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Mr John Hiles,
Richmondshire District Council,
Swale House,
Frenchgate,
Richmond,
DL10 4JE

27th September 2013

Dear Mr Hiles,

**Re: Development Target Review – Representations on behalf of Mr T. Milbank & Mr M. Tennent**

I write to provide representations on behalf of Mr T. Milbank & Mr M. Tennent on the Development Target Review published by Richmondshire District Council in August2013.

Any decision to reduce the housing target to the level suggested by the CLG interim mid-2011 household projections (80 homes per year) would have a significant negative consequence on future housing provision in the District. Fundamentally it will result in the Council not being able to meet the objectively assessed housing needs of the area, thereby denying residents access to a decent home and preventing economic growth.

Notwithstanding this, it is noted that the Development Target Review recommends that the development target should not be changed from that outlined in the Core Strategy Submission Draft and whilst our client supports this approach over a significantly reduced target they maintain the view that a significantly higher target is required.

The Council in the overall housing requirement need to take into account the 'pent up' demand or the 'backlog' for additional housing resulting from low levels of affordable and market housing delivery over recent years.

The NYSHMA demonstrates, that taking into account existing need (i.e the'backlog') and future requirements, an average of 260 affordable dwellings per annum would need to be delivered over the next 5 years. Once the backlog is cleared the affordable housing need alone would be for around 156 dwellings per annum (net) – almost the same as the total housing requirement being sought by the draft Core Strategy. Presuming that that 180 (net) new dwellings are delivered per annum and are complaint with Policy CP6 (Providing Affordable Housing) this will deliver 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, the proposed 180 dwellings per annum would only deliver 45% of the future affordable housing requirement (net) over the plan period.

The housing requirements set out in Policy SP4 should be increased significantly for the first 5 years of the plan (to address the affordable housing backlog) and then can be reduced to a lower level (higher than current target) thereafter for the remainder of the plan period to address affordable and market needs.

A significantly increased development target, coupled with the affordable housing requirement as set out in Policy CP6 (Providing Affordable Housing), will allow for the Core Strategy to meet the full, objectively assessed needs for market and affordable housing in the housing market area in a manner which is consistent with the policies set out in the National Planning Policy Framework.

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 Council's Local Plan and draft housing target **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.**

If you require any further information or clarification please do not hesitate to contact me at the above address.

Yours Sincerely,

Steven Longstaff
**Principal Planner**