Richmondshire Local Plan
Core Strategy

Representations Received

PACKAGE 1

RICHMONDSHIRE
DISTRICT COUNCIL

Richmondshire Local Plan: Core Strategy: Table of Respondents

	Ref	Respondent Name	Respondent Company	Agent
Package 1	0340	Mr Simon Jones	Highways Agency	Halcrow Group Ltd
	0397	Cllr Fleur Butler		
	0442	Mr Carl Bunnage	North Yorkshire County Council	
	1298	Mr Martin Foster	Castlevale Ltd	ID Planning
	1299	Mrs Julie Forrest	Leyburn Town Council	
	1393	Cllr Ian Threlfall		
	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		
	4493	Mr David Coates	Kingerlee Homes	
	4504	Miss Rose Freeman	The Theatres Trust	

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 A – Personal details

	Your Details	Agent's Details
Title	**Mr**	**Mr**
First name	**Simon**	**Richard**
Last name	**Jones**	**Edwards**
Job title (if applicable)	**Asset Manager**	**Planning Consultant**
Work/organisation (if applicable)	**Highways Agency**	**Halcrow Group Ltd**
Address	**Network Strategy (YH)** **3rd Floor Tees Wing** **Lateral** **8 City Walk** **Leeds**	**Halcrow Group Ltd** **Arndale House** **Otley Road** **Headingley**
Postcode	**LS11 9AT**	**LS6 2UL**
Telephone No.	**0113 283 6486**	**0113 220 8175**
Email address	**Simon.Jones@highways.gsi.gov.uk**	**Richard.Edwards@ch2m.com**

Part B - Your representation

Please use a separate sheet for each representation.

Name/Organisation	**Highways Agency**

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)	**Core Policy CP14: Providing and Delivering Infrastructure**
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 request of the Inspector, based on the matters and issues he/she identifies for examination.</u>

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

Q3. **Do you consider the Core Strategy is unsound because it is not: (please refer to the guidance notes)**	
(a) Justified	**X**
(b) Effective	**X**
(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:
The 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 and the junctions immediately surrounding them. Without the full consideration of such impacts the Agency is concerned that the infrastructure improvements proposed in the strategy may not be sufficient to deliver the scale of growth identified resulting in a detrimental impact on the safety and efficiency of the Strategic Road Network. Therefore, without this evidence the Agency currently considers that strategy to be unsound on the basis that the infrastructure requirements in relation to the SRN are not currently fully justified and ultimately may not be effective.
(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:

The Agency is currently in the process of completing a gravity model which will determine the level of impact on the Strategic Road Network and the junctions immediately surrounding them. It is considered that this is an important piece of evidence which can be used to underpin the strategy's development and infrastructure proposals and will be used to test the impact of development on the networks slip roads and junctions. This information can then be used to determine whether improvements are likely to be required and to what extent.

The delivery of such improvements could prove integral to the delivery and soundness of the strategy's development proposals and infrastructure requirements. Potentially, should improvements be necessary which could be considered to be undeliverable as a result of costs / funding then this could also have implications for the viability of development sites, which could be a risk to the soundness of the strategy as a whole.

However, it is considered that the issues raised in this representation should be able to be satisfactorily resolved prior to the EiP hearing sessions. The Agency is due to complete the model shortly and therefore, provided appropriate solutions can be agreed, the Agency will be able to withdraw this representation.

(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	**X**

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:
The Highways Agency will be attending the Examination to assist the Inspector in their decisions process, whilst it has raised concerns as of today that the evidence base is not complete, it is however confident that at the time of the EiP that matters outstanding will be resolved in regards to the SRN in the area.

If you wish to be notified of future stages of plan preparation, please tick the appropriate box(es) below.			
Submission for Examination	**X**	**Notify me by:** (please tick)	
Inspector's Report Publication	**X**	Post	**X**
Adoption	**X**	Email	**X**

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:	Simon Jones
Date:	14 September 2012

Our ref:
Your ref:

Richmondshire District Council
Swale House
Frenchgate
Richmond
North Yorkshire
DL10 4JE

Highways Agency
Network Strategy (YH)
3rd Floor Tees Wing
Lateral
8 City Walk
Leeds LS11 9AT

http://www.highways.gov.uk

For the attention of: John Hiles

14 September 2012

Dear Mr Hiles

RICHMONDSHIRE LOCAL DEVELOPMENT FRAMEWORK – CORE STRATEGY PROPOSED SUBMISSION DOCUMENT, AUGUST 2012

The Highways Agency (the Agency) welcomes the opportunity to provide comments on the Core Strategy Proposed Submission Document. The Agency has undertaken a review of the document in accordance with its responsibilities and aims and this letter provides a summary of the Agency's response in the attached representations.

The Agency is generally supportive of many of the elements of the Core Strategy including the vision, objectives and the majority of the proposed policies. In particular, the Agency is generally supportive of the provisions of the policies regarding strategic transport and improving connectivity and welcomes the reference to continuing to working in partnership with the Agency. However, the Agency does have a number of concerns, most of which have already been raised during previous stages of consultation.

The Agency has therefore deemed it necessary to submit a representation in response to *Core Policy CP14: Providing and Delivering Infrastructure*. However, it is the Agency's expectation that the issues raised in this representation should be able to be satisfactorily resolved through further co-operative work prior to the EiP hearing sessions. Should appropriate solutions be agreed prior to the commencement of the EiP then the Agency will be able to withdraw this representation.

Core Strategy Proposed Submission Document Comments

The Agency has the following comments to make on the Core Strategy. Where it is considered that a significant issue is still present and has not been addressed, which could have implications for the soundness of the document, reference to the corresponding representation is provided.

The SRN in Richmondshire consists of A1 and A66. With regards to the A1 upgrade from Leeming Bar to Barton, this has been cancelled which could have an impact on accessibility. The Agency welcomes that this has been correctly acknowledged in paras 2.17 and 2.18.

In principle, the Agency can generally be supportive of the aims of the six Strategic Objectives (para 3.1.4), however it is the detailed implementation of objectives, which could be of concern for the Agency, particularly with regards to Catterick Garrison. However, it is welcomed that a key part of the objective seeks to encourage improvements in accessibility and improved public transport links to other centres. With regards to Objective b) which identifies the provision of 180 dwellings per annum based upon Richmondshire Scrutiny of Population (2012). Given that the aim of this level of provision is to help address leakage issues and therefore should help to reduce the need to travel, the Agency can generally be supportive of this provision.

These Strategic Objectives are complimented by Local Objectives. The provisions of these objectives can generally be supported, particularly with regards to Objective 2 – which seeks to reduce the need to travel and provide safer and easier access to jobs and key services by sustainable forms of transport, such as public transport, walking and cycling.

The spatial principles set out in *SP1: Sub Areas; SP2: Settlement Hierarchy; SP3: Rural Sustainability; SP4: Scale and Distribution of Housing Development; and SP5: Scale and Distribution of Economic Development,* set out 3 sub areas which will have different approaches taken within them. These are Central Richmondshire which includes Richmond and Catterick Garrison where most of the growth will be concentrated. Lower Wensleydale which includes Leyburn which will have modest growth and North Richmondshire which will have limited housing in an attempt to resist further in-migration and decrease pressures for cross-boundary commuting. The Agency is generally supportive of locating the majority of development in the principle centres, such as central Richmondshire, which can generally support higher levels of development and as identified, are accessible from surrounding areas with public transport links to other centres.

The distribution of the housing provision of 180 dwelling per year is identified and proposes that 79% of housing will occur in the Central area and 62% will occur in Catterick Garrison. In addition to this requirement, provision is also made for 1,440 homes for military service families at Catterick Garrison if required. With regards to employment land, there is already 25ha in Catterick Garrison, Richmond, Leyburn and at Scotch Corner with planning permission and some 28,000 square metres of vacant space and therefore there is already sufficient provision to accommodate the required need. However, SP5 proposes that major employment sites will be encouraged in the Colburn area. It is not clear whether this is one of the sites with planning permission. This has not been assessed and therefore moving sites from the existing permissions may have a traffic impact on the A1.

The Agency is fully supportive of *Policy CP2: Achieving Sustainable Development* which promotes the efficient use of land and infrastructure including developments with a sustainable and complementary mix of uses and be locating development so as to minimise the need to travel. In particular the Agency welcomes the provision that development that would generate a significant adverse traffic impact, without appropriate mitigation, will not be permitted. The policy also states that convenient access via foot, cycle and public transport should exist or be provided, where possible, encouraging the use of these modes of travel for local journeys and reducing the need to travel by private car and improving the accessibility of services to all. This is particularly welcomed by the Agency. CP2 also provides support to transport schemes that lead to improvements in accessibility and seeks to address the potential for more sustainable means of transport related to the uses and users of

the development, including through the preparation of travel plans. Again, this is supported be the Agency.

Policy CP4: Supporting Sites for Development also requires developments to be accessible and well related to existing facilities. The Agency is supportive of the policy provisions which seeks to prevent significant adverse impact on amenity or highway safety and requires infrastructure to be within capacity or that the necessary additional infrastructure can be provided. *Policy CP8: Achieving Rural Sustainability* also includes provisions for improvements of public transport services, whilst criteria m) of *Policy CP7: Promoting a Sustainable Economy* provides support for infrastructure necessary to support economic development, including transport investment.

The Agency welcomes the provisions of *Policy CP14: Delivering Infrastructure* and the linkage made to the supporting Infrastructure Delivery Plan (IDP). As stated in para 4.14.4, the IDP identifies the key strategic infrastructure which will be required within Richmondshire in order to deliver the specified level of development for the plan period up to 2028. The Agency has not been able to obtain a copy of the IDP but it is assumed that the schemes set out in the IDP correlate with those identified in *Table 6: Local Plan Infrastructure Delivery Plan Projects*. The following comments are provided in relation to Chapter 5 regarding the implementation and delivery of infrastructure.

Para 5.12 states that the Agency has not previously raised specific existing capacity issues affecting the A1 and A66 in the plan area, but did raise general concerns about the potential impact of the scale of development on the SRN including development around Scotch Corner. However, it is worth noting that Scotch Corner is at capacity and in terms of the Agency's general concern regarding impact, it has not been provided with any modelling of the impact on the SRN. The Catterick Garrison Strategic Transport Assessment (CGSTA) only extends are far as Scorton Cross Roads towards the northern junction and Catterick Bridge towards the southern junction. Notwithstanding this, discussions are on going between the Council and the Agency regarding the impact of the strategies development proposals on the operation of the SRN and as such the Agency welcomes the reference to these further discussions being undertaken to identify how impacts could be mitigated and addressed through development and developer contributions to local highway improvements.

As part of this continued work the HA are developing a gravity model based upon journey to work information contained within the 2001 census. This will help determine the level of impact on the SRN and the junctions immediately surrounding them. This will be used to test the impact on the slip roads and junctions to determine whether junction improvements are likely to be required.

If junction mitigation is required as a result of the proposed allocations it is thought initially that a highway solution should be achievable. It is necessary to consider which developments should contribute to any mitigation measures. If it is left to the application stage it may be that by bringing forward individual applications then none of the sites, or possibly only one or two sites, would materially impact on the A1 and the immediate junctions with the slip roads. If this were to be the case either the mitigation measures would never come forward, or could be attributable to a single development which could make that development unviable.

The traffic impact is a cumulative effect from several developments and therefore Richmondshire District Council will need to act as 'Ringmaster' in collecting the contributions from several of the allocated sites based upon the relative impacts of each development. This will allow money to be collected as developments come forward and the improvement implemented as soon as is required.

Should the impact assessment show that improvements are required to the slip roads then this would be more costly and potentially require third party land and could affect the viability of the proposed sites. It is considered that this risk should also have been identified in Para 5.25.

Para 5.26/7 identifies the use of CIL to deliver necessary infrastructure, however it needs to be clarified that the money will be available when it is required.

Table 6 identifies the A1 upgrade even though it has been cancelled. Whilst, this may be important to the economic well being of Richmondshire, given that it is not currently required to deliver the strategy's development, it is considered that its removal may provide greater clarity and could be reintroduced in the future should it once again become a viable scheme.

Representations

Given that the Agency are in the process of completing a gravity model to assist with determining the level of impact on the SRN and the junctions immediately surrounding them, it is considered that this is an important piece of evidence which will be used to test the impact on the slip roads and junctions to determine whether junction improvements are likely to be required. The delivery of such improvements could prove integral to the delivery and soundness of the strategy's development proposals and could have implications for the viability of some of the proposals. Without this evidence the Agency currently considers that strategy to be unsound on the basis that the infrastructure requirements in relation to the SRN are not currently fully justified. Therefore, a representation has been provided in relation to Core Policy CP14: Providing and Delivering Infrastructure. However, as stated above, it is considered that the issues raised in this representation should be able to be satisfactorily resolved prior to the EiP hearing sessions. Therefore, once appropriate solutions have been agreed then the Agency will be able to withdraw this representation.

I trust this response will be helpful. If, however, you require any further information, please do not hesitate to contact me. I look forward to receiving confirmation that our comments have been received in due course.

Yours sincerely

Simon Jones
Asset Manager
Yorkshire and Humber
Email: simon.jones@highways.gsi.gov.uk