



Our Ref: G:\YHA Data\Our work\Planning Delivery\024- Richmondshire\Local Development Frameworks\Final Responses\April 09 - March 10

26 April 2010

John Hiles
Swale House
Frenchgate
Richmond
North Yorkshire
DL10 4JE

Dear John

Richmondshire Core Strategy – Issues and Options Consultation

Local Government Yorkshire and Humber welcomes the opportunity to comment on the Richmondshire Core Strategy – Issues and Options Consultation Paper and to continue its involvement in the development of a coherent spatial planning framework for the region. The comments offered in this letter are intended to be within the spirit of continued and productive joint working.

LGYH is acting on behalf of the Local Authorities Leaders Board who together with the Regional Development Agency, Yorkshire Forward, comprise the Joint Regional Board (the Responsible Regional Authority). The response to the consultation document is a set of comments aimed at highlighting where issues related the Regional Spatial Strategy might arise. The RSS forms part of the Richmondshire Local Development Framework and, as of April 2010, part of the Regional Strategy along with the Regional Economic Strategy and Regional Housing Strategy.

The following comments are made in relation to the current RSS – The Yorkshire and Humber Plan, which was issued by the Secretary of State in May 2008. The Yorkshire and Humber Plan aims to achieve a more sustainable pattern and form of development, investment and activity across the region, putting a greater emphasis on matching needs across the region with opportunities and managing the environment as a key resource. There is a particular emphasis on achieving the regeneration and renaissance of the region's city and town centres by making them the focus for housing,

employment, shopping, leisure, education, health and cultural activities and facilities in the region.

Previous Correspondence

The Regional Planning Body (now abolished and replaced by the Responsible Regional Authority) sent a number of officer comments in response to the initial issues and options paper in May 2007 and also to the Preferred Options Consultation in February 2008. In these responses we highlighted some key issues to take into account:

- Given the continued uncertainty that will surround the development of Catterick Garrison, we felt that it was essential to plan for the future of the District to ensure that the objectives of the RSS and LDF are met whatever decisions are taken on the expansion of the Garrison?
- This we felt could be done by considering how Core Strategy policies might differ depending on the level (and nature) of expansion and then ensuring that the final Core Strategy is flexible enough to deal with the continued uncertainty.
- We were concerned at the absence of an approach to transport within the vision;
- We raised issues as to the distribution of development within that area;
- We suggested that there was a need to provide more evidence as to the capacity of settlements to accommodate growth;

As you will be aware these comments were made in relation to the then draft Regional Spatial Strategy – the Yorkshire and Humber Plan (December 2005). This response will set out comments in relation to the current RSS – The Yorkshire and Humber Plan, which was issued by the Secretary of State in May 2008.

Key Points on the Core Strategy: Revised Further Options

Below is a summary of the main points the Local Authority Leaders Board wishes to raise with regards to the Core Strategy: Issues and Options document. **Annex A** provides further detail for each of these issues.

1. Support the general approach to the LDF
2. Support the positioning of the RSS within the wider context of the LDF
3. Suggest that some of the cross-boundary linkages between Richmondshire and adjoining local authorities (within and outside of the region) be made more explicit as part of the evidence base. This is especially the case when considering the approach to what the wider Catterick Garrison represents on the ground.
4. Suggest that more evidence be put forward as to the intended roles of place especially for Richmond, Catterick Garrison and Leyburn. The Core Strategy should start with a desire to achieve positive outcomes for places. At present the document appears to be based on the challenge of distributing growth.
5. The next stage of preparation should make clearer links between the SHELA and the housing and employment land figure. This is a key piece of evidence that is not currently reflected in an explicit manner.

I trust that the comments provided here, and expanded on in Annex A, are helpful to you as you continue to prepare the Core Strategy for submission. Clearly we wish to

see the Core Strategy developing in general conformity with the Regional Spatial Strategy. Please do not hesitate to get in touch if anything is not clear. We look forward to working with you further on your Core Strategy and to commenting on the final document in due course.

Yours sincerely

A handwritten signature in black ink that reads "Mart - Elliot". The letters are slightly slanted and connected, with a small mark above the 't' in "Mart".

Martin Elliot
Acting Head of Planning Delivery

Annex A

General Comments

We welcome references made throughout the document to RSS (May 2008) and welcomes the regional planning policy context that is set out throughout the document.

We alert you to the fact that while the Core Strategy is still required to be in general conformity with the RSS it is the Planning Inspectorate that will provide this opinion. In the past this was done by the Regional Planning Body prior to publication stage. While we are not obliged to provide an opinion our views as a statutory consultee will be material considerations and we would encourage the joint working thus far fostered to continue through further dialogue as you approach publication.

Achieving Sustainable Communities in Richmondshire

We support the testing of the notion of a joint Principal Town through this consultation. RSS established that Richmond/Catterick Garrison together had the capacity to fulfil a Principal Town role under Policy YH5. We support exploring the value of this designation with a few caveats:

- if you were to remove the joint Principal Town designation we suggest that you would need to ensure (through evidence, policy and delivery mechanisms) that the settlements develop in a complementary manner so that growth of Catterick Garrison does not harm the health and vitality of Richmond.
- it may be the case that neither Richmond nor Catterick Garrison fits neatly with a Principal Town or Local Service Centre role as set out in Policies YH5 and YH6 at the current time. The question for the LDF to answer is what the desired **future role** of these settlements is (with or without Garrison expansion) and what policies need to be put in place to help them fulfil that role.
- in thinking about the roles of places you should evidence how the outcomes of YH6 can be delivered without significant growth. Para 2.43 notes that there has been considerable recent pressure placed on the region's market towns. To that end, you should consider how Richmond could fulfil a Principal Town role with a reduced focus for growth and an increased focus on enhancement and improvement.

Thinking about these issues should enable you evidence SC8c where you question the role that Richmond and Catterick Garrison play as the focus for development. We have not sought in the past to place a percentage figure on what "main local focus" means in Policy YH6. Instead we feel that local evidence (i.e. from SHLAAs, SHMAs, Employment Land Reviews and local opportunities and constraints) will play a part in answering that.

Scale and Distribution of Development

While RSS sets a minimum housing target for the District it is worth explaining in the Core Strategy what this is meant to achieve i.e. meeting Richmondshire's local housing

demand and household projections. In answering question SD2a you should also refer to recent evidence from national household projections found on CLGs website. PPS3 and PPS12 note that this is something local authorities should do as part of their evidence base.

You note in para 2.8 that there is potential for some of the Garrison's growth to be located outside of the District. If this is the case you should demonstrate that, working sub-regionally and jointly across boundaries, that other LDFs are aware of this potential and are able to plan for it. To be clear, Garrison related development that is located outside of the District is not the responsibility of Richmondshire's LDF solely. This is something that should be raised as part of the sub-regional planning assessment for North Yorkshire and York.

The options that you have put forward in terms of distribution of development are considered appropriate to stimulate sufficient local evidence to:

- underpin the role of Richmond
- underpin the potential future role of Catterick Garrison
- assess the potential benefits and disbenefits brought about by a more dispersed pattern of development

At the next stage of preparation your SHELA should be more explicitly guiding these options.

In terms of Garrison related growth there was an expectation that growth in association with the Garrison would be located within the Garrison rather than distributed across the District and elsewhere.

We support the AAP area as a means of providing sufficient sites for development related to the Garrison providing that this is fully evidenced with reference to the limitations of growing the Garrison settlement itself to accommodate further growth.

It is recommended that more evidence be put forward to support a move away from Option D1 under issues SD6. Given the scale of potential growth and the likely need for a critical mass of development to secure the necessary infrastructure required to form a sustainable settlement it would seem inevitable that some impacts would occur to the communities of Hipswell, Scotton and Colburn. A desire to avoid such impacts would, we suspect, not form a sufficiently robust evidence base for considering options D2 and D3.

Other considerations

At this stage we have limited our comments to the main spatial distribution issues and headline strategic issues.