# **Richmondshire Local Plan Submission Core Strategy**

# **Representations Statement**

# February 2013



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### 1.0 Introduction

1.1 This document will in accordance with Regulation 22c (v) of the Town and Country Planning (Local Planning) (England) Regulations 2012 outline the number of representations made and a summary of the main issues raised in those representations.

### 2.0 Background

2.1 The Council has completed community participation and involvement throughout the production of the Core Strategy up to the submission document publication stage. This is set out in a separate consultation statement prepared in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

### 3.0 Local Plan Proposed Submission Core Strategy Consultation

- 3.1 The Richmondshire Local Plan Core Strategy Proposed Submission document was published for formal representations on the 3<sup>rd</sup> August 2012 for a period of six weeks until 4pm on the 14<sup>th</sup> September 2012.
- 3.2 544 consultees on the consultation database including the specific consultees and parish councils were contacted in a letter format via their preferred method of contact informing them of the publication of the Proposed Submission Core Strategy. General consultees were also provided with a copy of the Statement of the Representations Procedure and Document Availability Document and a representations form. Specific consultees including Parish Councils were also provided with these documents along with a copy of the Core Strategy, a copy of the Guidance Notes and a CD containing all of these documents and also a the Sustainability Appraisal and the Habitat (Regulations) Assessment – Screening Assessment. Appendix 1 provides a copy of the guidance notes, which were made available to assist those wishing to make representations. There is also a copy of the Statement of the Representations Procedure and Document Availability, which outlined the representations procedure along with the location and availability of documents. Also included is the representations form.
- 3.3 All documents were available to view on the Council's website during the consultation period and paper copies of all documents, except the relevant supporting documents which were only available on the website, were available to view in the Community Offices and Libraries detailed in the Statement of the Representations Procedure and Document Availability Document included in the submission.
- 3.4 The deadline for responses was at 4pm on the 14<sup>th</sup> September 2012. Those which arrived late were not included in accordance with

Regulation 20(2) of the Town and Country Planning (Local Planning) (England) Regulations 2012.

### 4.0 Representations Received

- 4.1 In total, 56 organisations or individuals (appendix 2) have provided responses to the Council during the consultation period, resulting in a total of 196 representations being recorded.
- 4.2 Appendix 2 outlines the number of responses received from each respondent during the consultation and also the total number of responses received in relation to each chapter or policy of the document.
- 4.3 Also included in appendix 2 are tables showing how many of the total responses for each policy regarded it as sound, not sound and reasons why not sound, also if the respondent indicated that they didn't know or if no response was offered.
- 4.4 In instances where there was uncertainty as to whether the respondent was making a formal representation, contact was made in writing to ask if the respondent wished for their comments to be used as a formal representation. Those who confirmed this have been included.

### 5.0 Key Issues Raised

The main issues raised during the consultation on the proposed submission core strategy are summarised below where the representors considered the Council's approach sound or unsound:

### **Spatial Principle SP1: Sub Areas**

### 5.1 Support

- The recognition of the Principal Centres and Central Richmondshire as the sustainable locations for the greatest growth in the District.
- Darlington BC welcome the proposal to support regeneration in Darlington by constraining development in the North Richmondshire sub area, particularly near the boundary with Darlington and agrees with the need to resist development pressures from neighbouring Tees Valley settlements such as Darlington.
- Builds on the general strategy and approach of both the former North Yorkshire County Structure Plan and the Regional Spatial Strategy modifying it to reflect changes in circumstances.

# 5.2 Unsound

- The effects on commuting or limiting regeneration in Darlington and Teesside are over stated and the limitation on the North Richmondshire sub area is both unnecessary and damaging and also at odds with the NPPF.
- Provides insufficient emphasis on the positive benefits of development and does not encourage growth where it can be shown to be sustainable, particularly Lower Wensleydale.

# Spatial Principle SP2: Settlement Hierarchy

# 5.3 Support

- Looks to support the local needs of smaller rural communities and to encourage appropriate rural development.
- Settlement Hierarchy.

# 5.4 Unsound

- Settlement Hierarchy excludes villages and settlements which could be regarded as secondary service villages including Redmire and Daltonon-Tees / Croft-on-Tees.
- Introduction of a settlement hierarchy coupled with other policies condemns settlements outside the hierarchy to a life in aspic for the plan period.
- A key constraint in the Richmondshire area is flood risk, with virtually every settlement cited in SP2 identified as being, at least in part, vulnerable to flooding. No evidence appears to have been presented to substantiate that a sequential approach to the spatial distribution of development in respect to flood risk has been taken, as required by the NPPF and the SFRA.
- Question identification of Melsonby as a primary service village in relation to its facilities.

# Spatial Principle SP4: Scale and Distribution of Housing Development

# 5.5 Support

- For the scale and distribution of housing proposed, including:
  - Proposed housing growth figure represents a sound basis for the future development of Richmondshire and is justified and deliverable.
  - Strategy to constrain the amount of future growth within Richmond because of its considerable environmental assets and its landscape setting.

- Approach to provide housing within the Secondary Service Villages.
- Housing requirement proposed for Catterick Garrison.
- Housing requirement proposed for Leyburn.
- Reference to Gypsy and Traveller accommodation needs.

# 5.6 Unsound

- Insufficient scale of housing proposed, for the following reasons:
  - Population projections used not up to date and do not provide an accurate reflection of the district population.
  - Evidence of persistent under-delivery and not seeking to make up shortfall / backlog.
  - Proposed housing target does not meet the Districts affordable housing requirement identified in the SHMA.
  - Does not conform to RSS requirement.
- Unbalanced housing distribution as:
  - Proposed distribution of housing in Central Richmondshire fails to recognise Richmond and Garrison area housing markets are separate and distinct.
  - Richmond should be apportioned more growth to retain its principal town role and limit affordability issues.
  - Proportion of Lower Wensleydale should be increased to between 15-20% to take account of growth opportunities at Leyburn and Middleham.
  - Areas of Growth/Key sites within primary service villages should be identified.

# Central Richmondshire Spatial Strategy

# 5.7 Support

- The positive way in which the Strategy integrates the MOD estate into the future development of the District.
- The priority and emphasis given to the use of vacant land and previously developed sites.
- The reference to the establishment of a neighbourhood centre in Colburn.
- The Strategic Development Growth Area.
- Requirement that employment development at Gallowfields Trading Estate protects the setting of the town and its environmental assets.

# 5.8 Unsound

- Too great a focus on previously developed land as one principal determinant in the allocation of sites in Richmond and the Primary Service Villages.
- Strategic Development Growth Area has significant deficiencies in terms of clarity it omits for instance both Colburn Lane and Colburn back (West) lane. It appears to indicate that the land adjacent to the A6136 and on its north side should not be developed. This runs contrary to the various principles and policies that prioritise housing development areas in the Garrison.

# Core Policy CP1: Responding to Climate Change

# 5.9 Support

- Acknowledgement that, in the case of some heritage assets, it may not be possible to make carbon-savings without compromising their significance.
- The incorporation of green infrastructure.

# 5.10 Unsound

- Does not manage flood risk pro-actively enough. It fails to attempt to steer development away from flood risk areas in line with the Sequential Test (ST) set out in the NPPF.
- Not sufficiently ambitious in respect to the incorporation of Sustainable Drainage techniques in new development.
- Flexibility should be introduced regarding the CSH Level 4 requirement to ensure that the costs of compliance with it and other policies do not adversely affect the viability of residential development projects.
- The requirement to demonstrate no adverse effects in respect of landscape and visual issues goes further than the guidance in the NPPF.
- Reliance on the 'Richmondshire Local Renewable and Carbon Study' and in particular the 'Energy Opportunities Map' does not provide a clear policy for renewable energy development. The study is neither clear nor concise and the Energy Opportunities map misses many opportunities for renewable energy development.

# Core Policy CP2: Achieving Sustainable Development

# 5.11 Support

• Emphasis that brownfield land should be developed first.

- Welcomes the provision that development that would generate a significant adverse traffic impact, without appropriate mitigation, will not be permitted.
- Protection given throughout to the District's environmental assets.
- Inclusion of improved access for all to local services and the decrease in the need to travel by encouraging public transport.

# 5.12 Unsound

- No policy on waste management for the district.
- No reference to prevent / reduce noise and light pollution.
- Plays down the issue of ground conditions and does not accurately reflect the evidence base provided regarding coal mining legacy.

# Core Policy CP6: Providing Affordable Housing

# 5.13 Support

- Approach to make provision for affordable housing on rural exception sites where there is a proven local affordable housing need.
- This policy taking in to consideration the supplementary document. (Note: Supplementary information was provided to Parish Councils in response to lobbying material sent to them concerning this policy).
- Inclusion of the reference to 'economic viability assessment'.

# 5.14 Unsound

- Economic evidence lacking as evidence of economic effects only looked at economic viability based on resale value and no economies of scale has been undertaken.
- Lack of meaningful consultation since significant changes to policy in autumn 2011. Local builders were not asked regarding build cost in a rural areas nor what the economic effects of this 40% tax would be on them.
- In current economic conditions this figure is likely to be unviable resulting in schemes not coming forward and no affordable housing being delivered.
- Target is not justified by robust and credible evidence of economic viability.
- Such a higher housing requirement and low site threshold is unrealistic and would effectively stifle housing supply.
- This cash levy is a tax and not a planning policy. Not a single new site will be identified through lowering the threshold down to single sites and demanding a cash payment. It is impossible for a community where the tax is paid to gain an affordable house because of the tax levy. There is no link. This is not the case for larger developments

# **Core Policy CP11: Supporting Community and Recreation Assets**

### 5.15 Unsound

- The Council has neither an up to date playing pitch strategy nor a built sports facilities strategy and therefore does not have an appropriate evidence base for sport.
- Actual policy does not use the word 'cultural'. This is necessary to remain consistent with NPPF.

# Core Policy CP12: Conserving and Enhancing Environmental and Historic Assets

### 5.16 Unsound

- Policy is confusing and does not clearly set out how the NPPF requirements will be applied at the local level.
- Omits important sites. Bullet point 2 Easby Abbey and St Agatha's Church at Easby should be added. Final bullet point Gilling Wood Hall should be added.
- Does not identify and map biodiversity opportunity areas so that the authority can work to join up habitat through the planning process.

# **Core Policy CP14: Providing and Delivering Infrastructure**

# 5.17 Sound

 Agency currently considers that there is insufficient evidence to support the strategy's development proposals in relation to the identification of the level of impact on the Strategic Road Network (SRN) and the junctions immediately surrounding them. The Agency is currently in the process of completing a gravity model which will determine the level of impact on the SRN and the junctions immediately surrounding them, provided appropriate solutions can be agreed, the Agency will be able to withdraw this representation. (Note: Representation written prior to announcement re-instating A1 upgrade).

# Sustainability Appraisal

### 5.18 Unsound

 No indication within the Sustainability Appraisal of other relevant plans, programmes and objectives which may influence the development of the Core Strategy. Without the context of international, European, national and local polices and legislation, there is no confirmation that EU Water Framework Directive (2000/60/EC) has been incorporated overall into the Core Strategy polices.

# Richmondshire Local Plan Core Strategy August 2012

# Guidance Notes for Making Representations at Publication Stage

# Introduction

These guidance notes are to assist those wishing to make representations on the Richmondshire Local Plan Core Strategy, which can be viewed online at: **www.richmondshire.gov.uk/localplan.aspx** 

These Guidance notes are based on the notes prepared by The Planning Inspectorate (2009). It would be helpful if representations are made on the form provided or follow its format as a guide. This helps us to accurately analyse the results.

The Proposed Submission version of the Richmondshire Local Plan Core Strategy is available to allow the public and other interested parties to make comments prior to the formal submission of the document to the Secretary of State. The representations will be considered alongside the published document when submitted, which will be examined by a Planning Inspector.

The Planning and Compulsory Purchase Act 2004(as amended) (the 2004 Act) states that the purpose of the examination is to consider whether the Plan complies with the legal requirements and is 'sound'.

If you are seeking to make representations on the way in which Richmondshire District Council has prepared the published document it is likely that your comments or objections will relate to a matter of legal compliance.

If it is the actual content on which you wish to comment or object it is likely it will relate to soundness i.e. whether the document is positively prepared, justified, effective and consistent with national policy.

# Legal Compliance

At the Examination, the Inspector will first check that the Local Plan Core Strategy document meets the legal and procedural requirements under the 2004 Act and the Localism Act 2011 before moving on to test for soundness. You should consider the following before making a representation on legal compliance:

• the document should be within the current Richmondshire Local Development Scheme (LDS) and the key stages should have been followed in its preparation. The LDS is effectively a programme of work prepared by Richmondshire District Council, setting out the documents it proposes to produce over a three year period. It sets out the key





stages in the production of any Plans which are to be brought forward for independent examination. If the Core Strategy document is not in the current LDS it should not have been published for representations. The LDS is available at the Council's Community Office, Dundas Street, Richmond and on the Council's website: www.richmondshire.gov.uk/localplan.aspx

- the process of community involvement for the document in question should be in general accordance with the Local Planning Authority's Statement of Community Involvement (SCI). The Statement of Community Involvement (SCI) is a document which sets out the Council's strategy for involving the community in the preparation and revision of Local Plans and the consideration of planning applications
- the document should comply with the Town and County Planning (Local Planning) (England) Regulations 2012. On publication, the Council must publish the documents prescribed in the regulations, and make them available at their principal office and on their website. The Council must also place a local advertisement and notify general and specific consultation bodies (as set out in the regulations) and any persons who have requested to be notified
- the Local Planning Authority is required to provide a Sustainability Appraisal Report when it publishes a local plan. This identifies the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economic factors
- the Core Strategy document should have regard to national policy and conform generally to the Regional Spatial Strategy (RSS). The Yorkshire and Humber RSS sets out regional policies in relation to the development and use of land and forms part of the development plan. However, with the implementation of the Localism Act, 2011 the Government will be revoking the RSS soon, so that it no longer forms part of the development plan
- the document must have regard to any Sustainable Community Strategy for its area (i.e. The Sustainable Community Strategies for North Yorkshire and Richmondshire).

# Soundness

A local Planning Authority should submit a plan for examination which it considers is 'sound' - namely that it is:

**Justified** - This means that the document should be founded on a robust and credible evidence base involving:

- evidence of participation of the local community and others having a stake in the area
- research/fact finding: the choices made in the plan are backed up by facts.
- the Local Plan Strategy document should also provide the most appropriate strategy when considered against reasonable alternatives, based on proportionate evidence.





These alternatives should be realistic and subject to Sustainability Appraisal. The document should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

Effective - This means the document should be deliverable over its period, embracing:

- sound infrastructure delivery planning
- having no regulatory or national planning barriers to delivery
- delivery partners who are signed up to it
- coherence with the strategies of neighbouring authorities
- effective joint working on cross-boundary strategic priorities

The document should also be flexible and able to be monitored. The document should indicate who is to be responsible for making sure that the policies and proposals happen and when they will happen. The plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the Local Plan Strategy document should make clear that major changes may require a formal review including public consultation.

Any measures which the Local Planning Authority has included to make sure that targets are met should be clearly linked to an Annual Monitoring Report. This report must be produced each year by all local authorities and will show whether the Local Plan Core Strategy needs amendment.

# **Consistent with National Policy**

The document should be consistent with national policy. Where there is a departure, Local Planning Authorities must provide clear and convincing reasoning to justify their approach. Conversely, you may feel the Local Planning Authority should include a policy or policies which would depart from national or regional policy to some degree in order to meet a clearly identified and fully justified local need, but they have not done so. In this instance it will be important for you to say in your representations what the local circumstances are that justify a different policy approach to that in national or regional policy and support your assertion with evidence. The plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

# **Positively Prepared**

The plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

continued overleaf





# **General Advice**

If you wish to make a representation seeking a change to the document or part of it, you should make clear in what way the Core Strategy or part of the Core Strategy is not sound having regard to the legal compliance check and tests of soundness set out above. You should try to support your representation by evidence showing why the document should be changed. It will be helpful if you also say precisely how you think the document should be changed. Representation necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at publication. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Where there are groups who share a common view on how they wish to see the Core Strategy changed, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send in separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

Please complete separate copies of Part B of the Representations Form for each Spatial Principle, Sub Area Strategy or Core Policy about which you wish to comment.

If you believe that a Spatial Principle, Sub Area Strategy or Core Policy is unsound with regard to more than one test of soundness, please provide a separate representation for each test.

# Please return completed form(s) by 4pm on Friday 14 September 2012 to:

# **Richmondshire District Council (Planning Policy)**

Swale House, Frenchgate, Richmond, North Yorkshire, DL10 4JE or an electronic version of the form is available online at www.richmondshire.gov.uk/localplan.aspx which can be e-mailed to: localplan@richmondshire.gov.uk



As this is a statutory stage, no late representations can be accepted.

# This guidance note is available in Large Print or other formats on request

# Statement of the Representations Procedure and Document Availability

### Title:

Richmondshire Local Plan Core Strategy Proposed Submission (August 2012)

### Subject Matter and Area of Coverage:

Richmondshire District Council has published its Local Plan Core Strategy for formal representations prior to its submission to the Government for independent examination.

The Core Strategy is part of the new Richmondshire Local Plan and contains the Council's vision, spatial principles, sub area strategies and core policies to guide development up to 2028 in the area of Richmondshire outside the Yorkshire Dales National Park.

### **Representations:**

Representations on the Core Strategy should be made on the response form provided and sent to Planning Policy, Richmondshire District Council, Swale House, Frenchgate, Richmond, DL10 4JE or by email to <u>localplan@richmondshire.gov.uk</u> to be received **by 4pm on Friday 14 September 2012**.

Representations may be accompanied by a request to be notified at a specified address of any of the following:

- the submission of the local plan for independent examination under Section 20 of the Planning and Compulsory Purchase Act 2004,
- the publication of the recommendations of the person appointed to carry out an independent examination of the local plan under Section 20 of the Planning and Compulsory Purchase Act 2004, and
- the adoption of the local plan.

### **Document Availability:**

The Proposed Submission documents (Core Strategy Local Plan, Consultation Statement, Sustainability Appraisal and such supporting documents considered relevant to the Plan's preparation) are available for inspection on the Council's website and at the following locations:

District Council office at Dundas Street, Richmond and Community offices in Colburn, Leyburn, Hawes and Reeth; Catterick Hive and libraries at Richmond, Catterick Garrison, Colburn and Leyburn - during normal opening hours (see attached list of current times).

The Proposed Submission documents are available at these locations as paper copies, except the relevant supporting documents listed below, which are only available as electronic copies for download from the Council's website

Richmondshire Local Plan Supporting Documents:

Proposed Submission Assessments

- Equalities Impact Assessment (June 2012)
- Habitats (Regulations) Assessment (June 2012)

**Consultation Documents** 

- Statement of Community Involvement (November 2006)
- Core Strategy Issues and Options (November 2009)
- Core Strategy Preferred Strategy (June 2010)
- Local Strategy Statement (February 2011)
- Consultation on Control & Release of Sites for Development and Development Search Areas & Strategic Directions of Development for Richmond, Catterick Garrison and Leyburn (September 2011)

**Evidence Studies** 

- A Sustainable Future for Lower Wensleydale Leyburn and Middleham (August 2009)
- Affordable Housing Economic Viability Assessment (September 2011)
- Annual Monitoring Report 2011 (December 2011)
- Catterick Garrison and Surrounding Area Strategic Transport Assessment (August 2011)
- Employment Land Review Update (January 2012)
- North West Yorkshire Level 1 Strategic Flood Risk Assessment Update (April 2010)
- Renewable and Low Carbon Energy Study (August 2012)
- Catterick Garrison Retail Impact Assessment November 2006
- Scrutiny of Population Estimates and Projections (January 2012)
- Settlement Facilities Study (June 2011)
- Strategic Housing Market Assessment (November 2011)
- Strategic Housing and Employment Land Availability Assessment (June 2010)

Other Plans & Strategies

- Catterick Garrison Town Long Term Development Plan (April 2008)
- Richmondshire Sustainable Community Strategy 2010-2015 (Sep 2010)
- Richmondshire Council Plan 2011-2015 (Oct 2011)
- Richmondshire Local Plan 1999-2006 (September 2001), with Saved Policies list of September 2007.
- North Yorkshire Community Plan 2011-2014
- The Yorkshire and Humber Plan Regional Spatial Strategy to 2026 (May 2008)

Please note this is not an exhaustive list but comprises in our opinion the key background and reference studies and documents.

Copies of all the Proposed Submission documents, the representations form and guidance notes can be downloaded from the Council's website

**Further information** can be obtained from Planning Policy on 01748 829100 or email <a href="mailto:localplan@richmondshire.gov.uk">localplan@richmondshire.gov.uk</a>

# Library and Office Opening Times

#### Richmond Community Office 01748 829100

Monday	8.45 - 17.15
Tuesday	8.45 - 17.15
Wednesday	8.45 - 17.15
Thursday	8.45 - 17.15
Friday	8.45 - 16.45

#### Colburn Community Office 01748 828738

Monday	14.00 - 17.00	
Tuesday	14.00 - 17.00	
Thursday	10.00 - 13.00	14.00 - 17.00
Friday	10.00 - 13.00	14.00 - 16.45

# Leyburn Community Office

01748 828740

Monday	9.00 - 12.30	13.30 - 17.00
Tuesday	9.00 - 12.30	13.30 - 17.00
Wednesday	9.00 - 12.30	13.30 - 17.00
Thursday	9.00 - 12.30	13.30 - 17.00
Friday	9.00 - 12.30	13.30 - 16.00

#### Hawes Community Office 01748 828739

Monday	10.00 - 16.30
Tuesday	9.30 - 18.00
Wednesday	10.00 - 16.30
Thursday	10.00 - 18.00
Friday	10.00 - 16.30

#### Reeth Community Office 01748 828741

Wednesday	10.00 - 15.30
Thursday	10.00 - 15.30
Friday	10.00 - 15.30

#### Catterick HIVE 01748 872944

Monday	8.30 - 16.30
Tuesday	8.30 - 16.30
Wednesday	8.30 - 16.30
Thursday	8.30 - 16.30
Friday	8.30 - 15.30

#### Richmond Library 0845 034 9508

Monday10.00- 18.00Tuesday10.00- 17.00Wednesday10.00- 12.00Thursday10.00- 18.00Friday10.00- 17.00Saturday10.00- 13.00

#### Catterick Garrison Library 0845 034 9501

Monday	10.00 - 17.00
Wednesday	10.00 - 19.00
Thursday	13.00 - 19.00
Saturday	10.00 - 13.00

### Colburn Library

0845 034 9502

Monday	14.00 - 17.00	
Tuesday	14.00 - 17.00	
Thursday	10.00 - 13.00	14.00 - 17.00
Friday	10.00 - 13.00	14.00 - 17.00
Saturday	10.00 - 12.00	

#### Leyburn Library 0845 034 9505

Monday	9.00 - 12.30	13.30 - 17.00
Tuesday	9.00 - 12.30	13.30 - 18.00
Wednesday	9.00 - 12.30	13.30 - 17.00
Thursday	9.00 - 12.30	13.30 - 18.00
Friday	9.00 - 16.00	
Saturday	9.30 - 12.30	



# Richmondshire District Council Local Plan Core Strategy Proposed Submission August 2012

# **Representations Form**

Please read the guidance notes before completing this form

This form comprises two parts: Part A - Personal details Part B - Your representation(s)

Both Part A and Part B of this form need to be completed in order for your representation(s) to be valid. Please complete a separate sheet (Part B) for each representation you wish to make. Further copies of this form can be downloaded from www.richmondshire.gov.uk/localplan.aspx You do not need to fill out Part A for each representation, provided that all representations made are securely attached.

Your completed form must be returned to the following address to reach us no later than 4pm on Friday 14 September 2012:

Planning Policy Richmondshire District Council Swale House Frenchgate Richmond DL10 4JE

Alternatively, you can email localplan@richmondshire.gov.uk and submit this form as an attachment.

Please note, all representations will be made available for public inspection on our website www.richmondshire.gov.uk/localplan.aspx with personal details (i.e. email address, telephone number and signature) removed.

PART	Α-	Personal	details
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	YOUR DETAILS	AGENT'S DETAILS
Title		
First name		
Last name		
Job title (if applicable)		
Work/Organisat (if applicable)	ion	
Address		
Postcode		
Telephone no.		
Email address		

			our representat	ion(s) representatio	n	
		ocpulate		representation	•	
Name/Organisation:						
Q1 To which part of the Co (Spatial Principle, Sub Area				ument does th	is representatio	on relate?
Policy number (e.g. SP2, C	RSS or CP8)					
Page/paragrap	h number(s)					
Please Note: Your represer information necessary to function normally be a subsequent of be only at the request of the	Illy support/just	tify the rep nake furth	presentation a er representat	nd the sugges tions. <u>After this</u>	ted change, as stage, further	there will not submissions will
Q2 Do you consider the Co		-	Ibmission Doc Don't know	ument is?		
(a) Legally compliant	Yes	No				
(b) Sound						
If you answered ' <i>No</i> ' to (a)	or (b) above, pl	ease cont	inue to Q3, oth	nerwise contin	ue to Q5	
Q3 Do you consider the Co	ional policy you consider th	e Core Sti	rategy Propose		-	

Q4 Please set out what change(s) you consider necessary to make the Core Strategy Proposed Submission Document legally compliant or sound, having regard to the test you have identified at Q3 where this relates to soundness. You need to say why this change will make the Core Strategy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible: Q5 If you wish to support the legal compliance or soundness of the Core Strategy Proposed Submission Document, please use the space below to set out your comments:

continue on a separate sheet if necessary

If your representation is seeking a change to the Core Strategy Proposed Submission Document, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

If you have selected '*No*', your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

If you wish to be notified of future stages of plan preparation, please tick the appropriate box(es) below:

Submission for Examination

Inspector's Report Publication

Adoption

Please notify me by:

Post

Email

Please Note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

#### Richmondshire District Council Local Plan Core Strategy Proposed Submission August 2012 Representations Form

#### Please read the guidance notes before completing this form

This form comprises two parts: Part A: Personal details Part B: Your representation(s)

Both Part A and Part B of this form need to be completed in order for your representation(s) to be valid. Please complete a separate sheet (Part B) for each representation you wish to make. Further copies of this form can be downloaded from <a href="http://www.richmondshire.gov.uk/localplan.aspx">www.richmondshire.gov.uk/localplan.aspx</a>. You do not need to fill out Part A for each representation, provided that all representations made are securely attached.

Your completed form must be returned to the following address to reach us no later than **4pm** on Friday 14 September 2012:

# Planning Policy, Richmondshire District Council, Swale House, Frenchgate, Richmond, DL10 4JE

Alternatively, you can email: <a href="mailto:localplan@richmondshire.gov.uk">localplan@richmondshire.gov.uk</a> and submit this form as an attachment.

	Your Details	Agent's Details
Title		
First name		
Last name		
Job title (if applicable)		
Work/organisation (if applicable)		
Address		
Postcode		
Telephone No.		
Email address		

#### Part A – Personal details

#### Part B - Your representation

#### Please use a separate sheet for each representation.

Name/Organisation	
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Q1.To which part of the Core Strategy Proposed Submission Document does this representation relate? (Spatial Principle, Sub Area Strategy or Core Policy)

Policy number (e.g. SP2, CRSS or CP8)

Page/paragraph number(s)

<u>Please note:</u> Your representation should cover succinctly all the information, evidence and supporting information necessary to fully support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations. <u>After this stage, further submissions will be only at the</u> <u>request of the Inspector, based on the matters and issues he/she identifies for</u> <u>examination.</u>

Q2. Do you consider	<b>Q2</b> . Do you consider the Core Strategy Proposed Submission Document is?											
(a) Legally	Yes	No	Don't									
compliant			Know									
(b) Sound	Yes	No	Don't									
. ,			Know									
If you answered 'No Q5.	If you answered 'No' to (a) or (b) above, please continue to Q3, otherwise continue to											

# Q3. Do you consider the Core Strategy is unsound because it is not: (please refer to the guidance notes)

(a) Justified

(b) Effective

(c) Consistent with national policy

(d) Positively prepared

Please give details of why you consider the Core Strategy Proposed Submission Document is not legally compliant or is unsound. Please be as precise as possible:

(Continue on a separate sheet if necessary)

Q4. Please set out what change(s) you consider necessary to make the Core Strategy Proposed Submission Document legally compliant or sound, having regard to the test you have identified at Q3 where this relates to soundness. You need to say why this change will make the Core Strategy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible:

(Continue on a separate sheet if necessary)

Q5. If you wish to support the legal compliance or soundness of the Core Strategy Proposed Submission Document, please use the space below to set out your comments:

(Continue on a separate sheet if necessary)

If your representation is seeking a change to the Core Strategy Proposed Submission Document, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

If you have selected 'No', your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

If you wish to participate at the oral part of the examination, please outline why you	I
consider this to be necessary:	

# If you wish to be notified of future stages of plan preparation, please tick the appropriate box(es) below.

Submission for Examination	Notify me by: (please tick)						
Inspector's Report Publication		Post					
Adoption		Email					

Please Note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:	
Date:	

Appendix 1:

# **Insert Reps Procedure Forms**

# Appendix 2: Summary Response Tables

# Table 1: Table of Policy / Chapter Codes

Ref	CS Chapter	Policy Description
CH1	Chapter 1	Introduction
CH2SI	Chapter 2	Strategic Issues
CH3SO	Chapter 3	Strategic Objectives
CH3LO	Chapter 3	Local Objectives
CH3V	Chapter 3	Vision
SP1	Chapter 3	Sub Areas
SP2	Chapter 3	Sustainable Settlement Hierarchy
SP3	Chapter 3	Rural Sustainability
SP4	Chapter 3	The Scale & Distribution of Housing Development
SP5	Chapter 3	The Scale & Distribution of Economic Development
CRSS	Chapter 3	Central Richmondshire Spatial Strategy
LWSS	Chapter 3	Lower Wensleydale Spatial Strategy
NRSS	Chapter 3	North Richmondshire Spatial Strategy
CP0	Chapter 4	Planning Positively
CP1	Chapter 4	Responding to Climate Change
CP2	Chapter 4	Achieving Sustainable Development
CP3	Chapter 4	Supporting the Settlement Hierarchy
CP4	Chapter 4	Supporting Sites for Development
CP5	Chapter 4	Providing a Housing Mix
CP6	Chapter 4	Providing Affordable Housing
CP7	Chapter 4	Promoting a Sustainable Economy
CP8	Chapter 4	Achieving Rural Sustainability
CP9	Chapter 4	Supporting Town & Local Centres
CP10	Chapter 4	Developing Tourism
CP11	Chapter 4	Supporting Community & Recreations Assets
CP12	Chapter 4	Conserving & Enhancing Environmental & Historic Assets
CP13	Chapter 4	Promoting High Quality Design
CP14	Chapter 4	Providing & Delivering Infrastructure
CH5	Chapter 5	Implementation and Delivery
SUP		Supporting Documents

# Table 2: Table of Respondents

Ref	Respondent Name	Respondent Company	Agent
0340	Mr Simon Jones	Highways Agency	Halcrow Group Ltd
0397	Clir Fleur Butler		
0337	Mr Carl Bunnage	North Yorkshire County Council	
1298	Mr Martin Foster	Castlevale Ltd	ID Planning
1299	Mrs Julie Forrest	Leyburn Town Council	
1393	Clir Ian Threifall		
1975	Mrs Elizabeth Donoghue	Melsonby Parish Council	
2282	Mr Ian Smith	English Heritage	
2679	Dr Rupert Hildyard		
3407	Valerie Adams	Darlington Borough Council	
3842	Mr Martin Watson	Defence Infrastructure Organisation	
4049	Rev David Ashforth		
4049	Mr David Coates	Kingerlee Homes	
4493	Miss Rose Freeman	The Theatres Trust	
		The Theatres Trust	
4780 5311	Clir Tony Duff	Bishmand and District Civic Society	
-	Mark Whyman	Richmond and District Civic Society	
5315	Mr Campbell Dawson	Newton Morrell Parish Meeting	
5514	Ms Sara Robin	Yorkshire Wildlife Trust	
6059	Mr John Gill	CPRE (Swaledale)	
6251	Mr John Gill	Aldbrough St John Parish Council Richmond Business and Tourism Association	
7662 7832	Ms Gillian Howells		
7832	Mr Godfrey Kane Mrs Vicki Raven	Former Royal Mail Scorton Parish Council	
7913		Scorton Parish Council	
8905	The Hon Bernard Derek Borman-Schreiber Graf v. Ullersdorf		
9064	Mr Craig Barnes	Gladman Developments	
9086	Ms Melissa Burnham	North Yorkshire County Council	
9105	Mr M Needham	Davis Planning Partnership	Davis Planning Partnership
9106	Mr G Simpson	Davis Planning Partnership	Davis Planning Partnership
9107	Mr Michael Pattison	St Martins Parish Council	
9108	Mr M & T Tennant & Milbank		England & Lyle Ltd
9109	Mr Michael Corner		England & Lyle Ltd
9110	Mr Darren Hendley	Arcus Renewable Energy Consulting Ltd	
9111		Middleham Homes	Cassidy & Ashton Group Ltd
9112	Miss Meryl Leung	Environment Agency	
9113	Mr Don Noble	GVA Hotels and Leisure	GVA Hotels and Leisure
9115		Taylor Wimpey Strategic Land	England & Lyle Ltd
9116	Messrs Spier & Congreve		England & Lyle Ltd
9117	Mr David Westbrook	Natural England	
9118	Mr J.W.G. Cameron	Stanton Mortimer Property Consultants	
9119	Mr & Mrs Sunter		ID Planning
9120	Cllr Wynn Delf	St Martins Parish Council	
9121	Cllr Susan Birdsall	St Martins Parish Council	
9122	Mrs Audrey Grundy		
9123	Julia Stephenson		
9124	Mr Lee Wardman		
9125	Mr Trevor Chaytor-Norris		Taylor & Hardy Limited
9126		Bolton Estates	Peter Greenwood & Co LLP
9127	Mr Dave McGuire	Sport England	
9128		AR & C Booth & Sons	Carter Jonas LLP
9129		Campion Bare Trust	Carter Jonas LLP
9130	Mr John Thornhill		England & Lyle Ltd
9131	Mr Randall Orchard		George F White
9145		North Yorkshire Development Consortium	Barton Wilmore
9146	Mr Mark Harrison	The Coal Authority	
9147	Mr Colin Lilley		
9148		The Cliffe Estate	GSC Grays
	l		

# Table 3: Table summarising number of responses received by policy

Ref	CH1	CH2SI	CH 3V	CH3SO	CH3LO	SP1	SP2	SP3	SP4	SP5	CRSS	LWSS	NRSS	CP0	CP1	CP2	CP3	CP4	CP5	CP6	CP7	CP8	CP9	CP10	C P11	CP12	CP13	CP14	CH5	SUP	Total
0340		1		1	1	1				1						1		1			1	1						1			10
0397																				1											1
0442	1					1	1	1	1	1																		1		1	7
1298						1	1		1		1			1		1	1	1		1							1			1	10
1299															1					1								1			3
1393																				1											1
1975							1																								1
2282		1	1	1				1	1		1	1			1	1		1				1	1	1		1	1				15
2679											1																				1
3407						1			1	1								1			1					1					6
3842											1																				1
4049																				1										1	1
4493											1				1					1											3
4504																							1		1						2
4780																				1											1
5311											1															1					2
5315													1							1											2
5514																										1					1
6059				1		1		1			2					2	1	1		1				1				1			12
6251																				1											1
7662										1																					1
7832																												1			1
7913																				1											1
8905																												1			1
9064									1																						1
9086					1											1						1							1		4
9105	_										1						1														2
9106	_																1														1
9107	_		1																												1
9108						1	1	1	1				1	1	1	1	1	1	1	1										<u> </u>	12
9109	_								1																						1
9110	_							1							1						1	1									4
9111	_					1			1								1	1		1										<u> </u>	5
9112	_						1								1	1														1	4
9113	_						1		1			1					1			1											5
9115	_								1																					<u> </u>	1
9116	-								1																				-	<u> </u>	1
9117	-														1	1		1								1			2	1	7
9118	-																			1											1
9119	-					1	1		1			1		1		1	1	1		1							1	· ·			10
9120	-								1		1									1								1			4
9121																												1			1
9122						-								-				-	-	1		-									1
9123						-								-				-	-	1		-									1
9124						-								-				-	-	1		-									1
9125	-					1	1		1	1		_								4											4
9126							1		1			1			1					1					4						5
9127		4	4	4		4	4		4		4									4					1						1
9128 9129		1	1	1		1	1		1		1									1											8
9129 9130		1	1	1		1	r 1		1		1			-						1		-					-				8
9130 9131			1						1	1	1									1				1							6
9131 9145						-			1		I			-				-		-		-					-			<u> </u>	1
9145 9146	2								-							1														<u> </u>	3
9140 9147	<u> </u>																			1											3 1
9147 9148						1	1	1	1	1										-											5
Total	3	4	5	5	2		12		_	7	13	4	2	2	8	11	8	٥	1	25	3	4	2	3	2	5	3	8	3	2	196
10121	3	4	3	3	2	12	12	0	21	1	13	4	2	3	0		0	9		25	3	4	2	3	2	5	3	0	3	2	190

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SUUMANSUUM			
			undness of policies

	CH1	CH2SI	CH3V	CH3SO	CH3LO	SP1	SP2	SP3	SP4	SP5	CRSS	LWSS	NRSS	CP0	CP1	CP2	CP3	CP4
Sound	2	2	2	3	2	6	5	5	7	2	7	3	0	3	2	8	6	7
Unsound	1	2	3	2	0	6	7	1	14	3	6	1	2	0	5	3	2	2
Don't Know	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
No Response	0	0	0	0	0	0	0	0	0	2	0	0	0	0	1	0	0	0
Total	3	4	5	5	2	12	12	6	21	7	13	4	2	3	8	11	8	9

CP5	CP6	CP7	CP8	CP9	CP10	CP11	CP12	CP13	CP14	CH5	SUP	Total
0	7	3	3	1	1	0	2	3	3	3	1	99
1	14	0	1	1	2	2	3	0	3	0	1	88
0	0	0	0	0	0	0	0	0	1	0	0	1
0	4	0	0	0	0	0	0	0	1	0	0	8
1	25	3	4	2	3	2	5	3	8	3	2	196

	CH1	CH2SI	CH3V	CH3SO	<b>CH3LO</b>	SP1	SP2	SP3	SP4	SP5	CRSS	LWSS	NRSS	CP0	CP1	CP2	CP3	CP4
Unsound Not Justified	0	2	2	2	0	5	7	0	12	2	4	1	1	0	5	0	1	1
Unsound Not Effective	1	2	2	2	0	3	3	1	6	1	4	1	0	0	2	2	2	2
Unsound Not Consistent	1	2	3	2	0	5	4	0	11	2	4	0	1	0	3	2	1	1
Unsound Not Positively Prepared	0	2	2	2	0	6	4	0	11	2	4	0	1	0	1	1	1	1

Table 5: Table outlining unsoundness category responses by policy

CP5	CP6	CP7	CP8	CP9	CP10	CP11	CP12	CP13	CP14	CH5	SUP
1	11	0	1	0	0	1	1	0	3	0	1
0	10	0	1	1	1	1	0	0	3	0	0
1	9	0	1	1	1	1	3	0	2	0	0
0	6	0	1	0	0	0	1	0	2	0	0

Note: Multiple Responses