**Representations to**

**Richmondshire Local Plan Core Strategy**

**Development Target Review: August 2013**

**September 2013**

**Made on behalf of Mr R Orchard**

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Our client, Mr R Orchard, owns land to the south of Green Howards Road. A location plan has been enclosed which indicates the extent of the site. We are instructed to make the following representations to Richmondshire District Council.

The representations respond to the five questions set out on page 4 of the Development Target Review (August 2013) (DTR).

**1. Do you agree with the Council's reassessment of its development target?**

1.1 The Council's view that the objective assessment of the scale and distribution of local housing should consider a combination of factors is supported. The objective need should be a triangulation of the; 1) Wider context, 2) scale of Housing and, 3) views of stakeholders.

1.2 The retention of the target of 180 dwellings a year, rather than 80 dwellings per year, as indicated by the Interim mid 2011 projections is supported.

1.3 However, the Council's contention that the 20% buffer to the land supply should not need to be applied is disputed. Table 1 of the letter to the Planning Inspector dated 03 May 2013 gives a total of 824 annual net completions between 2004/5 to 2010/11. The average completion rate over the 7 years is 117 dwellings per year. This is significantly less than the 170 dwellings reduced target argued for in paragraph 2.40 of the DTR. To be positively prepared, the LPCS should provide for a 20% buffer in the first 5 years of the plan period.

1.4 The DTR states that the "landscape and history limit" Richmond's capacity for growth (paragraphs 2.13 and 2.16). As previously submitted to the Proposed Submission (August 2012), the land to the south of Green Howards Road (see enclosed Location Plan) has not been fully considered. This site is an opportunity for housing development which could provide the 50 dwellings adjacent to Richmond.

1.5 The site has not been fully assessed and is not included in the SHLAA Update April 2013, even though the site was submitted in relation to the Additional Core Strategy Consultation: CP14 : Control and release of sites for development (October 2011).

1.6 The Council's conclusions in relation to the changes in household formation are supported. Planning for a "stagnation population" (paragraph 2.31) would not result in a plan which was positively prepared to achieve sustainable growth in Richmondshire. The *T&CP Tomorrow Series Paper 16: New Estimates of Housing*

*Demand and Need in England, 2011 to 2031* (Alan Holmans) provides a critique of the Interim mid 2011 projections and considers that:

*"These projections are based on past trends in sector shares and an eventual return to long-term trends in output. They can only form a starting point for understanding future investment requirements. But lower levels of output will put increasing strains on the housing market, worsening affordability and restricting access to adequate housing. And if, as we all hope, the economy moves back towards longer-term patterns of growth, even more housing investment will be required to meet resultant demands"* (paragraph 10, page 3).

1.7 This indicates that, as the Council set out in paragraph 2.34 of the DTR, if a lower housing figure is used then this will simply exacerbate the "height of the barrier" to families looking for a home in Richmondshire.

1.8 In relation to 'Housebuilding and Land Availability' (paragraph 2.39), the timing of delivery of the sites is questioned. The SHLAA is on the basis of "30 dwellings max completed per site per annum". However, no consideration is made of the market conditions for specific areas.

1.9 For example, the SHLAA Update April 2013 indicates that in Catterick Garrison in Year 5 (2017) 145 dwellings will be completed on sites 56, 124, 186, 156, and 157. Developments that compete within the same location are unlikely to be brought to market simultaneously, due to the depressing effect on the values. This should be reflected in the estimated yields.

1.10 In smaller markets (Primary Service and Secondary Service Villages) developers are similarly unlikely to flood the market and a lower average completion rate is considered to be more appropriate.

1.11 The 'Views of Local Stakeholders' (paragraph 2.43) section states that throughout the consultation process the Council has not received representations asking for a lower development target. This supports the retention of the higher target and rejection of the 80 dwellings per year indicated by the Interim mid 2011 projections.

**2. Do you agree that the revocation of the Regional Spatial Strategy has little impact on the Council's development targets?**

2.1 The *Richmondshire: Scrutiny of population estimates and projections* (edge analytics, January 2012) assess more recent projections than those on which the RSS targets

were based upon. However, the RSS targets are considered applicable to the assessment of whether a 5% or 20% buffer should be applied.

**3. Do you agree with the Council's position on the provision of military service families' accommodation following the publication of the Army Basing Plan?**

3.1 The Council's position on the provision of military service families' accommodation is generally supported. However, no indication is given on the specific reduction of the current provision of 1,440 dwellings.

**4. Do you agree with the Council's approach to updating its Gypsies and Travellers Accommodation Assessment?**

4.1 No comment.

**5. Do you agree with the proposed changes to the Local Plan Core Strategy identified at paragraph 5.2?**

5.1 The general conclusions are supported. However, as stated in paragraphs 1.4 – 1.5 above, Richmond is considered to be able to accommodate growth at land to the south of Green Howards Road.

5.2 The introduction of a strategic review programme with a five year cycle has been supported by the Planning Inspectorate (e.g. Ryedale District Council – The Ryedale Plan: Local Plan Strategy – Inspectors Report: August 2013); however, a commitment to an early review of the Core Strategy is considered to be evidence that the Council is not looking to meet their "objectively assessed needs". The difficulties, especially the likely release of further projections in May 2014, indicate that this is a pragmatic proposal and is therefore supported as an effective way to monitor, implement and review the LPCS.