

Richmondshire District Council

**Local Plan Core Strategy Modifications
Assessment of Representations**

August 2014

Local Plan Core Strategy Modifications Representations and Assessment

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1. Representations Summary

The following table summarises the representations received in response to the publication of the Local Plan Core Strategy Modifications. Section 4 of this report is a summary of the proposed Core Strategy Modifications.

No	Name / organisation	Modification	Subject	Support
1	Bernard Borman	Not specified	Neighbourhood infrastructure issues	No
2	Harrogate Borough Council	No Comment		
3	Hambleton District Council	General support for modifications		Yes
4	Melsonby Parish Council	No Comment		
5	The Coal Authority	M/1/0/04	Role of Coal Authority and Local Minerals Authority	Yes, but correction required
		M/4/CP2/05	Land instability	Yes
		M/4/CP2/05	Role of Coal Authority and Local Minerals Authority	Yes, but correction required
6	English Heritage	M/2/0/06	Management of historic environment	Yes
		M/4/CP12/01	Redrafted built heritage policy Core Policy CP 12	Yes
7	North Yorkshire Local Access Forum	No Comment		
8	Campaign for the Protection of Rural England (Swaledale Branch)	M/3/CRSS/07	Use of brownfield land	No
		M/3/CRSS/09	Use of brownfield land	No
		M/4/CP2/03	Renewable energy installation visual impact assessment	No
		M/5/Mon/02	Rewording of installed renewable energy indicator	No
		M/3/SP4/01	Retention of housing target	Yes
		M/4/CP2//07	Flood risk management	Yes
		M/4/CP4/03	Flood risk management	Yes

9	House Builders Federation (North)	M/3/SP4/01	Housing target	No
		M/3/SP4/02	Housing target	No
		M/3/SP4/03	Housing target	No
		M/3/CRSS/07	Development of brownfield land	No
		M/3/CRSS/09	Development of brownfield land	No
		M/4/CP2/05	Code for sustainable homes	No
		M/4/CP3/03	Development of brownfield land	No
		M/4/CP6/01	Viability Assessment	No
		M/4/CP6/02	Viability Assessment	No
10	Leyburn Town Council	All except M/5/infra/04	General support	Yes
		M/5/infra/04	Capacity of Leyburn Waste Water Treatment Works, para 5.15	No
11	Mr and Mrs Wood	M/3/CRSS/05	Strategic growth area near Colburn	No
12	Sport England	M/4/CP/11/02	Planning for sporting facilities	Advisory
13	North Yorkshire County Council	M/1/0/04	Role of Coal Authority and Local Minerals Authority	Yes, correction proposed
		M/4/CP2/05	Role of Coal Authority and Local Minerals Authority	Yes, correction proposed
		M/5/Infra/06	Updated infrastructure delivery plan	Yes
14	Natural England	M/4/CP12/01	Identification of designated and non-designated natural sites Para 4.12.12 -	Yes
		M/4/CP12/01	Distance of impacts on Natura 2000 sites, Para 4.12.13	No
		Sustainability appraisal	Overall impact of modifications	Advisory - modifications do not affect soundness
15	Colburn Town Council	M/3/CRSS/05	Strategic growth area near Colburn	No
		M/4/CP12/03	Definition of green infrastructure separating Colburn and Hipswell	No

2. Assessment of Representations

The following assessment only covers those representations that do not support aspects of the Local Plan Core Strategy Modifications. Representations covering similar issues are discussed together.

1. Mr Bernard Borman

This representation rejects all modifications because they do not address the following issues:

1. The appropriate allocation of employment land
2. The capacity of Brentwood to accommodate further development
3. The consideration of infrastructure and amenity issues in current planning applications
4. Flood risk management
5. Waste water capacity
6. Development capacity issues in Leyburn

1. Allocation of employment land

The purpose of the Local Plan Core Strategy is to set the overall direction of growth and is not concerned with site allocations. This is the task of the Delivering Development Plan, which will follow the Core Strategy. The allocations process will address relevant impact and capacity issues affecting particular sites consistent with the LPCS and the National Planning Policy Framework. The previous applications referred to have been through the planning process under the Local Plan 1999-2006 and have not been subject to any appeals.

2. The capacity of Brentwood to accommodate further development

As with point 1, the LPCS is concerned with the strategic level of growth and the capacity of specific sites will be addressed in the Delivering Development plan. The overall scale of growth proposed for Leyburn was reduced between the Preferred Core Strategy and the Submission version. The preferred direction for strategic growth is to the north of Leyburn rather than the east, where Mr Borman's concerns are focussed, which responds to the limited capacity for strategic growth within Leyburn. Core Policy CP4 also ensures that proper consideration is given to the capacity for any new development proposal until the Delivering Development Plan is published.

3. The consideration of infrastructure and amenity issues in current planning applications

Point 3 appears to be the same as point 2 and describes the problems of growth around existing road networks. Prior to the adoption of the Delivering Development Plan, any application on the Brentwood Lodge site should be considered under the existing adopted Local Plan 1999-2006 and the emerging policies of the Local Plan 2012-2028 Core Strategy, both subject to the weight given them under the National Planning Policy Framework. Core

Policy CP4 requires that “the location of any development should be....within the capacity of existing infrastructure, or it can be demonstrated that necessary additional infrastructure will be provided.” North Yorkshire County Council, as the Local Highway Authority, is responsible for ensuring that this remains the case.

4. Flood risk management

The risk of sink holes is a normal characteristic of local limestone geology. Core Policy CP4 requires that development should “not be located in areas of flood risk or contribute to flood risk elsewhere.” This would require appropriate surveys to be undertaken as part of any development proposal and ground condition surveys are a validation requirement for planning applications.

5. Waste Water Capacity

Yorkshire Water has advised the Council that there are no strategic capacity issues that affect the proposed level of growth. YW has investigated local network issues affecting existing homes.

6. Development capacity issues in Leyburn

Point six reprises previous points. The LPCS is a strategic document and cannot address many of the site specific issues raised in this representation. It does provide core policies that require any capacity issues to be identified and mitigated. The general direction of proposed development is away from the areas of greatest concern to Mr Borman.

10. Leyburn Town Council

Leyburn Town Council generally supports the modifications, but questions the advice received from Yorkshire Water that Leyburn Waste Water Treatment Works has the capacity and can be modified to support the proposed level of development. It is recognised that small scale issues have been identified in specific areas. The strategic direction of development is away from these areas and enables modern drainage systems to be installed.

5. The Coal Authority and 13 North Yorkshire County Council

Both the Coal Authority and North Yorkshire County Council require corrections to clarify their respective roles in paragraph 1.9 of the introduction and Core Policy CP2. These corrections are minor and do not alter the overall strategy.

The following text has been suggested by NYCC:

M/1/0/04 paragraph 1.9

Minerals and Waste Planning Issues are dealt with through NYCCs minerals and waste local plans. **The minerals planning authority is responsible for safeguarding mineral resources of economic importance and for establishing consultation arrangements with local planning authorities to ensure that minerals safeguarding issues are taken into account in relevant development decisions. The Coal Authority is responsible for identification of Development High Risk areas that are most likely to be subject to land stability and other public safety hazards. Within these areas the Coal Authority will expect many new development proposals to be accompanied by a Coal Mining Risk Assessment.**

M/4/CP2/05 Core Policy CP2

Development Proposals will be expected to provide an appropriate **risk assessment and** remediation strategy that addresses any issues of land contamination or land instability arising from past uses or activities. Where **relevant** non-mineral development is proposed within Mineral Safeguarding Areas defined by the Coal **mineral planning authority**, the local planning authority will expect consideration to be afforded to the extraction of the mineral resource prior to development.

8. Campaign for the Protection of Rural England (Swaledale Branch)

CPRE supports the modifications related to the Council's housing target (M/3/SP4/01) and flood risk management (M/4/CP2//07), but raises concerns about modifications affecting the use of brownfield land (M/3/CRSS/07,09) and renewable energy installations (M/4/CP2/03, M/5/Mon/02).

The modifications affecting brownfield land were required to improve the consistency of relevant policies with NPPF. In particular, the replacement of the "prioritisation" of development on brownfield sites with the "encouragement" of development of the same sites. This issue is discussed further in relation to comments made by the Home Builders Federation below.

The scale of currently available but uncommitted brownfield land is very low. Although there may be further brownfield land on the Defence Estate, this is unlikely to become available in the foreseeable future.

Similarly, the changes made in relation to renewable energy installations have been made to improve the consistency of relevant policies with NPPF.

9. Home Builders Federation

The Home Builders Federation considers the following aspects of the modifications are unsound:

1. Housing target
2. Development of brownfield land
3. Sustainability performance of new homes
4. Affordable housing targets

1. Housing target : M3/SP4/01,02 and 03 :

The HBF representation argues that the Council should consider a higher housing target. Specifically the Council should address:

- Market signals
- Employment forecasts
- Workforce ageing
- Workforce impact of military houses
- Impact of significant growth projects
- Affordable housing needs

The Council's objective assessment, as explained in the Development Target Review (PSD004, August 2013) is based on modified mid 2008 based ONS projections. The modification specifically addressed methodological errors in the 2001 based series of population projections causing inflated international migration trends (Richmondshire Scrutiny of Population Estimates and Projections, TE012, March 2012). These modifications were built into subsequent ONS projections for Richmondshire. This modified projection is preferred because it is based on prerecessionary trends, which provide a positive trajectory, rather than the interim mid 2011 and mid 2012 based sub national projections (ONS), which show a worsening picture of negligible growth.

On balance, the proposed target provides for growth that is in excess of reducing population projections. The Council considered the mid 2011 interim population and household projections as an indicator of what would happen if its Core Strategy was not implemented (DTR, 2013). This prospect worsened with the publication of the mid 2012 population projections, which indicate a further reduction in projected growth subject to underlying assumptions. The Council's target now promotes a higher rate of growth compared with this latest set of national projections.

Market signals

The market signals suggested by NPPG combine to show that Richmondshire, like all attractive rural areas, can be an expensive place to buy a home. The Council's development strategy seeks to provide the largest proportion of housing in Catterick Garrison, which will provide wider housing choice for local people than is currently available.

Employment Forecast

HBF criticises the Council for not taking account of its "proposed level of jobs growth" and relies upon the mismatch between this "target" and the proposed housing target to argue for a higher housing target. Paragraph 3.1.39 (modified) of the Core Strategy cites the level of growth anticipated in the Employment Land Review (TE005, January 2012) and its underlying employment projection based on the Yorkshire and Humber Regional Econometric Model (REM). This figure was not set as a target by the Council. Its interpretation has been explored in the Council's assessment of the Employment-led Demographic Forecasts (PSD013, March 2014). The level of 2,200 jobs created is likely to be an overestimate for the following reasons:

- The circular relationship of household growth to employment growth in econometric projections
- The inflation of workforce estimates with military personnel in Service Families Accommodation (SFA)
- Time-lag in the implementation of key projects
- Reliance on uncorrected mid 2008 based population projections

The recently published Planning Advisory Service report on objective assessment complements the Council's caution over simplistic interpretation of econometric forecasts (Objectively Assessed Need and Housing Targets : Technical Advice Note, PAS, June 2014, paras 6.10-6.12). In addition, the reliability of employment forecasts in Richmondshire is reduced by the very small sample sizes of the input data from sources such as the Annual Survey of Hours and Earnings and Labour Force Survey.

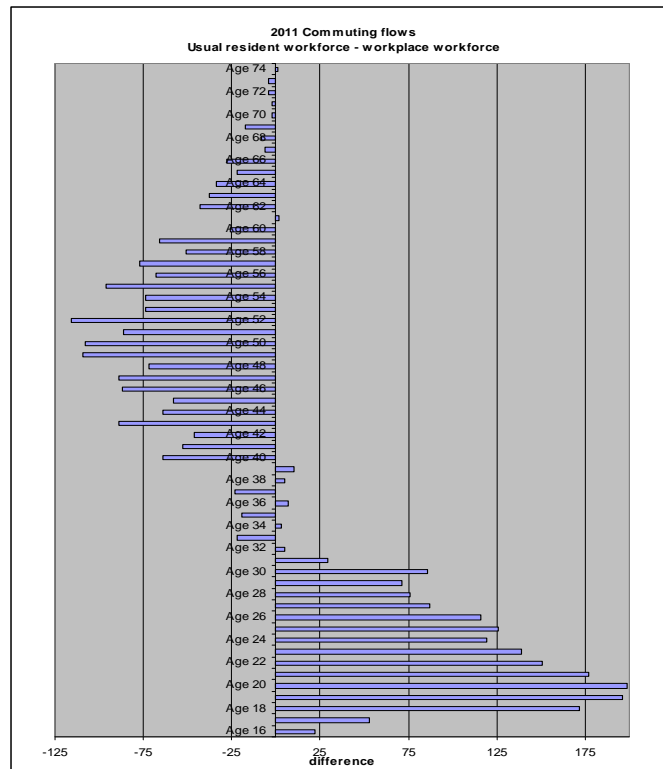
The Core Strategy expects to maintain a supply of employment land to promote flexibility. But the track record for development on previous employment land allocations indicates limited market interest even in economically buoyant times (Employment Land Review, 2012). This is a product of a deeply rural land and service based economy and the remote location of much of the District. The Catterick Garrison Town Centre Development does offer a potential step change for the local economy and is expected to be completed by late 2015. Although land is available, it would be unrealistic to expect completions equivalent to housing all of the proposed jobs to be delivered in this time.

Workforce Ageing

HBF also recommends that the Council should respond to the ageing of the local workforce in addition to the likely economic growth when setting its housing target. There is no doubt that the ageing of the baby boom generation presents issues affecting the national economy and service provision. The interim mid 2011 and recently published mid-2012 subnational population projections (ONS) paint a picture of very low population growth, subject to underlying assumptions derived from severe economic recession. These projections do show a potential decrease in the population of working age in the District equivalent to 2,700 people aged 16-74 over the plan period, with the bulk of the reduction at ages 45 to 59.

	2012	2028	Change	
	(000's)	(000's)	(000's)	%
0-4	2.90	2.60	-0.30	-10.3%
5-9	2.80	2.70	-0.10	-3.6%
10-14	2.90	2.80	-0.10	-3.4%
15-19	3.50	3.60	0.10	2.9%
20-24	4.90	4.40	-0.50	-10.2%
25-29	4.00	4.00	0.00	0.0%
30-34	3.10	3.20	0.10	3.2%
35-39	2.90	3.10	0.20	6.9%
40-44	3.70	2.80	-0.90	-24.3%
45-49	3.60	2.50	-1.10	-30.6%
50-54	3.50	2.40	-1.10	-31.4%
55-59	3.20	3.40	0.20	6.2%
60-64	3.30	3.70	0.40	12.1%
65-69	3.20	3.60	0.40	12.5%
70-74	2.30	3.00	0.70	30.4%
75-79	1.80	2.70	0.90	50.0%
80-84	1.20	2.40	1.20	100.0%
85-89	0.70	1.30	0.60	85.7%
90+	0.40	0.90	0.50	125.0%
Total	53.90	55.00	1.10	2.0%

The projected decrease in resident working age population would only occur if the mid-2012 projections' assumptions were realised. The Council does not regard the mid 2012 projection as a realistic basis for longer-term planning, because they project the severe recessionary trends of the previous 5 years. Therefore, caution is needed when inferring any development requirements from them as suggested by HBF. To plan for this reduction at face value would also be to ignore the dynamics of the local workforce. Results from 2011 Census show very clearly that the District commuting in and outflows are quite different in age structure. See figure below.



Source : 2011 Census, Tables QS103EW, WD1117E, WP1101EW (ONS)

The District is a net importer of young people (16-39, 1,785) and a net exporter of older people (40+, 1,778). In addition, much of the outflow heads towards local employment centres in the Yorkshire and Humber, Tees Valley and rest of the north east. In comparison, the inflow covers the rest of the country.

Place	In	Out	Balance
All	7,583	7,256	327
Darlington	1,286	1,387	-101
Hambleton	848	2,057	-1,209
County Durham	778	640	138
Harrogate	399	593	-194
Stockton	236	333	-97
Middlesbrough	107	220	-113
Leeds	95	208	-113
Redcar and Cleveland	99	78	21
Ryedale	89	103	-14
Newcastle upon Tyne	60	94	-34
Bradford	82	50	32
Total Darlington - Bradford	4,079	5,763	-1,684
Total Rest of UK	3,504	1,493	2,011

Source : NOMIS

The commuting in flows are, in part, a product of the military population in Richmondshire and how this has been coded into the Census. In particular, the widespread in-commuting and high proportion of younger people commuting in. It is not feasible for large numbers of people to commute from, for example, the south-west region. A plausible explanation is that some military personnel have given a home address from where they were recruited or where they maintain a home base while also living in military accommodation at Catterick Garrison. However, this does not alter the substantial older working age outflow, which is indicative of the attractiveness of Richmondshire as a place to live and transfers a large part of the ageing workforce problem outside of the District.

Workforce impact of proposed military households

HBF criticises the Council for not estimating the workforce impact of dependants of military (Service Families Accommodation) households in local workforce. ONS estimates participation rates for men and women in the workforce at all ages. (Women in the Labour Market ONS, 25/09/2013). Taking the proposed level of 500 military homes over the plan period a workforce impact can be estimated.

Average occupancy of military (SFA) homes = 0.95

Number of additional military families = 500 homes x 0.95 = 475

Nearly all SFA homes will have one adult who is not military personnel, usually aged between 20 -25 and most likely female. Participation = 0.6 (average participation for women aged 20-25, ONS)

Number of non-military adults participating in the workforce = 0.6 x 475
= 285

Impact of significant growth projects

The A1 upgrade, Catterick Garrison Town Centre and Army Basing Plan implementation create both economic optimism and turbulence for a number of years. The town centre is due for completion by mid-2015 and the A1 upgrade and Army Basing Plan by later 2017. The Council intends a five year review cycle to assess the delivery of its development strategy and review its targets as indicated in the review of the Employment-led Demographic Forecasts (PSD013, March 2014).

Affordable Housing Needs

HBF is incorrect to say that the Council's total affordable housing need according to the SHMA amounts to 260 affordable dwellings per annum over the next 5 years. This headline figure ignores the construction of the underlying estimate, which includes households whose housing needs could be met through adaptation and households whose need if met would release a home into the market. This issue was also addressed in the Council's response to the Inspector's Matters and Issues (CO14, January 2014, paras 3.1.4 – 3.1.6)

The Council's approach to housing delivery.

HBF also cites the failure of the Council to deliver a sufficient supply of development sites as a contributory factor to a poor level of delivery over recent years. While accepting that the Council does not yet have a full Local Plan in place, this is not a true representation of the Council's track record on promoting sites or the activity of the development industry, including HBF members, locally.

There has been little pressure for development sites in Richmondshire or any challenges to a limited supply. The Council has not been inundated with sites for development when it has refreshed its land availability assessment. There have been no appeals concerning refusal of major sites for development, nor applications on unexpected sites. Currently there is capacity in the Council's 5 year land supply to provide for the Council's proposed target and a buffer in excess of the 20% recommended in NPPF (RDC Response to Inspectors Matters and Issues, CO14, January 2014, sections 3.3 – 3.5). This land supply does not rely upon a windfall supply from very small sites, which has averaged 30% of housing completions over the past 10 years or 350 homes. The Council has also worked to promote several sites through a flexible approach to long standing allocations and participate in innovative schemes such as the Public Land Auction pilot and a range of grant funded affordable housing schemes. These sites have been brought forward in the prevailing development market. For example:

Site	Capacity	Comment
Arras Lines, Somerset Close, Gough Road Catterick Garrison	195	Three MoD sites, one of which was a long standing employment allocation, brought forward by the Council through the Public Land Auction Pilot. Outline permission granted stc S106 agreement 1/4/14
Hipswell Croft Catterick Garrison	72	Site adjacent to existing development boundary, brought forward under Core Policy CP4. Permission granted 22/10/13
Colburndale 2 Catterick Garrison	273	Employment land in outline permission converted to housing. Permission granted 4/12/12
Former Arriva Bus Depot Richmond	24	Affordable apartments. Full planning permission granted 23/3/12. Funded through off site contribution from another site

The Beacon Catterick Garrison	43	Veterans Centre with 31 supported apartments and 12 social rent dwellings. Completed 2011/12.
Bishops Way, Catterick Village	31	Affordable exception site. Completed 2011/12
Richmond Park Catterick Garrison	31	Get Britain Building Scheme – 15 Homebuy, 16 social rent.. Completed 2010/11

Overall developers already have sufficient choice to respond to the economic opportunities provided by A1 upgrade, Catterick Garrison Town Centre and Army Basing Plan.

2. Development of brownfield land : M/3/CRSS/07,09, M/4/CP3/03

HBF seeks further changes to policies CRSS and CP3, which address the use of brownfield land. In actual terms this is a minor point because the bulk (98%) of available brownfield land is already in the planning system. CRSS 5a qualifies the direction of travel from the town centre making it subject to the “demonstrable availability and deliverability of sites”. In other words development will not be held up by the exercise of any unjustified preference.

HBF reflects that the Council should encourage the use of brownfield land through the reduction of burdens placed upon sites and negotiation with land owners. This is a reasonable summary of the Council’s approach to date, which has seen a substantial amount of brownfield land being brought forward with permission for 764 homes. This includes participation in the government’s Public Land Auction pilot, that has led to the granting of outline permission for a further 195 homes on vacant military sites. These initiatives have been successful because an open book approach has been pursued that has enabled the different site characteristics to be fully appraised. The result has been viable projects for developers that address local conditions as far as possible within the context of the Council’s overall strategy for this area.

3. Sustainability performance of new homes : M/4/CP2/05

HBF recommends that the Council drafts policy in anticipation of, as yet, unadopted national guidance and standards. It is likely that the national zero-carbon homes strategy would be phased in over several years and developers will need to prepare for this. The Council’s approach anticipates the expected requirement for the building industry to improve the performance of its products and CP2 only requires relevant standards to be exceeded where it is feasible and viable to do so.

4. Affordable housing targets : M/4/CP6/01,02 :

The Council's affordable housing targets have been set subject to economic viability and hence do not render any site unviable that can provide the evidence that this is the case. The Council is dealing with a wide variety of sites often located in areas where there are excessive land value expectations. The targets have been set to maximise the likely delivery of necessary affordable homes, which is something the HBF advocates elsewhere in its representation (page 3, paragraph 2).

HBF highlights the range of conditions that the general viability assessment considered, which reflects some of local site diversity. This assessment has been supplemented with real-life schemes negotiated recently by the Council, which provide an ongoing update to the general assessment and demonstrates the conservative nature of its assumptions. In addition, results from actual sites also shows the inherent flexibility of the Council's approach, which can respond rapidly to changing site and economic circumstances. It also encourages developers to properly evaluate the financial viability of their own schemes.

Settlement	Site	Dwellings	Contribution
Brompton on Swale	Gatherley Road	250	30%
Colburn	Colburndale	250	30%
Colburn	In-Pipes Products	47	17%
Colburn	Woodside Chase	272	30%
Hipswell	Hipswell Croft	72	38%
Catterick Village	Land Adjacent 9 St Paulinus Crescent (13/00365/OUT)	2	40%
Dalton On Tees	Land South East Of Chapel House Farm (13/00378/FULL)	1	30%
Newton-Le-Willows	Turtles Place Station Road (13/00502/OUT)	1	40%

The results for the largest Colburn sites exceeded the expectations of the Economic Viability Assessment (TE004) for this area. The In-Pipes site presented a number of problems and had a higher existing use value. The Hipswell site illustrates the potential for higher affordable housing delivery in a different part of Catterick Garrison.

The HBF comments in relation to site size threshold and current government consultation are, perhaps, premature. Although the government has already reported on the planning performance aspects of its consultation document, there has, as yet, been no indication of how it intends to progress the proposed imposition of a national site size threshold for developer contributions. Such a policy would have profound implications for all rural areas and would exclude a substantial proportion of local development from contributing. Core Policy CP6 enables the Council to respond effectively to local affordability issues by addressing the viability of the local housing market. It already provides a range of exclusions to enable local people to build necessary local housing without contribution. The Council has, for several years, worked with contribution thresholds much lower than the one proposed in the government's consultation document, without any problem. Over the past 10 years nearly 60% of all homes have been built on sites of less than 10 homes. The application of the proposed policy threshold would choke the supply of affordable housing. The Council's current development target is for 3,060 homes to be built to 2028. The application of the proposed threshold would, based on past development trends, take 1,830 of these out of making a contribution. Assuming that actual delivery of affordable housing is closer to 25%, accounting for site viability, then 460 affordable homes would not be built. In a time of funding constraint, rural exception sites are unlikely to offer a realistic alternative.

11 : Mr and Mrs Wood

Mr Wood considers the impact of development on the running of his farm between Colburn and Hipswell, north of Catterick Rd. This is not a strategic planning issue, but does highlight the need to sustain viable land uses that can maintain the open aspect in this area.

15 : Colburn Town Council

Colburn Town Council is concerned with the potential development of a site within the area of land between Colburn and Hipswell, north of Catterick Road. This matter has arisen out of modifications that sought to clarify the extent and interpretation of the strategic direction of growth in Catterick Garrison and the local desire to maintain a separation between Colburn and Hipswell. Until the Delivering Development Plan can progress settlement development limits and land use allocations, consideration of development proposals should be in compliance with the National Planning Policy Framework. The modifications to CRSS figure 8 did not alter the shape of the strategic growth area, they added details to map to assist orientation. Colburn Town Council highlights the range of access and infrastructure issues that would affect any development proposal on the area of the former recreation ground. These are being reappraised in the current land availability assessment (LPWG, 24 October 2013) and will also be reassessed when land use allocations and settlement development limits are renewed in the Delivering Development Plan.

Colburn Town Council also requests that annotation on the unmodified Figure 8 is reinstated in the Core Strategy. Specifically “development in this area will be on a limited number of sites and will not cover the whole area”. This is a minor change and would not alter the purpose or use of Figure 8, which is explained in modified paragraph 3.2.9. This paragraph also says that development areas will be defined in the Delivering Development Plan.

14 : Natural England, Modification M/4/CP12/01

Para 4.12.13 – This modification was originally proposed as a result of work with Natural England following their representation on the submission draft Core Strategy. The council however acknowledges the comments made by Natural England in this consultation and would support their expert advice in this regard that the proposed modification “up to 20km” should not be included.

Natural England highlights previous representations and confirms that they were not fundamental to the soundness of the plan. The comments on Core Policy CP2 about soils and Core Policy CP4 about tranquillity are sufficiently covered in existing policy to ensure consistency with NPPF.

No green infrastructure improvements are included in Table 6: Infrastructure Delivery Plan as there are no projects of this type fundamental to ensuring the delivery of the plan. The LPCS policy CP12.1d seeks to protect and enhance the existing green infrastructure network. Also a modification (M/4/CP12/04) has been proposed to paragraph 4.12.6 which makes it more explicit that the second part of the Local Plan the Delivering Development DPD will define in detail the green infrastructure.

The Sustainability Appraisal and Habitats Regulations Assessment will be updated to reflect where relevant the minor amendments to the LPCS prior to the adoption of the LPCS.

3. Local Plan Core Strategy : Summary of Post Hearing Proposed Modifications

Chapter numbers and policy references relate to the Local Plan Core Strategy (Post Hearing Proposed Modifications Tracked Changes Version) April 2014). This document can be found on the Council's website at

<http://www.richmondshire.gov.uk/planning/local-plan/1420-local-plan-core-strategy-2012-2028-modifications1>

Chapter 1

M/1/0/03 – Inspector Comment - Specify Delivering Development Plan Content - Detailed policies and allocations for housing, employment, town centre uses, MoD uses, Infrastructure, open space and green infrastructure, sport and leisure facilities

Chapter 2 (also Chapter 1)

M/1/0/01 & 02 & M/2/0/01 to 06 - Factual updates following Census 2011 results, Army Basing Plan publication, A1 Upgrade re-announcement, Development Target Review consultation (interim mid-2011 household projections), Economic-led household projection, Regional Spatial Strategy Revocation and emergence of LEP at sub-regional level.

Chapter 3

SP4: Scale and Distribution of Housing Development

M/3/SP4/02 – Inspector Comment - Inclusion of explanation how the Council expects to manage the housing target and not to regard it as a ceiling.

M/3/SP4/03 – Reduction in policy expectations for service families accommodation from 1440 to 500 homes following publication of Army Basing Plan (2013) and subsequent Development Target Review consultation. MoD confirmation.

M/3/SP4/06 – Inspector Comment / Home Builders Federation - Provision of Employment led-housing projections to demonstrate housing supply can meet expected jobs growth.

SP5: Scale and Distribution of Economic Development

M/3/SP5/05 – J Davis - Re-inclusion following A1 upgrade re-announcement of policy reference to appropriate economic development opportunities at upgraded A1 junctions subject to detailed appraisal.

Central Richmondshire Spatial Strategy

M/3/CRSS/03 – Inspector Comment/ J Ridgeon - Explanation of the definition of small scale housing developments

M/3/CRSS/04 & 05 – Inspector Comment / R Hildyard - Text and Figure 8 clarification regarding Catterick Garrison Strategic Development Growth Area.

M/3/CRSS/09 – Home Builders Federation / Inspector Comment - Align wording regarding use of brownfield land to NPPF

M/3/CRSS/10 – J Davis - Re-inclusion following A1 upgrade re-announcement of policy reference to appropriate economic development opportunities at upgraded A1 Catterick Central junction

North Richmondshire Spatial Strategy

M/3/NRSS/03 – J Davis - Re-inclusion following A1 upgrade re-announcement of policy reference to appropriate economic development opportunities at upgraded A1 Barton and Scotch Corner junctions.

Chapter 4

CP2 (previously CP1): Responding to Climate Change

Policy Part 1b – M/4/CP2/03 – Inspector Comment - Ensure policy requirements for renewable energy schemes regarding adverse landscape and visual impacts is consistent with NPPF requirements.

Policy Part 2a – M/4/CP2/04 – Inspector Comment - Delete requirements for consequential improvements as whilst well intentioned no sound justifications, difficulties in monitoring and changes in permitted development rights have made it less implementable.

Policy Part 2a – M/4/CP2/05 – Inspector Comment - Requirement for CSH Level 4 should be revised to Level 3 plus higher where viable. Viability evidence does not support requirement for Code 4, but flexibility of policy to assess financial viability does enable further consideration

Policy Part 2a - M/4/CP2/06 – Inspector Comment - Delete reference to BREEAM standard as not justified and viability evidence not available.

Policy Part 3 – M/4/CP2/07 – Environment Agency - climate change adaptation and flood risk requirements re-worded to ensure consistency with National policy.

M/4/CP2/08 – Inspector Comment - Clarification on renewable energy target. No target to be set consistent with the advice of National Planning Practice Guidance.

CP3: Supporting the Settlement Hierarchy and CP4: Supporting Sites for Development

M/4/CP3 & CP4/01 - Policy CP3 Deletion and amalgamation with CP4 to remove duplication. Greater clarity of the use of CP4 and supporting Settlement Development Guidance and 5 year land supply.

M/4/CP4/04 – Inspector Comment - Inclusion of criterion-based policy for Gypsies, Travellers and Travelling Showpeople using specific tailored criteria which reflects National Policy wording.

CP6: Providing Affordable Housing

M/4/CP6/01 & 02 - Inspector Comment - Include more detail from SPD including calculation to ensure regulatory compliance.

CP9: Supporting Town and Local Centres

M/4/CP9/01 – Include reference to proposed management processes including establishment of Town Centres Forum which will assist in delivery of complementary town centre approach

Policy Part 2 – M/4/CP9/01 - Definition of Retail and Commercial areas for Richmond, Catterick Garrison and Leyburn in policy (maps) and revised policy wording to reflect changes. Provides greater clarification prior to Delivering Development Plan and replaces Local Plan policy 83.

M/4/CP9/05 – Inspector Comment - Inclusion of intention to healthcheck town centres at Catterick Garrison, Richmond and Leyburn through annual monitoring procedures. This will enable the complementary town centre approach to be monitored and managed.

CP11: Supporting Community and Recreation Assets

M/4/CP11/01 – Theatres Trust - Addition of word cultural for clarification and consistency with NPPF.

M/4/CP11/02 – Sport England - Reference to completion of Settlement Facilities Study Sporting Supplement completed to ensure evidence corresponds to Sport England methods and requirements.

M/4/CP11/05 – Inspector Comment - Specify how Delivering Development Plan will respond to underpinning updated evidence particularly shortfall and surpluses at settlement level and how it will be ensured that it is more consistent with PPG17 Companion Guide typologies and NPPF para 73 and 74.

CP12: Conserving and Enhancing Environmental and Historic Assets

M/4/CP12/01 - English Heritage, Natural England and Yorkshire Wildlife Trust -

Policy restructured to provide greater clarity and consistency in presentation.

Policy Part 2d – M/4/CP12/03 – Inspector Comment / R Hildyard -
Textual clarification of agricultural countryside between Colburn Town, Colburn Village and Hipswell.

Chapter 5

M/5/Infra/01 – Inspector Comment - Inclusion of 5 year plan review cycle to clarify practical expectations for Local Plan Review.

Infrastructure Delivery Plan Table

M/5/Infra/06 – Inspector Comment - Update to reflect change in position of projects and funding, removal of projects that are not essential to facilitate the delivery of the strategy A1 Upgrade update, A6136 update + funding changes. Include education costs.