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Branch Chair
Jan Arger

Authority: Richmond District Council

Type of consultation: Policy

Full details of application/consultation: Local Plan Preferred Options Consultation

At land at: N/A

Type of response: Written Representation

Date of Submission: 23rd July 2021

All responses or queries relating to this submission should be directed to the Secretary for the Trustees at the contact details shown above on this frontispiece.

All CPRE North Yorkshire comments are prepared by the charity using professional planners whose research and recommendations form the basis of this response in line with national CPRE policies.

External planning consultant used in this response:



KVA Planning Consultancy
Katie Atkinson, BA (Hons), Dip TP, MA
MRTPI
www.kvaplaning.co.uk

Comment

CPRE North Yorkshire (CPRENY) welcomes the opportunity to comment on this policy consultation for the emerging Preferred Options Local Plan.

CPRENY looks forward to continuing to work with the Local Planning Authority in their capacity of plan-making for the district excluding the area covered by the Yorkshire Dales National Park.

Please find comments relating to each specific chapter of the draft plan attached to this frontispiece.

CPRENY reserve the right to comment further at later stages of the plan making process.

Richmondshire Local Plan Preferred Options Consultation

‘Challenges’ and ‘Vision and Objectives’ Questions

We are reviewing our Local Plan for the towns and villages outside of the Yorkshire Dales National Park. This Preferred Options consultation is the second stage in the production of the new Local Plan and the second opportunity for residents, businesses and other interested parties to help plan our future.

This consultation follows on from the previous Issues and Options consultation (held in September 2018) and sets out the proposed best strategy to deliver Richmondshire’s needs. The strategy has been developed through engagement with the public and key stakeholders to ensure the Preferred Options Local Plan and the evidence underpinning it have been shaped by an understanding of the key local issues. Please provide your views and comments on the Preferred Options document by completing this consultation questionnaire and returning it to us no later than **Friday 9 July 2021**.

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Your details (mandatory)

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Address (including postcode)	P.O. Box 189 York YO7 9BL
Telephone number	07983088120
Email	info@cprenorthyorkshire.co.uk

Agents details (if applicable)

Organisation	KVA Planning Consultancy
Name	Katie Atkinson
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Email	katie@kvaplanning.co.uk
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Please note that this Questionnaire contains the questions relating to the 'Challenges' and 'Vision and Objectives' sections. The full questionnaire document and other separate questionnaire documents for the individual policy sections are available if preferred on our website.

To return your form please email it to us at – localplan@richmondshire.gov.uk

Or return by post - FAO Planning Policy, Richmondshire District Council, Mercury House, Station Road, Richmond, North Yorkshire, DL10 4JX

Any questions please contact us by email – localplan@richmondshire.gov.uk

Or please ring – 01748 829100 and request a call back.

This question relates to the 'Challenges' section:

Strategic Issues

Do you agree with the preferred Strategic Issues proposed?

Yes

No

Please explain:

The preferred strategic issues proposed in the PO Local Plan include aspects of all 3 pillars that make up sustainable development. With the diverse landscape character types and heavy military presence it is imperative that the need for affordable housing is addressed alongside the requirement to protect and enhance the town centres and access to vital open green space and countryside area needed for well-being and its own sake.

Are there any other Strategic Issues you feel should be addressed?

CPRENY believe that the most important strategic issues have been covered, however, could be made stronger by explicit reference to the need for a net gain in biodiversity across the plan area (perhaps within challenge number 10 or independently); landscape protection in general not just within the nationally designated landscapes; and also recognition that whilst the plan area is rich in green infrastructure there are always more opportunities to develop, increase and enhance these areas in the interest of climate change.

These questions relate to the 'Vision and Objectives' section:

Vision

Do you agree with the preferred Vision proposed?

Yes

No

Please explain:

CPRENY believe that the approach to take forward the current Local Plan Core Strategy (2012-2028) and update to address the key challenges and characteristics is appropriate.

Do you have any comments to make on the preferred Vision?

Strategic Objectives

Do you agree with the preferred Strategic Objectives proposed?

Yes

No

Please explain:

CPRENY concur with the strategic objectives as set out, however, believe that F-H should read as 6-9 instead as they don't appear to follow on from 'e' within point 5.

Are there any other Strategic Objectives you feel should be included or omitted?

Within the current point F –additional wording should be added to expand the point to read (as underlined):

'Priority will be given to protecting and enhancing the rich variety of environmental assets including existing green and blue infrastructure corridors and vital open spaces.

This will include ensuring there is a net gain for biodiversity as a result of new development.'

The additional text is considered to strengthen the objective by protecting and enhancing existing areas alongside requiring new infrastructure as a result of development.

Local Objectives

Do you agree with the preferred Local Objectives proposed?

Yes

No

Please explain:

On the whole, CPRENY agree to the principles of the local objectives. It is considered additional wording as set out below could help strengthen each point and make the objectives more effective.

Are there any other Local Objectives you feel should be included or omitted?

Suggested wording to be included within the local objectives to make them more effective as shown underlined below:

LO2 – The need for travel is reduced and access to jobs and key services improved by sustainable forms of transport, such as: public transport, improved links for walking and cycling, increased provision for electric vehicle charging and an improved road network making travel safer and easier.

LO4 – Local and Military authorities work together through the joint Masterplan to create strong and well-integrated communities as well as sustainable services, facilities and open space, which will benefit the whole district.

LO7 – The adverse impact of society on the environment and the implications of climate change are mitigated and adapted to including through renewable and low carbon energy provision and development. (The inclusion of 'including' shows that renewable and LCE provision is an important but only 1 route to adapt to CC).

Richmondshire Local Plan Preferred Options Consultation 'Strategic Approach' and 'Sub Area Strategies' Questions

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Telephone number	07734 953236
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Please note that this Questionnaire contains the questions relating to the 'Strategic Approach' and 'Sub Area Strategies' sections. The full questionnaire document and other separate questionnaire documents for the individual policy sections are available if preferred on our website.

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These questions relate to the 'Strategic Approach' section:

Spatial Principle SD1 – Sub Areas

Do you agree with the preferred Sub Areas proposed?

Central Richmondshire, Lower Wensleydale and North Richmondshire

Yes

No

Please explain:

It is considered that the sub area approach is an extension of that found within the current LP Core Strategy (2012-28) and is appropriate for each distinct area subject to supporting policies.

Are there any other considerations or options which should be taken into account?

Spatial Principle SD2 – Settlement Hierarchy

Do you agree with the preferred Settlement Hierarchy proposed?

Principal Towns, Local Service Centres, Primary Service Villages, Secondary Service Villages, Smaller Villages, Elsewhere

Yes

No

Please explain:

CPRENY consider that the proposed settlement hierarchy is entirely appropriate for the plan area.

Are there any other considerations or options which should be taken into account?

Spatial Principle SD3 - Rural Sustainability

Do you agree with the preferred approach to Rural Sustainability?

Balance social and economic needs with protecting landscape character, natural and historic environment

Yes

No

Please explain:

In theory this is a much-needed policy for the rural district which is the Plan Area.

However, not enough emphasis has been given to the need to promote the landscape character and natural and historic environment within the policy – in fact these important facets are not mentioned at all within the policy. It is assumed that these are meant to be covered by ‘conservation or improvement of the rural environment’. Firstly, CPRENY believe the word ‘or’ should be replaced by ‘and’. Further, there is no explanation as to what the local authority means by the ‘rural environment’. It is, therefore, considered that to be a holistic sustainability policy these elements should be explicitly mentioned to afford clarity to all readers and ensure the policy is effective.

Are there any other considerations or options which should be taken into account?

These questions relate to the 'Sub-Area Strategy' section:

Central Richmondshire Sub Area Strategy

Do you agree with the preferred approach to Central Richmondshire?

Yes

No

Please explain:

Are there any other considerations which should be taken into account?

Lower Wensleydale Sub Area Strategy

Do you agree with the preferred approach to Lower Wensleydale?

Yes

No

Please explain:

Are there any other considerations which should be taken into account?

North Richmondshire Sub Area Strategy

Do you agree with the preferred approach to North Richmondshire?

Yes

No

Please explain:

Are there any other considerations which should be taken into account?

Richmondshire Local Plan Preferred Options Consultation

Sustainable Development Questions

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Please note that this Questionnaire contains the questions relating to the 'Sustainable Development' section. The full questionnaire document and other separate questionnaire documents for the individual policy sections are available if preferred on our website.

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These questions relate to the 'Sustainable Development' section:

Policy SD1 – Sustainable Development

Do you agree to preferred policy SD1 – Sustainable Development?

Yes

No

If not, do you agree with the general approach to policy SD1 but have any suggested changes?

Yes

No

n/a

Please provide any further comments

Policy SD2 – Amenity

Do you agree to preferred policy SD2 – Amenity?

Yes

No

If not, do you agree with the general approach to policy SD2 but have any suggested changes?

Yes

No

n/a

Please provide any further comments

Policy SD3 – Access

Do you agree to preferred policy SD3 – Access?

Yes

No

If not, do you agree with the general approach to policy SD3 but have any suggested changes?

Yes

No

n/a

Please provide any further comments

CPRENY recognise that many parts of the rural district can not access sustainable forms of transport and it is considered that this policy reflects the rural nature of the Plan Area with sufficient priority given to sustainable modes of transport. CPRE nationally and locally are campaigning for the increased provision of rural bus services and have recently published a report '[Every Village, Every Hour](#)' to this effect. The research, conducted by CPRE and Transport for Quality of Life, shows that, with the right investment, the government could deliver a world-leading bus network capable of matching Swiss standards. In Switzerland, every village of two to three hundred people is guaranteed at least an hourly bus service from 6am to midnight, 7 days a week. CPRE believes that this level of service is possible here too, and should be our aspiration as we build back better after the coronavirus pandemic. CPRE has calculated that the one-off spending outlined in the government's National Bus Strategy in March 2021, while full of ambitious plans, won't succeed in giving travellers the 'more frequent, more reliable, easier to understand and use, better coordinated and cheaper' buses that it aspires to.

To run services that meet everyone's needs, and especially those living in rural areas, the data in our Every village, every hour report shows that the government needs to make continuous year-on-year investment. This can be achieved by redirecting just a portion of the funding planned for the government's legally embattled and widely criticised multi-billion pound road-building schemes.

Policy SD4 – Use of Land and Materials

Do you agree to preferred policy SD4 – Use of Land and Materials?

Yes

No

If not, do you agree with the general approach to policy SD4 but have any suggested changes?

Yes

No

n/a

Please provide any further comments

CPRENY fully support and welcomes the Council's 'brownfield first' priority in this policy. It is thought that to ensure this occurs, incentives to remediate any contaminated land could be offered.

Policy SD5 – Supporting High Quality Electronic Communications

Do you agree to preferred policy SD5 – Supporting High Quality Electronic Communications?

Yes

No

If not, do you agree with the general approach to policy SD5 but have any suggested changes?

Yes

No

n/a

Please provide any further comments

CPRENY agree with the general approach but suggest one addition be made to paragraph c to read (as underlined):

Requiring new communications installation and associated ancillary infrastructure (including cabinets) proposals (including those submitted under prior approval) to demonstrate all of the following criteria:

CPRENY support the Council's inclusion of those submitted under prior approval within this policy as there often appears to be a relaxed approach to applications under this route by applicants who assume the approval will be given without the same level of attention to the surrounding residents, character and landscape setting of an area and also, to highway matters.

Richmondshire Local Plan Preferred Options Consultation

Housing Questions

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These questions relate to the 'Housing' section:

Policy H1 – Scale and Distribution of Housing

Do you agree with the preferred approach to the Scale of Housing?

High Growth Scenario of 160 homes per annum based on recommendations set out in the Strategic Housing Market Assessment

Yes

No

Do you agree with the preferred approach to the Distribution of Housing?

Catterick Garrison 57%, Richmond 5%, Leyburn 9%, Primary Villages 16%, Secondary Villages 6%, Smaller Villages 5%, Elsewhere 2%.

Yes

No

Please provide any further comments

CPRENY acknowledge the high economic growth forecasts as set out in the SHMA and the reasoning behind the selection of the higher growth scenario of 160 dwellings per annum (actually lower than in the core strategy).

However, when considering the impacts of the recent pandemic and changes to working and shopping patterns as a result, CPRENY question whether the higher growth scenario will play out as originally anticipated. Given such challenging times and the high rates of historic completions across the district as well as the purported 8-year demonstrable housing land supply, CPRENY believe that a lower scenario should be adopted in the interim ensuring the council can deliver its full quota of affordable need and still demonstrate a five-year viable supply. This would enable many of the edge of settlement greenfield potential allocations, to remain as countryside and open space which has proven invaluable to many in terms of well being and associated health benefits during recent times. Furthermore, the retention of and improvement to open space has benefits for climate change and the Council has committed to becoming net zero by 2030. As such, it would seem sensible to rely on the precautionary principle at this time rather than plan for a high economic and housing growth which may not occur and result in large vacant units which do not help tackle climate change.

As LPAs are required to monitor development annually and review policies every 5 years, there would appear to be sufficient flexibility given the amount of available land for the Council to allocate more land, if required, at such time rather than allocate sites and receive a 'permission in principle' but there not actually be the requirement or economic justification for them given economic uncertainties going forward.

As such, CPRENY believe that the alternative medium growth option should be favoured (120dpa), allowing for an increased number of jobs, based on 2014 projections with an affordability uplift but with recognition that this can be reviewed in 5 years.

Policy H2 – Allocations and Location of Housing Development

Allocations

Do you agree with the approach to allocating land?

Only making allocations for housing development in Catterick Garrison

Yes

No

Do you agree with the sites proposed for allocation?

Yes

No

Please provide any further comments

CPRENY understand the reasoning behind the increased growth at Catterick Garrison and the focus of delivery at this location, however, given the demonstrable 8-year housing land supply position, it is considered that a proposed 630 units at the Harley Hills site is far too large and question whether this site is needed at all given the evidence and stance of CPRENY set out in response to Policy H1 above.

This one site is disproportionately large compared to all of the other suggested allocations around Catterick Garrison and will completely alter the existing character of this flood plain location, altering the tranquillity enjoyed by the existing residents of this location. Many people who currently reside in this area are able to enjoy easy access to the countryside, with many not owning a private vehicle to travel to rural parts elsewhere therefore, the location contributes significantly to residential amenity.

The NPPF clearly states to avoid agricultural land where possible. This large site is within agricultural usage and has been since circa the 1970s. Furthermore, existing field boundaries are a mix of mature biodiversity rich hedges which would be highly detrimental to ecological communities if lost.

To promote a large new allocation of 630 units here, completely altering the settlement and character of this part of Central Richmondshire, alongside the remaining other allocations at Catterick, appears to fly in the face of the climate emergency which the Council have signed up to.

Further, given the large number of potential allocations, CPRENY do not support the below underlined section of point 2 of policy H2 stating that '[...] where allocations no longer come forwards development will only be permitted within, or if opportunities do not exist within, adjacent to the Development Limits'. All development should be on allocated sites at Catterick given the relatively low overall housing need number, lower stance suggested by CPRENY and historic build rates. There should be no need to develop further greenfield sites. If development does not come forward as planned then the LPA should simply not allow development other than brownfield or windfall infill opportunities to occur, especially if those landowners have declared through this process that sites are available and viable. By a strict enforcement of policy allocated sites should prove attractive to developers.

Policy H2 – Allocations and Location of Housing Development

Directions of Growth

Do you agree with the approach to Directions of Growth?

Establishing Directions of Growth for Leyburn and the Primary Villages

Yes

No

Please provide any further comments

It is considered that this question cannot yet be answered as no information has been consulted upon as yet regarding a specific direction for Leyburn and the primary villages..

Policy H2 – Allocations and Location of Housing Development

Development Limits

Do you agree with the approach to Development Limits?

Retaining and reviewing the Development Limits for all settlements.

Yes

No

Do you agree with the proposed Development Limits?

Yes

No

Please provide any further comments

As set out above, CPRENY do not consider that development should be located adjacent to the development limits, unless absolutely required for a specific and justified need. Therefore, development should be encouraged towards brownfield sites, allocated sites and infill opportunities first. It is considered that the policy at point 4 should be reworded to read as below

‘Housing developments resulting in a net gain in new dwellings will only be permitted within the development limits for the following settlements (by ward): [...].’

Point 5 should then be amended to read (as underlined) ‘All development in the first instance should be located within development limits. Where deliverable opportunities do not exist within development limits, if a development is justified and sustainable, development should be adjacent to development limits and within the identified Direction of Growth (where applicable).’ The forthcoming supporting text should define criteria (if not within the policy) as to determine how the council will consider a proposal to be justified. This is required in order to prevent encroachment into the countryside when sufficient allocated sites are available already according to the Council’s evidence base.

Policy H3 – Affordable Housing

Do you agree to preferred policy H3 – Affordable Housing?

Yes

No

If not, do you agree with the general approach to policy H3 but have any suggested changes?

Yes

No

n/a

Please provide any further comments

CPRENY welcomes this variable approach to the provision of affordable housing and contributions across all developments within the Plan Area.

Policy H4 – Housing Mix

Do you agree to preferred policy H4 – Housing Mix?

Yes

No

If not, do you agree with the general approach to policy H4 but have any suggested changes?

Yes

No

n/a

Please provide any further comments

CPRENY agree with the preferred approach as set out via Policy H4. However, to allow flexibility and creativity to ensure non-identikit but suitable housing capable of adapting to future needs including climate mitigation measures , CPRENY would argue that the words 'as a minimum' should be inserted at the very end of point 2 to read 'All new housing developments should adopt the Nationally Described Space Standards or any subsequent government standard as a minimum.'

Policy H5 – Rural Workers Dwellings

Do you agree to preferred policy H5 – Rural Workers Dwellings?

Yes

No

If not, do you agree with the general approach to policy H5 but have any suggested changes?

Yes

No

n/a

Please provide any further comments

Policy H6 – Conversion of Rural Buildings for Housing

Do you agree to preferred policy H6 – Conversion of Rural Buildings for Housing?

Yes

No

If not, do you agree with the general approach to policy H6 but have any suggested changes?

Yes

No

n/a

Please provide any further comments

Policy H7 – Replacement Dwellings

Do you agree to preferred policy H7 – Replacement Dwellings?

Yes

No

If not, do you agree with the general approach to policy H7 but have any suggested changes?

Yes

No

n/a

Please provide any further comments

Policy H8 – Gypsy and Traveller Accommodation

Do you agree to preferred policy H8 – Gypsy and Traveller Accommodation?

Yes

No

If not, do you agree with the general approach to policy H8 but have any suggested changes?

Yes

No

n/a

Please provide any further comments

Richmondshire Local Plan Preferred Options Consultation

Economy Questions

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These questions relate to the 'Economy' section:

Policy E1 – Scale and Distribution of Economic Growth

Do you agree with the preferred Scale of Economic Growth?

High Growth Scenario (109 jobs per annum) as per the recommendations in the Employment Land Review

Yes

No

Do you agree with the preferred Distribution of Economic Growth?

Combination of – A1(M)/Scotch Corner development, Catterick Garrison expansion and consolidation of existing sites

Yes

No

Are there any other considerations or options which should be taken into account?

As with the response to the housing section, CPRENY believe that the Council should adopt the medium growth scenario. Whilst this gives a positive net additional growth in jobs per annum, it is thought that given the recent pandemic and changing behaviours in terms of work and shopping and current problems with supply etc – continuing to plan for a high growth scenario could lead to redundant and vacant buildings. As such, given the healthy amount of available land in the district coupled with the climate emergency, it is considered that the Council should adopt the medium scenario in order to prevent unnecessary building on greenfield locations at this time. As Planning Authorities are required to review Local Plans and policies every 5 years, should ti be required, additional land could be brought forward at that juncture.

Policy E2 – Supporting a Sustainable Economy

Do you agree to preferred policy E2 – Sustainable Economy?

Yes

No

If not, do you agree with the general approach to policy E2 but have any suggested changes?

Yes

No

n/a

Please provide any further comments

Policy E3 – Allocations for Economic Development

Do you agree to preferred policy E3 – Allocations for Economic Growth?

Yes

No

If not, do you agree with the general approach to policy E3 but have any suggested changes?

Yes

No

n/a

Do you agree with the allocations identified in policy E3?

Yes

No

Please provide any further comments

CPRENY do not consider it necessary to include point 3c within the policy. Development should be capable of being contained within the development limits and or, on allocations. The growth at Catterick Garrison is significant and any further encroachment into the countryside at this location would be inappropriate.

Whilst agreeing with the allocations in principle, the size should be reduced to reflect the medium growth scenario. Should the sites be retained in their current form, then significant net biodiversity gain could be offered on sites whilst enabling the medium growth scenario.

Policy E4 – Protection of Allocated and Existing Employment Sites

Do you agree to preferred policy E4 – Protection of Allocated and Existing Employment Sites?

Yes

No

If not, do you agree with the general approach to policy E4 but have any suggested changes?

Yes

No

n/a

Please provide any further comments

Policy E5 – Economic Development in the Countryside

Do you agree to preferred policy E5 – Economic Development in the Countryside?

Yes

No

If not, do you agree with the general approach to policy E5 but have any suggested changes?

Yes

No

n/a

Please provide any further comments

Policy E6 – Sustainable Tourism

Do you agree to preferred policy E6 – Sustainable Tourism?

Yes

No

If not, do you agree with the general approach to policy E6 but have any suggested changes?

Yes

No

n/a

Please provide any further comments

Whilst agreeing with the general approach to policy E6, CPRENY consider that additional text would strengthen the policy and provide clarity for all users as below (additional text shown as underlined).

Point 3 – ‘[...] will be supported where a need is identified, and such a proposal does not adversely affect the character and appearance of the settlement and the surrounding landscape setting. [...]’

Point 4 – ‘in rural areas, new tourist attractions and new or extensions to existing accommodation, including the location of caravans (static and touring), chalet accommodation, glamping and camp sites, should be of an appropriate scale, low key and low impact, and will only be supported in the countryside if it does not adversely affect the character and appearance of the area, taking account of the capacity of the site and local landscape (including aspects of topography and natural screening) to absorb the development’

Policy E7 – Town and Local Centres

Do you agree to preferred policy E7 – Town and Local Centres?

Yes

No

If not, do you agree with the general approach to policy E7 but have any suggested changes?

Yes

No

n/a

Please provide any further comments

Richmondshire Local Plan Preferred Options Consultation

Climate Change Questions

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Agents details (if applicable)

Organisation	KVA Planning Consultancy
Name	Katie Atkinson
Address including postcode	18 Westgate Bridlington East Yorkshire YO16 4QQ
Telephone number	07734 953236
Email	katie@kvaplanning.co.uk

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Please note that this Questionnaire contains the questions relating to the 'Climate Change' section. The full questionnaire document and other separate questionnaire documents for the individual policy sections are available if preferred on our website.

To return your form please email it to us at – localplan@richmondshire.gov.uk

Or return by post - FAO Planning Policy, Richmondshire District Council, Mercury House, Station Road, Richmond, North Yorkshire, DL10 4JX

Any questions please contact us by email – localplan@richmondshire.gov.uk

Or please ring – 01748 829100 and request a call back.

These questions relate to the 'Climate Change' section:

Policy CC1 – Sustainable Design

Do you agree to preferred policy CC1 – Sustainable Design?

Yes

No

If not, do you agree with the general approach to policy CC1 but have any suggested changes?

Yes

No

n/a

Please provide any further comments

CPRENY commend the Council for the inclusion of this thorough policy on Climate Change. It is right to be ambitious in policy and set a *minimum target as exceeding* the energy efficiency standards currently prevailing though Part L of Building Regulations.

We also support the use of the energy hierarchy through policy.

However, to make the policy and chapter more prominent within the Local Plan and give it the primacy it deserves as central to 'all developments' as set out in the opening of point 1 of the policy, CPRENY believe it should be located at the start of the Local Plan following on from the vision and objectives etc.

Policy CC2 – Flood Risk and Sustainable Drainage

Do you agree to preferred policy CC2 – Flood Risk and Sustainable Drainage?

Yes

No

If not, do you agree with the general approach to policy CC2 but have any suggested changes?

Yes

No

n/a

Please provide any further comments

Policy CC3 – Renewable and Low Carbon Energy Generation

Do you agree to preferred policy CC3 – Renewable and Low Carbon Energy Generation?

Yes

No

If not, do you agree with the general approach to policy CC3 but have any suggested changes?

Yes

No

n/a

Please provide any further comments

Richmondshire Local Plan Preferred Options Consultation

Natural Environment Questions

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Email	katie@kvaplanning.co.uk
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These questions relate to the 'Natural Environment' section:

Policy NE1 – Biodiversity and Geodiversity

Do you agree to preferred policy NE1 – Biodiversity and Geodiversity?

Yes

No

If not, do you agree with the general approach to policy NE1 but have any suggested changes?

Yes

No

n/a

Please provide any further comments

Policy NE2 – Landscape Character

Do you agree to preferred policy NE2 – Landscape Character?

Yes

No

If not, do you agree with the general approach to policy NE2 but have any suggested changes?

Yes

No

n/a

Do you agree with the principle and identification of Settlement Gaps?

Yes

No

If not, do you agree with the general approach but have any suggested changes?

Yes

No

n/a

Please provide any further comments

CPRENY welcomes the landscape character policy (NE2) including the provision of important Settlement Gaps.

However, to strengthen the policy further, it is considered that reference should be made to the setting of the AONBs in point 5. It is well known that development in the setting of a designated landscape can impact the experience of the designation, as such, additional text should be added to read (as underlined):

‘Within the Nidderdale and the North Pennines Area of Outstanding Natural Beauty and their important setting, which cover parts of East Witton and Muker Parishes respectively, [...]’

Policy NE3 – Green Infrastructure

Do you agree to preferred policy NE3 – Green Infrastructure?

Yes

No

If not, do you agree with the general approach to policy NE3 but have any suggested changes?

Yes

No

n/a

Please provide any further comments

CPRENY welcomes the policy on Green Infrastructure within the preferred options Local Plan, however, to strengthen the policy further, it is considered that reference should be made to both biodiversity and the well-being of communities which can both benefit from existing and enhanced green infrastructure as well as helping to combat and mitigate the impacts of climate change.

Policy NE4 – Water Quality

Do you agree to preferred policy NE4 – Water Quality?

Yes

No

If not, do you agree with the general approach to policy NE4 but have any suggested changes?

Yes

No

n/a

Please provide any further comments

Policy NE5 – Trees, Woodland and Hedgerows

Do you agree to preferred policy NE5 – Trees, Woodland and Hedgerows?

Yes

No

If not, do you agree with the general approach to policy NE5 but have any suggested changes?

Yes

No

n/a

Please provide any further comments

CPRENY agrees with and welcomes the inclusion of Policy NE5 into the Preferred Options Local Plan. Not only are trees, woodlands, hedges and hedgerows an important part of landscape character and ecological habitats but they are also vital in helping to mitigate against climate change. As such, CPRENY would ask for clarity from the Council as to what they mean by 'of value' in the point 1a of the policy. Are these purely those trees that have been designated by TPO, included within a Conservation Area or granted some other form of protection, or are they those which often make up the countryside next door and of value to local residential communities also? Those ordinary mature trees and hedgerows etc should also be valued and protected as much as possible through the planning process.

Policy NE6 – Local Green Spaces

Do you agree to preferred policy NE6 – Local Green Spaces?

Yes x

No

If not, do you agree with the general approach to policy NE6 but have any suggested changes?

Yes

No

n/a

Do you agree with the identification and designation of the sites listed as local green space?

Yes x

No

If not, do you agree with the general approach but have any suggested changes?

Yes

No

n/a

Please provide any further comments

Richmondshire Local Plan Preferred Options Consultation

Historic Environment Questions

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This question relates to the 'Historic Environment' section:

Policy HE1 – Conserving and Enhancing the Historic Environment

Do you agree to preferred policy HE1 – Conserving and Enhancing the Historic Environment?

Yes

No

If not, do you agree with the general approach to policy HE1 but have any suggested changes?

Yes

No

n/a

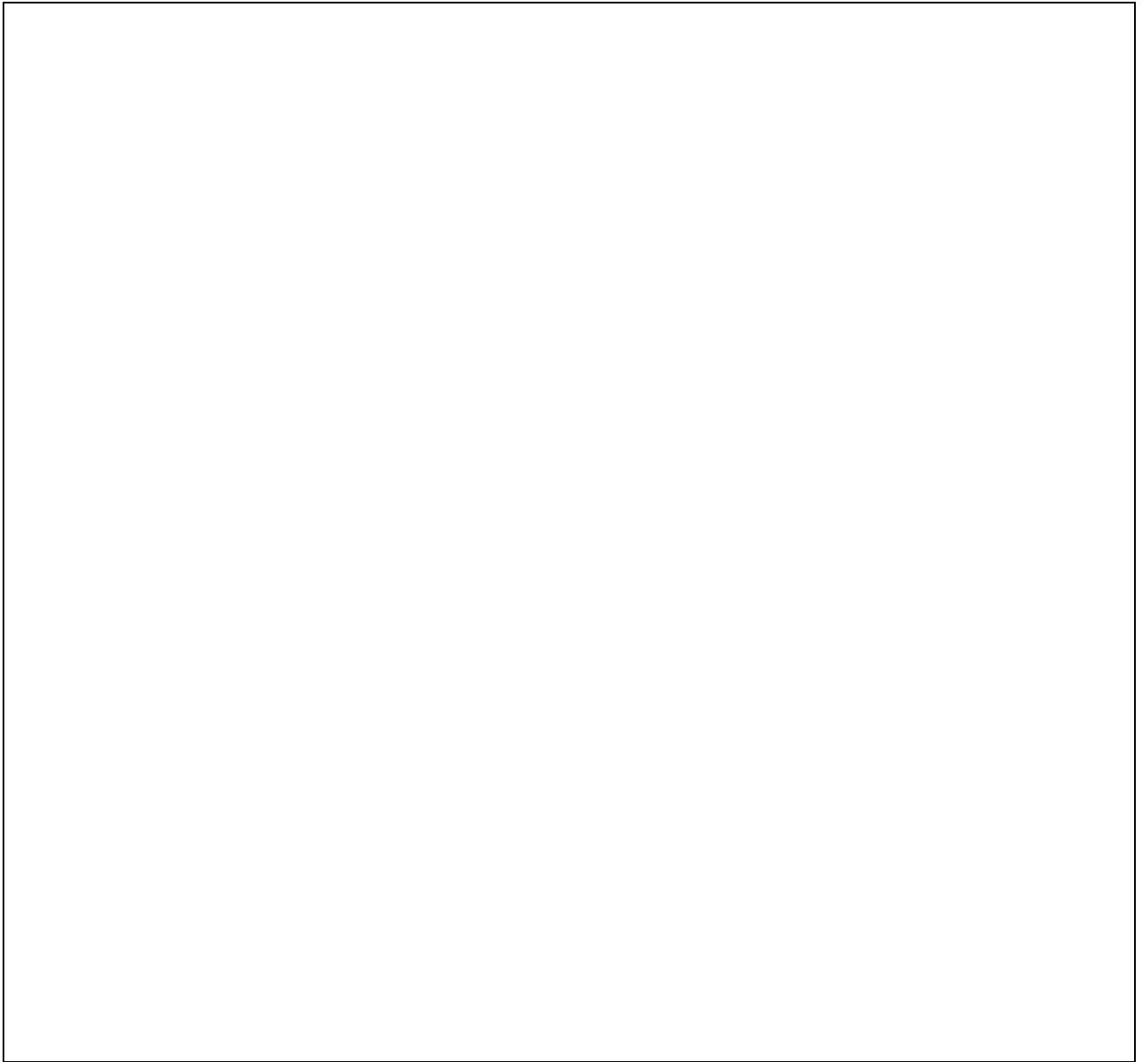
Please provide any further comments

Whilst CPRNEY consider the general approach to Policy HE1 is correct, there are a couple of areas of concern which CPRENY could help strengthen the policy.

No mention is given within the policy to the setting of a heritage asset (designated or undesignated). The NPPF clearly sets out that this is an important factor to take in to account when determining planning applications. As such the policy and supporting text should make sufficient reference to the conservation and (where appropriate) enhancement of the setting of such assets.

In a similar way, the 'archaeological heritage' section should also include reference to setting.

Furthermore, the policy in itself is very large. It is considered to be more effective the policy could be split into 3 parts (taking on board the sub headings) or 2, if the Council preferred to retain points 1-7 altogether.



Richmondshire Local Plan Preferred Options Consultation

Community Facilities Questions

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These questions relate to the 'Community Facilities' section:

Policy CR1 – Existing Open Space, Community, Sport and Recreation Facilities

Do you agree to preferred policy CR1 - Existing Open Space, Community, Sport and Recreation Facilities?

Yes

No

If not, do you agree with the general approach to policy CR1 but have any suggested changes?

Yes

No

n/a

Please provide any further comments

Policy CR2 – New Open Space, Community, Sport and Recreation Facilities

Do you agree to preferred policy CR2 - New Open Space, Community, Sport and Recreation Facilities?

Yes

No

If not, do you agree with the general approach to policy CR2 but have any suggested changes?

Yes

No

n/a

Please provide any further comments

Richmondshire Local Plan Preferred Options Consultation

Design Questions

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This question relates to the 'Design' section:

Policy D1 – Design

Do you agree to preferred policy D1 – Design?

Yes

No

If not, do you agree with the general approach to policy D1 but have any suggested changes?

Yes

No

n/a

Please provide any further comments

CPRENY fully support this innovative policy and welcome the Council's recognition of the need to establish and reinforce a sense of place and avoid monotonous featureless development which so often appears across the county and wider north of England.

To strengthen the policy further, CPRENY believe that there should now be a reference to tree-lined streets for new developments and the requirement of incorporating such green infrastructure into new residential and ideally all developments in the fight against climate change as per paragraph 131 in the July 2021 NPPF.

Finally it is thought that reference to the necessity to include energy efficient and energy generating technology in all new build developments should be incorporated into the criteria in point 1 of the policy.

Richmondshire Local Plan Preferred Options Consultation

Infrastructure Questions

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These questions relate to the 'Infrastructure' section:

Policy I1 – Providing and Delivering Infrastructure

Do you agree to preferred policy I1 – Providing and Delivering Infrastructure?

Yes

No

If not, do you agree with the general approach to policy I1 but have any suggested changes?

Yes

No

n/a

Please provide any further comments

Policy I2 – Infrastructure Delivery Plan

Do you agree to preferred policy I2 – Infrastructure Delivery Plan?

Yes

No

If not, do you agree with the general approach to policy I2 but have any suggested changes?

Yes

No

n/a

Please provide any further comments