



**Statement to**

**Examination of the  
Local Plan: Core Strategy  
Development Plan Document**

**January 2013**

**Made on behalf of Mr R Orchard**

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Our client, Mr R Orchard, owns land to the south of Green Howards Road. A location plan has been enclosed which indicates the extent of the site (Appendix 1). We are instructed to make the following representations to Richmondshire District Council.

The representations respond to the issues the applicable issues identified in the *Schedule of Matters and Issues for the Examination* and not considered in previous representations submitted to Richmondshire District Council.

## **1. Matter 2 – The Strategy**

### **1.1 Issue 2.8 – Overall, is the distribution of the development sought the most appropriate strategy, and what alternatives have been rejected?**

1.1.1 The proposed distribution is generally supported, specifically the identification of the Central Richmondshire sub area as the main area for housing and employment development (Policies SP1 and SP2).

1.1.2 The approach taken in Policy CP4 will deliver a distribution of development which is appropriate for Richmondshire. However, any reliance on Doc. PP005 Richmond: Development Search Areas and Strategic Directions of Development (September 2013) will significantly impact on the delivery of development. This document considers that;

“Richmond’s needs are to be largely met by strategic growth at Catterick Garrison (Hipswell, Scotton and Colburn) for housing and employment.” (page 12)

1.1.3 This was because;

“the analysis to date indicates that due to infrastructure and environmental constraints, it is not possible to identify an acceptable strategic direction of growth for the town.” (page 12)

1.1.4 Representations were submitted in relation to the Proposed Submission consultation argued that consideration should be given to smaller sites than those indicated in the “Development Constraints and Search Areas” identified in Doc. PP005 (included at Appendix 2). For example, Area “D” is an area of approximately 30ha which, based on 20% non-developable area, would provide sufficient space for 700+ homes, which would be inappropriate in Richmond. The areas of search are therefore not

commensurate with the level of development that would be appropriate in Richmond and it is therefore unsurprising that the search areas were negatively assessed.

1.1.5 Development areas discounted by Doc. PP005 should be considered as smaller, discrete development sites. Paragraph 3.2.7 of the submission draft states that there is no capacity for strategic development in Richmond: it is contended that insufficient assessment has been carried out to consider sites in Richmond.

1.2 Issue 2.10 – To deliver the strategy, is it the Council’s intention to allocate land for development in a future Local Plan document, and to identify land for other purposes (for example, to prevent development on it) on a Policies Map? Should the Core Strategy be clearer about this, and set out the commitments to be addressed?

1.2.1 The Council’s intention is not considered to be sound and will not accord with NPPF paragraph 154 which requires that Local Plans “should set out the opportunities for development and clear policies on what will or will not be permitted and where”, without further consideration of smaller sites than those identified in Doc. PP005 it is not clear that sufficient appropriate land around Richmond can be identified to provide the houses required.

1.2.2 The Council’s assertion that there are no suitable sites has not been sufficiently justified. Indeed, the land to the south of Green Howards Road has not been considered in the updated April 2013 SHLAA. No call for sites has been carried out since the Summer of 2009 and the SHLAA is therefore unlikely to be up to date. Indication had been given by the LPA that a further call for sites would be carried, but this has not happened to date.

1.2.3 A further issue is the wording of the ‘Central Richmondshire Spatial Strategy (CRSS)’ (page 39), which does not provide clarity on what will be considered “small scale”. The wording is not considered to be sound and will not accord with NPPF paragraph 154 which requires that Local Plans “should set out the opportunities for development and clear policies on what will or will not be permitted and where”, without further clarity on the scale of development which would be appropriate in Richmond.

## **2. Matter 3 - Housing**

2.1 Issue 3.1 – The Plan aims to deliver 3,060 new homes between 2011 and 2028, representing an annual average of 180 homes. The submitted Plan also proposes an additional 1,440 homes for military service families at Catterick Garrisons. a) Is the 3,060 figure supported by reliable evidence?

- 2.1.1 As previously submitted, the Council's view that the objective assessment of the scale and distribution of local housing should consider a combination of factors is supported. The objective need should be a triangulation of the; 1) Wider context, 2) the objectively assessed need and, 3) views of stakeholders.
- 2.1.2 The retention of the target of 180 dwellings a year, rather than 80 dwellings per year, as indicated by the Interim mid 2011 ONS projections is supported.
- 2.2 Issue 3.4 – Is there a supply of specific deliverable sites sufficient to provide five years worth of housing, with an additional buffer of 5% moved forward from later in the plan period to provide choice?
- 2.2.1 The timing of the delivery of the supply of specific deliverable houses as identified in the SHLAA Update April 2013 is questioned. The SHLAA is on the basis of “30 dwellings max completed per site per annum”. However, no consideration is made of the market conditions for specific areas.
- 2.2.2 For example, the SHLAA Update April 2013 indicates that in Catterick Garrison in Year 5 (2017) 145 dwellings will be completed on sites 56, 124, 186, 156, and 157. Developments that compete within the same location are unlikely to be brought to market simultaneously, due to the depressing effect on the values. This should be reflected in the estimated yields.
- 2.2.3 In smaller markets (Primary Service and Secondary Service Villages) developers are similarly unlikely to flood the market and a lower average completion rate is considered to be more appropriate. A completion rate of 10-15 is likely to be more appropriate.
- 2.2.4 It is considered that further work is required to fully assess the deliverability of sites.
- 2.3 Issues 3.5 – In light of paragraph 47 of the NPPF, should the buffer be 20%? Are there sufficient deliverable sites to provide a 20% buffer?
- 2.3.1 The Council's contention that the 20% buffer to the land supply should not need to be applied is disputed. Table 1 of the letter to the Planning Inspector dated 03 May 2013 gives a total of 824 annual net completions between 2004/5 to 2010/11. The average completion rate over the 7 years is 117 dwellings per year. This is significantly less than the 170 dwellings reduced target argued for in paragraph 2.40 of the

Development Target Review. To be positively prepared, the Local Plan Core Strategy should provide for a 20% buffer in the first 5 years of the plan period.

### **3. Matter 7 – Town centres**

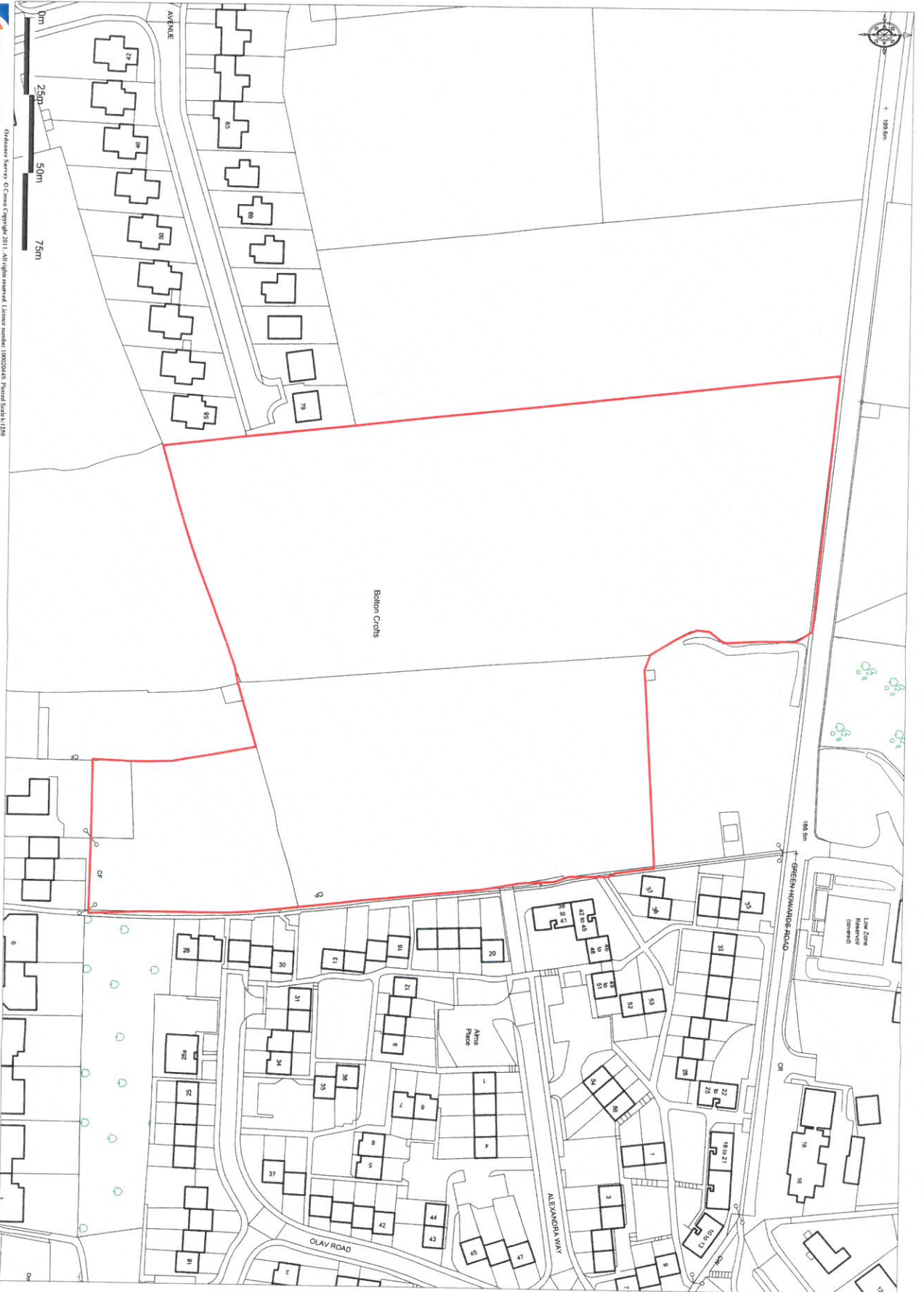
3.1 Issue 7.2 – Given the proximity of Catterick Garrison to Richmond, is there a danger that the growth envisaged at the former may have negative impacts on the latter, particularly in terms of vitality and viability? How will the relationship between Richmond and Catterick Garrison be managed?

3.1.1 The growth of Catterick Garrison is not necessarily going to impact negatively on the vitality and viability and the close proximity of the two settlements will allow residents to take advantage of the type of shops for which shoppers are currently travelling to other retail centres. To ensure the vitality and viability of Richmond is not negatively impacted upon new development need to compliment rather than replicate the types of shops in Richmond. Larger sized shops selling convenience goods that cannot be provided within Richmond would benefit residents of Richmond as they would then not need to travel further afield (e.g. Darlington).

3.1.2 Providing housing development on the edge of Richmond will also ensure that the retail offer in Richmond remains viable.

## Appendix 1

# Land at Green Howards Road



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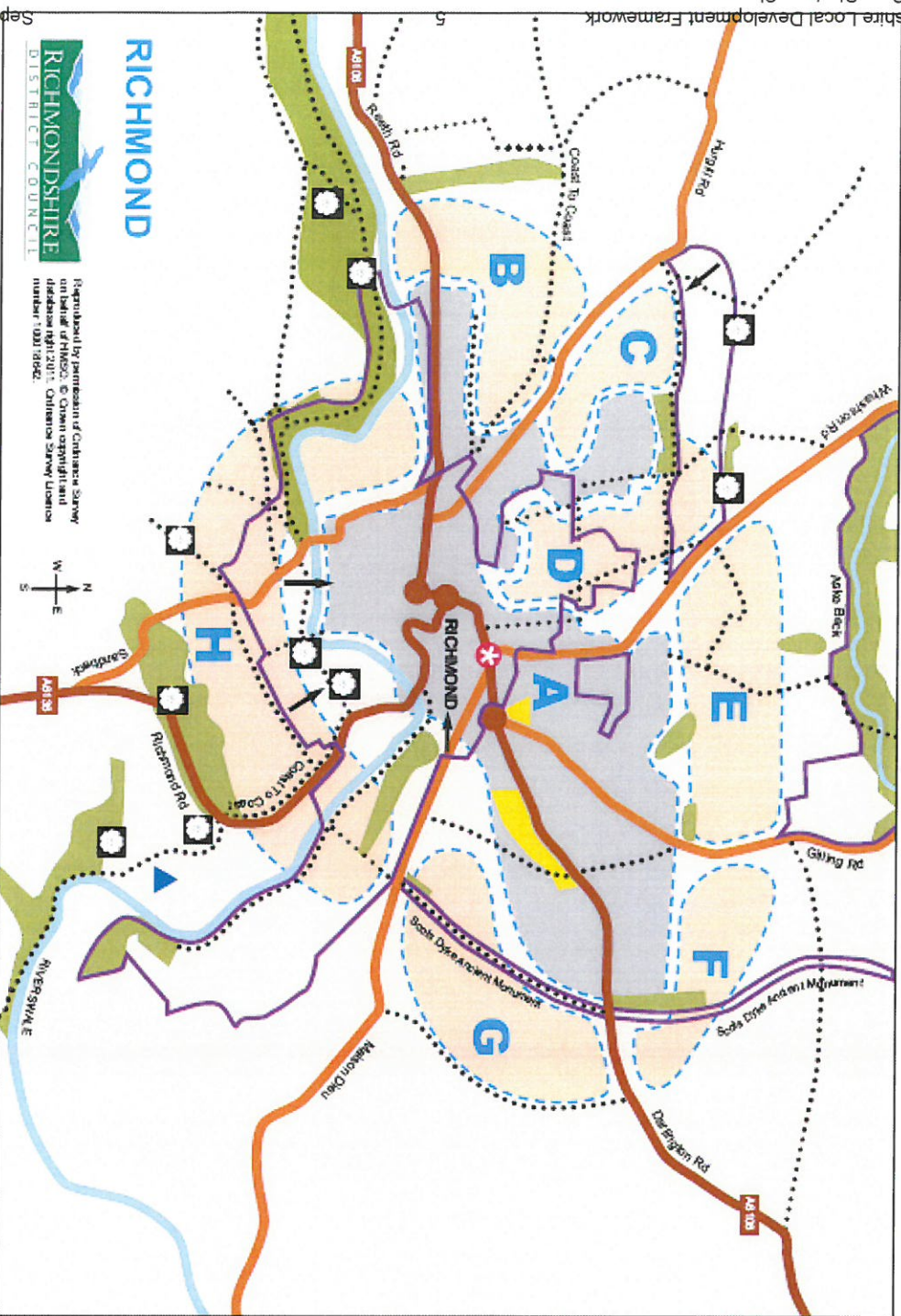
Location Plan  
scale 1:1250 @ A3

Appendix 2



# Diagram

## Development Constraints and Search Areas



Key

Settlement Built Form	
Development Search Areas	
Main Roads	
Secondary Roads	
Road Junction with Problems	
Footpaths and Rights of Way	
Water Courses	
Key Views	
Key Woodlands/Tree Groups	
Nature Conservation Areas	
Richmond Waste Water Treatment Plant	
Historic Areas	
Schools	

Richmondshire Local Development Framework Preferred Core Strategy Changes  
 Richmond District Council  
 Richmondshire Local Development Framework Preferred Core Strategy Changes  
 September 2011

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