

# North York Moors National Park Authority

The Old Vicarage, Bondgate, Helmsley, York YO62 5BP  
Tel: 01439 772700  
Email: general@northyorkmoors.org.uk  
Planning enquiries: planning@northyorkmoors.org.uk  
www.northyorkmoors.org.uk



**Andy Wilson**  
Chief Executive

Your ref:

Our ref: NYM/2020/3055/1/PF

Date: 20 February 2020

Dear Clive

## Ingleby Arncliffe Draft Neighbourhood Plan – Regulation 14 Version.

This letter forms the Authority's response to the 'pre-submission' version of the Ingleby Arncliffe Neighbourhood Plan.

The Authority has no comments on the overall approach taken by the Plan (other than to support), and the comments below are intended to be constructive in making the plan more deliverable or to highlight where circumstances may have changed:

General	<p>Our main point is that the policies need to be expressed with the end user in mind. This is principally Hambleton DC. It is mainly this District Council that will be deciding planning applications against policies in this Plan. Policies therefore should need to set out the circumstances under which development would (and would not) be permitted.</p> <p>Supporting text to Policy P1 states that the policy indicates the circumstances under which the Parish Council would support development – however the Plan will eventually become part of the development Plan of the two Authorities who will be responsible for making decisions based on it.</p> <p>I would therefore advise that some revisions may need to some policies so that they can be used in decision making on planning applications. One initial suggestion would be for policies to use the phrase 'will only be permitted' rather than 'will be supported'</p>
General	<p>On a similar point, it is not clear as to whether the whole document is the neighbourhood plan or whether the intention is to separate out the neighbourhood plan 'policies' section and submit that for referendum. At the moment the document contains the community plan and a wealth of background information that would not be relevant when it comes to deciding planning applications.</p>



Ref No 01HS03

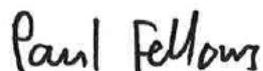
	<p>The text does state that only the policies directly relating to the development and the use of land will be the subject of the referendum vote, however the legislation treats a neighbourhood plan as a single legal entity and the question arises of how the Examiner would treat any comments made on other parts should they be made.</p> <p>My suggestion would be to separate the 'planning policies' part of the document and include the rest of the plan as supporting evidence or background. I would also agree with Hambleton BC that it is the 'whole' of the neighbourhood plan (including the supporting text) that has to go to referendum, and not just the policies.</p>
Pages 19, 22, 23 (x2), 24, 26, 27	<p>The NYMNPA Core Strategy and Development Policies will almost certainly be superseded by the new Local Plan by the time the Neighbourhood Plan is 'made' (we are anticipating adoption in June 2020). References should refer to the North York Moors Local Plan only.</p>
Page 22	<p>Refers to an 'accompanying Proposals Map' becoming a statutory planning document. There is also no proposals map in the Plan (i.e. a map of the whole neighbourhood plan area indicating where plan policies will change areas) – are you intending to include one at the next stage?</p> <p>There's no requirement for a neighbourhood plan to include a Policies Map. However, on adoption of the Neighbourhood Plan there will be a single 'Policies Map' for both HDC and the NYMNPA which forms part of the development plan and which would include any allocations made by the Neighbourhood Plan. I would suggest deleting 'and the accompanying Proposals Map' or including a Policies Map on an Ordnance Survey base which can then be incorporated to the Policies Map of each authority.</p>
Page 19	<p>This states that 'NYMNPA's planning policy will not allow the development of the Grain Store site' which implies some sort of 'blanket ban' on development, whereas the Plan then goes on to state on page 54 that in NYMNPA's view the site could be considered as an exception site or as a mix of affordable and local occupancy units. Planning policy is only one of the considerations when deciding a planning application (although it is the primary one).</p> <p>The Authority shares the Parish Council's view that a mix of local needs and affordable housing would be beneficial to the village - the issue is more one of viability once these tenures are introduced. Policy conformity could also change over the life of the Plan (as Community Action Point N1 indicates could be the case). I would suggest '<i>NYMNPA's planning policy focusses on delivery housing schemes to meet local and affordable housing needs, which has implications for whether the site can be viably developed (see page 54).</i>'</p>
Page 23 & 24	<p>A minor point, but text states that the purpose of National Park designation is to conserve and enhance... This is the first of two statutory purposes; hence I would suggest adding 'first' before 'purpose'. The same point applies at the bottom of Page 24.</p>
Policy P4	<p>Paragraph 3 and 4 are issues covered by building regulations rather than planning policy. Whilst we support the aim, the issue is how the decision maker would understand the circumstances under which failure to comply would warrant refusal of a planning application (or how an applicant would know how to comply with this policy).</p> <p>As background, Local Planning Authorities are generally discouraged from adopting energy/carbon standards in excess of building regulation standards,</p>

	and also have to provide evidence of need and viability if they wish to adopt higher optional technical standards on accessibility and adaptability of new housing. I would advise either removing these two criteria or including more information on the standards that would need to be applied and the evidence justifying them.
Page 29	Hambleton DC's response suggests you check this wording with us. Our new Local Plan does include a couple of site specific 'Environmental Enhancement Sites' and the Plan is required to be reviewed every five years, so it may be an option to consider the Grain Store site under this policy in a future review. You will understand we cannot commit to this at this early stage as future plans need to go through extensive consultation, and issues of viability of the site may remain if the site is to be for housing to meet local needs.

Finally, the Authority has also seen the Sustainability Appraisal and Habitats Regulation Assessments at an earlier stage and agrees with their conclusions. We will make this clear in our response to the Plan at the next stage.

I wish you every success in completing the plan. If you do have any further questions or need to know more please give me a ring on 01439 772700.

Yours sincerely,



Paul Fellows  
Head of Strategic Policy

e-mail: [p.fellows@northyorkmoors.org.uk](mailto:p.fellows@northyorkmoors.org.uk)