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 M Tennant & Mr T Milbank	Mr
First name		Steven
Last name		Longstaff
Job title (if applicable)		Senior Planner
Work/organisation (if applicable)		England & Lyle Ltd
Address	C/O Agent	Gateway House 55 Coniscliffe Road Darlington
Postcode		DL3 7EH
Telephone No.		01325 469236
Email address		steven@england-lyle.co.uk

Part B - Your representation

Please use a separate sheet for each representation.

Name/Organisation	Steven Longstaff – England & Lyle Ltd

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)	SP1
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		No		Don't Know	X
(b) Sound	Yes		No	X	Don't Know	
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	
(b) Effective	
(c) Consistent with national policy	x
(d) Positively prepared	x

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 approach set out by spatial principle SP1 and the focusing of development in the principle settlements is accepted but our clients would object to the assertion that development should be restricted in the North Richmondshire sub area to stop further in migration and decrease pressures for cross boundary commuting. This approach is clearly unsound and contrary to the aims of the National Planning Policy Framework (NPPF) to significantly boost the supply of housing and deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. The Local Planning Authority must plan for its own needs.

(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 policy should be amended to ensure that development is not restricted in the North Richmondshire sub area to ensure appropriate levels of housing is delivered to support existing settlement. The policy in its current form is not positively planned and is not compliant with the NPPF.

(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:

N/A

(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	X
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:
N/A

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	
Adoption	**X**	Email	**X**

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Signature:	S Longstaff
Date:	13/09/2012

Part B - Your representation

Please use a separate sheet for each representation.

Name/Organisation	Steven Longstaff – England & Lyle Ltd

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)	SP2
Page/paragraph number(s)	

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Q2. Do you consider the Core Strategy Proposed Submission Document is…?						
(a) Legally compliant	Yes	X	No		Don't Know	
(b) Sound	Yes	X	No		Don't Know	
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	
(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:
N/A (Continue on a separate sheet if necessary)

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N/A

(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:

Our clients firmly support the identification of Newsham as a secondary service village in a cluster with Ravensworth and Dalton. We would however suggest that the spatial principle makes it explicit that development is appropriate in secondary service village clusters to ensure existing services are maintained and supported.

Newsham has a number of existing facilities including a village hall, bus routes and a public house nearby and, as such, has an important role in providing services in this area of North Richmondsire. It is clear that Newsham is a secondary service village and should continue to be identified as such in the settlement hierarchy.

It is important that smaller service settlements are identified in the plan to ensure that adequate development to support existing services is provided. This can only be achieved by supporting further small scale development in locations such as Newsham.

Our client's land at Moor Lane is an ideal site to bring forward for residential development during the plan period to meet the spatial aims of this policy by providing a small scale development which meets the needs of the locality and sustains the existing facilities and the local community.

(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?	
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Inspector's Report Publication	**X**	Post	
Adoption	**X**	Email	**X**

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Signature:	S Longstaff
Date:	13/09/2012

Part B - Your representation

Please use a separate sheet for each representation.

Name/Organisation	Steven Longstaff – England & Lyle Ltd

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)	SP2
Page/paragraph number(s)	

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(a) Legally compliant	Yes	X	No		Don't Know	
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N/A

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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:

Our clients firmly support the identification of Newsham as a secondary service village in a cluster with Ravensworth and Dalton. We would however suggest that the spatial principle makes it explicit that development is appropriate in secondary service village clusters to ensure existing services are maintained and supported.

Newsham has a number of existing facilities including a village hall, bus routes and a public house nearby and, as such, has an important role in providing services in this area of North Richmondsire. It is clear that Newsham is a secondary service village and should continue to be identified as such in the settlement hierarchy.

It is important that smaller service settlements are identified in the plan to ensure that adequate development to support existing services is provided. This can only be achieved by supporting further small scale development in locations such as Newsham.

Our client's land at Moor Lane is an ideal site to bring forward for residential development during the plan period to meet the spatial aims of this policy by providing a small scale development which meets the needs of the locality and sustains the existing facilities and the local community.

(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	X
Yes, I wish to participate at the oral examination	

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N/A

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

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Signature:	S Longstaff
Date:	13/09/2012

Part B - Your representation

Please use a separate sheet for each representation.

Name/Organisation	Steven Longstaff – England & Lyle Ltd

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)	SP3
Page/paragraph number(s)	

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Q2. Do you consider the Core Strategy Proposed Submission Document is…?						
(a) Legally compliant	Yes		No		Don't Know	X
(b) Sound	Yes	X	No		Don't Know	
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	
(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:
N/A (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:**

N/A (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:
Our clients support the aims of this policy and particularly the promotion of appropriate rural housing schemes to achieve sustainable communities. It is vital that the emerging Local Plan supports the sustainability of existing settlements by allocating sites for residential development of an appropriate scale. (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	X
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:
N/A

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	
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Signature:	S Longstaff
Date:	13/09/2012

Part B - Your representation

Please use a separate sheet for each representation.

Name/Organisation	Steven Longstaff – England & Lyle Ltd

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)	SP4
Page/paragraph number(s)	

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Q2. Do you consider the Core Strategy Proposed Submission Document is…?						
(a) Legally compliant	Yes		No		Don't Know	X
(b) Sound	Yes		No	X	Don't Know	
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	
(c) Consistent with national policy	X
(d) Positively prepared	X

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 current approach is not consistent with the NPPF and does not actively seek to boost housing supply or address the market and affordable housing needs. Therefore, the Core Strategy Local Plan in its current form is not sound as it has not been positively prepared, is not justified and it is not consistent with national policy. (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:

Our clients have concerns over the proposed housing numbers as they have been revised down to 180 dwellings per annum from 200 dwellings per annum as set out in the Regional Spatial Strategy (RSS). Notwithstanding the work undertaken by Richmondshire District Council, the RSS still remains the most up to date and tested evidence base for determining the housing requirement. Furthermore, latent demand created by historic under delivery against the RSS requirements must be taken into consideration when setting the proposed housing requirement.

The Annual Monitoring Reports from recent years confirm the net housing completions for the last three years as follows:

Year	Completions (Net)	No. under RSS Requirement (200 DPA)	% of RSS Requirement Delivered
2008/9	56	144	28%
2009/10	40	160	20%
2010/11	38	162	19%

The Council acknowledges at Section 4.6.5 (Page 67) of the Core Strategy Submission Draft that the North Yorkshire SHMA 2011 identifies that there is an estimated need for 260 affordable dwellings per annum over the next 5 years based on both the existing and future demand. Notwithstanding this, the Core Strategy seeks only to make provision for 180 dwellings (market & affordable) per annum over the plan period with an affordable housing requirement, set out in draft Policy CP6 (Page 66), ranging between 30 – 40% dependent upon the Sub Area.

The overall housing requirements (annual requirement for 180 dwellings) appears to be based entirely on population estimates from this point forward and does not take into account the 'pent up' demand/need or 'backlog' for housing resulting from low levels of affordable and market housing delivery over recent years.

The NYSHMA demonstrates, that taking into existing/immediate need ('backlog') and future requirements for affordable housing, an average of 260 affordable dwellings per annum would need to be delivered over the next 5 years. Once the backlog is cleared the need would be for around 156 affordable dwellings per annum (net) – almost the same as the total housing requirement being sought by the draft Local Plan Core Strategy.

Presuming that 180 (net) new dwellings are delivered per annum and are complaint with Policy CP6 (Providing Affordable Housing) in respect of affordable delivery , this will amount to 71 affordable dwellings per annum which only 28.5% of the identified affordable housing need for the next 5 years. If the affordable backlog were addressed, 180 dwellings per annum would only deliver 45% of the future affordable housing requirement (net).

The Council's Local Plan will not meet the full and objectively assessed needs of market and affordable housing in the housing market area, it is therefore in conflict with national policy and not positively prepared. It is therefore unsound.

There is no reasoned justification provided for the assertion *'it is unlikely that new development will ever met the demand for affordable housing'* (page 67). Moreover, there is no evidence or justification that demonstrates that planning for a greater number of houses to achieve greater amounts of affordable housing, or other alternatives, would result in circumstances that would fundamentally conflict with the policies within the National Planning Policy Framework. The Core Strategy is not justified in this respect.

The current approach is not consistent with the NPPF and does not actively seek to boost housing supply or address the market and affordable housing needs. Therefore, the Core Strategy Local Plan in its current form is not sound as it has not been positively prepared and it is not consistent with national policy.

(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:

The proposed distribution of new housing is broadly supported by our clients and they are pleased that the amount of development proposed in the North Richmondshire sub-area has increased to 9% from the Core Strategy Preferred Options (July 2010). However, we consider this should be increased further to ensure that settlements in the North Richmondshire sub-area are supported by an appropriate level of development to ensure existing services are maintained.

It is suggested that 5% of new dwellings should be located within the secondary service villages throughout the plan period and our clients also support this increase. This equates to a minimum of 110 dwellings (based on current requirements) to be located within the North Richmondshire Service Villages of which Newsham is part of a cluster with Dalton and Ravensworth. The provision within the policy of detailed figures on the distribution of development is welcomed and firmly supported. However, these figures should only act as a starting point and not unduly restrict an appropriate amount of development coming forward on suitable sites within secondary service villages.

There are four Service Villages or clusters of villages in the North Richmondshire sub-area and Newsham is part of a 'cluster' of three smaller villages, along with Dalton and Ravensworth. Overall this suggests the need to deliver approximately 27 dwellings in each Secondary Village within the sub-area. There is however no guidance on the proposed distribution of housing within each cluster but our clients' firm view would be that these figures should remain flexible to allow appropriate levels of development to come forward on individual sites.

If the Council are to deliver at least 110 new dwellings in the North Richmondshire service villages across the plan period then suitable sufficient sites will have to be allocated through a review of the existing settlement limits in the emerging plan to meet these targets. Whilst Newsham forms part of a cluster with Dalton and Ravensworth, in our clients view the majority of development in this cluster should be focused on Newsham as it is relatively sustainable as a settlement and is the least constrained in planning terms for an appropriate level of development.

The SHELAA identifies our client's site as a deliverable site with a notional capacity of 21 dwellings. A review of the SHELAA suggests that there are only three other sites within the cluster identified as 'green' i.e. suitable, available and achievable. An assessment of these sites and the suitability of them to accommodate the level of development proposed in the cluster is undertaken below:

<u>SHELAA site 173- OS Field Number 161, Ravensworth</u>

This is the only site identified in the SHELAA as 'green' in Ravensworth and it is suggested that it has a notional capacity of 12 dwelling.

We would seriously question the deliverability of this site given extremely sensitive setting in planning terms. The site is located within the Ravensworth Conservation Area, an Area of Great Landscape Value and is adjacent to the remains of Ravensworth Castle which is a Scheduled Ancient Monument. These represent significant constraints on the development of this site and these issues have not been fully assessed as part of the SHELAA.

SHELAA site 101 – Part field on the south side of Hill Lane, Dalton

This is one of two sites identified as 'green' in the SHELAA in Dalton. The site has a suggested capacity of 42 units.

The suitability of development on this site is questionable as it would not fit well with the existing settlement pattern and form which focuses around the village core. Furthermore, the site bounds the Dalton Conservation Area. The site is also located within an area of Great Landscape Value and highly visible from the key vantage points within the surrounding landscape.

Dalton has the least amount of services and is the smallest settlement in the cluster and, as such, should receive the least amount of development as it is the least sustainable.

SHELAA site 51 – Town Head Field, Dalton

This is only a small site with capacity for 3 dwellings. The SHELAA suggests that the site is already within the settlement boundary for Dalton.

Newsham should be the focus of development in the cluster, it is a sustainable settlement with a number of existing services and the most appropriate for further housing development. Our clients' site at Moor Lane is the least constrained and provides the ideal opportunity to deliver a small scale residential development to meet the proposed targets and spatial strategy outlined in the Local Plan Core Strategy.

(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	X
Yes, I wish to participate at the oral examination	

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

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	
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Signature:	S Longstaff
Date:	13/09/2012

Part B - Your representation

Please use a separate sheet for each representation.

Name/Organisation	Steven Longstaff – England & Lyle Ltd

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)	NRSS
Page/paragraph number(s)	

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Q2. Do you consider the Core Strategy Proposed Submission Document is…?						
(a) Legally compliant	Yes		No		Don't Know	X
(b) Sound	Yes		No	X	Don't Know	
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	
(b) Effective	
(c) Consistent with national policy	X
(d) Positively prepared	X

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:
Our clients support the recognition in the North Richmondshire Spatial Strategy that some level of development may be acceptable to support the role of the sub-area. However, the proposed level of development must be sufficient to support existing settlements and ensure sustainable communities are maintained. It is vital that the emerging Local Plan supports the sustainability of existing settlements and gives confidence to developers by allocating sites for residential development of an appropriate scale. (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:
To ensure that supporting existing settlements is the central aim of the NRSS, our clients would suggest that the wording of the policy is amended to state: "*in the secondary service villages of Newsham – Ravensworth – Dalton (Cluster), Eppleby – Caldwell – Aldbrough (Cluster), North Cowton and Gilling West:* • *Small scale and a modest level of development will be acceptable where it supports the social and economic needs and sustainability of the local community*". (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:
N/A (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?	
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Date:	13/09/2012

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Name/Organisation	Steven Longstaff – England & Lyle Ltd

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Page/paragraph number(s)	

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(a) Legally compliant	Yes		No		Don't Know	X
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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:
N/A (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:
N/A (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:
Our clients support the inclusion of Core Policy CP0 in the Core Strategy which reflects guidance in NPPF concerning the presumption in favour of sustainable development. (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	X
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:
N/A

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	
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:	S Longstaff
Date:	13/09/2012

Part B - Your representation

Please use a separate sheet for each representation.

Name/Organisation	Steven Longstaff – England & Lyle Ltd

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)	CP1
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		No		Don't Know	X
(b) Sound	Yes		No	X	Don't Know	
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	
(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:
Our clients would raise significant concerns of the effect of Policy CP1 on the viability of new housing schemes particularly the requirement for Code for Sustainable Homes Level 4. (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:
Remove requirement for Code for Sustainable Homes Level 4. (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:
N/A (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	X
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:
N/A

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	
Adoption	**X**	Email	**X**

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Signature:	S Longstaff
Date:	13/09/2012

Part B - Your representation

Please use a separate sheet for each representation.

Name/Organisation	Steven Longstaff – England & Lyle Ltd

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)	CP2
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		No		Don't Know	X
(b) Sound	Yes	X	No		Don't Know	
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	
(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:
N/A (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:

N/A (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:
Core Policy CP2 is in generally conformity with the National Planning Policy Framework and, as such, is supported. (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	X
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:
N/A

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	
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:	S Longstaff
Date:	13/09/2012

Part B - Your representation

Please use a separate sheet for each representation.

Name/Organisation	Steven Longstaff – England & Lyle Ltd

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)	CP3
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		No		Don't Know	X
(b) Sound	Yes	X	No		Don't Know	
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	
(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:
N/A (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:
N/A (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:
The proposed settlement hierarchy is supported by our clients and they firmly support the inclusion of Newsham as part of a secondary service village cluster. Detailed representations have been made in respect of Spatial Principle SP2. They also fully support the confirmation in Core Policy CP3 that appropriate development will be supported within or adjacent to each settlement's development limits to secure the sustainability of each settlement in the hierarchy. (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	X
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:
N/A

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	
Adoption	**X**	Email	**X**

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Signature:	S Longstaff
Date:	13/09/2012

Part B - Your representation

Please use a separate sheet for each representation.

Name/Organisation	Steven Longstaff – England & Lyle Ltd

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)	CP4
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		No		Don't Know	X
(b) Sound	Yes	X	No		Don't Know	
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	
(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:
N/A (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:**

N/A (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:
Our clients fully supports the approach outlined in Core Policy CP4 which recognises that there is a need to bring forward development on appropriate sites in the short term and accept that this should be undertaken in accordance with the proposed settlement hierarchy and distribution of development. (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	X
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:
N/A

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	
Adoption	**X**	Email	**X**

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Signature:	S Longstaff
Date:	13/09/2012

Part B - Your representation

Please use a separate sheet for each representation.

Name/Organisation	Steven Longstaff – England & Lyle Ltd

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)	CP5
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		No		Don't Know	X
(b) Sound	Yes		No	X	Don't Know	
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	
(c) Consistent with national policy	X
(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 requirements of Core Policy CP5 present a number of concerns and we would object to the policy in its current form. Whilst it is acknowledged that a range of dwellings should be provided to meet the identified needs of the District, there should be appropriate flexibility to take account of market considerations and the need to deliver housing.

It is our client's view that the dwelling mix in terms of type and tenure of a development should be left to the market to decide. The proposed approach could have significant impact on the viability of many schemes and interfering in the market other than to specifically deliver affordable housing should be avoided.

(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:

Amend the policy to allow appropriate flexibility to take account of market considerations and the need to deliver housing. It is our client's view that the dwelling mix in terms of type and tenure of a development should be left to the market to decide

(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:

N/A

(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	X
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:

N/A

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	
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:	S Longstaff
Date:	13/09/2012

Part B - Your representation

Please use a separate sheet for each representation.

Name/Organisation	Steven Longstaff – England & Lyle Ltd

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)	CP6
Page/paragraph number(s)	

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Q2. Do you consider the Core Strategy Proposed Submission Document is…?						
(a) Legally compliant	Yes		No		Don't Know	X
(b) Sound	Yes		No	X	Don't Know	
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	
(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:

Our clients recognise the need to achieve a balanced housing stock that better meets local needs and aspirations.

In terms of affordable housing, our client supports the recognition in the Policy CP6 that the proposed percentages are only targets and subject to economic viability. However, there is a major concern that the threshold for affordable housing is anything more than a single dwelling. This approach will significantly damage the delivery of smaller sites particularly within settlements unless a pragmatic approach to viability is taken. Furthermore, in a predominately rural district, development of small sites makes a valuable contribution to the housing supply.

(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	X
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:
N/A

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	

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:	S Longstaff
Date:	13/09/2012

9108

REPRESENTATIONS

ON BEHALF OF MR M TENNANT & MR T MILBANK

England & Lyle

Richmondshire Local Plan
Core Strategy

Proposed Submission

September 2012

England & Lyle Ltd
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Co. Durham
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RICHMONDSHIRE DISTRICT COUNCIL

LOCAL PLAN

PROPOSED SUBMISSION AUGUST 2012

AGENTS:

England & Lyle Ltd

REVISION RECORD					
Rev	**Description**	**Date**	**Author**	**Checked**	**Approved**
0	Draft	05/09/2012	SL	RH	RH

Introduction

These representations are made on behalf of our clients, Mr M Tennant and Mr T. Milbank in response to the Richmondshire Local Plan Core Strategy Submission Draft Consultation and in particular to an area of land to the south west of Newsham shown in red on the attached plan and its role in respect of the delivery of high quality housing over the plan period.

Representations to inform the Local Development Framework have been made in relation to the site in 2008 and 2010. The suitability of the site for housing development was assessed by the Council as part of the Strategic Housing and Employment Land Availability Assessment (SHELAA) in 2009.

As part of the SHELAA, the site (ref: 148) was assessed as being able to accommodate 21 dwellings and as being 'green,' which indicates the Assessment Panel think the site is suitable for development. The site was also included in the 0 – 5 year housing land supply as outlined in the SHELAA document. Our clients support the assessment of the site undertaken in the SHELAA and would like to reiterate that in accordance with the NPPF tests the site is deliverable as it is available now, offers a suitable location for development now and is achievable in the first five years.

Having fully considered the Submission Draft we must comment as follows:

Spatial Principle SP1: Sub Areas

The approach set out by spatial principle SP1 and the focusing of development in the principle settlements is accepted but our clients would object to the assertion that development should be restricted in the North Richmondshire sub area to stop further in migration and decrease pressures for cross boundary commuting. This approach is clearly unsound and contrary to the aims of the National Planning Policy Framework (NPPF) to significantly boost the supply of housing and deliver a wide choice of high

quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. The Local Planning Authority must plan for its own needs.

Spatial Principle SP2: Settlement Hierarchy

Our clients firmly support the identification of Newsham as a secondary service village in a cluster with Ravensworth and Dalton. We would however suggest that the spatial principle makes it explicit that development is appropriate in secondary service village clusters to ensure existing services are maintained and supported.

Newsham has a number of existing facilities including a village hall, bus routes and a public house and, as such, has an important role in providing services in this area of North Richmondsire. It is clear that Newsham is a secondary service village and should continue to be identified as such in the settlement hierarchy.

It is important that smaller service settlements are identified in the plan to ensure that adequate development to support existing services is provided. This can only be achieved by supporting further small scale development in locations such as Newsham.

Our client's land at Moor Lane is an ideal site to bring forward for residential development during the plan period to meet the spatial aims of this policy by providing a small scale development which meets the needs of the locality and sustains the existing facilities and the local community.

Spatial Principle SP3: Rural Sustainability

Our clients support the aims of this policy and particularly the promotion of appropriate rural housing schemes to achieve sustainable communities. It is vital that the emerging Local Plan supports the sustainability of existing settlements by allocating sites for residential development of an appropriate scale.

Spatial Principle SP4: Scale and Distribution of Housing Development

Our clients have concerns over the proposed housing numbers as they have been revised down to 180 dwellings per annum from 200 dwellings per annum as set out in the Regional Spatial Strategy (RSS). Notwithstanding the work undertaken by Richmondshire District Council, the RSS still remains the most up to date and tested evidence base for determining the housing requirement. Furthermore, latent demand created by historic under delivery against the RSS requirements must be taken into consideration when setting the proposed housing requirement.

The Annual Monitoring Reports from recent years confirm the net housing completions for the last three years as follows:

Year	Completions (Net)	No. under RSS Requirement (200 DPA)	% of RSS Requirement Delivered
2008/9	56	144	28%
2009/10	40	160	20%
2010/11	38	162	19%

The Council acknowledges at Section 4.6.5 (Page 67) of the Core Strategy Submission Draft that the North Yorkshire SHMA 2011 identifies that there is an estimated need for 260 affordable dwellings per annum over the next 5 years based on both the existing and future demand. Notwithstanding this, the Core Strategy seeks only to make provision for 180 dwellings (market & affordable) per annum over the plan period with an affordable housing requirement, set out in draft Policy CP6 (Page 66), ranging between 30 – 40% dependent upon the Sub Area.

The overall housing requirements (annual requirement for 180 dwellings) appears to be based entirely on population estimates from this point forward and does not take into

account the 'pent up' demand/need or 'backlog' for housing resulting from low levels of affordable and market housing delivery over recent years.

The NYSHMA demonstrates, that taking into existing/immediate need ('backlog') and future requirements for affordable housing, an average of 260 affordable dwellings per annum would need to be delivered over the next 5 years. Once the backlog is cleared the need would be for around 156 affordable dwellings per annum (net) – almost the same as the total housing requirement being sought by the draft Local Plan Core Strategy.

Presuming that 180 (net) new dwellings are delivered per annum and are complaint with Policy CP6 (Providing Affordable Housing) in respect of affordable delivery , this will amount to 71 affordable dwellings per annum which only 28.5% of the identified affordable housing need for the next 5 years. If the affordable backlog were addressed, 180 dwellings per annum would only deliver 45% of the future affordable housing requirement (net).

The Council's Local Plan will not meet the full and objectively assessed needs of market and affordable housing in the housing market area, it is therefore in conflict with national policy and not positively prepared. It is therefore unsound.

There is no reasoned justification provided for the assertion *'it is unlikely that new development will ever met the demand for affordable housing'* (page 67). Moreover, there is no evidence or justification that demonstrates that planning for a greater number of houses to achieve greater amounts of affordable housing, or other alternatives, would result in circumstances that would fundamentally conflict with the policies within the National Planning Policy Framework. The Core Strategy is not justified in this respect.

The current approach is not consistent with the NPPF and does not actively seek to boost housing supply or address the market and affordable housing needs. Therefore, the Core Strategy Local Plan in its current form is not sound as it has not been positively prepared and it is not consistent with national policy.

The proposed distribution of new housing is broadly supported by our clients and they are pleased that the amount of development proposed in the North Richmondshire sub-area has increased to 9% from the Core Strategy Preferred Options (July 2010). However, we consider this should be increased further to ensure that settlements in the North Richmondshire sub-area are supported by an appropriate level of development to ensure existing services are maintained.

It is suggested that 5% of new dwellings should be located within the secondary service villages throughout the plan period and our clients also support this increase. This equates to a minimum of 110 dwellings (based on current requirements) to be located within the North Richmondshire Service Villages of which Newsham is part of a cluster with Dalton and Ravensworth. The provision within the policy of detailed figures on the distribution of development is welcomed and firmly supported. However, these figures should only act as a starting point and not unduly restrict an appropriate amount of development coming forward on suitable sites within secondary service villages.

There are four Service Villages or clusters of villages in the North Richmondshire sub-area and Newsham is part of a 'cluster' of three smaller villages, along with Dalton and Ravensworth. Overall this suggests the need to deliver approximately 27 dwellings in each Secondary Village within the sub-area. There is however no guidance on the proposed distribution of housing within each cluster but our clients' firm view would be that these figures should remain flexible to allow appropriate levels of development to come forward on individual sites.

If the Council are to deliver at least 110 new dwellings in the North Richmondshire service villages across the plan period then suitable sufficient sites will have to be

allocated through a review of the existing settlement limits in the emerging plan to meet these targets. Whilst Newsham forms part of a cluster with Dalton and Ravensworth, in our clients view the majority of development in this cluster should be focused on Newsham as it is relatively sustainable as a settlement and is the least constrained in planning terms for an appropriate level of development.

The SHELAA identifies our client's site as a deliverable site with a notional capacity of 21 dwellings. A review of the SHELAA suggests that there are only three other sites within the cluster identified as 'green' i.e. suitable, available and achievable. An assessment of these sites and the suitability of them to accommodate the level of development proposed in the cluster is undertaken below:

SHELAA site 173- OS Field Number 161, Ravensworth

This is the only site identified in the SHELAA as 'green' in Ravensworth and it is suggested that it has a notional capacity of 12 dwelling.

We would seriously question the deliverability of this site given extremely sensitive setting in planning terms. The site is located within the Ravensworth Conservation Area, an Area of Great Landscape Value and is adjacent to the remains of Ravensworth Castle which is a Scheduled Ancient Monument. These represent significant constraints on the development of this site and these issues have not been fully assessed as part of the SHELAA.

SHELAA site 101 – Part field on the south side of Hill Lane, Dalton

This is one of two sites identified as 'green' in the SHELAA in Dalton. The site has a suggested capacity of 42 units.

The suitability of development on this site is questionable as it would not fit well with the existing settlement pattern and form which focuses around the village core.

Furthermore, the site bounds the Dalton Conservation Area. The site is also located within an area of Great Landscape Value and highly visible from the key vantage points within the surrounding landscape.

Dalton has the least amount of services and is the smallest settlement in the cluster and, as such, should receive the least amount of development as it is the least sustainable.

SHELAA site 51 – Town Head Field, Dalton

This is only a small site with capacity for 3 dwellings. The SHELAA suggests that the site is already within the settlement boundary for Dalton.

Newsham should be the focus of development in the cluster, it is a sustainable settlement with a number of existing services and the most appropriate for further housing development. Our clients' site at Moor Lane is the least constrained and provides the ideal opportunity to deliver a small scale residential development to meet the proposed targets and spatial strategy outlined in the Local Plan Core Strategy.

North Richmondshire Spatial Strategy (NRSS)

Our clients support the recognition in the North Richmondshire Spatial Strategy that some level of development may be acceptable to support the role of the sub-area. However, the proposed level of development must be sufficient to support existing settlements and ensure sustainable communities are maintained. It is vital that the emerging Local Plan supports the sustainability of existing settlements and gives confidence to developers by allocating sites for residential development of an appropriate scale.

To ensure that this is the central aim of the NRSS, our clients would suggest that the wording of the policy is amended to state:

"*in the secondary service villages of Newsham – Ravensworth – Dalton (Cluster), Eppleby – Caldwell – Aldbrough (Cluster), North Cowton and Gilling West:*

- *Small scale and a modest level of development* ***will*** *be acceptable where it supports the social and economic needs and sustainability of the local community*".

Core Policy CP0: Planning Positively

Our clients support the inclusion of Core Policy CP0 in the Core Strategy which reflects guidance in NPPF concerning the presumption in favour of sustainable development.

Core Policy CP1: Responding to Climate Change

Our clients would raise significant concerns of the effect of Policy CP1 on the viability of new housing schemes particularly the requirement for Code for Sustainable Homes Level 4.

Core Policy CP2: Achieving Sustainable Development

Core Policy CP2 is in generally conformity with the National Planning Policy Framework and, as such, is supported.

Core Policy CP3: Supporting the Settlement Hierarchy

The proposed settlement hierarchy is supported by our clients and they firmly support the inclusion of Newsham as part of a secondary service village cluster. Detailed representations have been made above in respect of Spatial Principle SP2.

They also fully support the confirmation in Core Policy CP3 that appropriate development will be supported within or adjacent to each settlement's development limits to secure the sustainability of each settlement in the hierarchy.

Core Policy CP4: Supporting Sites for Development

Our clients fully supports the approach outlined in Core Policy CP4 which recognises that there is a need to bring forward development on appropriate sites in the short term and accept that this should be undertaken in accordance with the proposed settlement hierarchy and distribution of development.

Core Policy CP5: Providing a Housing Mix

The requirements of Core Policy CP5 present a number of concerns and we would object to the policy in its current form. Whilst it is acknowledged that a range of dwellings should be provided to meet the identified needs of the District, there should be appropriate flexibility to take account of market considerations and the need to deliver housing.

It is our client's view that the dwelling mix in terms of type and tenure of a development should be left to the market to decide. The proposed approach could have significant impact on the viability of many schemes and interfering in the market other than to specifically deliver affordable housing should be avoided.

Policy CP6: Providing Affordable Housing

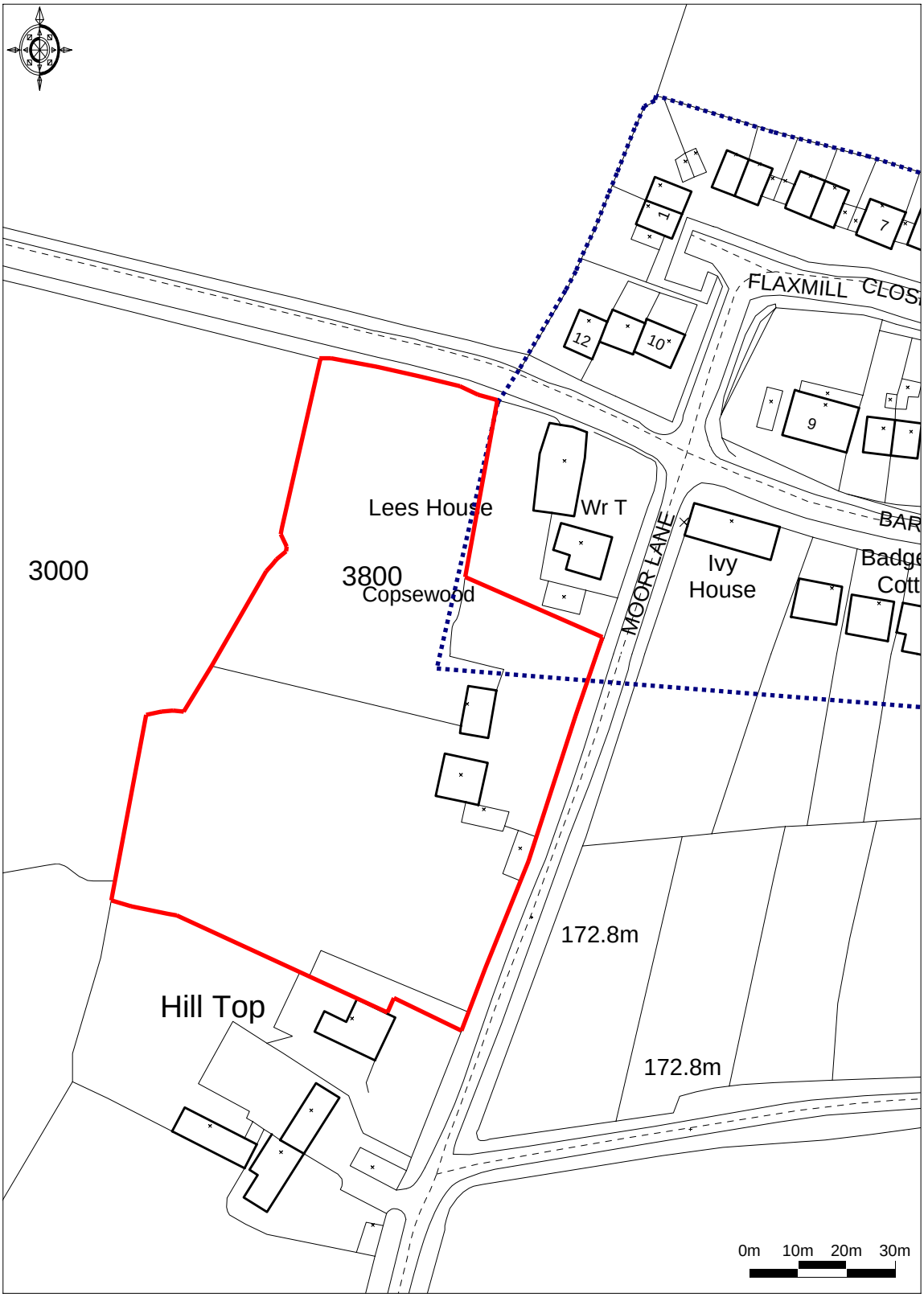
Our clients recognise the need to achieve a balanced housing stock that better meets local needs and aspirations.

In terms of affordable housing, our client supports the recognition in the Policy CP6 that the proposed percentages are only targets and subject to economic viability. However, there is a major concern that the threshold for affordable housing is anything more than a single dwelling. This approach will significantly damage the delivery of smaller sites particularly within settlements unless a pragmatic approach to viability is taken. Furthermore, in a predominately rural district, development of small sites makes a valuable contribution to the housing supply.

Summary

Our clients generally support the proposed distribution of development and settlement hierarchy welcoming the inclusion of Newsham as part of a Secondary Service Village cluster in the North Richmondshire sub-area.

However, the proposed housing requirement is not consistent with the NPPF and does not actively seek to boost housing supply or address the market and affordable housing needs. Therefore, the Core Strategy Local Plan in its current form cannot be considered as sound as it has not been positively prepared and is not consistent with national policy.



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