is the main tributary, Iburndale Beck. We would contend that this rules out any building or development on the flood plains.

As a Parish made up of a number of discrete settlements, Sleights, Littlebeck, Ugglebarnby, Briggswath, Iburndale and Eskdaleside we believe that it is incredibly important that settlements should keep their separate identities and not be joined together by additional development. Additionally. Within our Parish these settlements are linked by generally minor roads, “B” roads at best, lower categories of road are far more common. On the one trunk road through the Parish, the A169, this is already subject to heavy traffic flows and congestion as one of the three main routes into Whitby, particularly in holiday periods and when there are events. Traffic congestion is already a problem, and any further development will make it worse.

**Our views on the topics raised in the Figure 4 “Feedback on the Vision: are that these generally identify the headline issues but the devil, as always, is in the detail. We have addressed these individually in our responses to the individual questions later in our response to this consultation.**

**Again, the SWOT analysis covers most of the key issues, but we would consider that the issue of infrastructure capacity should be expanded to represent service capacity as well.**

**The National Key Priorities are a given but the Local Key Priorities are at the heart of this consultation and form the basis for the individual sections. As stated above, we have responded to these at the appropriate place within the consultation response.**

# North Yorkshire Council Local Plan Consultation

## What the Local Plan Should Contain

Issues Influencing What the North Yorkshire Council Local Plan Should Contain as published in the "How to Respond" document.




Question 2

**Have we captured the locally specific matters for North Yorkshire Y/N (if your answer is no, please explain why)**

**Question 2**
**Have we captured the Locally Specific Matters for North Yorkshire? Y/N (if your answer is No, please explain why)**

**No, as some clarification is needed, please see below:**

**General points**

- Sustainable is a term used extensively across the consultation document. This means different things in relation to different topics. Please clarify how "sustainable" is defined, since the term underpins the vision and the measurable outcomes.
- Again, prosperous is a relative term and relates very differently when applied to different sectors of the economy. One person's prosperous could be someone else's exploitation.
- The figures do not show affordable or specialist housing need. These are mentioned in other parts of the scoping document, but no proportions are given. Please clarify where they will be set out.

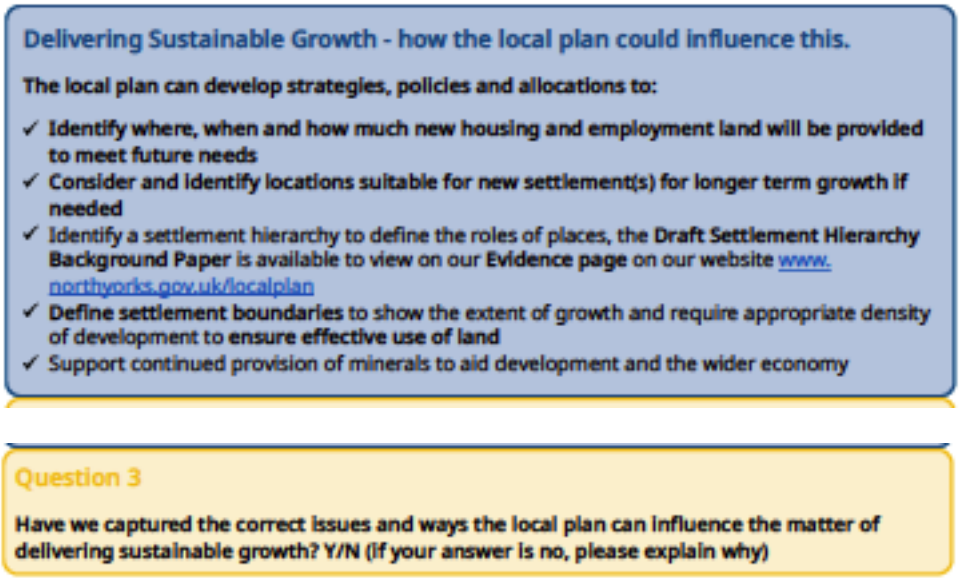
As each of the heads in the graphic in this section refer to a separate and more detailed section within the overall consultation document, we have addressed our responses to these within the relevant section.

# North Yorkshire Council Local Plan Consultation

## Delivering Sustainable Growth

Issues Influencing the Delivering Sustainable Growth as published in the “How to Respond” document.





Delivering Sustainable Growth - how the local plan could influence this.

The local plan can develop strategies, policies and allocations to:

- ✓ Identify where, when and how much new housing and employment land will be provided to meet future needs
- ✓ Consider and identify locations suitable for new settlement(s) for longer term growth if needed
- ✓ Identify a settlement hierarchy to define the roles of places, the **Draft Settlement Hierarchy Background Paper** is available to view on our **Evidence page** on our website www.northyorks.gov.uk/localplan
- ✓ **Define settlement boundaries** to show the extent of growth and require appropriate density of development to **ensure effective use of land**
- ✓ Support continued provision of minerals to aid development and the wider economy

Question 3

**Have we captured the correct issues and ways the local plan can influence the matter of delivering sustainable growth? Y/N (if your answer is no, please explain why)**

**Question 3**
**Have we captured the Correct Issues and Ways the Local Plan Can Influence the Matter of Delivering Sustainable Growth? Y/N (if your answer is No, please explain why)**

**No, as some clarification is needed, please see below:**

**General points**

- Given the baseline development needs in Figure 7 (84,000 homes, 340 ha industrial/warehouse land and 8 ha office land), please clarify the annual figure. Is it pro rata over the plan period, or will it change / accelerate towards 2045? Are the figures net of existing completions and commitments, or inclusive of them?

- Please clarify what the employment land area figures cover and what evidence underpins them. Do they include rural, tourism or town centre uses? Please also explain the justification for the split between 340 ha (industrial) and 8 ha (office) and whether there is any existing geographical split already included here.

- The figures do not show affordable or specialist housing need. These are mentioned in other parts of the scoping document, but no proportions are given. Please clarify where they will be set out.

- Paragraph 3.7 refers to "how, where and when" growth will be met and to "the right time", but neither Figure 8 nor the list of ways the local plan could influence this matter addresses delivery and phasing. Please clarify whether the pace and phasing of housing and employment delivery is within the scope.

- Please clarify how "sustainable" is defined, since the term underpins the vision and the measurable outcomes.

As each of the heads in the graphic in this section refer to a separate and more detailed section within the overall consultation document, we have addressed our responses to these within the relevant section.

- **A Balanced Mix of Sites**
  The North Yorkshire Council recognises the need to provide sites of different sizes across the plan area.
    - Please clarify what is meant by a genuine mix of small, medium-sized and larger strategic sites and how this will be determined. Some smaller settlements may accommodate more development and larger ones less development. In particular, where sites are located in and adjacent to existing settlements surely this can only be based on sites that are available. Within Eskdaleside-cum-Ugglebarnby the current sites proposed on the call for sites are all on agricultural land. This will not deliver a good mix.

    - Please clarify what criteria and evidence will be used to judge whether the distribution of growth is appropriate across the different geographical areas of North Yorkshire.

    - A county-wide housing requirement does not automatically produce a balanced distribution of development. This item concerns the geographical distribution and scale of sites, not the types of business or employment they should accommodate, which is a matter for the prosperous economy section. Additionally, there may well be a different blend of industrial and housing development in any given location.

- **Homes Close to Jobs**
  North Yorkshire Council identifies the importance of balancing housing and employment growth to reduce the distance people need to travel.

    - Please clarify what "balanced" means in practice, and what evidence will be used to assess the relationship between existing employment centres and the locations identified for future housing growth.

    - Please clarify whether the scope includes the cumulative effect of locating substantial housing in areas where existing and future employment opportunities are limited, which could create greater dependence on commuting turning existing vibrant communities into dormitory settlements.

    - Within Eskdaleside-cum-Ugglebarnby parish, a Tier 4 location, there is no current major or significant industrial or employment location within the parish other than minor retail and agricultural businesses and small hospitality led businesses. As such there are limited opportunities for wider employment or investment within the Parish, but we would benefit from development in Whitby. However, this would further relegate us to a dormitory location more reliant on Whitby than ever.

- **Potential New Settlements**
  North Yorkshire Council will explore whether new settlements could meet development needs and what form they would take.

    - Please clarify how the "if needed" test in the list of ways the local plan could influence this matter is measured. What criteria will determine whether a new settlement is preferable to distributing growth through existing towns and villages.

Paragraph 4.34 indicates that only a small proportion of new settlement homes would be delivered within the plan period.

- We have no comments to make on the potential provision of new settlements and agree with the points made in sections 4.30 to 4.35 in the consultation document. Also please refer to our responses to Question 12 in relation to this option. As a Parish Council, we would view it as highly unlikely that any potential new settlement within the boundaries of our Parish would be viable in light of our comments earlier in the is response regarding other options considered.

- **Settlement Hierarchy and the Role of Rural Communities**
  The local plan proposes to identify a settlement hierarchy to define the roles of different places, but the scoping document does not explain how settlements will be assessed and classified. There is a hierarchy of settlements provided in the Evidence Base, the Settlement Hierarchy Database spreadsheet.

  - Please clarify whether this hierarchy is intended to describe places or to determine the share of growth they receive. Also, will there be a reclassification after allocation of sites and any associated infrastructure and service improvements delivered as part of any development i.e. does allocating development to a location make it more likely to then receive further development?

  - The classification system used here seems very “tick box” related. Has a settlement got certain facilities. It does not consider the quality, location or relevance of these facilities to the settlement. Certainly, the classification of Eskdaleside-cum-Ugglebarnby as a Tier 4 “Neighbourhood Centre” seems to be based on the presence of some facilities rather than the size of these or their suitability for expansion or wider use.

  - Please clarify how smaller villages will avoid being automatically disadvantaged by their position in the hierarchy, particularly where modest development could help sustain their longer-term viability.

  - Please clarify how the hierarchy will recognise relationships between settlements rather than considering each in isolation. A settlement may be relatively small but provide important services or community facilities for a wider rural area, and its contribution to the sustainability of that area may not be reflected by its population alone.

- **Settlement Boundaries and Development Beyond Settlements**
  The Local Plan Scoping document identifies the need for clear settlement boundaries and considers where development outside those boundaries should be supported or restricted. Development beyond settlements has no corresponding entry in the list of ways the local plan could influence this matter or the criteria that might be used. We note that in the North Yorkshire Council Local Plan Evidence Base that there has been no published criteria set as yet in relation to this issue.

  - Please clarify whether there will be a consistent methodology for establishing settlement boundaries, which will allow for the individual character and circumstances of different settlements.

- Please clarify how development that represents inappropriate encroachment into the countryside will be distinguished from development that could reasonably support the long-term sustainability of rural communities.

- Please clarify whether the approach will recognise the particular circumstances of smaller villages and hamlets, including the possibility that appropriate development may be justified where a settlement has limited services or no formally defined development boundary.

- Looking at our own situation, our Parish consists of a small number of discreet settlements clustered around the larger village of Sleights. The connectivity between these is by “B” road or “C” road and largely by car. This is currently just about sufficient for the needs of those settlements. Any additional traffic load in the settlements would overload this current situation.

- **Green Belt review**
  Green Belt review is explicitly identified as an issue, but it does not appear in the list of ways the local plan could influence sustainable growth.
  - Please clarify whether the local plan will establish the circumstances and criteria under which Green Belt boundaries might be reviewed, and how the Council will demonstrate that any proposed changes are justified in accordance with national planning policy.

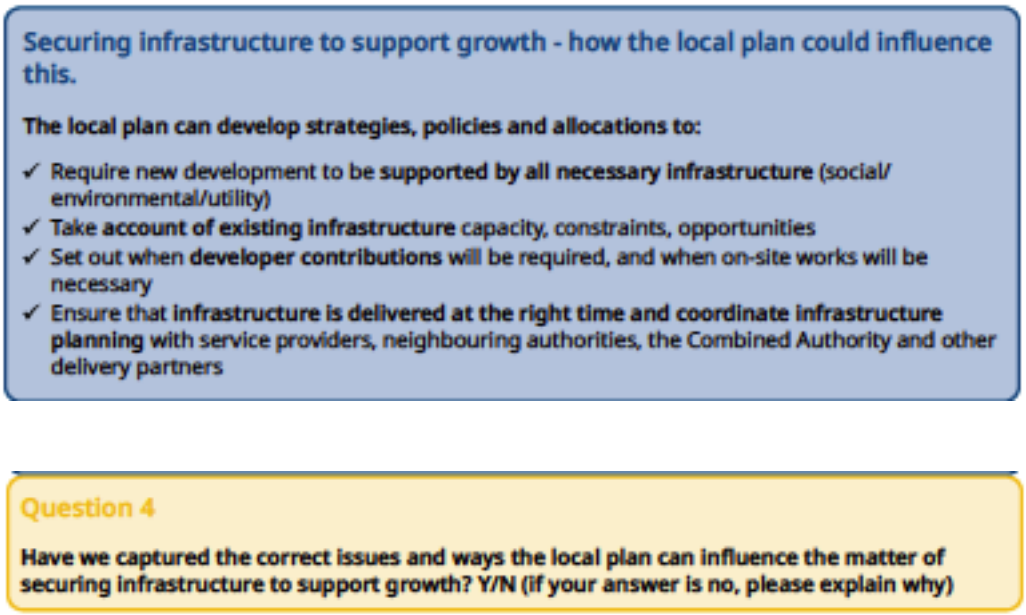
# North Yorkshire Council Local Plan Consultation

## Securing Infrastructure to support Growth

Issues Influencing the Securing Infrastructure to support Growth as published in the "How to Respond" document.

**Figure 9 Issues identified**






**Question 4**
**Have we captured the Correct Issues and Ways the Local Plan Can Influence the Matter of Securing Infrastructure to Support Growth? Y/N (if your answer is No please explain why)**

Addressing each of the issues influencing the "Securing Infrastructure to Support Growth" topic with specific reference to Eskdaleside-cum-Ugglebarnby Parish:

**No, as some clarification is needed, please see below:**

**General Points**

In relation to Eskdaleside-cum-Ugglebarnby parish, a Tier 4 location, the list of infrastructure types does not include:

- Shopping Facilities either local or access to larger shops
- Also, Healthcare should be split into:
  - GP Surgeries
  - Dental Surgeries
  - Proximity to A&E and other hospital services including Maternity Care, end of life care and dementia care

As each of the heads in the graphic in this section refer to a separate and more detailed section within the overall consultation document, we have addressed our responses to these within the relevant section.

- **Infrastructure Led Growth**
  In relation to Eskdaleside-cum-Ugglebarnby parish, a Tier 4 location and in general it is necessary to ensure that supporting infrastructure growth, both within any development and in the wider parish to support the development is done prior to housing or industrial development taking place. Not to do so risks significant overload of existing infrastructure of all kinds to the detriment of existing inhabitants.

- **Right Growth, Right Place**

At this time Sleights does not have the capacity for more growth, all of the access roads East of the A169 to the main areas of housing in Sleights are single track in many places which already causes bottlenecks. Therefore, any future development would require improvements in these areas before being considered. North of the river Esk, the areas to the East of the A169 are accessed by Carr Hill Lane, again a single-track road which does not have the capacity for more traffic.

We would support this approach subject to the points made above. Also, the designation of right place needs to consider the wider impacts. As noted above, Eskdaleside-cum-Ugglebarnby parish is a Tier 4 location. There are no current major or significant industrial or employment locations within the parish other than minor retail and agricultural businesses. Any industrial or economic development within the Parish would require major infrastructure and service development. While this option may be able to be made to deliver in relation to dwellings it is highly unlikely to have a significant impact on employment and economic opportunities in the Parish. This will effectively turn us into a dormitory settlement and increase commuter traffic. Looking at our own situation, our Parish consists of a small number of discreet settlements clustered around the larger village of Sleights. The connectivity between these is by “B” road or “C” road and largely by car. This is currently just about sufficient for the needs of those settlements. Any additional traffic load in the settlements would overload this current situation. The connectivity constraints between the Parish as a whole and our nearest Tier 2 settlement, Whitby, remains constricted by a single crossing of the River Esk together with a high number of junctions onto the A169 within the Parish.

- **Developer Contributions**
  While we would fully endorse robust developer contributions it is essential that any infrastructure constraints both within any development and within the wider settlement environment are completed prior to development going ahead.

- **Existing vs New Needs**
  As a neighbourhood centre Sleights, within the Eskdaleside-cum-Ugglebarnby Parish has together with the other settlements within the Parish has developed a character where domestic property is intermingled with the shops and services currently existing. Our current infrastructure has already got significant issues, these include sewage and drainage systems, parking, through traffic on the A169, access to non-car transport to name but a few. Many of these would need to be addressed either in advance or as part of any development led infrastructure improvements and must certainly be considered in any identified development. Critically any development must not address only selected items while making others worse.

- **Access to Services**
  As identified above, we would consider that identification of existing services and any shortfalls together with any additional load created by development is crucial. As stated earlier consideration needs to be broadened in relation to healthcare services as the nearest A&E is at Scarborough or Middlesbrough and dental care is extremely limited in Whitby already with many Parishioners having to go much further afield. In fact, the access to services have deteriorated in general over the past 10 years.

- **Ongoing Collaboration**
  This is key and it is not just about mutual recognition of issues but about delivery. Although the Parish Council

has commented many times on the sewage capacity during planning consultations, our concerns are ignored even at the planning stage. **Collaboration is not enough; measured performance and delivery is a minimum requirement.**

- **Digital Connectivity**
  As more and more organisations come to rely on digital engagement, including North Yorkshire Council, digital connectivity is critical to any existing and new or expanded settlements.
  We have, in Eskdaleside-cum-Ugglebarnby Parish undertaken a Parish-wide survey which has already identified a shortfall in connectivity, both in relation phone coverage and access to high-quality broadband connections. As there is already an issue here any significant new development must address this for existing residents. Also, as part of the digital connectivity workstream, given the demographics within our Parish, the development of the digital infrastructure must go hand in hand with support for people to use digital access to services.

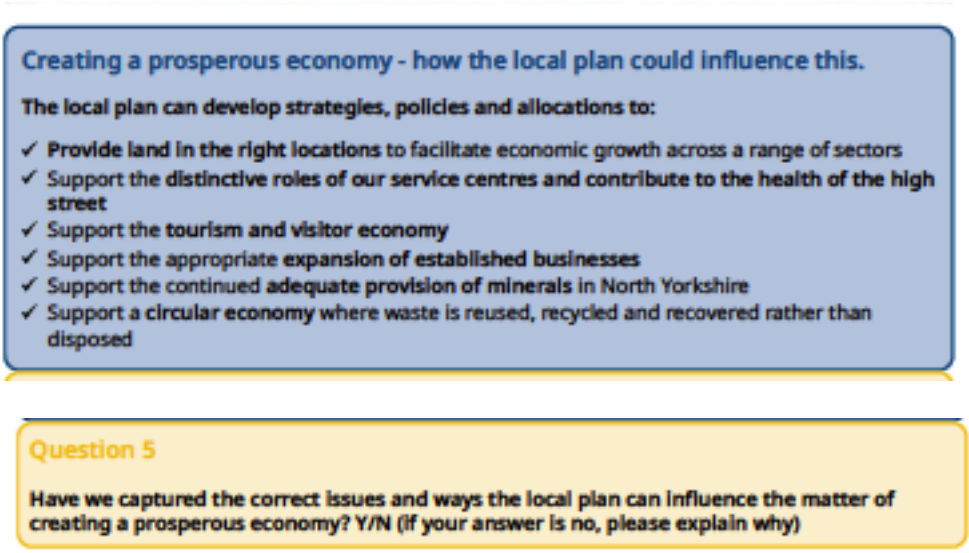
- **Utilities and Drainage Capacity**
  Again, in order to deliver any housing or industrial development within our Parish a major consideration is the current drainage and sewerage system. Currently all sewage and captured surface water runs into a single network that already has to be pumped uphill to the Whitby STS. The sewerage system is Sleights is now 96 years old and, being a combined system, it is often overwhelmed during storms in some areas, Yorkshire Water have previously looked at installing a new surface water system only and concluded that it would be too costly and disruptive.
  There are already issues around capacity on this system and as a Parish Council we have raised these consistently, at the planning stage, in relation to current small scale infill developments and larger ones one in Briggswath. Any significant development must address this network issue, rather than just locally within the development prior to that development taking place. As a Parish we are also concerned about other key services including electricity. We are already subject to frequent short-term power-cuts and any significant increased load would make this worse. Additionally, with the government focus on the provision of charging points for electric vehicles on any new housing development, this would cause a disproportionate increase in electricity demand.

# North Yorkshire Council Local Plan Consultation

## Creating a Prosperous Economy

Issues Influencing the Creating a Prosperous Economy as published in the “How to Respond” document.





**Creating a prosperous economy - how the local plan could influence this.**

**The local plan can develop strategies, policies and allocations to:**

- ✓ **Provide land in the right locations** to facilitate economic growth across a range of sectors
- ✓ Support the **distinctive roles of our service centres and contribute to the health of the high street**
- ✓ Support the **tourism and visitor economy**
- ✓ Support the appropriate **expansion of established businesses**
- ✓ Support the continued **adequate provision of minerals** in North Yorkshire
- ✓ Support a **circular economy** where waste is reused, recycled and recovered rather than disposed

**Question 5**

**Have we captured the correct issues and ways the local plan can influence the matter of creating a prosperous economy? Y/N (if your answer is no, please explain why)**

**Question 5**

**Have we captured the correct issues and ways the local plan can influence the matter of creating a prosperous economy? (Y/N if your answer is No, please explain why)**

**No, as some clarification is needed, please see below:**

**We consider that some clarification is needed around many of the issues raised and how these will be addressed in the Local Plan.**

**General points**

- It is unclear how the plan will address innovation and skills, the rural economy and diversification, the low-carbon transition, connectivity in relation to a prosperous economy, visitor management and heritage-led regeneration. In relation to Eskdaleside-cum-Ugglebarnby parish, a Tier 4 location, there is no current major or significant industrial or employment location within the parish other than minor retail and agricultural businesses together with small employers in the hospitality sector. Please clarify which fall within the scope of planning and which fall to other strategies, so that expectations are managed.

- This section seems to be silent on the linkage between education and training as a necessity in building employment within a prosperous economy. Any commercial or industrial development needs appropriate skilled and trained people and the buildings and facilities to deliver these are a key part of planning considerations. In our own Parish, Eskdaleside-cum-Ugglebarnby and the adjacent area we have mining, agriculture, fishing, ship building, small industrial and commercial businesses and, of course, hospitality. All of these require an educated, trained, qualified and skilled workforce. As part of the consideration for any commercial/industrial development the provision of adequate and appropriate education and training facilities needs to be included.

As each of the heads in the graphic in this section refer to a separate and more detailed section within the overall consultation document, we have addressed our responses to these within the relevant section.

- **Provide and Maintain a Mix of Sites**
  Meet the needs of new and existing businesses within North Yorkshire.
  - Please clarify how "provide and maintain a mix of sites" relates to the land need identified earlier in the Scoping Document and how this mix is assessed in relation to existing communities and potential new communities.

  - In particular, where sites are located in and adjacent to existing settlements surely this can only be based on sites that are available. Within Eskdaleside-cum-Ugglebarnby the current sites proposed on the call for sites are all on agricultural land. This will not deliver a good mix.

  - Please clarify whether the scope includes reviewing existing employment land as well as identifying new sites, including whether existing sites will be safeguarded or improved, and whether they are netted off the Figure 7 need. Existing sites may be perfectly adequate or, with some investment, could be improved, rather than being overlooked in favour of larger new sites.

  - Please clarify how the space needs of emerging sectors (flexible, rural and innovation workspace) will be assessed. Please also refer to our comment above in relation to current employment opportunities within our Parish.

- **Promote Innovation, Skills and Modern Sectors**
  The North Yorkshire Council wants support for green industries, digital technologies, logistics, apprenticeships and training opportunities. In general, we would support this; however,
  - Please clarify how NYC intends the local plan to support innovation, emerging industries, and the facilities and locations needed for skills development and training, beyond simply providing land.

  - Logistics is mentioned. Please clarify how its location relative to strategic roads and sustainable travel is to be considered. Will this consider seasonal variations and traffic load in relation to coastal and near-coastal communities?

  - With specific regard to Eskdaleside-cum-Ugglebarnby any significant development in our Parish must consider the travel constraints into Whitby, i.e. the single road bridge over the River Esk and the existing high levels of visitor traffic going through Sleights on the A169. Any increase in this will make an already difficult situation worse.

- **Improve Infrastructure and Connectivity**
  Provide the infrastructure needed for economic growth and improve physical and digital connectivity.
  - No query.

- **Strengthen and Diversify the Visitor Economy; Improve Accessibility and Visitor Management**
  Promote year-round tourism that responds to the character of North Yorkshire and its places, improve public transport, support rural businesses and introduce measures to help manage visitor pressures.
    - Please clarify how the local plan is intended to encourage a more diverse, year-round visitor economy and reduce reliance on seasonal tourism and the impact that this will have on developmental choices.

    - Please clarify how the local plan will help manage the pressures that visitor numbers already place on particular destinations and local communities while continuing to support the visitor economy. Visitor management does not appear in the list of ways the local plan could influence this matter.

    - Where visitor pressure arises in or around the National Parks, which are outside the plan area (paragraph 1.4), please clarify how cross-boundary management will work.

    - As a Parish we are already suffering from the impact of seasonal traffic flows, particularly on the A169. Any additional traffic on this road at any time will make an already bad situation much worse. This is the sort of consideration that must be included in the Local Plan.

- **Support a Sustainable Rural Economy**
  The Council wants to enable business development, enterprise, diversification and stronger links to local supply chains.
    - Please clarify how the local plan will support new rural enterprises, agricultural diversification and stronger local supply chains, including businesses operating outside established employment areas.

    - As previously stated, in Eskdaleside-cum-Ugglebarnby parish, a Tier 4 location, there is no current major or significant industrial or employment location within the parish other than minor retail and agricultural businesses and support for small hospitality operations. Any development around these existing areas will also need infrastructure enhancements just as much as any new development.

- **Support the Low-Carbon Transition**
  The North Yorkshire Council supports renewable energy, green initiatives, local food networks and environmental protection as part of the low-carbon transition.
    - Please clarify how the local plan intends to recognise and support the economic opportunities arising from the low-carbon transition, including renewable energy, green industries and local food networks.

    - Given the main employment opportunities within our Parish are largely vehicle reliant, either by customers or by agricultural machinery it is difficult to see how this can be delivered here. Also, with the largest carbon footprint by far being traffic through the Parish there would seem to be a clash with the aspirations identified within issues four and five,

- **Plan for Continued Mnerals Provision and Waste Management**

  Meet future requirements sustainably, supporting communities and the economy.

- No comment.

- **Strengthen Town Centre Vitality**
  Encourage a mix of uses that creates activity throughout the day and evening, including housing where possible.
  - Please clarify how the local plan will support the adaptation of town centres to changing patterns of use, including commercial, community and residential uses that can sustain activity throughout the day and evening.

  - In relation to our own village there are already issues with supporting existing businesses. We would see this as needing special consideration in relation to small villages and settlements; the issues here are very different to those in larger town centres.

- **Support Heritage-led Regeneration**
  The Council wants to protect and enhance local character and heritage assets while enabling sustainable growth and regeneration.
  - We as a Parish Council have raised issues in commenting on planning applications regarding developments impinging on local character and lessening the special identity of a place. These do not seem to have been acknowledged or considered when granting consent. We would like to see specific constraints written into the Local Plan as to how this is assessed and the fact that local people often have the best knowledge and view of what is relevant to the assessment and maintenance of local character.

  - We would support this providing that reuse of a historic building does not stand opposed to the earlier identified issues.

  - Please clarify how the local plan will encourage the sustainable reuse of heritage assets and support the businesses, tourism and regeneration opportunities that can arise from them while protecting their significance. This item has no matching entry in the list of ways the local plan could influence this matter.

  - While not in our own Parish, Whitby has already lost some substantial industries, brickmaking, industrial supplies and major boat and ship building. These were major employers in the area. These were located here due to available local resource, consideration should be given to the use of local natural resources in relation to heritage regeneration.

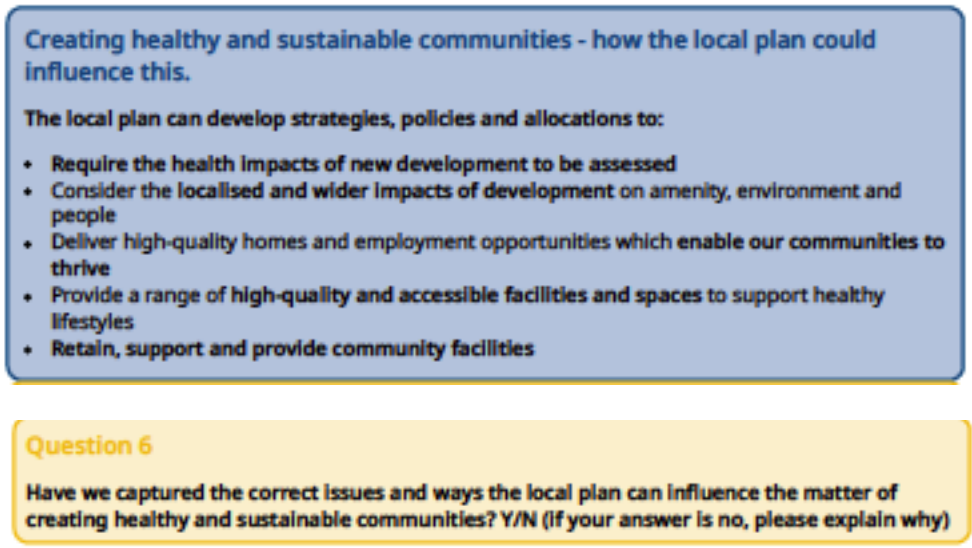
# North Yorkshire Council Local Plan Consultation

## Creating Healthy and Sustainable Communities

Issues Influencing the Creation of Healthy and Sustainable Communities as published in the "How to Respond" document.

**Figure 11 Issues identified**






**Question 6**
**Have we captured the Correct Issues and Ways the Local Plan can Influence the Matter of Creating Healthy and Sustainable Communities? Y/N (If your answer is No, please explain why)**

**No, as some clarification is needed, please see below:**

There are nine areas identified within the issues graphic linked to this section. Addressing these individually: -

- **Infrastructure Led Growth**
  Sustainable design and energy efficiency in new development.
  Support renewable energy and low carbon technology
  Reduce carbon emissions from transport and improve local air quality.
  Support carbon capture.
  Expand green infrastructure to support climate resilience
  Consider land stability and geological constraints.

- **Right Growth Right Place**
  Reduce carbon emissions from transport and improve local air quality.
  Direct new development away from flood risk. Reduce surface water run-off.
  Avoid inappropriate development in vulnerable coastal areas.
  Deliver Biodiversity. Protect habitats and ecological networks. Help natural environment and improve access to nature.
  Control pollution. Air, water, light and noise impacts.
  Consider land stability and geological constraints.
  Protect landscape and agricultural environment.

- **Developer Contribution**
  Deliver Biodiversity. Protect habitats and ecological networks. Help natural environment and improve access to nature.
  Expand green infrastructure to support climate resilience
  Control pollution. Air, water, light and noise impacts.
  Protect landscape and agricultural environment.

- **Existing vs New Needs**
  Sustainable design and energy efficiency in new development.
  Consider land stability and geological constraints.
  Protect landscape and agricultural environment.

- **Ongoing Collaboration**
  Reduce carbon emissions from transport and improve local air quality.
  Direct new development away from flood risk. Reduce surface water run-off.
  Support carbon capture.

- **Digital Connectivity**
  Support renewable energy and low carbon technology

- **Utilities and Drainage Capacity**
  Direct new development away from flood risk. Reduce surface water run off.
  Avoid inappropriate development in vulnerable coastal areas.
  Expand green infrastructure to support climate resilience
  Control pollution. Air, water, light and noise impacts.
  Ensure Wastewater and Drainage is fit for existing and future communities. Better use of water resources and treatment.

- **Rural and Coastal Health**
  Reduce carbon emissions from transport and improve local air quality.
  Avoid inappropriate development in vulnerable coastal areas.
  Deliver Biodiversity. Protect habitats and ecological networks. Help natural environment and improve access to nature.
  Control pollution. Air, water, light and noise impacts.
  Protect landscape and agricultural environment.

- **Protect Heritage Assets**
  We as a Parish council clearly support this objective. However, the key issue will be the designation of what is and is not a Heritage Asset. In particular the tiering between National and International Heritage Assets and those of a more regional and local significance. Once there is a designation of a Heritage Asset it should enjoy protection whatever level of asset it is.

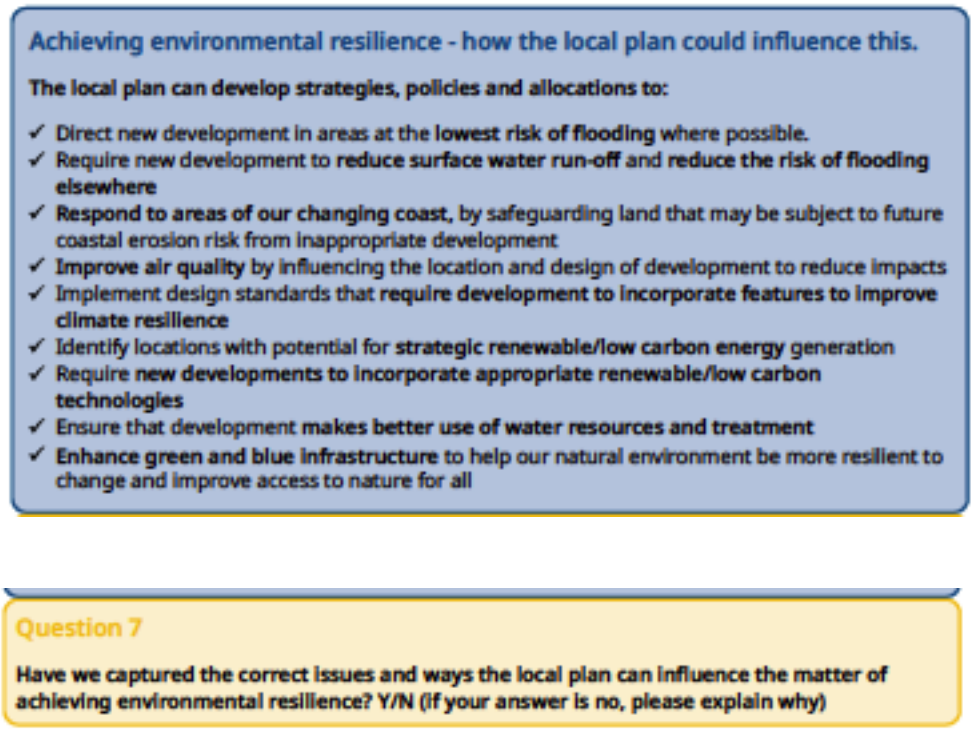
# North Yorkshire Council Local Plan Consultation

## Achieving Environmental Resilience

Issues Influencing Achieving Environmental Resilience as published in the "How to Respond" document.

**Figure 12 Issues identified**





**Achieving environmental resilience - how the local plan could influence this.**

**The local plan can develop strategies, policies and allocations to:**

- ✓ Direct new development in areas at the **lowest risk of flooding** where possible.
- ✓ Require new development to **reduce surface water run-off** and **reduce the risk of flooding elsewhere**
- ✓ **Respond to areas of our changing coast,** by safeguarding land that may be subject to future coastal erosion risk from inappropriate development
- ✓ **Improve air quality** by influencing the location and design of development to reduce impacts
- ✓ Implement design standards that **require development to incorporate features to improve climate resilience**
- ✓ Identify locations with potential for **strategic renewable/low carbon energy** generation
- ✓ Require **new developments to incorporate appropriate renewable/low carbon technologies**
- ✓ Ensure that development **makes better use of water resources and treatment**
- ✓ **Enhance green and blue infrastructure** to help our natural environment be more resilient to change and improve access to nature for all

**Question 7**

**Have we captured the correct issues and ways the local plan can influence the matter of achieving environmental resilience? Y/N (if your answer is no, please explain why)**

**Question 7**
**Have we captured the Correct Issues and Ways the Local Plam can Influence the Matter of Achieving Environmental Resilience? Y/N (if your answer is No, please explain why)**

**No, as some clarification is needed, please see below:**

**General points**

We consider that the 12 areas covered do encompass the main issues which may be of concern to our residents within Eskdaleside-cum-Ugglebarnby Parish.
We do however have two issues.

- In relation to the statement “Direct new developments in areas of lowest risk of flooding where possible”. The 'Where possible' rider seems akin to an easy get out clause and is not elaborated upon as to when it would be used. Given that significant parts of our Parish are susceptible to flooding from the River Esk and Iburndale Beck we see it as important that this caveat is explained in some detail.

- Specific to our Parish, there are significant topographical and geological issues that make any significant development potentially difficult and expensive. The whole Parish is sloping, in some cases steeply, and there has been recent evidence of land slips. Previous developments have also come across sand lenses causing issues with foundation design and installation.

# North Yorkshire Council Local Plan Consultation

## Meeting Specific Housing Needs

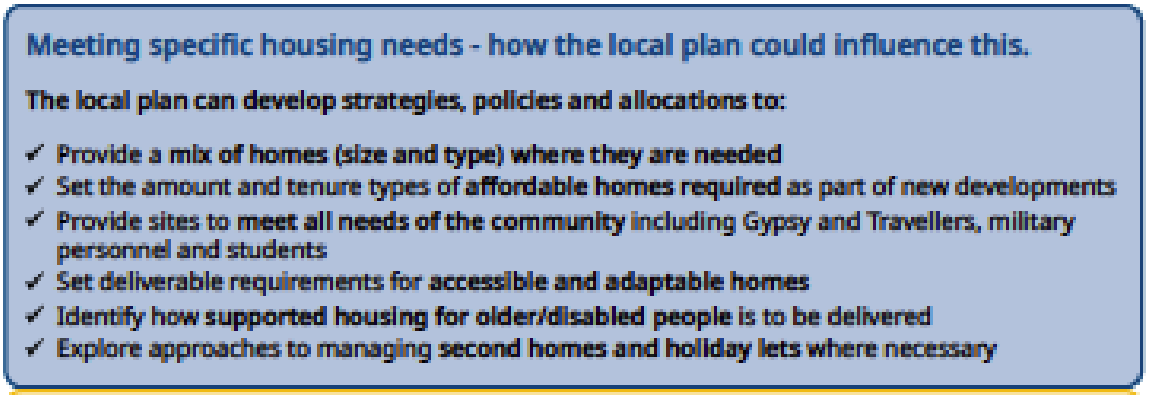
The HEDNA and the results of early engagement has identified that NYC, within the Local Plan, need to consider the provision of different types of homes. Some of these needs are highlighted below:
Figure 15 There are a wide range of housing needs




Issues Influencing the Meeting Specific Housing Needs as published in the "How to Respond" document.

Figure 13 Issues identified






**Question 8**
**Have we captured the Correct Issues and Ways the Local Plan can Influence the Matter of Meeting Specific Housing Needs as published in the "How to Respond" document. Y/N (If your answer is No, please explain why)**

**No, as some clarification is needed, please see below:**

**General points**
There are five areas identified within the issues graphic linked to this section. These are, in the main, non-contentious.

- However, in the follow-on box there are six areas identified. One of which falls outside the issues identified from early engagement and feedback. This is, "Provide Sites to Meet the Needs of the Community including Gypsy and Travellers. Military Personnel and Students"
  As a Parish Council we would need to discuss this topic as it is a new issue beyond those previously identified and already engaged on. At the moment in our Parish there are no specific identified facilities in relation to these groups, and this would be viewed as a significant change of use completely out of keeping with the character of the Parish.

- Additionally, "Explore approaches to managing second homes and holiday lets" is already a contentious topic within our Parish as in most coastal or near-coastal communities. Any significant changes to existing rules in this area would require detailed consultation. Although the Parish Council has commented many times on the use of new properties and extensions to existing properties in relation to their use as holiday lets during planning consultations, our concerns are ignored even at the planning stage.

- The need for additional homes in Sleights needs to be carefully investigated, there are always 25 to 30 homes for sale and the 14 homes recently built at the top of Carr Hill Lane have taken 3 years to sell. The question must therefore be asked, who needs these additional homes in Sleights. There is a need however for social housing and starter homes.

As each of the heads in the graphic in this section refer to a separate and more detailed section within the overall consultation document, we have addressed our responses to these within the relevant section.

- **National Space Standards**

  Local standards must include off road parking and amenity space. If garages are included in the design, they should only be considered suitable for off road parking if a standard minimum size is used which considers and addresses the size of modern vehicles. Also, given the difficulty many young people have in finding their own home, there are large numbers of younger adults living with parents or in shared accommodation. Consideration must be given to the potential for greater numbers of vehicles associated with any property and the associated requirement for space to avoid worsening existing parking problems.

- **Future Proof Homes**

  Future proofing needs to be vigorously enforced to ensure no new homes are built within on near a flood risk area, in Sleights the river Esk and Iburndale Beck both create a very large flood risk to homes beyond the existing developments along the B1410 towards Ruswarp. These fields flood regularly and should never be considered suitable for future homes, especially with the likelihood of increasing sea levels

- **Quality Design**

  Quality design usually comes at a price. Many new houses recently built in -cum-Ugglebarnby Parish have been built to an unaffordable price when the need in the area is actually for social housing and starter homes.

- **Accessible and Adaptable**
  We agree with this point, and this must be a key inclusion in the Local Plan

- **Monitoring and Enforcement**

  Strict enforcement of the building regulations is key. On site inspections are a must to ensure that the regulations are complied with to ensure safe and sustainable buildings which will last. Building for the future not just for the first 10 years.

# North Yorkshire Council Local Plan Consultation

## Achieving and Protecting High-quality Environments

Issues Influencing the Achievement and Protection High-Quality Environments as published in the "How to Respond" document.

Figure 14 Issues identified

