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John Hiles
Planning Policy Officer
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By email only

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Dear Mr Hiles

Examination of the Richmondshire Local Plan: Core Strategy

Following your letter of 3 May and your more recent meeting with my Programme Officer Emma Lundberg, I consider it necessary to hold a preliminary hearing focussing on whether the level of new housing proposed is the most appropriate.

As submitted, the Core Strategy plans to deliver an annual average of 180 homes. You have indicated that the Government's recent statistical release setting out household interim projections for 2011 to 2021 suggests an annual growth in households in the order of 80. There is some degree of difference here.

I understand that the Council wishes the examination to proceed on the basis of the submitted housing figures. Setting the most appropriate strategy for housing delivery is one of the most fundamental issues a Local Plan must address. It is a matter which can influence many others, including key factors such as the basis for the spatial distribution of growth and the provision of necessary infrastructure.

I am sympathetic to the position the Council finds itself in. These circumstances could not have been foreseen. However, as things stand, my examination is faced with local evidence pointing to higher housing growth and more recent national figures indicating a substantially lower level. This is problematic, to say the least, and the anticipated publication of the final national projections in May 2014 is a further complication.

Consequently, given the potentially critical nature of the level of new housing to the plan, I have decided to hold a preliminary hearing focussing on this issue ahead of scheduling hearings on other matters for examination. Part of my aim here is to avoid the considerable effort and expense to the Council and others of holding a full suite of public hearings unless the Core Strategy stands a reasonable chance of being found sound on this point.

I have set out previously my concerns in relation to accommodation for Gypsies and Travellers. In short, the evidence base is not sufficiently up-to-date and this element of the Core Strategy falls some way short of the requirements set out in *Planning for Traveller Sites*. At this stage, the response you have given does little to persuade me otherwise. It appears that the Council is not minded to follow my earlier

recommendation that further work be done to properly address the Government's expectations. Given this position, the preliminary hearing will also include discussion on this issue.

I ask the Council to prepare a detailed (but concise) paper addressing the two issues. Obviously, the paper should unambiguously state the reasons why the Council considers an annual average of 180 dwellings to be the most appropriate option. It should also set out the sustainability credentials of the alternative indicated by the national interim projections. If this level of housing has not been subject to sustainability appraisal (SA), then this will need to be done. A comparison should be drawn between the SA outcome for the proposed level of housing and that for the lower level indicated by the interim projections. In relation to the national and local projections, an explanation of the assumptions behind the various 'headline' figures presented will be helpful. Commentary on the reliability of the underlying assumptions will also be of assistance.

In addition, I would particularly ask that the paper addresses the relationship between the overall housing figures and the Ministry of Defence plans for housing at the garrison sites. The relationship between the revised population/household projections and the need for affordable housing will also need to be clearly explained, as will the wider implications of the population/household figures on other aspects of the plan. The paper should also cover any implications that the revocation of the Regional Strategy may have on the overall level of housing sought and the evidence justifying it.

With regard to accommodation for Gypsies and Travellers, the paper should either explain how the requirements of *Planning for Traveller Sites* have been met or set out a schedule and timetable of work to be undertaken to ensure that they are. I strongly recommend the latter.

It is my intention that your paper and my questions from it should form the basis for the preliminary hearing, and it will need to be the subject of public consultation beforehand. With this in mind, I would be grateful if you would contact Emma Lundberg with an indication of when your paper will be ready for publication, and to discuss a potential date for the preliminary hearing.

If, following the preliminary hearing, I am satisfied that the Core Strategy has a reasonable chance of being found sound in relation to these issues, and the Council wishes to continue on that basis, I will then draw up a full schedule of matters and issues for the examination and further hearing sessions will be arranged. For clarification, I do not at present anticipate that it should be necessary for those sessions to return to the matter of the overall level of housing proposed. Your paper and the written evidence produced during the consultation leading up to the preliminary hearing, and the hearing itself, will provide the opportunity for the Council and all other participants to make representations on that point.

I turn now to other matters which will be relevant if the examination is to continue beyond the preliminary hearing. Firstly, you will be aware that section 112 of the Localism Act 2011 affects the power of Inspectors to recommend changes, now referred to as 'modifications', to a plan. Put simply, Inspectors can only make modifications to rectify issues of legal compliance and/or soundness, and then only when specifically requested to do so by the Council. Your letter of 3 May suggests that you intend to put forward modifications. That being so, I would be grateful if you would request in writing that my report recommends the main modifications you

suggest throughout the examination process, where necessary to make the plan sound.

In addition, I am not clear as to whether the revocation of the Regional Strategy is a matter on which participants have so far had the opportunity to comment. It appears that they have not, but I would again be grateful if you would confirm the position on this point.

If you have any questions in relation to procedural issues or any of the matters raised in this letter, please do not hesitate to contact me through my Programme Officer. I look forward to hearing from you in relation to the timescale for your paper and possible dates for the preliminary hearing at the earliest opportunity.

Yours sincerely,

Simon Berkeley

Inspector