Our Ref.: - 07/20/21/JD/FTR
Your Ref.: -

Planning Policy,
Richmondshire Core Strategy,
Swale House.
Frenchgate.
Richmond.
North Yorkshire.
DL10 4JE

22 August 2013

Dear Mr. Hiles,

RICHMONDSHIRE CORE STRATEGY
DEVELOPMENT TARGET REVIEW
PALLETT HILL SAND AND GRAVEL CO LTD

I enclose representations on the Development Target Review on behalf of Pallett Hill Sand and Gravel Co Ltd.. Please can you kindly confirm receipt,

Yours sincerely

Jill Davis BA, MRTPI

Cc Pallett Hill Sand and Gravel Co Ltd
Vicki Lamb, Lister and Haig

**RICHMONDSHIRE CORE STRATEGY**
**DEVELOPMENT TARGET REVIEW**
**REPRESENTATIONS ON BEHALF OF PALLETT HILL SAND AND GRAVEL CO LTD**

## 1. Questions set in Paragraph 1.7 of "Development Target Review" August 2013

*"1. Do you agree with the Council's reassessment of its development target?"*

No - See below (1)

*"2. Do you agree that the revocation of the Regional Spatial Strategy has little impact on the Council's development targets?"*

Agree/no comment

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

Agree/no comment

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

Agree/no comment

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

No - See below (2)

## Response to questions 1 and 5

### Paragraph 2.5

Para 2.5 says sufficient amount of growth has been proposed to address problems that are "The level of growth proposed is considered appropriate for Richmondshire's very rural setting and pays respect to the quality of the local environment."

## Section 3 and Annex 2

### Paragraph 2.38

No explanation is given in the text for the "Average" column in the Table in paragraph 2.38.

As it appears in the document the average column is a cumulative average (i.e. average year 1, average year 1 + 2, etc), over a nine year period from 2004/5 – 2012/13. This does not reveal any trend and in itself appears to be a meaningless statistic. Apart from the year 2005/6 when it is recalled in paragraph 2.40 there were military homes relaxed into the open market, all this form of averaging reveals is an accumulating deficit and consistent underperformance and the method of averaging is not statically sound or indformative.

Most comparative studies use a rolling 5 year average or rolling averages at years 5, 10, 15 and 20 which gives a representative average yearly build figure.

The average figure of average 128 in year 2012/13 does not reflect the actual housing completion figure of 38 and the shortfall.

A five year average from 2008/9 to 2012/13 would give averages of 165, 137, 87, 108 and 78 which shows the accumulating deficit.

We consider that this table should be replaced with a table showing the rolling averages over at least a 5 year period, and preferably 10, 15 and 20 year periods.

The delivery of new housing is an important part of UK urban regeneration policy and practice. The "housing trajectory" seeks to help policy makers make better decisions about housing delivery. Government guidance on trajectories is deficient and fragmented and does not take account of recent changes in government policy and there are shortcomings regarding the relationship between planning policy processes and housing delivery.

The plans are written in a way that does not encourage involvement of stakeholders or the awareness of the need to prepare contingency plans if housing supply targets are not met.

This gives rise to concerns about the reliability and accuracy of housing delivery forecasts as well as the difficulties of measuring the effectiveness of housing policy. This Development Target Review is not transparent or readily understandable by stakeholders.

## Paragraph 2.43

This paragraph states that despite arguing for higher target development proposals identified by Stakeholders did not identify strategic growth areas.

Paragraph 2.8 of the document says that the A1(M) upgrade will improve protects for growth, particularly around Catterck Garrison. The new Catterick Central Junction and the local access roads will have a significant impact on reassigning traffic to and from the Strategic Road network (SRN) to the local highway network.

As well as encouraging growth in the Garrison, the proposed junction and local access roads will increase potential for strategic growth east of the motorway in Central Richmondshire.

The SHELAA recognises the commercial potential of land to the immediate east of the new junction. Strategic housing growth in Catterick Village would also be facilitated by the scheme. Whereas growth is retarianed by traffic impacts at Catterick Bridge, the new scheme would relive this constraint and open up further land in Catterick Village for housing growth.