

ANNEX 1

Annex 1 – Draft Site Selection Methodology Comments and the Council’s Response

Theme/ Stage	Issues raised	• Respondent	Response by Council
General	<ul style="list-style-type: none"> • Welcome option to discuss comments, in particular in relation to soundness. • Concerned about the lack of evidence of a joined up approach to the Helmsley DPD, and in respect of a duty to co-operate, therefore objects to SSM on the basis of its failure to provide a suitable approach to land allocations in Helmsley. • Site selection should be tailored to the purpose for which the site is to be developed. Not a one-size fits all. Should be looking to create attractive, low density spacious properties to attract investors (as well as employment land), not just high density affordable homes. SSM should acknowledge that sites on the edge of towns are best suited to providing this housing. Current approach fails to recognise the important demand for this type of development. • Council understands general approach, but finds methodology highly prescriptive and formulaic. In practice, some flexibility will be needed in the 	<ul style="list-style-type: none"> • Directions Planning Consultancy o.b.o Redrow Homes Yorkshire • Barton Willmore o.b.o Wharfedale Homes • Mark Southerton • Helmsley Town Council 	<p>Noted.</p> <p>The Council doesn’t accept this is the case. The Council is committed to working jointly with the North York Moors national Park (NYMNP) to produce the Helmsley Plan. The SSM has been deliberately tailored to both Ryedale’s and NYMNP’s objectives to ensure consistency and relevant questions are asked. As the SSM will be used for both the Helmsley Plan and the Local Plan Sites Document, this is considered to be a suitable approach.</p> <p>The SSM is to enable objective analysis of sites individually as well as together with other sites submitted in the settlement. This assists in making transparent decisions which can be justified and take into account sustainability considerations. It is important to recognise that it is a tool to assist in the consideration of sites rather than an end in itself. Q21 specifically refers to “appropriate density” rather than a prescribed density level (reflecting the LPS), and therefore takes account of the context of the site within the settlement.</p> <p>The SSM is to enable objective analysis of sites individually as well as together with other sites submitted in the settlement. This assists in making transparent decisions which can be justified and take</p>

	<p>assessment of individual sites. Looks forward to making a full contribution to the Helmsley DPD.</p> <ul style="list-style-type: none"> • Made comment in respect of the site he has submitted and what the site can offer (comments added to sites comments) • Request full consideration of our interests in the process of selecting and assessing sites for allocation, include biodiversity; Geodiversity; landscape character and quality; green infrastructure; access to countryside and other open space; protection and enhancement of soils; and environmental land management. • Support the inclusion of accessibility and transport assessments and travel planning criteria in the draft SSM. • Request that it should be recognised that the Highways Agency feed in their analysis as part of the SSM approach 	<ul style="list-style-type: none"> • J C Fields • Natural England • Highways Agency 	<p>into account sustainability considerations. It is important to recognise that it is a tool to assist in the consideration of sites rather than an end in itself. Comments noted, though they are site specific rather than commenting on the Draft SSM.</p> <p>Noted. The Council agrees that this should be the case and considers that the SSM does take all of these considerations into account.</p> <p>Noted.</p> <p>Agreed. The SSM will be amended to include reference to input from the Highways Agency on highway matters.</p>
<p>1. Do you agree with the overall approach of linking the SSM to the objectives of the Core Strategy and Sustainability Appraisal?</p>	<ul style="list-style-type: none"> • In general, agree in respect of the questions, but wish to include a 1000 homes cap, and a phasing of sites (1,2,3), and sets out various criteria for assessing sites for housing and employment. • Generally supportive • Doesn't fully accord with aims and objectives of NPPF. • Aims to introduce consideration of issues which should be considered at a 	<ul style="list-style-type: none"> • Malton Town Council • Pickering T. Council • Directions Planning Consultancy o.b.o Redrow Homes Yorkshire 	<p>These comments relate to issues being considered through the LPS. In relation to the phasing of sites, this is not an element being considered through the SSM, however it will be something which is considered through consultation on the Local Plan Sites Document and Helmsley Plan.</p> <p>Noted.</p> <p>General support for approach noted. However the Council disagrees that the SSM doesn't accord with the NPPF. Since the SSM consultation, the final NPPF was published in March 2012. The Council considers</p>

	<p>planning application stage.</p> <ul style="list-style-type: none"> • Scoring could be prejudicial, dialogue should be continuous with developers to resolve any inaccurate scoring and address any issues. • Premature to ask about financial contributions and economic viability, as part of site selection, cannot be lawful. Realistic policy assumptions coupled with site-specific requirements where they are necessary. • Support principle and overall approach, but have concerns relating to some questions being used for site selection scoring. <ul style="list-style-type: none"> • Supports principle of a SSM which accords with policies and objectives of the Core Strategy, and this needs to be clearer. Regarding linkage to SA, agrees with principle, but that the level of detail required is commensurate with the stage of the LDF process, and not onerous and unnecessary. • Object. The SSM should also reflect the objectives of the NYMNP core Strategy and SA, as well as those of Ryedale DC. Currently Ryedale's take priority. 	<ul style="list-style-type: none"> • Barton Willmore o.b.o David Wilson Homes. (Y.E Div.) • Barton Willmore o.b.o Wharfedale Homes 	<p>that the SSM is consistent with this. It is essential that the Council identifies a deliverable supply of site allocations and therefore, it is necessary to require a certain level of information at this stage. Clearly this will be dependent on the scale of the site. The Council have not adopted a scoring approach in strict terms. However it enables a comparative assessment of sites so that balanced decisions can be made, taking into account a range of sustainability factors. The Council does not consider it premature to ask questions relating to developer contributions, as this is an essential element of ensuring the plan and associated infrastructure requirements are deliverable. However, Q54 and Q55 will be amended to reflect whether the normal range of s106 requirements can be met and whether the requirements set out in the CIL Charging Schedule (work is underway on this) can also be met. Support noted. The Council believes that, with the changes proposed to the SSM, the level of detail required through this process is appropriate.</p> <p>The Council disagrees with this assessment. The SSM makes clear how the objectives of Ryedale and the NYMNP mesh. The NYMNP Core Strategy has fewer objectives than those in the LPS, and this is a product of it being a Core Strategy covering a National Park. However the SSM clearly demonstrates there is a close fit between them.</p>
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	<ul style="list-style-type: none"> • Agree with overall approach. • Agree to overall approach of linking SSM with Core Strategy and SA. Agree with having an SSM for transparency. But consider it is too complex, unworkable and requires too much information upfront at such an early stage in site consideration. • Agree. • Consider that CS objectives need revision, regarding location of housing and RRCHs should be reinstated. • Approach supported in principle, given need for objective assessment, but consider site-by-site approach fails to give sufficient weight to the benefits of working closely with landowners who are able to deliver a comprehensive approach to phasing and delivery of development sites. • Document is overly complex, and is not accessible for the average local landowner. • Council appears focused on technical assessments, which goes against Govt. thinking which is moving towards 'presumption in favour'. 	<ul style="list-style-type: none"> • Flaxton Parish Council • Ward Hadaway obo Washford Ltd and Willowtree Ltd. • North East Yorkshire Geology Trust • Ward Hadaway obo Birdsall Estates • Smiths Gore obo Mr J M Douglas, Fitzwilliam Trust Corporation and Mr WR Peacock 	<p>Noted.</p> <p>Support in principle noted. It is essential that the Council identifies a deliverable supply of site allocations and therefore, it is necessary to require a certain level of information at this stage. Clearly this will be dependent on the scale of the site. As site allocations establish the principle of development, it is appropriate that enough information on a range of factors is received to ensure that sites best meet the objectives of the plan. The Council disagrees that the SSM is unworkable.</p> <p>Noted.</p> <p>This is a policy representation relating to the progression of the LPS, as the objectives set out in the SSM simply reflect the LPS. Therefore the LPS Examination is considering this issue.</p> <p>Support noted. Disagree that the SSM fails to recognise need to work closely with proposers of sites. Clearly the SSM will be an iterative process that requires ongoing discussion with proposers of sites. It is essential that the Council identifies a deliverable supply of site allocations and therefore, it is necessary to require a certain level of information at this stage. As site allocations establish the principle of development, it is appropriate that enough information on a range of factors is received to ensure that sites best meet the objectives of the plan. The Council therefore does not consider the document to be overly complex. The Council only refers to technical assessments that are normally required as part of the plan-making process. Clearly</p>
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	<ul style="list-style-type: none"> • SSM to focused and steers development towards national and major developers, makes no allowances for the local or smaller developer. It is biased towards those developers who have got themselves into good positions with landowners, and impinges upon the prospects of those landowners (mentioned) who prefer to remain independent of developers. • Main attraction of the SSM is the removal of development limits, thus releasing more land for housing within villages. Current plot is outside development limits, thankful that this SSM returns this to development land status. • Agree. • SSM is fine as far as it goes, but omits a vital stage. It does not contain a mechanism to evenly (as far as possible) distribute housing within the Service Villages, this must be included in the Methodology. • Linking to CS and SA is too complex and convoluted. SSM should focus on principal issues: conformity to Settlement Hierarchy, SHLAA and SA findings, accessibility, flood risk and development constraints. 	<ul style="list-style-type: none"> • Executors of Harold Linley • D and J Cossins • Nawton Parish Council • Carter Jonas obo the Hovingham Estate, Wintringham Estate and Dr R Wheeler. 	<p>the level of information required is a product of the scale of the site. The Council has to balance the certainty of a site allocation being brought forward against asking for a reasonable amount of information need to support the site. On this basis the SSM, with the suggested amendments in this schedule, is appropriate.</p> <p>The SSM does not remove development limits. These will be reviewed and adjusted through the Local Plan Sites Document around any allocations made.</p> <p>Noted. The SSM is not the mechanism for the final choices on sites, it is a tool to assist in making choices. The distribution of development between service villages will reflect the policy approach set out in the LPS. Whilst this gives steer on the distribution of development it is not a prescriptive approach and depends on choices made in the preparation Local Plan Sites Document following consultation. Linking the SA and LPS objectives is essential to ensuring sustainable choices are made on the most appropriate sites. Clearly a key part of the SSM is applying LPS policy such as the settlement hierarchy. The questions of the SSM do cover all those other elements you have highlighted, within the umbrella of sustainability considerations.</p>
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	<ul style="list-style-type: none"> • Support general approach adopted in this methodology and strong links shown to the Core Strategy and SA. • Endorse approach of linking SSM to CS and SA. Ensure that sites which come forward do not compromise delivery of the Vision and Objectives of the CS, and that the sites not chosen are likely to be shown as unsustainable. 	<ul style="list-style-type: none"> • Yorkshire Water • English Heritage 	<p>Noted.</p> <p>Noted and agreed.</p>
<p>2. Stage 1 – Do you agree with the detail of the ‘sift’ set out in Stage 1?</p>	<ul style="list-style-type: none"> • In general, agree in respect of the questions, but wish to include a 1000 homes cap, and a phasing of sites (1,2,3), and sets out various criteria for assessing sites for housing and employment. • Generally supportive • Should be making allocations for employment land in villages, or allowing expansion of existing sites, otherwise unsustainable approach. • Concerned about no clear definition of employment uses, should not just be restricted to B uses • Concerned that no definition of community facilities, and that some facilities would also constitute suitable employment • Support the stage 1 sift on p.17, subject to concerns and issues outlined in table 	<ul style="list-style-type: none"> • Malton Town Council • Pickering T. Council • D. Baines • Directions Planning Consultancy o.b.o 	<p>These comments relate to issues being considered through the LPS. In relation to the phasing of sites, this is not an element being considered through the SSM, however it will be something which is considered through consultation on the Local Plan Sites Document and Helmsley Plan.</p> <p>Noted.</p> <p>These comments relate to issues being considered through the LPS. The SSM simply applies the approach set out in the LPS and in this regard, a criteria based policy approach supports employment outside of the towns and the expansion of existing businesses. The LPS is clear that only ‘B’ uses are considered in terms of employment development. However allocations could also be made for retail development which also is an employment generating use. No specific allocations will be made for community uses in the Local Plan Sites Document, unless it is part of a wider mixed use site involving and element of housing, employment or retail. The LPS sets out what ‘community facilities’ means.</p> <p>Support noted.</p>

	<p>2</p> <ul style="list-style-type: none"> • Support applying initial filter to remove unsuitable sites – pragmatic. However, instead of ‘assessing only sites in the towns’ should be re-worded to: ‘assessing only sites which would support the needs of the towns’. Further clarity provided to define what would constitute ‘significant harm to heritage assets’. • Agree with stage 1 sift in so far as fitting with the Core Strategy. However, object to detailed text, which is not sufficiently aligned with C.S, as text refers to only in towns, whereas policy refers to within and adjacent. Needs to be amended. • Objects- the SSM refers to sites only in the towns, whereas the Core Strategy Objectives refer to sites in an adjacent the built up area. The text must be amended to reflect the CS objectives. • Also need clarification on whether is referring to the physical form of the town, or development limits, which in the NYMNP side of Helmsley, do not exist. Needs clarification. • Objects to the lack of reference to CS policies which are being used. • Objects to the lack of reference of NYMNP policies. • Object to exclusion of part of a site 	<p>Redrow Homes Yorkshire</p> <ul style="list-style-type: none"> • FLP • Barton Willmore o.b.o David Wilson Homes. (Y.E Div.) • Barton Willmore o.b.o Wharfedale Homes 	<p>Support noted. The application of the Sift at stage 1 reflects the LPS approach. The Council considers that the suggested alternative is too loose. However this section will be re-worded to state sites “at” the settlements rather than “in” to clarify that this includes sites outside of the current development limits at the towns and service villages. The Council is amending the term “significant harm” to reflect comments made by English Heritage..</p> <p>As stated above, in line with proposed changes to the LPS, this section will be re-worded to state sites “at” the settlements rather than “in” to clarify that this includes sites outside of the current development limits at the towns and service villages.</p> <p>As stated above, in line with proposed changes to the LPS, this section will be re-worded to state sites “at” the settlements rather than “in” to clarify that this includes sites outside of the current development limits at the towns and service villages. It is considered that the change to “at” the towns is clear for all instances including Helmsley. The Council are also adding an additional question to the SSM to consider the sites relationship to the settlement in Stage 2 Assessment Level 2 It is considered that these changes, taken together, clarify this issue. The Council will also clarify which LPS Policies the SSM is referring to. Reference will also be mad to relevant NYMNP policies.</p> <p>The Council will be applying national policy relating</p>
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	<p>which is flood zone 3b, this land may be used for appropriate uses (such as open space) ensuring a more efficient use of the site as a whole.</p> <ul style="list-style-type: none"> • Support assessing only sites in the towns and key service villages, in the service villages there should be an assessment of the size of the site and its impact on the village. • Agree with approach to link SSM to CS and SA, but concerned about the presumption of the settlement hierarchy being established, as CS is not finalised. It could be refined in light of consultation. Hope that SSM could be open to review should the settlement hierarchy should change at a later stage in the process. • Methodology should allow assessment of sites outside of towns and key service villages, to be assessed on their individual relative merit. The current process is relatively crude, and is immediately discounting potentially suitable housing sites. • Agree in large, but should be potential for other settlements to provide appropriate land for housing, subject to meeting other appropriate assessment 	<ul style="list-style-type: none"> • Flaxton Parish Council • Edwardson Associates 	<p>to flood risk which Stage 1 of the SSM reflects. However the Council agrees that water compatible uses could be appropriate as part of the wider development of the site, in line with the NPPF. On this basis, it is proposed to amend the text on page 17 of the SSM to say: "Where sites are partially in Flood Zone 3b, that part of the site will not be considered further for built development"</p> <p>Noted.</p> <p>The SSM reflects the Policies of the LPS and will be amended if any further changes are made to the LPS. Clearly at the time of the SSM consultation, the LPS was only at a draft stage. These representations relate to the progression of the LPS and are issues being considered through the Examination.</p>
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	<p>criteria.</p> <ul style="list-style-type: none"> • Agree that majority of developments should be directed to market towns. Agree that sites which cause significant harm to national/international nature conservation sites should be sieved at stage 1, Council should make clear what is meant by 'significant harm' and what are defined to be national/international nature conservation sites. • Agree that sites wholly within Flood zone 3b (or part of a site) should be discounted. (need to be clear about the flood zone areas information). • No, geology needs to be mentioned alongside species and habits under nature conservation sites. It is also a heritage asset. • Disagree that sites outside the towns and service villages are to be ruled out. Draft NPPF requires planning authorities in rural areas to respond to local circumstances and reflect local requirements. Ask that Council revisit RRCHs model. Some employment may also require a rural location. Noted that tourism and leisure are not subject to SSM, and this is supported, as they are likely to be in a rural area. • Agree. • First stage should eliminate sites which 	<ul style="list-style-type: none"> • Ward Hadaway obo Washford Ltd and Willowtree Ltd. • North East Yorkshire Geology Trust • Ward Hadaway obo Birdsall Estates • D and J Cossins • Carter Jonas obo 	<p>Support noted. Definition of significant harm will be reflect NPPF phrasing – see comments in reply to English Heritage. The Council considers that nationally and internationally protected nature conservation sites are self-explanatory and do not need further definition. The flood zone data will be the latest available information from the Environment Agency.</p> <p>The Council disagrees that geology should be part of the Stage 1 sift as it is not an absolute constraint to development. Geology is covered in stage 2, Assessment Level 2 and this is considered appropriate.</p> <p>These are comments in relation to the LPS rather than the SSM. These issues are being considered through the LPS Examination.</p> <p>Noted. Support noted. HSE Zones are not necessarily an</p>
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	<p>cannot or should not be developed. Sites subject to one or more insurmountable major constraints should be rejected. Stage 1 should also exclude sites in HSE zones.</p> <ul style="list-style-type: none"> • Support the detail of the sift set out in stage 1, and endorse proposals to not consider sites which are likely to result in significant harm to heritage assets. However, would benefit from some amendments: <ul style="list-style-type: none"> a) Only designated heritage assets should be ruled out at this stage. b) Wording should more closely reflect PPS5 and draft NPPF: “or would involve substantial harm to or loss of designated heritage assets will not be considered further”. 	<p>the Hovingham Estate and Dr R Wheeler.</p> <ul style="list-style-type: none"> • English Heritage 	<p>absolute constraint depending on the relationship of the site and type of use. However the Council recognises that it is an important consideration and the SSM does already reflect this issue in Stage 2, Assessment Level 2.</p> <p>Support noted. The Council agrees that clarification on this subject should be made as outlined, except that national policy is now reflected in the finalised NPPF published in March 2012.</p>
<p>3. Stage 1 – Do you agree with the threshold of sites at or above 0.3ha being considered further through Stage 2?</p>	<ul style="list-style-type: none"> • In general, agree in respect of the questions, but wish to include a 1000 homes cap, and a phasing of sites (1,2,3), and sets out various criteria for assessing sites for housing and employment. • Generally supportive • Support, subject to larger sites not being penalised as they would have a greater impact, and a reasonable spread of allocations being made . • Does not object to the threshold, but there is no qualification for its use. 	<ul style="list-style-type: none"> • Malton Town Council • Pickering T. Council • Directions Planning Consultancy o.b.o Redrow Homes Yorkshire • Barton Willmore o.b.o David Wilson Homes. (Y.E Div.) 	<p>These comments relate to issues being considered through the LPS. In relation to the phasing of sites, this is not an element being considered through the SSM, however it will be something which is considered through consultation on the Local Plan Sites Document and Helmsley Plan.</p> <p>Support noted. Support noted.</p> <p>Lack of objection noted.</p>

	<ul style="list-style-type: none"> • No, should evaluate smaller sites- acknowledge that they will make a positive contribution to the future supply of land, and reduce the need for larger sites and reduce the impact on the edge of the towns. • Agree threshold of 0.3ha, any sites below this would be assessed as windfall sites. • Agree with threshold for towns and villages, but consider that development should be allowed to come forward in other locations, and that this may be on sites greater or less than 0.3 ha • Note minimum size threshold, sites of this size will struggle with the costs of providing information about the site. Methodology favours the larger sites, which can better stand the costs of providing technical information. • Agree • Threshold is at a reasonable level. 	<p>and Barton Willmore o.b.o Wharfedale Homes</p> <ul style="list-style-type: none"> • Edwardson Associates • Ward Hadaway obo Washford Ltd and Willowtree Ltd. • Ward Hadaway obo Birdsall Estates • Smiths Gore obo Mr J M Douglas, Fitzwilliam Trust Corporation and Mr WR Peacock • D and J Cossins • Carter Jonas obo the Hovingham Estate, 	<p>The Council notes the response. Given the scale of development proposed in service villages is less than that in the Market Towns, the Council suggests having a different threshold for Service Villages of 0.15ha. The threshold for the Principal Town and Local Service Centres will remain at 0.3ha. This is considered an appropriate balance. Support noted.</p> <p>The Council notes the response. Given the scale of development proposed in service villages is less than that in the Market Towns, the Council suggests having a different threshold for Service Villages of 0.15ha. The threshold for the Principal Town and Local Service Centres will remain at 0.3ha. This is considered an appropriate balance. The Council will not be allocating sites outside of the settlement hierarchy in line with the LPS. It is essential that the Council identifies a deliverable supply of site allocations and therefore, it is necessary to require a certain level of information at this stage. The Council has to balance the certainty of a site allocation being brought forward against asking for a reasonable amount of information need to support the site. It is not considered that the SSM will unfairly affect the progression of smaller sites. Noted. Noted.</p>
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		Wintringham and Dr R Wheeler.	
<p>4. Stage 2 – Assessment level 1 – Do you agree with the prioritisation of accessibility, highways and flood risk as having additional weight in the choice of sites?</p>	<ul style="list-style-type: none"> • In general, agree in respect of the questions, but wish to include a 1000 homes cap, and a phasing of sites (1,2,3), and sets out various criteria for assessing sites for housing and employment. • Generally supportive • Acceptable, subject to consultation responses from statutory consultees, being passed to the site promoter for comment and response before being sieved, as supplemental information could be provided. • Accept the three factors are generically those to which the most weight should be given, could be for individual sites another factor, which could provide significant harm/benefit. • Support and suggest prominence to 'results in assess. 1stage 2 will be analysed in detail then compared to the results of Assess. 2 and 3 to arrive at a balanced view of suitability of the site. • For Q1A the distances which equate to these times should be stated • P.22 sites reported in order to allow comparison, any attempt to order them by outcome would prejudice the decision to not adopt a scoring system. • Agree that they should be prioritised. 	<ul style="list-style-type: none"> • Malton Town Council • Pickering T. Council • Directions Planning Consultancy o.b.o Redrow Homes Yorkshire • FLP • Barton Willmore o.b.o David Wilson 	<p>These comments relate to issues being considered through the LPS. In relation to the phasing of sites, this is not an element being considered through the SSM, however it will be something which is considered through consultation on the Local Plan Sites Document and Helmsley Plan.</p> <p>Support noted</p> <p>Noted. The Council will make proposers of sites aware of statutory responses which require further attention.</p> <p>Noted. The Council will assume an average walking speed which gives a standardised walking distance for each 5 minute band. The Council considers that the comparison of sites will assist in making choices on sites and does not constitute scoring.</p> <p>Noted</p>

	<ul style="list-style-type: none"> • Does not object in principle to the prioritisation of these criteria, but objects to the rating system reg. Flooding, when such issues could be mitigatable, and therefore should not adversely affect rating. • Agree that accessibility is an important consideration. However, SSM has overlooked, and should include assessment of where improvement may be brought about by a particular site being developed. • Agree with importance of flooding as an issue, consider that the SSM need not duplicate PPS25 guidance nor create a new scoring system. The scoring system is not clear, and conflicts with PPS25 guidance. Also assessment of RIZ does not have a clear distinction between the zones, indeed some overlap. • Impact on the highway is an important consideration. North Yorkshire CC must enter into dialogue with landowners before concluding the acceptability of sites, particularly where dev. Contributions may lead to highway improvements. • Agree • All things being equal, agree with prioritisation, but should also consider 	<p>Homes. (Y.E Div.)</p> <ul style="list-style-type: none"> • Barton Willmore o.b.o Wharfedale Homes • Ward Hadaway obo Washford Ltd and Willowtree Ltd • North East Yorkshire Geology Trust • Ward Hadaway obo Birdsall Estates 	<p>Noted. The Council disagrees with the assessment that sites with no flood risk should be categorised the same as sites which are affected by flood risk but which are capable of mitigation. However changes to the flood risk questions of the SSM are being made in line with comments from the Environment Agency. Whilst not specifically referred to, the Council will consider accessibility to the site in line with the proposals put forward. Therefore if an improvement is suggested, this will be included in the assessment. The SSM will simply apply flood risk in line with national planning policy. RIZ zones are a specific concern in relation to the flood defences in Malton and Norton and due note will be taken of them in line with national planning policy and guidance, the SFRA and the advice of the Environment Agency. The Council notes the comments relating to NYCC, and confirms that responses of the statutory agencies will be made available where additional information is required.</p> <p>Noted.</p> <p>Noted. Enabling Development is an issue relating to the LPS and is being considered through the</p>
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	<p>the wider benefits of a particular site (mentions responding to a conservation deficit)</p> <ul style="list-style-type: none"> • Agree. • Approach is consistent with PPS1 and PPS3, in seeking to achieve sustainable communities. Also support the prioritisation of accessibility, in accordance with NPPF. However, landowners whose sites have poor accessibility should be given the opportunity to rectify the situation. • Support the sifting out of sites in Flood Zone 3b, or parts of sites in FZ 3B at Stage 1 of the SSM. 	<ul style="list-style-type: none"> • D and J Cossins • Carter Jonas obo the Hovingham Estate, Wintringham Estate and Dr R Wheeler. • Environment Agency 	<p>Examination.</p> <p>Noted.</p> <p>Noted. Whilst not specifically referred to, the Council will consider accessibility to the site in line with the proposals put forward. Therefore if an improvement is suggested, this will be included in the assessment. Opportunity will be given to proposers of sites to respond to the assessment of their site through the SSM.</p> <p>Noted.</p>
<p>5. Stage 2 – Assessment level 2 – Do you agree with the range of factors chosen to gauge the performance of a site? Are there any other factors do you think that should feature here?</p>	<ul style="list-style-type: none"> • In general, agree in respect of the questions, but wish to include a 1000 homes cap, and a phasing of sites (1,2,3), and sets out various criteria for assessing sites for housing and employment. • All factors should be included. Highlighted in particular ‘cultural heritage’, natural resources, community facilities, utilities and infrastructure, and further consideration of meeting the needs of the elderly (in particular those suffering from dementia) • Acceptable subject to concerns being addressed as raised in table 2 (response below), particular issues regarding scoring pertain to: 	<ul style="list-style-type: none"> • Malton Town Council • Pickering T. Council • Directions Planning Consultancy o.b.o Redrow Homes Yorkshire 	<p>These comments relate to issues being considered through the LPS. In relation to the phasing of sites, this is not an element being considered through the SSM, however it will be something which is considered through consultation on the Local Plan Sites Document and Helmsley Plan.</p> <p>Noted.</p> <p>Noted. Response to detailed comments on objectives set out below under ‘Table 2’. Comments on mitigation and enhancement of biodiversity noted and it is considered that Stage 2, Assessment Level 2</p>

	<p>-Appropriate mitigation and enhancement of biodiversity</p> <p>-low carbon and RE development, premature to assess- progressing rapidly – don't know what will be available in future, and need to be considered with blg sustainability and waste reduction.</p> <p>-should be no presumption on B.F land, and remediation can be conditioned, Density can be considered at the PA stage</p> <p>-Most greenfield sites will fall in BMVA classification, support site thresholds to score where there is greatest loss of ag. Land</p> <p>-Amenity- should consider smell, suitable mitigation measures should be discussed with the site promoter, potential loss of light, privacy overbearing effect are design issues to consider at PA stage, gen. amenity can be protected through good design.</p> <p>- premature to require FRA or SUDs to support allocation at this stage</p> <p>- People issues around secure by design, modal shift etc, premature to consider at allocation stage.</p> <p>-Affordable housing, impossible to know what the requirements and viability will be at time application is made.</p> <p>Community</p>		<p>of SSM reflects this. Low carbon and RE development</p> <p>- the Council does not consider this is premature at this stage as need to know how site perform across a range if sustainability principles. However it is important to note that Q14, Q17 and Q18 are being amended to reflect the latest version of the LPS and responses to consultation. There is no presumption in favour of PDL in the SSM as such, however the reuse of PDL is one positive consideration amongst many others, reflecting national planning policy. Comments on BVV agricultural land noted and it is considered the SSM reflects these considerations. Agree that 'smell' should be added to the list of amenity considerations for Q29. It is anticipated that there will be an ongoing dialogue with proposers of sites in relation to the SSM. The Council considers that it is appropriate to consider flood risk and drainage concerns at this point as well as 'people' SSM issues to ensure sustainable choices are made around site allocations. Affordable housing is an important consideration and this is an element which needs to be considered now in line with latest LPS policy. In terms of community facilities, utilities and infrastructure, Q54 and Q55 are being amended to reflect the latest LPS policy and the emerging work on a CIL charging schedule. This is considered entirely appropriate to ensure that the infrastructure necessary to support the Ryedale Plan, can be delivered through the sites chosen for allocation.</p>
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	<p>facilities/utilities/infrastructure- premature to require detailed submission, and expect that some mitigation will be likely. Larger sites may have a larger impact, but also provide benefits. Impossible to quantify off/on site provision- should come out of the scoring system.</p> <ul style="list-style-type: none"> • It is possible that the site will fit into none of the categories and have a neutral impact, should consider inclusion of scoring a neutral outcome. • Most of the questions assess very specific matters of detail (Q14,19,38B and45)- which could lead to unfair assessment, if it not clear whether it really is capable- scoring should reflect whether it is capable, and extra scoring if the detail is presented. • Q14-16 and E (LC and RE) this will be addressed through the BRegs process, therefore shouldn't have a negative scoring. Consider + category in addition to ++ category. • Q17, should be amended, inappropriate that the achievement of a mandatory level is awarded a negative score. • Q36- site specific s may mean that limited or no measures are necessary to address climate change- should not receive a negative score • Q39- better define what feature of a 	<ul style="list-style-type: none"> • FLP 	<p>Noted. The Council does not consider it is necessary to include another classification of neutral. Sites will be compared against each other at a settlement level and this comparison enables choices to be made across a range of factors, rather than any single issue in isolation. Where sites are incapable of accommodating or utilising certain factors which would have beneficial sustainable outcomes, then this should be considered more negatively than those that can. However again it is essential that sites considered through the SSM will be considered against each other at a settlement level. Please note that Q14 and Q17 are being amended to reflect revisions to the SSM. In most cases some elements can be built into a scheme to provide climate change resilience. If a site is not capable, then that sustainability outcome is not achieved and therefore attracts a negative result in the SSM. This is considered appropriate. The Council agrees that the supporting text to Q39 could be better defined to assist proposers of sites. Q41 and Q42 will require updating to reflect the latest version of the LPS, in terms of affordable housing target and threshold as well as elderly provision. However the SHMA still is an important evidence base for the assessing need,</p>
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	<p>scheme will contribute to attracting a balanced living and working community.</p> <ul style="list-style-type: none"> • Q41-42- should be assessed against Council's affordable housing policy, not the SHMA, the latter informs policy and DC decisions. • Agrees with broad range of factors chosen to gauge performance of the site, but objects to Q11's wording and rating. It penalises sites that are out of existing settlements, but have no affect on coalescence; when compared to sites that fall within the built form. There should be no difference. Also reference to the built form requires clarification, is it physical form or development limits? Should be the former. • Agrees with broad range of factors, but objects to two criteria: Q11 penalises sites which are outside of existing settlements, regardless of whether they cause coalescence, against sites within settlements. Reference to built form needs clarification, is it physical form or Development Limits? Should be former. Q36, flood risk, where it is mitigatable should not be penalised, and it does not differentiate that flood risk may only affect part of a site. • C2- needs some modification, as unlikely that many, if any, development 	<ul style="list-style-type: none"> • Barton Willmore o.b.o David Wilson Homes. (Y.E Div.) • Barton Willmore o.b.o Wharfedale Homes • Edwardson Associates 	<p>housing mix and tenure.</p> <p>Noted. The Council considers that an additional question should be added to the SSM to reflect the relationship of the site to the existing commercial or development limits, depending on the nature of the development.</p> <p>Noted. The Council considers that an additional question should be added to the SSM to reflect the relationship of the site to the existing commercial or development limits, depending on the nature of the development.</p> <p>C2 is an SA objective and the questions which flow from it are listed next to this. The Council recognises</p>
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	<p>sites will maintain and enhance the quality of the landscape, focus should be on minimising impacts, should flow through stages 1 and 2.</p> <ul style="list-style-type: none"> • Agree that the Council needs to assess other factors than those in assessment 1. But requires too much information from developers/landowners, requiring information normally provided at application stage. This would require significant expense with no guarantee of allocation/permission. Should be streamlined to concentrate on key factors at the allocations stage, such as the principle of location of development in key settlements. • Yes, but should include geological feature in Q13. • A further factor which should carry additional weight in the choice of sites is the wider benefits of a particular site/overall proposal. • Concerned about the level and scale of information required. Prohibitively expensive for smaller local land owners, especially since not guarantee of a site being acceptable. • Consider that the SSM could isolate landowners and potentially restrict the growth of Ryedale. • Unreasonable to expect developers or landowners to provide this level of 	<ul style="list-style-type: none"> • Ward Hadaway obo Washford Ltd and Willowtree Ltd. • North East Yorkshire Geology Trust • Ward Hadaway obo Birdsall Estates • Smiths Gore obo Mr J M Douglas, Fitzwilliam Trust Corporation and Mr WR Peacock • Carter Jonas obo the Hovingham Estate, 	<p>that development will have an impact on the landscape and that it is essential that this is minimised through the choices of sites as well as mitigation measures.</p> <p>Noted. It is essential that the Council identifies a deliverable supply of site allocations and therefore, it is necessary to require a certain level of information at this stage. Clearly this will be dependent on the scale of the site. As site allocations establish the principle of development, it is appropriate that enough information on a range of factors is received to ensure that sites best meet the objectives of the plan. Assessment Level 1 of Stage 2 shows where a number of key factors are considered, however the many other factors in Assessment Levels 2 and 3 are essential to ensure sites for allocation are the most appropriate and sustainable.</p> <p>Geological features are considered under Q5. Including this in Q13 would represent duplication. The SSM as a whole is an assessment of the proposed development as a whole, taking into account wider benefits.</p> <p>It is essential that the Council identifies a deliverable supply of site allocations and therefore, it is necessary to require a certain level of information at this stage. The Council has to balance the certainty of a site allocation being brought forward against asking for a reasonable amount of information need to support the site. It is not considered that the SSM will unfairly affect the progression of smaller sites.</p> <p>Noted. It is essential that the Council identifies a deliverable supply of site allocations and therefore, it</p>
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	<p>information. Site layout, landscaping, housing mix and developer contributions should be dealt with at the planning application stage.</p> <ul style="list-style-type: none"> • Methodology also places undue emphasis on the use of PDL before Greenfield, this concept has been abandoned by the NPPF. • Number of environmental constraints which may affect the size. Scale, form and delivery of sites, including designated sites for nature conservation and landscape, UK BAP habitats/species, opportunities for biodiversity gain, ancient woodland and access to green space. • May find Nature on the map website useful to source information on conservation sites and habitats. • Aim to avoid damaging existing biodiversity and look to enhance opportunities to enhance biodiversity through delivery of the LBAP targets. Further information about national BAP is available on the JNCC website. • Cannot advise on presence of protected species, non-statutory sites and species records may be obtained from the local Wildlife Trust and Local Records Centre. 	<p>WIntringham Estate and Dr R Wheeler.</p> <ul style="list-style-type: none"> • Natural England 	<p>is necessary to require a certain level of information at this stage. Clearly this will be dependent on the scale of the site. As site allocations establish the principle of development, it is appropriate that enough information on a range of factors is received to ensure that sites best meet the objectives of the plan. The Council does not consider that the emphasis on PDL is inappropriate. However it remains only one consideration to be balance against others. The LPS recognises that there are limited brownfield opportunities and that a significant amount of Greenfield sites will be needed. Noted. The Council considers that the SSM does take account of all of these considerations.</p>
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	<ul style="list-style-type: none">• Should attach appropriate weight to Geodiversity interests of designated sites and within the wider environment, and maximise opportunities to enhance geodiversity.• SSM useful starting point to consider soils and ensure their protection. Need to consider protection of BMV agricultural land, unless wider sustainability objectives. Should use the Agric. Land Classification.• SSM should include thorough examination of the impacts on landscape character, in particular those designated landscapes. A landscape character approach should underpin and guide decisions on development and set out criteria based policies for landscape character areas.• Green Infrastructure, and integral part of sustainable communities. SSM process can provide a useful starting point for the provision of GI. One important function of the provision of GI is for new opportunities for access to open space. Should use ANGSt to provide a set of bench marks to ensure that new housing and existing housing has access to nature. Refers to CABI Space Guidance 'Start with the Park' (2005). Should be considered at an early stage so it is deliverable at the plan stage.		
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	<ul style="list-style-type: none"> • Support inclusion of accessibility, transport assessments and travel planning criteria. • In relation to Q43 confirm that the Malton and Norton STA does not replace need for detailed transport assessment • Confirm that HA will feed in information from Network Analysis Tool to Q43 and Q44. 		<p>Support noted. The Council agrees that the detailed transport assessment is required for Malton and Norton at the allocations stage. The Council will amend Q43 and Q44 to reflect the involvement of the HA in this matter alongside NYCC. The Council welcomes the ongoing input from the HA regarding Q43 and Q44</p>
<p>6. Stage 2 – Assessment level 3 – Do you agree with the deliverability and developability factors? Are there any others you think we should consider?</p>	<ul style="list-style-type: none"> • In general, agree in respect of the questions, but wish to include a 1000 homes cap, and a phasing of sites (1,2,3), and sets out various criteria for assessing sites for housing and employment. • Strongly supported- will establish realistic likelihood of delivery. • Regarding developer contributions they should not form part of the assessment but are a legitimate part of the planning process. Should be examined, not in an SPD. Charging schedule has no place in a scoring system, need to ensure development remains viable. • Agrees. • Agrees in principle, but objects, due to the reliance on the SHLAA, which will not have the same level of detail available as in the SSM, should be part of the assessment with supplementary 	<ul style="list-style-type: none"> • Malton Town Council • Directions Planning Consultancy o.b.o Redrow Homes Yorkshire • Barton Willmore o.b.o David Wilson Homes. (Y.E Div.) • Barton Willmore o.b.o Wharfedale Homes 	<p>These comments relate to issues being considered through the LPS. In relation to the phasing of sites, this is not an element being considered through the SSM, however it will be something which is considered through consultation on the Local Plan Sites Document and Helmsley Plan.</p> <p>Support noted. The Council disagrees that developer contributions as a factor should not be part of the SSM process. However given the need to reflect the latest version of the LPS and the eventual production of a CIL charging schedule, Q54 and Q55 are being revised in this way.</p> <p>Noted</p> <p>Noted. Q52 has regard to the SHLAA as part of the assessment of housing sites, however this is only one factor and the SSM overall itself takes into account a range of detailed factors.</p>

	<p>information provided when necessary.</p> <ul style="list-style-type: none"> • Out of context with level 2, generic consideration based on SHLAA criterion (which is being updated, and therefore not sure if it is the appropriate document to assess delivery against). The SHLAA does not consider the mitigation measures that would make a site suitable for development, nor does it consider financial contributions or other improvements that the development of a site could bring. • Q54 and Q55 will be difficult to answer at a strategic planning level, and do not take account of site viability, a site with abnormal costs may not be able to deliver expected financial contributions, thus performing poorly in the SSM, when the development may have site-specific regeneration improvements/ accessibility enhancement. • Agree, but Q54 should include Geodiversity compensation measures • Support assessment of whether a site is deliverable or developable. Agree that SHLAA should be the starting point, but SHLAA findings are not always accurate or up-to-date. • Agree. • SHLAA and ELR should be key determinate of whether a site is 	<ul style="list-style-type: none"> • Ward Hadaway obo Washford Ltd and Willowtree Ltd. • North East Yorkshire Geology Trust • Ward Hadaway obo Birdsall Estates • D and J Cossins • Carter Jonas obo the Hovingham 	<p>Noted. Q52 has regard to the SHLAA as part of the assessment of housing sites, however this is only one factor and the SSM overall itself takes into account a range of detailed factors. Q54 and 55 are being amended to reflect the latest version of the LPS and the production of a CIL charging schedule, but contributions remain an important consideration in ensuring development and infrastructure requirements are considered.</p> <p>The Council disagrees that ‘geodiversity compensation measures’ should be included on Q54, as it is not a developer contribution as such. Support noted. The SHLAA should be considered a starting point and the SSM itself helps to consider more detailed as well as wider factors.</p> <p>Noted. The SHLAA and ELR are one of a number of considerations which the SSM takes into account.</p>
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	deliverable or developable.	Estate, Wintringham Estate and Dr R Wheeler.	
7. Do you agree with the proposed 'categorisation' and 'rating' approach to the consideration of sites through the various stages as opposed to a numeric scoring system?	<ul style="list-style-type: none"> • In general, agree in respect of the questions, but wish to include a 1000 homes cap, and a phasing of sites (1,2,3), and sets out various criteria for assessing sites for housing and employment. • Support categorisation of sites, but no real difference to scoring system. Welcome Council's commitment in stage 3 to continue on-going dialogue with site promoters to ensure necessary information is provided. • Support the categorisation and rating approach and recognition that the SSM will not allocate sites but is to provide an objective process to site selection. • Agrees in principle with categorising certain criteria and rating the outcome, but that some form of numerical comparison is inevitable. Currently object to lack of clarity and distinction in the SSM on how the rating approach will be quantified or accumulated to determine site acceptability. It is inevitable that both a quantitative and qualitative approach will be required-application of professional judgement. It is imperative that the quantitative element is transparent, and that the qualitative exercise is fair and 	<ul style="list-style-type: none"> • Malton Town Council • Directions Planning Consultancy o.b.o Redrow Homes Yorkshire • FLP • Barton Willmore o.b.o David Wilson Homes. (Y.E Div.) 	<p>These comments relate to issues being considered through the LPS. In relation to the phasing of sites, this is not an element being considered through the SSM, however it will be something which is considered through consultation on the Local Plan Sites Document and Helmsley Plan.</p> <p>Support noted. The Council does consider that the SSM is not a strict scoring mechanism. The outcomes of the assessment are a measure of the overall sustainability of the development of a site.</p> <p>Support noted.</p> <p>Noted. The Council has chosen a non-numerical method of assessing sites rather than a strict scoring mechanism in line with sustainability and plan objectives. To have a system which does not have a quantitative element is effectively scoring and would not allow for professional judgment or 'flexibility'. The SSM is clear that sites will be compared against each other in terms of their performance on range of factors. There are also 'overall' ratings for each section under Stage 2. This is considered to be the best balance in ensuring a consistent approach to site selection, whilst providing a tool for professional judgement on the acceptability of sites.</p>

	<p>consistent. Should also make clear a certain degree of flexibility, depending on local circumstances and wider planning benefits.</p> <ul style="list-style-type: none"> • Object. Current approach lacks clarity in the scoring, and numeric system would give greater clarity. Site selection should be qualitative and quantitative. It should be transparent, and consistent, and go into greater detail. As currently drafted SSM does not give sufficient detail. SSM need to have some flexibility, depending on local circumstances and wider planning benefits. • Whatever approach is adopted, the individual merits of all the sites need to be assessed. Rather than a crude sieve. Settlement Hierarchy should not be the determining factor. The true merits of the site should be a key consideration in any initial appraisal of site suitability. • Re. employment land this will necessitate using land from outside existing settlement boundaries, and that allocations should avoid sites likely to exacerbate traffic problems in the towns. • Find the SSM over complicated and confusing. In the absence of a scoring system, no clear guidance how sites will 	<ul style="list-style-type: none"> • Barton Willmore o.b.o Wharfedale Homes • Edwardson Associates • Ward Hadaway obo Washford Ltd and Willowtree Ltd. 	<p>Noted. The Council has chosen a non-numerical method of assessing sites rather than a strict scoring mechanism in line with sustainability and plan objectives. To have a system which does have a quantitative element is effectively scoring and would not allow for professional judgment or 'flexibility'. The SSM is clear that sites will be compared against each other in terms of their performance on range of factors. There are also 'overall' ratings for each section under Stage 2. This is considered to be the best balance in ensuring a consistent approach to site selection, whilst providing a tool for professional judgement on the acceptability of sites.</p> <p>This is a comment in relation to the LPS and which is being considered through Examination. The SSM simply applies the LPS approach to sieve sites which do not fit with this approach. The SSM reflects the Policies of the LPS and will be amended if any further changes are made to the LPS. Clearly at the time of the SSM consultation, the LPS was only at a draft stage. Traffic considerations will be taken into account through Stage 2, Assessment Level 1 and 2 of the SSM.</p> <p>The SSM is clear that sites will be compared against each other in terms of their performance on range of factors. There are also 'overall' ratings for each</p>
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	<p>be assessed against each other. Agree Council should not use a numeric scoring system, as it does not allow flexibility for officer view/experience. The SSM should be streamlined. Should consider the principles of good planning as set out in National Planning Policy and NPPF, with development on PDL coming first in the most sustainable locations. Majority of the questions in Level 2 are better considered at the pre-application/application stage.</p> <ul style="list-style-type: none"> • Yes, numeric scoring systems are totally subjective and lead to meaningless averages being used. • Agree in general terms, but rightly and properly planning involves judgements and must not be reduced to being a 'tick box' exercise. • Agree. • Catagorisation and weighting is unclear, as no weighting is given to different sections/q's. Any system should be transparent and show how the different sites have been appraised. Currently it is not sufficiently transparent. • Suggest a meeting is arranged to discuss what weighting should be used in respect of flood risk, as in draft form the SSM does not attribute weighting. 	<ul style="list-style-type: none"> • North East Yorkshire Geology Trust • Ward Hadaway obo Birdsall Estates • D and J Cossins • Carter Jonas obo the Hovingham Estate, Wintringham Estate and Dr R Wheeler. • Environment Agency 	<p>section under Stage 2. This is considered to be the best balance in ensuring a consistent approach to site selection, whilst providing a tool for professional judgement on the acceptability of sites. The Council considers that the SSM is consistent with the NPPF – particularly plan-making principles and indeed does refer to the development of PDL land. It is essential that the Council identifies a deliverable supply of site allocations and therefore, it is necessary to require a certain level of information at this stage. Clearly this will be dependent on the scale of the site. The Council believes that, with the changes proposed to the SSM, the level of detail required through this process is appropriate.</p> <p>Support noted.</p> <p>Support noted.</p> <p>Support noted.</p> <p>The SSM is clear that sites will be compared against each other in terms of their performance on range of factors. There are also 'overall' ratings for each section under Stage 2. This is considered to be the best balance in ensuring a consistent approach to site selection, whilst providing a tool for professional judgement on the acceptability of sites.</p> <p>A meeting took place with the Environment Agency on this matter and the Council agrees to make amendments to the SSM as set out in the EA's comments below (listed under Table 2 comments)</p>
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	<ul style="list-style-type: none"> • Support categorisation and rating, a numeric system can result in people assuming that the total can be added up to establish what sites are appropriate, but such an approach ignores the fact that a site which scores highly, might, nonetheless, have significant adverse impacts, making it inappropriate for development. 	<ul style="list-style-type: none"> • English Heritage 	Support noted.
Table 2 comments	<ul style="list-style-type: none"> • A1 – should seek to understand relationship and compatibility to surrounding uses, and provide a logical rounding off of the settlement boundary • A2 - impossible to know housing mix and proportion of affordable housing. Should be deleted from the assessment • A3 – detailed design issues should only be determined at the planning application stage • B3 – sites cannot be chosen by the level of financial contribution that a site promoter purports to offer now, which will not be based on any real knowledge of viability. • C1- support in principle, but protected and unprotected trees, hedgerows and ancient woodland can be satisfactorily accommodated within development. • C2- sensitive sites which are well located physically to the existing settlement can provide opportunities to enhance existing landscape 	<ul style="list-style-type: none"> • Directions Planning Consultancy o.b.o Redrow Homes Yorkshire 	Comments noted. As a general point, the points raised concern the plan and sustainability objectives which are effectively 'set'. However the Council has the following comments in response: A1 - The Council considers that an additional question should be added to the SSM to reflect the relationship of the site to the existing commercial or development limits, depending on the nature of the development. A2 – The Council disagrees, this is a factor which should be considered at this stage to meet the objectives of the LPS and NYMNP Core Strategy. A3 - The Council disagrees, this is a factor which should be considered at this stage to meet the objectives of the LPS and NYMNP Core Strategy. B3 - The Council disagrees, this is a factor which should be considered at this stage to meet the objectives of the LPS and NYMNP Core Strategy. However, amendments to Q54 and Q55 are being made to reflect the latest version of the LPS and work on CIL. C1 – Noted. C2 – Noted. C3 – Noted. That is what the SSM is intended to assess. TA/ TP work is not premature as needed to assess whether site is acceptable at this stage. C4 – Flood risk – as set out in the EA comments – is an important element and thorough consideration

	<p>character, provide habitats and new access to amenity areas for community benefit.</p> <ul style="list-style-type: none">• C3 – should acknowledge new development will place pressure on the highway network, but that it can be mitigated, to undertake a transport assessment/travel plan is premature. Generic work by LPA for future infrastructure requirements should be sufficient.• C4- FRA would only be undertaken at the planning application stage.• C6- laudable, but again relevant at the planning application stage, continuous improvements are coming through building regulations, gradual intro. Of CfSH will achieve these aims better than individual site specific requirements for on-site renewable energy.• C7- needs to be greater off-site renewable energy for developers to link into, a local plan policy that encourages the provision of major renewable schemes by utility providers would be better.• C8- NPPF does not allow for sequentially using brownfield first, more about sustainability of sites, appropriate density- depend on negotiation at planning application stage, taking into account, character of		<p>needs to be undertaken at the site allocation stage as guided by the EA and national policy. C6 – Noted. Q14 and Q17 are being amended to reflect the latest version of the LPS. C7 – Noted. This relates to the LPS, which is undergoing Examination. The SSM will reflect the latest LPS policy. C8 – The finalised version of the NPPF was published in March 2012 and it is considered the SSM (in Q20) reflects this. C11 – The Council does not consider this is premature at this stage. Waste infrastructure is set out in the Council’s Infrastructure Delivery Plan.</p>
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the area, market demand etc.

- C11 – premature to set out site specific recycling intentions, also depends on proximity of local services and Council’s own services.
- Suggest weighting based on flood zone:
 Q2A - Flood zone 1 ++
 Flood zone 2 +
 Flood zone 3 -
 Q2B- Flood zone 3a (defences below 1:50) --
 Flood zone 3a (defences 1:100) +
 Flood zone 3a (defences 1:50 to less 1:100) –
 Undertaken after the application of a sequential test.
- Q3- should be before 2B, to assess development vulnerability classification and apply sequential test. Also suggest splitting into Flood Zone 2 and 3.
 Vulnerability:

F. Zone	Low	Med	High
FZ2	++	+	-
FZ3	+	-	--

Sequential and exceptions tests should be applied.

Consideration of Rapid Inundation Zones, should be fully considered at Stage 2 Q3, not at Stage 3 Q31A

Do not agree with the rating at Q31A.

- Environment Agency

Comments noted. The Council accepts all the points made, and will amend the SSM in line with them. Specifically: revising flood risk questions, adding in potential resilience measures to Q36, amend phrasing of SUDs to Sustainable Drainage Systems.

	<p>The + at moderate danger to some would mean a risk of safety to children, elderly and the infirm. Propose the following rating.</p> <p>Low + Moderate – Significant - - Extreme - - or ---</p> <ul style="list-style-type: none"> • Q36- suggest examples to potentially build in resilience. (a number of these are available in the NE Yorks SFRA chapter 12, section 12.1. Q36 assesses sites with a single additional measure according 1 positive , but it would depend on the measure and the site in question, and adjacent land. • Support overall flood rating assessment in J in Q36, but the SFRA did not fully consider climate change because of the unavailability of data. • Support and welcome the following questions, their content and weightings: Q31, 32,33,34,35,54. • Q22 –approve of prioritising sites which are likely to require remediation. However, would question the ratings, just because remediation proposals are not provided for a site with potential contamination, does not mean the site cannot be remediated and would not benefit from remediation. • Q25- we approved of the assessment, in order to protect quality of ground 		
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	<p>water within SPZs (particularly z1) should be given a high weighting.</p> <ul style="list-style-type: none">• Need to make the sentence describing 'functional floodplain' clearer, by referring to FZ 3B, not FZ3.• Remove 'urban' from Sustainable Urban Drainage Systems- outdated.• Q33, should mention 2 sets of surface water maps available from the environment agency – Areas Susceptible to Surface water Flooding, and Flood Map for surface water, as well the critical drainage areas identified in the NE Yorkshire SFRA.• Re. Waste Water Treatment Works (WWTW), the general standard for a buffer is 400m, although development can take place closer providing proper investigation of odour levels. It is advisable for a developer/agent to consult YW where a site falls within 400m.	<ul style="list-style-type: none">• Yorkshire Water	<p>Noted. The Council considers that an additional question should be added which reflects a WWTW Buffer.</p>
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