

Planning Policy,  
Richmondshire District Council,  
Mercury House,  
Station Road,  
Richmond,  
DL10 4JX

SENT BY EMAIL  
localplan@richmondshire.gov.uk  
31/10/2018

Dear Sir / Madam,

## **RICHMONDSHIRE LOCAL PLAN REVIEW ISSUES AND OPTIONS CONSULTATION**

Thank you for consulting with the Home Builders Federation on the Richmondshire Local Plan Review Issues and Options consultation.

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

We would like to submit the following brief comments to selected questions from the Issues and Options consultation. A more detailed response will be provided during later stages of plan making. The industry is keen to work with the Council to ensure a sound plan is produced which facilitates the delivery of an appropriate number of homes across the plan area. Within this regard we would also welcome further engagement with the industry throughout the production of the plan.

### **Strategic Issues and Opportunities**

The HBF generally support the re-wording of: Strategic Issue F to include a '*wider range of tenures*'; Strategic Issue G to *include 'a wider range of employment opportunities*'; and the addition of Strategic Issue L '*addressing the declining and ageing population*'.

### **Vision**

The HBF generally support the proposed vision particularly elements in relation to the provision of market and affordable homes.

### **Strategic Objectives**

The HBF support the objectives to ensure an appropriate level of housing and employment provision which will meet local social and economic needs; and supporting rural sustainability by meeting locally generated needs for both market and affordable housing.

### **Local Objectives**

The HBF supports the local objective which looks for future population and employment growth to be accommodated in line with local requirements and the objective which seeks good quality housing to be provided with an appropriate mix of different sizes, types and tenures.

### **Scale of Housing**

The scale of housing included in the current adopted Local Plan Core Strategy is 180 homes per annum. Proposed options include Option A – 15dpa, Option B – 120 dpa and Option C – 160dpa.

The HBF do not consider that Option A will provide an appropriate scale of housing for Richmondshire. Option A is based on the Standard Methodology. The HBF note that whilst the MHCLG figure is applicable for ten years the Council is proposing to extrapolate this over the plan period. The Council should also be aware that the housing figures provided by the MHCLG standard methodology are likely to change and would not, at present, form an appropriate basis for the scale of housing to be proposed. Planning Practice Guidance (PPG) draws attention to the wording of the Government's response to the revised NPPF which states that *'the Government was clear that reforms set out (which included the introduction of a standard method for assessing housing need) should lead to more homes being built. In order to ensure that the outputs associated with the method are consistent with this, we will consider adjusting the method after the household projections are released in September'*.

The HBF would highlight that the figure generated by the standard method is considered as the minimum starting point and can be exceeded. Within Richmondshire there are a number of considerations that will need to be assessed in relation to an appropriate scale of housing. For example, the standard method relies on past growth trends, which in the case of the Richmondshire has been significantly affected by population change associated with the Army at Catterick Garrison. Other considerations that will need consideration include the implications of the intended increase in the number of military personnel identified in paragraph 2.5.3; and the need to support economic growth. It is therefore clear that in the case of Richmondshire an uplift over and above the Standard Methodology would be considered appropriate.

Options B and C have taken some of these considerations into account including the exclusion of army movements and the need to balance development and economic growth. However, it is not clear why the retention of the existing housing figure has not been considered as a potential option. It is clear that housing can be delivered over and above this rate with 241 dwellings completed in 2016/17. The HBF consider that the Council should consider a higher scale of housing than is currently set out in

the proposed options taking into account potential for economic growth and the potential for positive movements in to the army.

### **Distribution of Housing**

The HBF would expect the spatial distribution of sites to follow a logical hierarchy, provide an appropriate development pattern and support sustainable development within all market areas.

### **Future Engagement**

I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Joanne Harding', written in a cursive style.

**Joanne Harding**

**Local Plans Manager – North**

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