

Richmondshire Local Plan Core Strategy

Development Target Review Consultation Summary

October 2013



Background

- 1.1 The Council was requested by the appointed Planning Inspector to seek further representations following the publication of the interim mid-2011 household projections by Dept Communities and Local Government, the publication of the Army Basing Plan by the Ministry of Defence, the revocation of the Yorkshire and Humber Regional Spatial Strategy and concerns with the Council's strategic approach to accommodation for gypsies and travellers. The Council's Development Target Review considers all of the above and recommends that its agreed development target should be retained.
- 1.2 The paper was published for formal representations in accordance with regulation from Monday 5th August 2013 to 5pm on Friday 27th September 2013, a period of almost 8 weeks. All 655 consultees on the Council's consultation database, including those who commented on the council's proposed submission Core Strategy were contacted. All consultees contacted were either provided with a copy of the consultation paper and the Statement of the Representations Procedure and Document Availability or made aware of their availability on the Council's website and at the Council's offices for the duration of the consultation period.
- 1.3 The consultation document set 5 key questions for respondents to consider when providing their responses and asked respondents for their reasons for agreeing or disagreeing with the Council's assessment and to also provide relevant evidence where available whilst taking in to account legal compliance and soundness checks which were outlined in detail in the paper.

Representations Received

- 1.4 A total of 26 organisations or individuals (see appendix 1) provided responses to the Development Target Review consultation. 4 of the organisations to respond simply stated that they had no comments or observations to make regarding this consultation paper, they were all statutory consultees. The remaining 22 respondents provided comments on some or all aspects of the consultation paper, appendix 2 outlines which question each respondent commented on and whether they agreed or disagreed with it. 3 responses were regarded as general comments. The main issues that they raised will be outlined below in relation to each of the 5 key questions raised in the consultation paper.

Q1. Do you agree with the Council's reassessment of its development target?

Agree

- 1.5 The main points outlined in the 12 representations received which supported the Council's position of maintaining a development target of 180 dpa include:
 - Level of growth proposed is appropriate to Richmondshire's rural setting and any increase could have detrimental effect on the local environment.
 - Appropriate scale of development proposed.
 - Support the thorough reassessment so as to meet your economic and housing growth requirements and particularly affordability needs.

- If target was to be significantly reduced to 80dpa this would put pressure on Hambleton housing market area which would not be able to accept a requirement to meet needs in it's district arising from adjacent areas or diversion of housing pressure.
- Sound reassessment which has fully understood weaknesses inherent in interim mid-2011 household projections.
- Founded on a sound and robust evidence base that takes account of the nature of the housing market area, meets the full objectively assessed housing needs of the area, the growth aspirations of the Core Strategy and uses the most reliable data on the projected need for housing
- Recognises the District's natural assets, including its landscape, and the potential impacts a revised housing target would have upon them.

Disagree

1.6 There were no representations received which disagreed with the council regarding lowering its development target to reflect the interim mid-2011 household projections published April 9, 2013 which infer a lower growth rate of 80 dpa. There was however a total of 7 representations received which disagreed with the Council's reassessment of its development target. 6 (3 were the same representation from an agent on behalf of different clients) of which question the Council's proposed development target of 180 and indicate that it should seek a higher target. The main issues raised include:

- 20% buffer should be provided in the first 5 years of the plan period.
- Overall housing requirement needs to take in to account previous under delivery and the 'backlog' for additional housing resulting from low levels of affordable and market housing delivery over recent years.
- Significantly constrains scope for addressing annual affordable housing need of 260 dwellings (NY SHMA) in the District.
- Proposed housing requirement does not reflect the true full objectively assessed needs for the District.
- Table in paragraph 2.38 of the Development Target Review uses a cumulative average rather than a 5 year average or rolling averages at years 5, 10, 15 and 20 which give a representative average yearly build figure.

1.7 4 of the 6 representations received which stated that the Council's proposed development target of 180dpa remains too low have supplied site information. The capacity of these sites is for approximately 150 homes which are acceptable in principle within the submitted strategy subject to detailed appraisal.

Q2. Do you agree that the revocation of the Regional Spatial Strategy (RSS) has little impact on the Council's development targets?

Agree

1.8 10 representations were received which agreed that the revocation of the RSS has little impact on the Council's development targets. Comments received include:

- Development target is based upon more recent projections than those which the RSS targets were based upon.
- Fully support arguments made regarding the RSS.
- Council prepared Core Strategy in the knowledge of the proposed revocation of the RSS.
- Council's approach has not been to disregard this valuable and detailed evidence, but to update it according to their local circumstances which have produced a figure not materially different.

Disagree

1.9 1 representation was received which disagreed that the revocation of the RSS has little impact on the Council's development targets. Comments included:

- Need to account for previous under delivery of housing against the RSS requirements.

Q3. Do you agree with the Council's position on the provision of military service families' accommodation following the publication of the Army Basing Plan?

1.10 A total of 9 representations were received which responded to question three all of which were in agreement with the Council's position on the provision of military service families' accommodation. Comments received include:

- Small numbers of armed forces personnel and their dependents reside within the Darlington Borough without any significant impacts on the local housing market and no significant housing market issues are foreseen if this level of demand continues.
- Support approach to making provision within Richmondshire on either military or open market sites.
- Demand for accommodation is dependent upon national policies for defence which at present are increasingly fluid.

Q4. Do you agree with the Council's approach to updating its Gypsies and Travellers Accommodation Assessment?

Agree

1.11 9 representations were received which were in agreement with the Council's approach to updating its Gypsies and Travellers Accommodation Assessment. Comments received included:

- Darlington BC supports the proposed changes and has no evidence from its own work that there are any significant movements of these groups between the two areas.
- Not aware of any increased demand in our Parish.
- Approach is completely reasonable.
- Some contingency accommodation to cover the need for transit sites during Appleby Horse Fair should be considered.

Comments

- 1.12 1 comment was received regarding the accuracy of paragraph 4.11 of the Development Target Review which stated that travellers en route to Appleby Fair stopped at Bainbridge for two to three days. The Parish Council request this be changed to eight or nine days which would be a more accurate reflection of reality.

Q5. Do you agree with the proposed changes to the Local Plan Core Strategy identified at paragraph 5.2?

Agree

- 1.13 9 responses were received which were in agreement with the changes proposed. Comments include:
- Useful updating
 - Support approach to Gypsies and Travellers proposed.
 - Support proposal not to change housing requirement from 180dpa.
 - Partially centralised development would not necessarily impact unduly on infrastructure providers as targeted capital investment to improve capacity is easier in fewer, larger projects.

Disagree

- 1.14 1 response was received which stated that it disagreed with the changes proposed but direct comments were not made regarding question 5.

Sustainability Appraisal

- 1.15 Natural England has stated that the sustainability appraisal completed is compliant with the European SEA Directive and the Government's guidance to Strategic Environmental Assessment.

Appendix 1: Table of Respondents to Development Target Review Consultation

Ref	Respondent Name/Organisation	Agent
DTR01	Bainbridge Parish Council	
DTR02	Bellerby Parish Council	
DTR03	Carperby Parish Council	
DTR04	Mr P Clarke	
DTR05	Coal Authority	
DTR06	CPRE (Swaledale)	
DTR07	Darlington Borough Council	
DTR08	Mr T. Milbank & Mr M. Tennant	England & Lyle Ltd
DTR09	Mr A. Spier & Mr R. Congreve	England & Lyle Ltd
DTR10	Taylor Wimpey UK Ltd	England & Lyle Ltd
DTR11	English Heritage	
DTR12	East & West Layton and Carkin Parish Meeting	
DTR13	Mr R Orchard	George F. White
DTR14	Gladman	
DTR15	Hambleton District Council	
DTR16	Mulberry Homes (Yorkshire) Ltd	ID Planning
DTR17	Pallett Hill Sand & Gravel Co Ltd	Davis Planning Partnership
DTR18	Leyburn Town Council	
DTR19	Natural England	
DTR20	Richmond & District Civic Society	
DTR21	Jane Ritchie	
DTR22	Mrs L & Mr A Sherwood	
DTR23	Durham County Council	
DTR24	Home Builders Federation Ltd	
DTR25	Mr & Mrs B Borman	
DTR26	North Yorkshire County Council	

Key	NC - No Comment
	GC - General Comment
	SA - Sustainability Appraisal
	A - Agree
	C - Comment
	D - Disagree

Appendix 2: Table detailing responses by question and response type (Please see key for codes)

Ref	Respondent Name/Organisation	Agent	NC	GC	GC A	GC D	SA	Q1 A	Q1 D	Q2 A	Q2 D	Q3 A	Q3 D	Q4 A	Q4 C	Q4 D	Q5 A	Q5 D
DTR01	Bainbridge Parish Council														1			
DTR02	Bellerby Parish Council							1		1		1		1			1	
DTR03	Carperby Parish Council							1		1		1		1			1	
DTR04	Mr P Clarke							1										
DTR05	Coal Authority		1															
DTR06	CPRE (Swaledale)							1		1		1		1			1	
DTR07	Darlington Borough Council							1				1		1			1	
DTR08	Mr T. Milbank & Mr M. Tennant	England & Lyle							1									
DTR09	Mr A. Spier & Mr R. Congreve	England & Lyle							1									
DTR10	Taylor Wimpey UK Ltd	England & Lyle							1									
DTR11	English Heritage		1															
DTR12	E & W Layton & Carkin Parish Meet							1		1		1		1			1	
DTR13	Mr R Orchard	GeorgeF.White							1	1		1					1	
DTR14	Gladman								1		1							
DTR15	Hambleton District Council							1		1		1		1			1	
DTR16	Mulberry Homes (Yorkshire) Ltd	ID Planning						1		1							1	
DTR17	Pallett Hill Sand & Gravel Co Ltd	Davis Planning							1	1		1		1				1
DTR18	Leyburn Town Council			1														
DTR19	Natural England		1				1	1										
DTR20	Richmond & District Civic Society							1		1		1		1			1	
DTR21	Jane Ritchie							1						1				
DTR22	Mrs L & Mr A Sherwood							1										
DTR23	Durham County Council		1															
DTR24	Home Builders Federation Ltd								1	1								
DTR25	Mr & Mrs B Borman					1												
DTR26	North Yorkshire County Council				1													
Total			4	1	1	1	1	12	7	10	1	9	0	9	1	0	9	1

