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Branch Chair
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Authority: Ryedale District Council

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All responses or queries relating to this submission should be directed to the Secretary for the Trustees at the contact details shown above on this frontispiece.

All CPRE North Yorkshire comments are prepared by the charity using professional planners whose research and recommendations form the basis of this response in line with national CPRE policies.

External planning consultant used in this response:



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Comment

CPRE North Yorkshire The Countryside Charity ('CPRENY') welcomes the opportunity to comment on The Malton and Norton Neighbourhood Plan (the 'NP') submitted to Ryedale District Council ('RDC') in February 2021.

In general, CPRENY supports the development of NDPs and the vital role that they play within the adopted planning policy process, giving weight to the topics which matter most to the communities within the parish.

The Malton and Norton NP has been prepared by Neighbourhood Plan Steering Group on behalf of Malton and Norton Town Councils. The Designated Neighbourhood Area extends to the two civil parishes of Malton and Norton and was designated formally in February 2019. The Plan period for the document is 2020-2027 and includes a comprehensive set of objectives for the Neighbourhood Area.

The vision presents as a commentary rather than as a clear 'vision' of the town in 2027 but CPRENY acknowledges the essence of what is aspired to. The paragraphs under the 'vision' heading currently read more as a textual justification typically found under planning policies than as clear vision for the towns, although elements are there throughout the paragraphs. It is considered, however, that the wording of the paragraph beginning 'the River Derwent' should be reworded to remove negative connotations, albeit CPRENY understand the reasoning behind this.

CPRENY welcomes and supports the initiative of the Councils to promote the River Derwent in the creation of opportunities for visual, environmental and access improvements to the benefit of the community whilst preserving conservation designations. This approach will aid the regeneration of this area whilst promoting the principles found in the NPPF in terms of improving biodiversity and making a more effective use of land. This is also in general conformity with the Ryedale Local Plan Strategy which seeks to improve the built fabric of the towns by the redevelopment of the underused river corridor subject to appropriate flood risk mitigation and ensuring that elsewhere 'downstream' does not become liable to flooding as a result of development.

The NP seeks to allocate 8 sites as 'Local Green Spaces'. CPRENY fully support all of these potential allocations through draft policy E1 and the emphasis on enhancement including to biodiversity to these spaces via draft policy E2. The attention afforded to the need to protect and preserve existing green spaces and create new spaces within the plan is commendable and the whole section supported.

It is considered, however, that the NP could be made stronger by the inclusion of a requirement for the provision of appropriate Sustainable Drainage Systems and native species planting within landscaping schemes along the river corridor. Similarly, a proposal that all new developments include the retention of existing hedgerows and incorporate significant tree planting on site or throughout an enhancement area would have been welcomed. This would not only aid climate change mitigation and improve biodiversity across new developments but also within existing centres in need of enhancement. CPRE campaign for the retention and expansion of greenspaces both nationally and locally, recognising their intrinsic roles providing both amenity value for residents and visitors to the countryside alongside facilitating wildlife habitats.

National Planning Policy is clear, however, that proposals should demonstrate a measurable net gain in biodiversity (paragraph 175d) and the forthcoming Environment Bill is expected to set out a requirement for all proposals to achieve a net gain of 10% in biodiversity, which is already being rolled out as good practice across the country. It is considered that the draft policies and supporting text within the NP could be made stronger by reference to the need to deliver a net gain for biodiversity which could have pre-empted this requirement and ensured conformity with the NPPF as well as highlighting the implicit role the environment must play in the fight against the detrimental impacts of climate change in line with paragraph 149 of the NPPF.

It is considered that the Steering Group could strengthen the NP through incorporating mitigation measures for climate change throughout the document, for example, within design policies requiring the generation of on-site energy production and zero-carbon dwellings and for proposed new built development to incorporate suitable electric car charging points as standard to future proof the plan.

Many NPs and Local Plans now incorporate plan policies dedicated to the reduction of greenhouse gas emissions and the requirement to combat climate change. It is felt that such a policy is missing from the plan. The inclusion of such a policy would ensure all types of future developments regardless of location (including horse racing, hotel provision, those within conservation areas, river corridor enhancements and new employment/residential developments) play their part to protect residents, the countryside and biodiversity from the harmful effects of climate change.

In summary, CPRENY, welcomes the opportunity to comment on the Malton and Norton NP and fully supports the intention of the Town Councils in their ambitions for the Neighbourhood Areas. CPRENY do feel, however, that the NP could have done more to consider the protection and promotion of the environment within their policies across various topics and sought to deliver ways to increase biodiversity across the parishes including within existing built up areas. This would in turn aid the mitigation of climate change within the plan area.