The countryside charity
North and East Yorkshire

PO Box 189
York
YO7 9BL

www.cpreney.org.uk

Tel: 07983 088120
Email: info@cpreney.org.uk

Branch Chair
Mrs Jan Arger

Authority: North Yorkshire 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 and East 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:

KVA Planning Consultancy
Katie Atkinson, BA (Hons), Dip TP, MA
MRTPI
www.kvaplanning.co.uk

Comment

CPRE North and East Yorkshire ('CPRENEY') welcomes the opportunity to comment on the North Yorkshire Local Plan Scoping Consultation and recognise the changes to the Local Plan making process which has consequently required this new consultation. CPRENEY is encouraged by the acknowledgement in the Scoping Consultation's introduction that the findings of the previous consultation has been used and *will be* used to inform and shape the new Local Plan alongside those submitted in response to this consultation. CPRENEY, therefore, clarifies that the response prepared for the previous consultation remains relevant to the preparation of the Local Plan.

This response sets out the views of CPRENEY in answering the questions posed in the scoping consultation document. Please note that this response is limited to those questions of most importance to CPRE at this time and focuses on critical areas where greater clarity and ambition are needed to ensure that development needs are met, Government requirements are satisfied and that the countryside is conserved, enhanced and recognised for the hugely beneficial value it brings to social, environmental and environmental factors at the county level as well as nationally and internationally.

QUESTION 1: Do you think there are any other key priorities we have missed? Y/N

A SWOT analysis has been undertaken to identify the main strengths, weaknesses, opportunities and threats to the Local Plan area to aid the preparation of the vision and measurable outcomes. CPRENEY agrees with the key priorities identified in the infographic. – However, consider that an additional weakness is the fact that a large proportion of the county has no access to the national grid network, which furthers the requirement for a speedy transition to renewable energy infrastructure to avoid reliance on fossil fuels and the importation of fuels. The emerging vision should set the Council's ambitions towards responding to and adapting to climate change and be a consistent key thread across all of the Council's ambitions and policies for decision making purposes.

As the largest rural authority in England, the Local Plan vision must recognise its rurality as the key factor at the 'heart' of North Yorkshire's identity. Whilst acknowledging the need to plan for future development, the Local Plan must recognise from the outset how the plan is going to protect and enhance its spectacular landscapes, rich cultural heritage, successful tourism sector and expanding green economies including its bustling urban centres, fine coastline and abundant quintessential rural villages (paragraph 2.6 of the First Conversation document).

QUESTION 2: Have we captured the locally specific matters for North Yorkshire? Y/N

CPRENEY agrees with the identified locally specific matters to be included within the Local Plan. The new National Planning Policy Framework ('NPPF') contains National Decision-Making Policies for the determination of planning applications. Policies within the Local Plan must seek to address matters specific to North Yorkshire (for the areas outside of the designated National Parks) which will guide development, allocate land for development and designate areas for protection, whilst addressing climate change and supporting healthy and sustainable communities.

QUESTION 3: Have we captured the correct issues and ways the local plan can influence the matter of delivering sustainable growth? Y/N

The Government has set an ambitious target of delivering 1.5 million homes nationally over the next five years and have introduced changes to the planning system to assist this delivery. As such, the new 'standard methodology' to be used by all planning authorities sets an overall housing need figure for North Yorkshire of 4,173 new dwellings per year which is substantially higher than previous local plan housing targets. The previous consultation document set out the identified housing need to be 4,116 new homes per year including within the two National Parks. The new figure of 4,173 further increases this figure but the Scoping Consultation does not set out whether this includes the National Parks and should be clarified in the next

consultation. The Government expects that this figure will be met in full, however, any reduction from this figure must be clearly justified.

The emerging Local Plan must also provide land allocations for sustainable economic growth. The Council's Housing and Economic Needs Assessment ('HEDNA') sets out the need for up to 8Ha of land for office-based use and circa 340 Ha for industrial and warehouse uses over the merging plan period which broadly align with historical development trends over recent years. These figures are in conformity with the previous draft Local Plan.

Issue 6 in the infographic is identified as 'Development beyond settlements' explaining the need to '*consider where development outside development limits should be supported or restricted*.' There is no specific reference to ensuring the protection and enhancement of nationally protected landscapes (National Landscapes and to their important setting and to the setting of National Parks), which are afforded the highest protection in policy terms.

CPRENEY stresses that good quality agricultural land (Grades 1-3) should be built on ONLY in exceptional scenarios, especially given national food security concerns. For the sake of clarity, whilst supportive of renewable energy generation, CPRENEY also consider that agricultural land should not be used for large scale solar farms (considering that roof-mounted solar is most appropriate).

QUESTION 4: Have we captured the correct issues and ways the local plan can influence the mater of securing infrastructure to support growth? Y/N
Yes.

QUESTION 5: Have we captured the correct issues and ways the local plan can influence the matter of creating a prosperous economy? Y/N
Yes.

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
Yes.

QUESTION 7: Have we captured the correct issues and ways the local plan can influence the matter of achieving environmental resilience? Y/N
CPRENEY agrees with the issues the local plan can influence the matter of achieving environmental resilience, with particular regard to addressing climate change. The planning process is required to be proactive in helping to achieve radical reductions in greenhouse gas emissions and as such the emerging Local Plan requires strong policies to deliver real change. The NPPF requires the planning system to support the transition to new zero by 2050 and take full account of all climate impacts. As submitted in our previous consultation response, CPRENEY would support a specific sustainable energy and construction policy which ensured that all adaptation to climate change is built in to all new development at the design stage including mandate such things as: roof-mounted PV, air source heat pumps, grey water collection points, SUDs, solar orientation etc. The application of the higher standard for reduced water usage of 110 liters per person per day in new homes is also supported.

Furthermore, in relation to point 11 of the infographic – landscape protection, CPRENEY recognises the importance of the protection of landscapes and agricultural land whilst restoring the environment. It is important to explicitly clarify within the Local Plan, that strategies, policies and allocations can ensure that the best and most versatile agricultural land should be protected for food security purposes enabling adaptation to modern farming techniques as necessary and protecting rural livelihoods and landscapes.

CPRENEY therefore advocates for a new county-wide Landscape Character Assessment to be undertaken by a suitably qualified independent landscape specialist which would aid the Council in determining where development should go, where it should be restricted and where mitigation may make some development viable.

QUESTION 8: Have we captured the correct issues and ways that the local plan can influence the matter of meeting specific housing needs? Y/N

CPRENEY are of the opinion that the Council has identified ways in which the local plan can influence specific housing needs, although has not mentioned 'looked after children' which is a key requirement of the NPPF (HO1).

QUESTION 9: Have we captured the correct issues and ways the local plan can influence the matter of achieving and protecting high quality environments? Y/N

North Yorkshire is defined by its rich and diverse natural landscapes, distinctive local environment, valued built heritage and local, national and European sites for biodiversity and geodiversity, all of which contribute to the character and identy of settlements, countryside and coastal areas. All of which are valued by residents and visitors to the county.

The emerging Local Plan must recognise the importance of North Yorkshire's high quality environments and the benefits and opportunities a preserved and enhanced countryside can offer in the response to a changing climate, the economy, health and well-being, nature resilience and for its own sake.

In the supportive text at paragraph 3.27 on high quality landscapes, and within the blue box identifying how the local plan can influence achieving high quality landscapes, the Council has failed to recognise its duty to protect the setting of National Landscapes as it has for the National Parks. Policy N4 of the NPPF sets out that '*Development proposals within the setting of Protected Landscapes should be sensitively located and designed to avoid or minimise adverse impacts on the Protected Landscape*.' It does not distinguish between the two types of nationally protected landscapes, and as such must be treated the same to be considered in conformity with national planning policy.

Furthermore, North Yorkshire contains 3 Heritage Coastlines which, whilst not having the same level of protection as Protected Landscapes, are afforded protection in their own right, when outside of these landscapes, via NPPF Policy N5-2 and as such should be explicitly recognised in the emerging Local Plan as a key restraint to major development.

The NPPF states that Local Green Space should only be designated through local and neighbourhood plans – only when a plan is being prepared or updated. As such, CPRENEY would expect the Council to issue a 'call for sites' equivalent for potential local green space designations which are of importance to local communities and satisfy the requirements of NPPF Policy HC2. CPRENEY emphasise protecting small-scale green assets of value to local communities which can include open spaces, recreation areas, areas of historical cultural or biodiversity value. With robust Local Green Space policies in place, smaller green areas can ensure inappropriate incremental development can be resisted and defended.

QUESTION 10: Have we captured the correct issues and ways the local plan can influence the matter of achieving high quality design? Y/N

The Council has set out the keys issues and ways in which the local plan can influence high quality design. However, it has to be said that the blue box is relatively high-level and does not specifically mention how design codes/masterplans etc. can create healthy and sustainable places , nor does it provide any detail relating to housing standards and sustainable design features. CPRENEY would urge the Council to ensure that

climate resilience, energy efficiency are considered at the design stage of new developments including water usage, solar positioning, tree canopy provision and BNG through the emerging policies of the Local Plan.

QUESTION 11: Have we captured the correct issues and ways the local plan can influence the matter of promoting sustainable transport and accessibility? Y/N
Yes

QUESTION 12: Which options should be considered to help us deliver growth in a sustainable manner?

A. Prioritizing growth in and around main urban areas.
B. Achieving a greater proportion of development in larger village with a good range of supporting services and infrastructure.
C. Dispersing development across a broader range of settlements, including smaller villages.
D. Growing locations that are well-served by existing and/or new high quality sustainable transport links.
E. Developing entirely new settlements/communities.
F.

And – QUESTION 13: Are there any other growth options that should be considered? Y/N
CPRENEY consider a one size fits all approach is not suitable for the vast and varied make-up of the county, therefore, some caveats may be required in certain policies to ensure appropriate scale of development in the most appropriate locations where a different growth approach is required so as not to conflict with national policy. A bespoke growth plan may be required to focus development across existing principle towns whilst ensuring market towns, large villages and next level smaller settlements receive an appropriate level of development to ensure that the centres do not become over-developed and remain sustainable. CPRENEY recognise that a limited number of truly sustainable design-led, net-zero new settlements / extensions may be required in order to preserve the character and identity of existing places.

When allocating land for development, CPRENEY considers that a brownfield-first approach must be used to ensure sustainable development, where viable brownfield land must be fully used before any Green Belt release is considered. Should the Council think release is necessary, a full and robust investigation should be undertaken first in line with Government guidance and should be stated as such in policy for clarity to would-be developers.

CPRENEY believe that Green Belt is a vital resource that should be maintained to achieve its fundamental purpose of preventing urban sprawl. Importantly there's enough brownfield land in the country for 1.2m homes without the need to 'release' Green Belt land. CPRENEY advocates for the protection of high-grade agricultural land and for the protection of 'openness' of Green Belts, especially in peri-urban areas.

CPRENEY's wider vision for sustainable place-making highlights the need for development to demonstrate access to active travel, public transport, digital infrastructure, services and amenities. Without spatial prioritisation of high quality, well designed walkable neighbourhoods the Council could inadvertently lock in car dependence and undermine green infrastructure goals.

Notwithstanding the above, a different policy approach is needed within the emerging Local Plan for development within and within the setting of protected landscapes as referenced within national policy. Policy N1 of the NPPF sets out clearly that development plans should safeguard and enhance the natural environment. Point C states that development plans should (inter alia) *'steer the location of development, including through site allocations, in ways which utilise land of least environmental value where that would be consistent with policies in the Framework. This should include limiting the scale and extent of development within Protected Landscapes..*'

QUESTION 14: Has all the relevant evidence required to develop the local plan been identified? Y/N

CPRENEY considers that alongside the evidence already identified by the Council (both completed and yet to be completed) further evidence streams are required including:

- An assessment of blue infrastructure;
- Local Green Space assessment – what exists already and where else could be designated;

As previously set out in this response, CPRENEY would also strongly urge the Council to ensure the completion of a robust and independently produced Landscape Character Assessment for the county which would not only assist site allocation exercises, but also in the determination of planning applications.

Conclusion

CPRENEY welcomes the opportunity to comment on the Scoping Consultation document of the emerging North Yorkshire Local Plan. CPRENEY looks forward to further consultation activities at the appropriate time of plan-preparation. CPRENEY hopes to be able to assist the Council in formulating a robust and ambitious Local Plan benefitting the local communities, the natural and built environment that make up North Yorkshire, responding proactively to the climate and environmental emergencies .