

Simon Berkeley
The Planning Inspectorate
c/o Emma Lundberg
Programme Officer
Swale House
Frenchgate
Richmond
DL10 4JE

(By email)

Your Ref:
My Ref:
Dealt with by: John Hiles
Planning Policy
Typetalk: 18001 01748 827025
3 May 2013

Dear Mr Berkeley

Examination of Richmondshire Local Plan Core Strategy

I have attached our responses to your initial questions, which I hope provides further background to our local context.

You asked about the impact of the recently published interim 2011 based household projections. Although we respond in detail later, we would appreciate your guidance on how we should proceed. This latest projection is so different that it would be prudent to better understand how ONS and as a consequence CLG have arrived at this position. Our demographic experts will provide recommendations early next week to enable us to plot a course of action.

I have attached two further documents as background to some our responses. These are:

- Draft Land Availability Assessment update
- Draft Affordable Housing Supplementary Planning Document

Yours sincerely



John Hiles
Planning Policy Officer
John.Hiles@richmondshire.gov.uk
Tel. 01748 827025

Richmondshire District Council
Swale House, Frenchgate, Richmond, North Yorkshire, DL10 4JE

The plan period

1. The plan provides the Council's strategy to 2028. What is the starting point for the plan period? For housing, is it intended that it covers 2011 to 2028?

We confirm that the plan period starts in 2011 and covers 17 years to 2028. It was extended from the original end date of 2026 in response to the impacts of organisational changes to ensure that the plan covered a full 15 years from its likely adoption.

Housing

Housing in general

2. I understand that the Core Strategy plans to deliver 3,060 new homes to 2028, representing an annual average 180 homes, and that this target stems from the level of need for new homes identified in the Richmondshire Scrutiny of Population Estimates and Projections (2012) 'migration-led revision'. For the avoidance of doubt, is that correct?

Yes this is correct. The Richmondshire Scrutiny of Population Estimates and projections builds on the identification of methodological issues affecting the reliability of the ONS mid 2008 population projections in the North Yorkshire Strategic Housing Market Assessment. The Council has faced major problems with the national estimation and projection of its local population. This is illustrated by the amount successive projections have changed while this Core Strategy has been in preparation:

Base population projection	Population 2021 (000's)
ONS mid 2006	62.4
ONS mid 2008	57.4
RDC local projection	51.9
ONS mid 2010	50.9
ONS mid 2011 (interim)	49.6

The modifications to the ONS mid 2010 projection methodology prior to the Census, 2011 Census results and the interim household projections have justified our concern.

3. You will be aware that the Government has recently published a statistical release setting out household interim projections for 2011 to 2021. Do these figures show a different level of housing requirement in Richmondshire than the 3,060 planned for in the Core Strategy? If so, what is the difference involved?

Examination of the raw CLG results from the 2011 interim household projections indicates that the number of households in Richmondshire will grow from 20,800 households in 2011 to 21,600 in 2021, if underlying assumptions are realised. This represents a growth of 800 households in 10 years or 80 each year. Although we can be reasonably confident about the 2011 derived base population for these projections, it is, perhaps, premature to consider a radical review of the District housing target until the final projections are published, but this is not likely to be until May 2014. We have asked the authors of the Richmondshire Scrutiny of Population Projections and Estimates to assess the reliability of the interim mid 2011 projections and also to assess the need to refresh the local projection in the light of 2011 Census results and are currently waiting for their recommendations and costs. If this continues to support the reduction indicated in the mid 2011 interim projections then it may be necessary to review Spatial Principle 4 to ensure that it continues to provide a realistic base for local planning.

These latest interim household projections raise a number of questions that run through the whole Core Strategy. Although we would not anticipate changing the shape of the overall strategy, detail decisions would need to be made about the scale and distribution of development. How should we progress with the examination, if the detailed assessment does enable a justifiable reduction of the housing target of the scale indicated?

4. It may be that I am missing something, but I am unclear about the expected rate of housing delivery through the plan period. The plan should explain the rates of delivery anticipated for both market and affordable housing, and illustrate this through a housing trajectory. Does it?

The housing trajectory is implicit in the Core Strategy and perhaps should be made more visible as illustrated in the Table and graph below. It should be noted, on reading this table, that we have taken the same approach to setting the housing target for Richmondshire as the now revoked Regional Spatial Strategy. This means that it is a whole District target, rather than one set specifically for the smaller plan area with a population that is about four-fifths of the District total. This is also reflected in the Core Strategy's approach to housing in rural areas particularly in the Lower Wensleydale Sub Area Strategy and the role of Leyburn as a service centre for an extensive and remoter rural area extending into the National Park. That said, housing is built in the National Park and this is acknowledged in the performance of the Core Strategy.

Table 1: Historic Annual Net Completions

	Historic Annual Net Completions Pre-CS Period								Annual Net Completions CS Period	
	2004/5	2005/6	2006/7	2007/8	2008/9	2009/10	2010/11	Total	2011/12	2012/13
Total	157	256	122	193	56	40	38**	824	227	67*
Open Market	138	228	62	152	27	30	39**	637	118	59*
Affordable Housing	19	28	60	41	29	10	41**	187	109	8*
% Affordable	~	~	~	~	~	~	~	22.7%	~	~
National Park	3	21	20	-5	0	-17	-10	12	20	9*

Table 2: Projected Net Completion for remainder of plan period to 2028

Year	Projected Net Completions														
	13/14	14/15	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28
Total	189	189	189	189	189	176	176	176	176	176	176	176	176	176	176
Open Market	136	136	136	136	136	127	127	127	127	127	128	128	128	128	128
Affordable Housing***	53	53	53	53	53	49	49	49	49	49	48	48	48	48	48
National Park****	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5

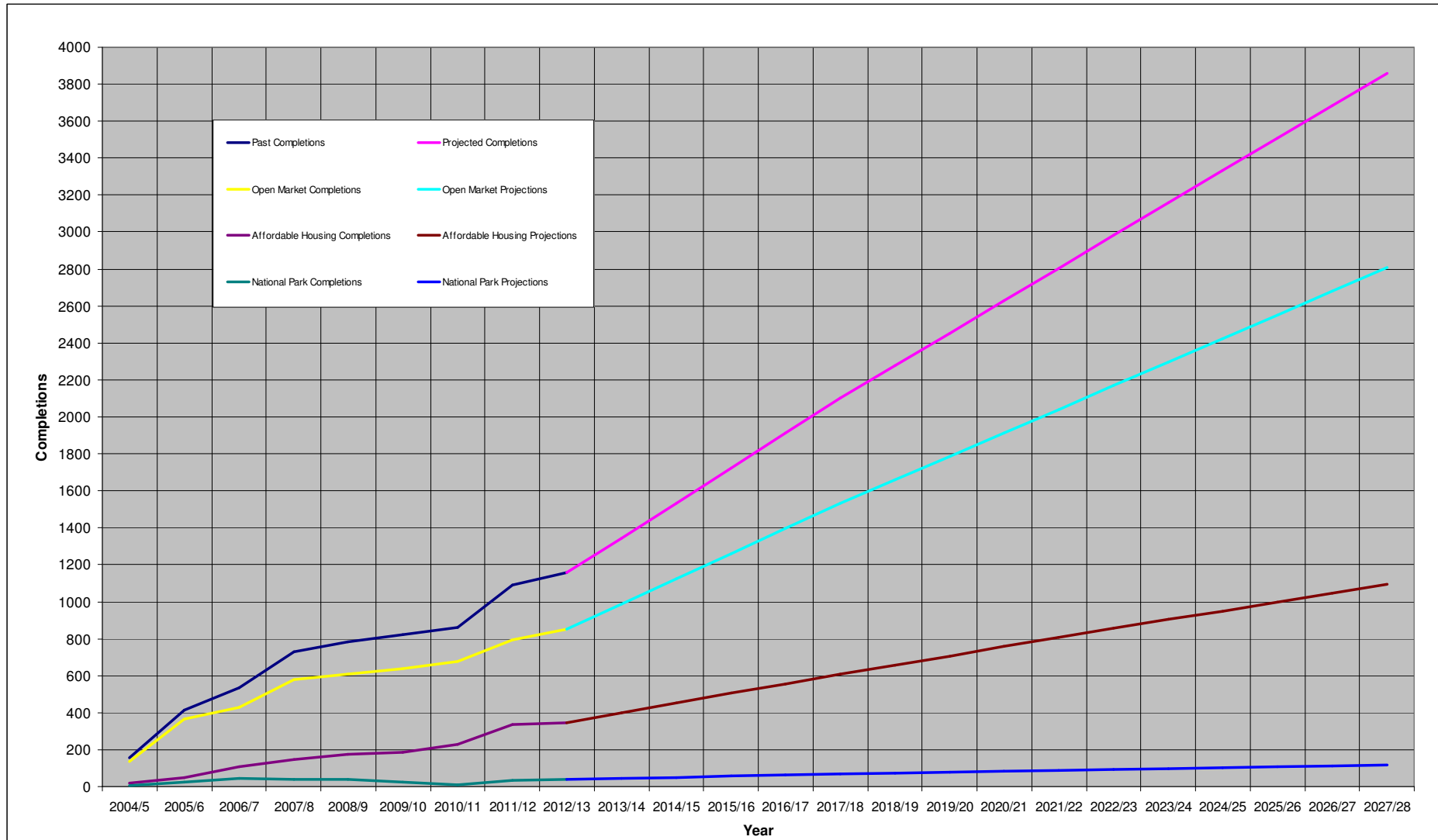
* Working Figure - Data Lag - Further to input

** Includes 42 dwellings demolished and 27 dwellings re-instated at Lyle Close, Richmond in 2011/12

***Affordable Housing Target = SPG expectations

****National Park Projections based on past completions average

Figure 1: Housing Trajectory (Cumulative)



5. Paragraph 47 of the NPPF requires that a supply of specific deliverable sites sufficient to provide five years worth of housing be identified, with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition. A 20% buffer is required where there has been a record of persistent under delivery. Given the performance against the (now revoked) RS and the Council's Local Strategy Statement as noted in the AMR (December 2012), should the 20% buffer apply in Richmondshire? Overall, I would be grateful for clarification about the housing land supply position.

A copy of the updated 5 five year land supply is attached. There is excess capacity in this for two reasons the first is that it was prepared in anticipation of the need to demonstrate a 20% buffer. The second is more practical, examination of the relationship between permissions granted and homes delivered shows that a probability must be attached to even the most deliverable sites with planning permission.

The judgement over sustained under delivery and the setting of a 20% as provided for in NPPF para 47 is problematic. A number of issues question the use of Richmondshire's RSS target of 200 homes per annum to assess actual housing delivery. First, the RSS target was for the whole District and not the smaller plan area. The plan area's smaller population is about four fifths of the total District suggesting a simple arithmetic reduction in the target to ensure that monitoring against the district wide target does not misrepresent the smaller LPA. Second, previous over projection has been confirmed in the revision of ONS projection methodologies and the latest results from the interim mid 2011 projections indicating that the growth potential modelled into the RSS was over optimistic. Third, an amount of the proposed RSS delivery was assumed to come from the reinstatement of vacant accommodation. This assumption originated from an unusually high vacancy rate observed in 2001 Census. Detailed analysis shows that this vacancy rate was due to changes in military accommodation and the release of a large number of homes to the open market. All of these homes had been reinstated by 2004 effectively reducing the target by 30 homes per annum to 170. Taking these issues on board, the housing trajectory set out in response to Q4 suggests that on average the plan area has actually performed well and should not need to apply the 20% buffer to its land supply.

The publication of the interim 2011 based household projections now add a further complication to this argument, because the level of the future housing target may need to change. If it is reduced further then the excessive growth expectations of the RSS target become more evident and the buffer, if required, will also be quantitatively reduced.

Affordable housing

6. It is clear that meeting the need for affordable housing is something of a challenge in Richmondshire. As I understand it, it is anticipated that the implementation of Core Policy CP6 would deliver an annual average of 71 affordable homes throughout the plan period, against an annualised need of 249. I anticipate the Council's position to be that aiming to meet the identified need for affordable housing in full in would be unrealistic.
7. I must indicate that, at this stage, I have some doubts about the deliverability of even the lower level of affordable housing sought. It appears that the plan relies on Core Policy CP6 in this regard. This policy seeks an affordable housing contribution of 30% to 40% from all new homes, including single dwellings. While I note the content of the viability assessment, is there a risk that Core Policy CP6 may cause viability problems? Is this why the policy sets the requirements 'subject to economic viability assessments'? If so, how acute does the Council consider the risk to be? Is there a contingency in the event that Core

Policy CP6 either prevents market housing schemes going forward or fails to realise the level of affordable housing sought?

It would be unrealistic to take the annualised figure from the SHMA at face value and compute an implicit housing target from it as has been done in a number of representations. If, for example, the figure of 249 was delivered at the rate of 30% of all housing this would require an annual target of 830 homes to be built or 14,110 up to 2028. Assuming a household size of 2.0, to reflect declining average household size over the plan period, this would increase the Richmondshire population by 28,220 or nearly 50%. All current population projections suggest a much lower rate of change in the population meaning that such a substantial increase would have to come from a substantial increase in inward migration. Richmondshire has witnessed such levels of growth historically. The first was at the height of the lead mining industry in the eighteenth and early nineteenth centuries and later the creation of Richmond Camp, subsequently Catterick Garrison in 1915 at the height of the First World War and again in the Second World War. The level of migration required would need significant economic drivers to stimulate it. Without these economic drivers this level of migration would promote unsustainable patterns of movement or a substantially retired population creating additional problems for support.

The estimate of housing need from the North Yorkshire SHMA needs to be looked at critically. The estimate has not translated into pressure on services involved with the actual provision of affordable homes. Local housing needs surveys conducted since 2004 by the rural housing enabling service identified an initial need for 170 homes which translated into just 63 homes occupied. Over the same period, homelessness presentations and housing enquiries to the Council's Housing Options Team show much lower levels of unresolved need than suggested in the SHMA estimate.

The SHMA estimate of housing need includes those who cannot afford a home in the Richmondshire housing market. The SHMA does make it clear that the affordability gap starts much higher in Richmondshire than criteria for access to social rented housing or intermediate tenures. This reflects a major structural problem for the Richmondshire housing market in the availability of lower range market affordable housing rather than subsidised housing. The concentration of development in the Catterick Garrison area will provide a range and volume of market affordable housing that is in very short supply in the local housing market. However changes in mortgage finance may also have improved individual household's prospects to access mortgage finance since the SHMA was drafted.

Core Policy CP6 intends to be consistent with the Blyth Valley judgement which requires local planning authorities not to set unviable planning obligations. The general assessment of viability prepared by Three Dragons (Richmondshire DC Economic Viability Study, 2011), was based on a range of existing developments to test the range of likely development types in the plan area. Apart from certain areas in Catterick Garrison and certain development types, this indicated that the affordable housing contributions were reasonable. But we recognise that all sites vary and as a consequence expect that contributions from individual sites will be negotiated. The approach taken therefore sets a reasonably higher target that can be negotiated when necessary rather than set a lower average target which would automatically reduce potential contributions from higher value areas. Recent site appraisals in Catterick Garrison have in fact yielded much higher levels of viability than had been anticipated in the general assessment.

The table below demonstrates recently negotiated affordable housing contribution percentages in Catterick Garrison

Site Name	Size (homes)	Location	Affordable Housing Contribution (%)
Hipswell Croft	70	Hipswell	38
In-Pipes Products	47	Colburn	17
Colburndale	250	Colburn	30
Gatherley Road	250	Brompton on Swale	30

The figure of 71 represents a theoretical maximum level of delivery assuming all sites provide for the maximum level of contribution. The Council expects that some sites will not deliver this level of contribution as identified in the Affordable Housing Viability Assessment (2011) and estimates that the overall level of delivery will average 50 homes each year. This also reflects the reduction seen between local surveys of affordable housing demand and the number of actual households coming forward to access new homes when built.

Therefore the risk of making sites unviable is mitigated by rigorous assessment as proposed in draft guidance (see Q8). The risk of failing to deliver the expected level of affordable housing has been reduced by the application of Core policy CP6 to all housing development including single dwellings. This increases the potential supply over the previous approach and provides the Council with the flexibility to invest in more effective developments to address local housing need.

8. I note from paragraphs 4.6.9 and 4.6.15 of the plan that a number of matters, including calculating commuted payments, exceptional developments, tenures, local occupancy conditions, and the conditions under which cross-subsidy will be permitted are intended to be devolved to a Supplementary Planning Document (SPD). The Town and Country Planning (Local Planning) (England) Regulations 2012 are more restrictive about the content and function of SPDs than was previously the case. I draw to your attention to Regulations 2, 5 and 6 which, taken together, indicate what an SPD can and cannot contain. It seems to me that, among other things, SPDs cannot make statements on the development and use of land, or contain development management policies intended to guide the determination of applications for planning permission. Would the SPD meet the Regulations in this regard, or should the matters intended for inclusion in it, or some of them, be part of the Core Strategy or another Local Plan document?

We have drafted a document designed as an SPD (copy supplied), which at this stage could be taken forward as either a DPD as defined in regulation 5 or an SPD or split appropriately to provide any necessary elaboration of Core Policy CP6 supplemented by guidance. We have found the Regulation 2I definition of an SPD ambiguous in that it seems to define one in the same way as a DPD in all but name. The crux of the decision on a way forward seems to rest in Regulation 5.1iii, 5.1iv and also NPPF paragraphs 153 and 174.

NPPF para 153 indicates that an SPD should enable successful applications and not be used to add unnecessarily to the financial burdens on development. NPPF para 174 develops this with considerations of viability and deliverability. It indicates that affordable housing requirements should be in the Local Plan and that the impacts of supplementary planning documents and other policies designed to support the Local Plan should be assessed. Clearly there is an expectation for non DPD documents to support policy implementation and hence decision making. The proposed document meets the requirements of para 153 in that it provides the tools for applicants to meet Core Policy CP6's requirements for affordable housing. It also details exceptions to the policy and

provides scope to negotiate lower contributions. Since the document is also an economic viability tool it is by design responsive to economic cycles, as expected by para 174, and should not through its lifetime create unnecessary burdens for applicants. Regulation 5.1iii provides the substance for Regulation 2's definition of an SPD. Regulation 5.1iv requires development management and site allocations policies intended to guide the determination of planning applications to be included in the Local Plan. What seems to be unclear is the division between policy and supporting guidance which can be used as a material consideration in the determination of a planning application (NPPF Annex 2). Policy CP3 (Affordable Housing) of the recently adopted Winchester Core Strategy shows how this problem has been resolved in a sound Core Strategy examined under current regulations. It was submitted for examination in June 2012 and adopted in March 2013. This policy is similar in form to Core Policy CP6 and its supporting text refers to the provision of further guidance on implementation in a detailed Supplementary Planning Document. This example suggests that the balance between policy and guidance is towards a concise core policy supported by a published assessment methodology. It may be helpful for some parts of our proposed guidance to be included in the Core Strategy, but other parts would need to remain flexible to be able to move with market conditions or refer to regular market reassessments.

Accommodation for Gypsies and Travellers

9. Paragraph 3.1.31 of the Core Strategy reflects the need for three additional pitches identified in the Gypsy and Traveller Accommodation Assessment (GTAA). But it does not give any commitment to delivering these pitches, or set any targets. In any event, the GTAA was undertaken in 2007 and 2008 and only considers additional need to 2015. In short, it is not up-to-date and the evidence it provides falls considerably short of the plan period. As things stand, unless I have missed something, this element of the plan is not sound.
10. It is incumbent on the Core Strategy to ensure that the accommodation needs of Gypsies and Travellers are properly addressed. Policy B of *Planning for Traveller Sites* says that local planning authorities should set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs in their area, working collaboratively with neighbouring local planning authorities. It also says that in producing their Local Plan, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets. There is a clear need for further work here.

The approach we have taken reflects the scale of the issue in the Local Plan Area. Routine review of evidence shows that there has been no demand for the three pitches recommended in the 2007 GTAA. This covers homelessness presentations, planning applications, enforcement action and advice from local travellers' representatives. Neighbouring GTAAs (DBC, HDC) do not identify demand for Richmondshire locations from their larger resident traveller and showman communities.

The annual Appleby Fair temporarily increases demands for transit sites along traditional routes. Through Richmondshire these are Wensleydale for smaller and horsedrawn vehicles and along the A1 and A66 for vans and trailers. Durham County Council provides transit arrangements along the A66 corridor and the green at Bainbridge in the Yorkshire Dales National Park has been used as a temporary transit site for several years.

The main travellers' site in the local plan area is located at Lime Kiln Woods near the A1 outside Catterick Village. Its normal occupancy rate is below capacity and it has expansion space if required. The site manager confirms that there is no unmet need from families using this site either for transit or longer term requirements. A commitment to the expansion of this site could be made in Spatial Principle 4 similar to the commitment to military requirements.

Economic development

11. I am not sufficiently clear about the plan's approach to economic development. I would be grateful if you could provide detailed explanation on this issue. In particular, please could you detail in your response to this letter how and where the submitted version of the Core Strategy:
 - a. sets out the quantitative and qualitative needs for land or floorspace for all foreseeable types of economic activity, *including retail and leisure development* (see paragraph 161 of the NPPF); and
 - b. indicates how the district's overall need will be met and explains the plan's intended spatial distribution of land or floorspace for economic development, including retail and leisure development.

12. The point here is that the strategy must be clear about what will or will not be permitted and where (see paragraph 154 of the NPPF). This is essential both for determining planning applications and for providing an unambiguous steer to the allocation of sites for economic development. At present, I am concerned that the plan may not be sufficiently explicit for these purposes. This is a fundamental issue and a critical soundness matter.

The Council's approach to local economic development reflects its understanding of local conditions and the local rural economy in particular, as such the Core Policy takes its approach from NPPF para 28. The overall approach to economic development comprises:

- Spatial Principle SP3 : Rural Sustainability
- Spatial Principle SP5 : Scale and Distribution of Economic Development
- Central Richmondshire Spatial Strategy
- Lower Wensleydale Spatial Strategy
- North Richmondshire Spatial Strategy
- Core Policy CP4 : Supporting Sites for development
- Core Policy CP7 : Promoting a Sustainable economy
- Core Policy CP8 : Achieving Rural Sustainability
- Core Policy CP9 : Supporting Town and Local Centres
- Core Policy CP10 : Developing Tourism

Together these reflect both the options and opportunities that exist in the local plan area where the local economy is characterised by a high number of very small scale businesses that are predominantly service sector or land based, neither of which are amenable to the allocation of employment land for traditional employment uses. The Core Policy directs employment development to existing centres where capacity exists and constraints can be overcome. Leisure and retail development will be satisfied by the proposed Catterick Garrison Town Centre, for which a planning application is expected imminently.

The conventional approach to broad allocations of employment land, in the currently adopted Local Plan, did not lead to a step change in the scale and distribution of the types of local employment and industry. The Employment Land Review update (2012) points to the long standing lack of interest in a number of employment sites. Colburn Business Park, a major and well located employment site was built prior to the current recession and failed to attract the target businesses even in more affluent times. A significant factor in this was the misplaced expectations about the role of the Army as an economic driver. It is clear from experience and the Impact of the Military in North Yorkshire (2011) study that the expected economic affects failed to materialise due mainly to the nature of centralised procurement and the accommodation of main contractors in MoD property.

Consistent with NPPF para 22, the oversupply of employment land and the high level of vacancy in existing stock has lead the Council to change its approach to two large employment sites. One of these now has permission for major housing development including local retail and employment facilities. The other is a former Ministry of Defence site and has been included in the DCLG Public Land Auction pilot, again for housing. Both of these contribute to efforts to stimulate local economy through housebuilding and housing for local people.

The Central Richmondshire Spatial Strategy and Core Policy CP9 pave the way for a new Catterick Garrison Town Centre built to fulfil deficits in the local and retail offer. This project has been developed in partnership with the Ministry of Defence and developers are currently engaged in final public consultation ahead of a planning application. The town centre application will provide a significant economic boost and will also benefit from the reintroduction of proposals to upgrade the A1 through Richmondshire.

We have engaged with LEP to fund essential local infrastructure but this was unsuccessful because the expected rate of housing delivery was below its requirements for recycling of funds. The LEP has also recently commented that the scale of the Richmondshire economy and its ability to grow is much less due to the nature of local businesses. (Andrew Leeming LEP, partnership manager, Northern Echo 1/5/13).

Responding to climate change

13. Core Policy CP1 'supports and encourages' the generation of renewable and low carbon energy. This sentiment is reflected in the supporting paragraphs. This is a rather passive approach. The NPPF says that local planning authorities should have a positive strategy to promote energy from renewable and low carbon sources. It says that Local Plans should include strategic policies to deliver the provision of energy, including heat. I am concerned that, at present, the Core Strategy may fall short of these expectations. What does the Core Strategy do to realise the district's potential for renewable electricity (as noted in paragraph 4.1.7 of the plan)? Should the plan be more specific about the types of renewable and low carbon energy generation schemes anticipated, and indicate broad locations for such developments?

NPPF para 97 is concerned with the promotion of low carbon and renewable energy. This paragraph covers the need for a positive approach that is appropriate to local conditions including the mitigation of local impacts. Core Policy CP1.1 a-c is concerned with the promotion of energy generation and is fundamentally based on an assessment of realistic potentials in the local area, seeking to promote these where they are viable and appropriate. In addition the Central Richmondshire Spatial Strategy 5e directs developers to the single greatest potential for district heating in the plan area. The broad locations of search for potential developments are indicated in the Energy Opportunities Plan (Figure 22 of the Richmondshire Local Plan Renewable and Low Carbon Energy Plan, August 2012). This map had not been included in the Core Strategy to enable it to be revised. This approach is similar to that taken in the Central Richmondshire and Lower

Wensleydale Spatial Strategies which identify areas of search for large scale development. The Delivering Development DPD expects to provide allocations for development and other map based policies.

- 14 Do the Code for Sustainable Homes levels and BREEAM standards required by Core Policy CP1 go beyond existing national mandatory controls, including those in Part L of the Building Regulations? What evidence is there to demonstrate the viability of the Code for Sustainable Homes levels and BREEAM standards set out in Core Policy CP1? Is there any evidence to demonstrate that these levels are viable across the district?

The general viability assessment (Affordable Housing Viability Assessment, 2011) calculated the added cost of Code Level 4 but did not recalculate the viability assessment to assess the impact of Code Level 4. The draft CIL viability Assessment (2012) did assess build costs to deliver code Level 4 and Core Policy CP6 requirements for affordable housing. It showed viable modelled margins enabling CIL contributions to be considered. The draft CIL viability study was a joint project lead by Hambleton District Council. HDC has recently consulted on a draft charging schedule based on the same methodology. This has raised issues about some of the assumptions made and we are seeking advice from the consultants about the impact of this.

Again the Council recognises that sites in Richmondshire are very varied and scope for negotiation needs to be maintained. Core Strategy para 4.1.13 recognises the potential impact of this on certain developments and recommends an open book approach to the resolution of any viability issues.

Having looked closely at this aspect of CP1 we think that the current wording of CP1.2b is potentially ambiguous. On the one hand it requires all new residential development to conform to CSH4 but then applies a more flexible approach to developments of 10 or more dwellings seeking consideration of improvements in excess of Building Regs. The more flexible approach is proofed against changes in the Building Regulations and is not tied to a fixed and voluntary standard that may change. However, it does not seek any more than an energy statement and demonstration that additional savings have been considered. The resolution to this problem seems straightforward. CSH4 is dropped and the flexible approach is increased to all residential development, subject to viability assessment, which would be carried out anyway to calculate affordable housing contributions. We suggest that the limit on commercial development is maintained to avoid undue burden on smaller businesses.

- 15 For clarification, please can you explain how the Strategic Flood Risk Assessment has informed the spatial approach to new development, particularly housing. How does the plan follow the sequential approach – does it steer development to areas with the lowest probability of flooding? Is it envisaged that areas in Flood Zone 1 will need to be developed?

The Core Strategy provides an overall vision and strategy for development in the plan area but does not make any specific site allocations. The Delivering Development DPD will allocate land for development and the sequential approach to flood risk will be applied as part of the process to assess sites.

The SFRA Update (2010) does show that most settlements identified within the SP2 settlement hierarchy contain some flood risk areas. But, the SFRA Update (2010) mapping shows that not one of these settlements is located entirely in Flood Zones 2, 3a or 3b offering options for development. This mapping also demonstrates, through the inclusion of sites from the Strategic Housing and Land Availability Assessment (SHELAA), that there is enough land in the settlement hierarchy without significant constraints (such as being within Flood Zones 2, 3a and 3b) to accommodate the amount and distribution of development proposed in the Core Strategy. This is evidenced by Tables 9.2, 9.3 and 9.4 (pgs 126-136) of the SFRA Technical Report (2010) which outline respectively the SHELAA sites that are located in flood zones 1, 2 and 3. A total of 7 SHELAA Sites were identified as being located in flood zones 2 and 3. Two Sites 31 and 141 are incorrectly labelled with the proposed land use of housing rather than employment which is their proposed land use in the SHELAA. Sites 35, 36 and 78 were discounted from the SHELAA due to the risk of flooding. The risk of flooding on sites 142 and 143 was acknowledged and the sites were placed in the 11-15 years reserve supply list. A further 7 sites were identified as having margins in flood zones 2 and 3 in table 9.3 of the SFRA Update (2010). Site 22 was discounted for other reasons. All other sites in table 9.3 were included and flood constraints on parts of these sites were acknowledged. This demonstrates that the SFRA (2010) was taken into consideration in the completion of the SHELAA and also a sequential approach relating to flood risk along with the incorporation of other factors was completed in the creation of the timeline for the likely bringing forward of sites for development. This is a task that will be repeated in the allocation of sites in the Delivering Development DPD and subsequent updates of the SHELAA as required by NPPF.

The Strategic Direction of Growth Papers for the Garrison area (Hipswell, Scotton and Colburn), Richmond and Leyburn also considered the main constraints to development and particularly the risk of flooding. Although this was not made explicit, the sequential approach was incorporated in identifying the preferred strategic development areas. These areas are not allocations but areas of search for suitable sites that would be considered under the Core Strategy policy framework including Core Policy CP1. They are also significantly larger than the amount of land required to meet development targets, providing enough choice to enable areas at risk of flooding to be avoided.

The Core Strategy (Para 4.1.20, p58) does also make explicit reference to areas of particular flood risk that are identified in the SFRA (2010) including the Catterick Village and Scorton areas and Gilling West. A flexible approach to the identification of the expected distribution of housing development has been adopted in SP4. An example of this is the expected delivery of 240 homes during the plan period across the Central Richmondshire primary service villages of Brompton on Swale, Catterick Village and Scorton rather than an explicit figure for each. This approach, in co-ordination with the application of other policies in the document, principally CP1 and CP4, aims to ensure that development is steered away from flood risk areas in accordance with the NPPF, the SFRA and their successors.

Para 4.1.20 (p58) also requires all new housing proposals of 1ha or more in Flood Risk Zone 1 and all housing proposals in Flood Risk Zones 2 or 3 to carry out a flood risk assessment in order to comply with CP1 and the NPPF. It will also ensure that all applications in the Catterick Garrison Strategic Development Area must include assessments to determine the most vulnerable areas to flooding and demonstrate an appropriate strategy to protect and mitigate against potential impacts.

Monitoring

16. Many indicators in the monitoring framework do not include any specific numerical targets. Why is this? Why does it not include any trigger points or actions to be taken in the event of targets not being met? In this absence, is it clear how the progress towards delivering the strategy's aims and objectives will be measured, and how and when any contingency plans would be triggered?
17. For every aim set out in the framework, please explain what the target is, what the trigger point is for action to be taken and what contingency plan would be put in place.

Ultimately the Core Strategy should be responsive to underlying social and economic trends that affect local growth and local need. It should respond to indicators of a sustained departure from its strategy by modifying its strategy. It is ironic that, at this early stage in the examination, we are faced with understanding a potentially major departure from working assumptions caused by the recent publication of interim national statistics. Annual land supply updates will provide ongoing indications of the direction of travel against main development targets as will the contents of Annual Monitoring reports. But, year on year changes are likely to be variable, as has been witnessed by housing delivery since 2004. We also face a basic statistical problem in that small changes in absolute terms can appear disproportionately large. Therefore, the Council expects to monitor the cumulative impacts of the Core Strategy and assess performance at 5 year intervals to ensure that underlying trends are sufficiently evident for reliable interpretation. We have set out, in paragraph 5.30, our range of responses to variations in performance and should add in to this the programme of review.

For quantitative target setting to be effective there needs to be a direct relationship between the object of the target and the resources deployed to influence it. The Council has set targets for all of the variables that it has some influence over, but it is unrealistic to expect that numerical targets can be applied to all aims in this strategy and this is not uncommon in other Core Strategies. The Council enables development in a familiar environment in which opportunities, constraints and needs are understood as far as possible. It influences this by identifying an appropriate scale and distribution for local development, which it promotes through identification of land supply, encouraging development and determination of planning applications. In addition, it can use its powers to influence the provision of affordable housing and necessary infrastructure. All of these things it can influence and should set targets that reflect agreed aims and objectives. Outside of its control lies a range of economic, social and political influences that it must understand and respond to, but cannot be expected to influence. The most obvious example of this is the impact on housebuilding rates as a result of the restriction of capital symptomatic of current global financial turbulence. The Core Strategy, through Core Policy CP4 and its sub area spatial strategies, provides greater flexibility to enable a greater range of development proposals to be considered now, but even this approach is reliant on the decisions of investors to commit to development. At the other end of the scale, many of the potentials for growth enabled by the Core Strategy require individual decisions to be made by external agents to exploit them, whether this results in a small scale business improvement or development securing the continuity of a heritage asset. We expect to observe change through the information gathered through the development management process. But, the data required to assess and project these changes would be disproportionately complex and hence expensive to collect compared to the likely scale of change observed.