

Matter 2 – Housing and Employment Needs (Policy S2)

Issue 1 – Housing Needs – Policy S2

Methodology for Assessing Housing Needs and the Demographic Starting Point

To determine the minimum number of new homes required, paragraph 60 of the Framework states that strategic policies should be informed by a local housing need assessment, conducted using the standard method in the PPG – unless exceptional circumstances justify an alternative approach.

Q1. In response to the *Inspectors' Initial Questions*, the Council stated that when calculated using the standard method there would be a need for 196 dwellings per year. Is this figure correct, and what would the minimum number of new dwellings be over the plan period?

1. The HBF concurs that the standard method at this time identifies a minimum local housing need of 196dpa. Over the Plan period of 2014 to 2035¹, this would be a total figure of 4,116 dwellings. However, this is only the minimum local housing need and further consideration would need to be given to the circumstances which may identify a higher housing need.
2. PPG (ID: 2A-010) goes on to states that these circumstances can include: growth strategies for the area; strategic infrastructure improvements; previous levels of delivery; or where previous assessments of need (such as the Hambleton Housing and Economic Development Needs Assessment (HEDNA)) are significantly greater than the outcome from the Standard Method. The HBF note for example that the housing completions over the last five years for Hambleton averaged 420dpa and that the HEDNA 2018 suggests that there is an objectively assessed need (OAN) of 315 dwellings per annum (dpa) or 6,615 homes over the period.
3. Since the submission of the Hambleton Local Plan it is noted that the Government have published for consultation on Changes to Planning Policy and Regulations, this includes a new method for calculating the LHN. The new method is considered to align with Government's aspirations for the housing market, provide stability and certainty for all stakeholders and address the issues with the current approach. The HBF note that this new method for calculating the LHN would see a significant increase to the LHN for Hambleton, the HBF calculate the new LHN for Hambleton to be 349dpa². This significant increase is likely to have implications for how quickly the plan will need to be reviewed particularly if insufficient sites have been allocated to create flexibility in supply or insufficient land has been safeguarded for future use.

¹ Or to 2036 as proposed by the Council in their response to the Inspector's Initial Questions which would give a total of 4,312 dwellings.

² Proposed new Standard Method: Existing Stock = 42,422, 0.5% of Existing Stock = 212.11, 2018-based household projections – 2020 = 40,851, 2030 = 42,777, average = 193, Ratio of median house price – 2009 = 7.61, 2019 = 8.96, Adjustment Factor = 1.6475, New LHN = 349.45dpa

The PPG advises that there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method. Circumstances where this may be appropriate include situations where there are growth strategies for an area, where strategic infrastructure improvements are proposed or where an authority is taking on unmet housing needs from elsewhere.

The PPG³ also advises that there may be situations “...where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method.”

The Hambleton *Housing and Economic Development Needs Assessment* ('HEDNA')⁴ was completed in June 2018, shortly before the revised Framework was published in July 2018. The HEDNA uses the 2014-based household projections as the starting point for considering housing need. Table 8 identifies a demographic need for 153 dwellings per annum over the plan period.

Q2. How does this compare with the 2018-based household projections?

4. The 2014-based household projections saw a household increase of 1,494 between 2020⁵ and 2030, whilst the 2018-based household projections saw an increase of 1,926. This does not include any further modelling to allow for migration or adjustments to household formation rates but generally suggests that the demographic starting point is likely to be higher when utilising the 2018-based household projections.

Q3. Paragraph 4.62 of the HEDNA states that “there is a strong basis for taking into account the latest demographic information”. The PPG⁶ also advises that where using an alternative approach to the standard method, this needs to adequately reflect current and future demographic trends. Taking into account the answer to Question 2 above, does the starting point in the HEDNA adequately reflect current and future demographic trends?

5. The HBF consider that the evidence would have benefitted from further consideration of the 2018-based household projections, to ensure that the HEDNA adequately reflects the current and future demographic trends.

Q4. Using the latest information available, what is the demographic-led need for housing in Hambleton? In answering this question, it would assist the examination if the Council could produce a similar table to Table 8 in the HEDNA (page 30).

6. The HBF do not wish to respond to this question at this time.

Adjustments to the Demographic Starting Point

Q5. In calculating the demographic-led need for housing, the HEDNA considers alternative scenarios using 10 and 15-year migration data. What is the justification for

³ Paragraph: 010 Reference ID: 2a-010-20190220

⁴ Core Document SD08

⁵ 2014-based 2020 – 40,070, 2030 – 41,564, 2018-based 2020 - 40,851, 2030 - 42,777

⁶ Paragraph: 015 Reference ID: 2a-015-20190220

this approach? Are 10 and 15-year trends more likely to be representative of what will happen over the plan period?

7. The HBF do not wish to respond to this question at this time.

Q6. What is the justification for considering alternative rates of household formation for the 25-34 age group? What impact does this have on the demographic-led need for housing in Hambleton?

8. Figure 2 of the HEDNA shows the household formation rates in Hambleton, it shows that household formation rates for younger households (25-34yrs) has fallen. The HEDNA identifies research that have considered these changes in formation rates and suggests reasons for it include recession and housing market factors, levels of student debt, impacts of welfare reform, changes in types of employment, and higher numbers of couple households than previously projected, as well as the impacts of international migration on changing household structures. Table 11 provides a range of scenarios for Hambleton including two potential adjustments to the household formation rates either a full return to 2001 for the 25-34 age group or a part return to trend for the 25-44 age group. These two scenarios provide a range of housing need figures from 164dpa to 240dpa, with GL Hearn suggesting a reasonable range of between 166dpa and 235dpa.

Future Jobs

Q7. What is the justification for making adjustments to the demographic projections to account for potential future job growth? What would be the consequences of not planning for future increases in jobs?

9. The HBF are concerned that if the housing figure and the level of economic development are not balanced it could lead to an unsustainable form of development and could lead to an increase in commuting.

In response to the Inspectors' Initial Questions, the Council states that the additional 78 jobs per year (above the baseline forecast by Cambridge Econometrics) were as a result of adjustments to the forecasts based on discussions with North Yorkshire County Council, Economic Development Officers, other local stakeholders and to account for local and regional policies. In particular, the York and North Yorkshire Local Enterprise Partnership ('LEP') seeks to grow employment in agri-tech, engineering, construction, the visitor economy and the bio-economy sectors.

Q8. What specific programmes or policy interventions can the Council point to which justifies the expected increase in employment in these sectors across the plan period? Can the Council point to any evidence which suggests that additional jobs have been created, over and above baseline forecasts, since the HEDNA was produced as a result of such policies or projects?

10. The HBF considers that this is a question for the Council to answer.

Q9. What impact is the Coronavirus ('COVID-19') pandemic likely to have on the forecasts in the HEDNA? Are sectors such as agri-tech, engineering, construction, the visitor economy and the bio-economy expected to see continued growth going forward?

11. The HBF do not wish to respond to this question at this time.

Q10. In response to the *Inspectors Initial Questions* the Council recognises that commuting patterns are likely to change in the future. This would result in either drawing the labour force from other neighbouring areas, or, retaining a greater level of the resident workforce. What implications would this have on the need for additional housing?

12. The HBF considers that this is a question for the Council to answer.

Conclusion

The PPG advises that *“Where a strategic policy-making authority can show that an alternative approach identifies a need higher than using the standard method, and that it adequately reflects current and future demographic trends and market signals, the approach can be considered sound as it will have exceeded the minimum starting point.”*⁷

Q11. Is the alternative approach to calculating local housing needs in Hambleton justified and consistent with national planning policy and guidance?

13. The HBF consider that the local housing need in Hambleton is higher than that identified by the standard methodology. The HBF considers that the HEDNA better reflects the level of need within the Borough than the standard method.

Q12. Is the figure of at least 6,615 new homes over the plan period as set out in Policy S2 (or 315 dwellings per year) sound? If not, what should the housing requirement be for the plan period?

14. The HBF support the Council in using a figure over and above the figure identified by the LHN identified by the Standard Method, however, it is considered that there is potential to increase the housing requirement further.

15. The HBF support the Council in the use of the words ‘at least’ 6,615 new homes, which allows for additional homes over and above the requirement. However, it is considered the policy would benefit from the inclusion of ‘net’ new homes.

Q13. What is the justification for suggested modifications M5 and M9? Are they necessary for soundness?

16. Modification M9 proposes to amend Policy S2 to include additional text which states ‘at least 6,615 net new homes’. The HBF considers that this will add clarity to Policy S2 and would be in line with the requirements of the NPPF⁸ which states that the policy should be clearly written and unambiguous. Therefore, the HBF consider that this amendment is necessary for soundness.

⁷ Paragraph: 015 Reference ID: 2a-015-20190220

⁸ Paragraph 16

Matter 5 – Housing Land Supply (Policy HG1)

Issue 1 – The Five Year Housing Land Requirement

Q1. What is the basic five-year housing land requirement, what is it based on and how has it been calculated?

1. PPG⁹ states that the five year housing land supply is a supply of specific deliverable sites sufficient to provide five years worth of housing (and appropriate buffer) against a housing requirement set out in adopted strategic policies, or against a local housing need figure, using the standard method, as appropriate.
2. As this calculation is part of the examination of the Hambleton Local Plan the HBF have considered the proposed housing requirement of 315dpa, to provide the housing requirement element of the five-year supply. Five years of 315 dwellings would be 1,575 dwellings. It is not apparent whether the 5% or 10% buffer should be applied (as discussed in response to Q2), however, if the 5% buffer were to be added this would give a requirement of 1,654 dwellings (331dpa), whereas if the 10% buffer is applied this would give a requirement of 1,733 dwellings (347dpa).

Q2. Does this include a buffer as required by paragraph 73 of the Framework?

3. Paragraph 73 of the NPPF sets out that the supply of specific deliverable sites should in addition include a buffer. It identifies 3 levels of buffer: 5% to ensure choice and competition; 10% where the Council wishes to demonstrate a five year supply through an annual position statement or recently adopted plan, and 20% where there has been significant under delivery.
4. Significant under delivery is identified by the housing delivery test (HDT), Hambleton have had a HDT score of 230 and 243 in 2018 and 2019 respectively. Therefore, it is not considered appropriate to apply the 20% buffer.
5. The HBF do not know if the Council wish to include the 10% buffer to demonstrate the five-year supply or not, therefore, either the 5% or 10% buffer could apply.

Q3. How does the five-year housing land requirement compare to previous rates of delivery in Hambleton?

6. The HBF have considered the housing land requirement in Q1 and identified a possible requirement of either 331dpa or 347dpa dependent on whether the Council wish to utilise the 5% or 10% buffer. Table 1 below identifies the previous rates of delivery in Hambleton and identifies the average level of completions over the last five years. It shows that both the 331dpa and the 347dpa are below the previous rates of delivery.

	2014/15	2015/16	2016/17	2017/18	2018/19	Average
MHCLG ¹⁰	305	361	546	416	473	420.2

⁹ PPG ID: 68-002-20190722

¹⁰ Numbers taken from MHCLG Table 122: housing supply – net additional dwellings,
<https://www.gov.uk/government/statistical-data-sets/live-tables-on-net-supply-of-housing>

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Hambleton ¹¹	317	367	567	417	475	428.6
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Issue 2 – Housing Land Supply

Q1. When calculating the housing trajectory and supply of housing land, what evidence has the Council used to determine which sites will come forward for development and when? Where is this set out and is it robust?

7. The Housing Assessment Update appears to provide the Council's evidence in relation to which sites will come forward and when. The HBF consider that the information provided within this report is limited and does not always meet the expectations set out in the PPG.
8. The NPPF identifies when a site can be considered deliverable this includes sites which do not involve major development and have planning permission, and all sites with detailed planning permission, unless there is clear evidence that homes will not be delivered. The PPG sets out what evidence may be used to demonstrate deliverability this includes:
- Current planning status – e.g. how much progress has been made towards approving a reserved matters and discharge of conditions;
 - Firm progress being made towards the submission of an application;
 - Firm progress with site assessment work; or
 - Relevant information about site viability, ownership or infrastructure provision.
- For sites to be considered developable the PPG also sets out the evidence that may be used to demonstrate that there is a reasonable prospect of development these include:
- Written commitment or agreement that funding is likely to come forward;
 - Written evidence of the developer's delivery intentions and anticipated build out rates;
 - Likely build out rates based on sites with similar characteristics; and
 - Current planning status.

Q2. Where sites have been identified in the Local Plan, but do not yet have planning permission, is there clear evidence that housing completions will begin within five years?

9. The HBF considers that this is a question for the Council to answer.

Q3. Are there any sites in the housing supply which are identified as 'LDF Allocations', but which do not have full or outline planning permission and have not been allocated in the Plan? If so, what is the justification for their inclusion?

10. Paragraph 2.2 of the Housing Assessment Update suggests that a further 1,790 dwellings are to be provided from LDF allocated sites, with Annex 1 suggesting that 1,783 dwellings within the supply are from LDF allocated sites. Section 3 of the same document highlights that of the original 44 allocated sites nine do not have planning permission, with the table in paragraph 3.9 providing details of these sites.

¹¹ Numbers taken from Housing Assessment Update (March 2020)

Q4. What lead-in times and build-out rates have been applied to sites, both with and without planning permission? Have different approaches been adopted for sites with or without full planning permission? Are the assumptions used appropriate and justified?

11. The HBF considers that this is a question for the Council to answer.

Q5. How has the Council taken into account the possibility that some sites may not come forward due to unforeseen circumstances? Has a lapse-rate or allowance for non-deliverability been applied? If so, has it been applied to all sites?

12. Paragraph 4.7 of the Housing Assessment Update and the table below provides information in relation to the five year housing land supply, it sets out the a windfall allowance has been included within the five year supply and that this includes a 10% non-implementation rate for small sites. This lapse rate does not appear to have been considered in relation to the LDF allocations, local plan draft allocations or for larger sites or for the longer period.

13. The HBF does not consider that the Council has given sufficient consideration to the possibility that some sites may not come forward due to unforeseen circumstances and that this may apply to all sites not just to the small windfall sites. The HBF considers that it would be appropriate to include a lapse rate for non-delivery for all sites in the supply.

Q6. What allowance has been made for windfall sites as part of the anticipated supply? Is there compelling evidence to suggest that windfall sites will come forward over the plan period, as required by paragraph 70 of the Framework?

14. The Housing Assessment Update states that since 2004 6,954 windfall dwellings have been delivered, averaging 435 dwellings each year. Figure 2.5 identifies that 61% of completions have been on windfall sites.

15. The Update suggests that 1,227 dwellings from known windfall sites will be included within the five-year supply. Whilst Annex 1 provides a table showing the housing supply summary, it includes 1,261 windfall dwellings as part of the housing supply over the plan period. However, these windfalls appear to be from known sources, e.g. sites with planning permission, rather than this being a general allowance for windfall sites from unknown sources. It would be beneficial if this could be confirmed by the Council and appropriate information provided in relation to each permission. If this is not the case, the HBF considers that the Council should ensure that they can provide compelling evidence to support the inclusion of these windfall sites.

Q7. Having regard to the questions above, will there be a five-year supply of deliverable housing sites on adoption of the Plan?¹²

16. The Housing Assessment Update suggests that there is a supply of 3,554 dwellings, however, the HBF are concerned about the level of evidence to support the deliverability of some of these sites. The HBF are also concerned that little consideration has been given to whether these sites will all be delivered in the format currently assumed, it is

¹² Inspectors' Note - Annex 3 of document SD21 provides a long list of sites grouped by area. To assist the examination, it would be helpful if the Council could produce a breakdown of sites which make up the different components of future supply.

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possible that some of the sites will not come forward as envisioned. The HBF does not consider that it is in a position to confirm whether or not there is a five-year supply.

Q8. What is the justification for suggested modification M12? Is this necessary for soundness?

17. The HBF considers that this is a question for the Council to answer.

Issue 3 – Future Supply and Flexibility

Q1. The response to the Inspectors' Initial Questions confirms that delivery of housing in the later years of the Local Plan will decline from an initial peak. Does the Local Plan therefore identify an adequate supply of specific, developable sites or broad locations for growth for years 6-10, and where possible years 11-15, as required by paragraph 67 of the Framework?

18. The HBF is concerned at the low levels of supply in the later part of the Plan. They are concerned that should the deliverable supply come forward at the rate proposed that this will not provide an adequate supply of developable sites for the period post year 5. This could mean that the Council finds itself unable to meet the HDT requirements and that the Plan needs to be reviewed more quickly.

Q2. What flexibility does the plan provide in the event that some of the allocated sites do not come forward in the timescales envisaged?

19. The HBF considers that this is a question for the Council to answer.

Q3. In response to the Inspectors' Initial Questions, the Council has produced information setting out the expected phasing of delivery. How has the Council arrived at the figures for years 6-10 and 11-15?

20. The HBF considers that this is a question for the Council to answer.

Q4. Is it necessary to have a review mechanism in the Local Plan to consider progress against allocated sites, and to identify any appropriate steps to increase supply if required?

21. The HBF considers that the Local Plan should include a review mechanism to ensure that appropriate steps are taken if the housing requirement is not being delivered as envisioned and if the housing allocations are not coming forward, this could be included as part of policy HG1. The HBF also considers that it would be beneficial if more details in relation to targets and actions were provided within the monitoring framework.

Matter 6 – Meeting Housing Needs (Policies HG2, HG3, HG4 and HG6)

Issue 1 – Delivering the Right Type of Homes - Policy HG2

House Types and Sizes

Q1. Is it clear to decision-makers, developers and local communities what is required of applications for planning permission under Policy HG2(f)?

1. Firstly, part f of Policy HG2 looks to support housing development where a range of house types and sizes will be included. The HBF generally understands the need for a mix of dwelling types and is generally supportive of providing a range and choice of homes to meet the needs of the local area. However, the Council should recognise that it may not be appropriate for every site to provide a complete range of house types and sizes, this may be due to the site size, location, or local character.
2. The policy then goes on to suggest that this range should reflect the housing needs as identified in the SHMA or successor documents. It should be noted that the SHMA or success documents will only ever form a snapshot in time and may not be up to date or appropriate for the site proposed for development. Therefore, the HBF consider that alternate evidence should also be considered, this could include information provided by the developer or by others for example the housing waiting list.
3. The next line appears to hint at this possibility for additional evidence with its reference to an agreed mix that has had regard to evidence of local housing need or market conditions. However, it is not clear if this line in relation to local housing need or market conditions is an 'or' or an additional requirement. The HBF consider that the flexibility of the second part of this criterion appears more appropriate, providing that the evidence required to support it is not overly onerous.
4. It is noted that the final part of the criterion in relation to the ability of the site to accommodate a mix of housing is proposed to be deleted. The HBF consider that this element should not be deleted, it is considered to provide an important recognition that not all sites may be able to provide a full range of house types and sizes.
5. The HBF recommend that this part of the policy is amended to ensure that it is easily understood, appropriately flexible and does not require a lot of additional evidence.

Q2. Is the policy flexible enough to allow for circumstances where it may not be possible to provide a certain size or type of dwelling, due to site constraints for example?

6. The HBF do not consider that this policy is flexible enough, and that this flexibility would be reduced further if the final part of the criterion in relation to the ability of the site to accommodate a mix of housing were to be removed.

Q3. What is the justification for considering market conditions in Policy HG2(f)?

22. The HBF considers that this is a question for the Council to answer.

Q4. What is the justification for suggested modification M30 and M31? Are they necessary for soundness?

23. Modification M30 looks to remove the final part of criterion f of Policy HG2. The HBF do not consider this modification is appropriate, and do not consider that it is necessary for soundness.

24. The HBF does not wish to comment, at this time, in relation to Modification M31.

The Inspectors' Initial Questions asked what the justification is for Policy HG2(i), which requires 10% of all dwellings on major schemes to be 2-bedroom bungalows. In response, the Council referred to, amongst other things, evidence contained within the Strategic Housing Market Assessment ('SHMA'), dated January 2016¹³. Within the SHMA, reference is made to discussions with local agents who highlighted unmet demand for bungalows. This was largely due to older people staying in existing housing and from retired households seeking to downsize.

Q5. What evidence can the Council point to which 1) identifies a market demand for bungalows, and 2) justifies 10% of all major housing schemes built as 2-bedroom bungalows? Is the policy requirement supported by appropriate, robust evidence?

25. Criteria i requires at least 10% of dwellings are two-bedroom bungalows on major developments (defined as 10 or more homes or an area of 0.5ha or more). The Council's response to the Inspector's Initial Questions highlights evidence from the SHMA which sets out the need for different sizes of homes, and states that the SHMA identifies a gap in the supply of bungalows due to retired households seeking to downsize. However, the HBF also note that in the section on Gaps in Supply in the SHMA, it also highlights a 'very high demand for 2 and 3 bedroom family homes', it is noted that this is not identified in the policy. The HBF does not consider that the SHMA provides appropriate evidence to support the need for a 10% requirement for 2-bed bungalows. The SHMA does not identify a need for a 10% requirement for bungalows or recommend that this should be included in policy. The HBF recommend that criterion i is deleted there is not considered to be clear evidence to justify its inclusion and it is not considered to be sound.

Internal Space Standards

Q6. What evidence can the Council point to which justifies the need for all new homes to meet the nationally described space standards, as required by footnote 46 of the Framework?

26. Criteria g requires of all homes to meet the Nationally Described Space Standards (NDSS). PPG (ID 56-020) identifies the type of evidence required to introduce such a policy. It states that 'where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:

- **Need** – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be

¹³ Core Document SD18

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properly assessed, for example, to consider any potential impact on meeting demand for starter homes.

- **Viability** – the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.
- **Timing** – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions'.

27. The Council will need robust justifiable evidence to introduce any of the optional housing standards, based on the criteria set out above. Need is generally defined as 'requiring something because it is essential or very important rather than just desirable'. The HBF do not consider that the Council have demonstrated that there is an actual 'need' for the introduction of the NDSS. The Council have provided extremely limited evidence in relation to the need for the NDSS to be introduced.

28. The HBF have concerns that the introduction of the NDSS could lead to people purchasing homes with a smaller number of bedrooms, but larger in size due to the NDSS, which could therefore have the potential to increase issues with overcrowding and potentially lead to a reduction in quality of the living environment.

29. In terms of choice some developers will provide entry level two, three and four bedroom properties which may not meet the optional nationally described space standards but are required to ensure that those on lower incomes can afford a property which has their required number of bedrooms. The industry knows its customers and what they want, our members would not sell homes below the enhanced standard size if they did not appeal to the market. It needs to be recognised that customers have different budgets and aspirations, and generally that is based on the number of bedrooms provided not the floorspace of the building. The HBF is concerned that the requirements of this policy may reduced choice and affordability and could in turn impact on delivery of homes. There is no evidence that the properties have not sold, or that those living within these properties consider that they do not meet their needs. There is no evidence provided that the size of the homes being completed are considered inappropriate by those purchasing them or that these homes are struggling to be sold in comparison to homes that do meet the standards.

30. The HBF in partnership with NHBC undertake a Customer Satisfaction Survey¹⁴ annually to determine the star rating to be given to individual home builders. This is an independently verified survey and regularly demonstrates that new home buyers would buy a new build home again and would recommend their homes builder to a friend. The results of the 2018/19, the most up to date information available, asked how satisfied or dissatisfied the buyer was with the internal design and layout of their new home, 93% of those who responded were either fairly satisfied (28%) or very satisfied (65%). This does not appear to suggest there are significant number of new home buyers looking for different layouts or home sizes to that currently being provided.

¹⁴ <https://www.hbf.co.uk/policy/policy-and-wider-work-program/customer-satisfaction-survey/latest-results/>

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31. The HBF consider that standards can, in some instances, have a negative impact upon viability, increase affordability issues and reduce customer choice. The HBF consider that if the Government had expected all properties to be built to NDSS that they would have made these standards mandatory not optional. The HBF do not consider that the Council currently has the evidence to demonstrate that this standard is necessary, and it has not appropriately considered the implications of introducing such a standard.
32. However, if the policy is to be retained, the HBF consider that a number of amendments need to be made to the policy to ensure that it is sound, this will include providing a transition period and ensuring that provision is viable.

Accessible and Adaptable Homes

In response to the Inspectors' Initial Questions the Council pointed to the expected increase in the number of older people in Hambleton, and the number of Disabled Facility Grants, as justification for requiring all new homes to meet Building Regulation M4(2) standards. The PPG advises that there is a wide range of published official statistics and factors which local planning authorities can consider and take into account. This includes:

- **The likely future need for housing for older and disabled people;**
- **The size, location, type and quality of dwellings needed to meet specifically evidenced needs;**
- **The accessibility and adaptability of existing housing stock;**
- **How needs vary across tenures; and**
- **The overall impact on viability.**

Q7. In considering the need for all dwellings to meet Building Regulation M4(2) standards, how has the Council considered the size, type and quality of dwellings needed, the accessibility and adaptability of existing housing stock and how needs vary across tenures?

33. Section 9 of the SHMA (2016) sets out the specialist housing needs in the borough, it sets out the projected change in the population of older people 2014-2035, highlights the estimated population change for a range of health issues including dementia and mobility problems and identified the projected need for specialist homes. It provides some very limited information in relation to the tenures of current older person households, which shows that older person households is significantly biased towards outright ownership with the current supply having a slightly higher proportion of affordable homes (than seen across other households). Paragraph 9.23 states that the analysis is not specific about the types of specialist housing that might be required. Therefore, it is not clear how the Council have considered the size, type and quality of dwellings needed and how this may vary across the tenures.
34. The HBF are not aware of any evidence provided by the Council in relation to the accessibility and adaptability of the existing housing stock. Therefore, it is not apparent how the Council has considered this in relation to the potential provision the existing housing stock could make to the accessible and adaptable homes in the borough.

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35. The HBF does not consider that the Council has provided appropriate evidence to support the need for all new homes to meet the M4(2) requirement.
36. The HBF is also concerned that the Council has not fully considered the requirements of the PPG¹⁵ which states that *'local plan policies should also take into account site specific factors such as the vulnerability flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings, particularly where step free access cannot be achieved or is not viable. Where step-free access is not viable, neither of the Optional Requirements in Part M should be applied'*. The HBF recommend that if this policy requirement is to be retained, that the policy should be amended to reflect the PPG requirements.

Q8. Policy HG2(h) states that as part of large scale developments (defined as 200 dwellings or more or over 4 hectares in size) a 'proportion' of homes will be expected to meet Building Regulation M4(3) standards. What is the justification for only requiring such standards on 'large scale' developments?

37. Part h requires that within a large-scale development (defined as 200 or more homes or 4ha or more) a proportion of homes must meet building regulation requirement M4(3) (wheelchair adaptable dwellings). The HBF do not consider that the Council have provided any justification for the provision of homes at the M4(3) standard. As set out in relation M4(2) the Council have provided very limited information in relation to the likely future need, the size location, type and quality of dwellings needed, the accessibility and adaptability of the existing stock, or how needs vary across different tenures. It is not clear how the evidence provided within the Council's response to the Inspector's Initial Questions in relation to the Disabled Facility Grant (DFG) relates to the need for a proportion of new homes to meet the M4(3) provision.
38. The policy does not set out what proportion of homes should be at the M4(3) standard, although the justification states that this should be 9% of new market homes and around 30% for affordable homes but it goes on to state that precise levels of need will vary in response to circumstances at the time a planning application is determined. It is not clear what these circumstances may be, and whether this proportion is determined by Council evidence or developer evidence. The HBF do not consider there is sufficient evidence to justify these proportions.

Q9. Based on the number of large scale housing proposals allocated in the Local Plan (without planning permission) how many wheelchair adaptable dwellings are expected to be provided? How does this compare to the identified need?

39. The HBF considers that this is a question for the Council to answer.

Q10. The supporting text to Policy HG2 states that the precise levels of need for dwellings built to M4(3) standards will 'vary'. Is it sufficiently clear to decision-makers, developers and local communities what is expected of applications for planning permission? Is the Local Plan consistent with paragraph 16 of the Framework in this regard, which states that Plans should contain policies that are clearly written and unambiguous?

¹⁵ PPG ID:56-008-20160519

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40. The HBF consider that it can be beneficial to have some flexibility in the policy, but this wording in the justification is not particularly clear when, where or why this proportion may vary, and as such does not provide a clear policy.

Q11. Taking into account the answers to the questions above, what is the justification for suggested modification M103? Is this necessary for soundness? Subject to suggested modification M103, how would a decision-maker determine what proportion of dwellings should be built to Building Regulation M4(3) standards?

41. The HBF consider that Modification M103 would be an improvement, and as the proportions can not be justified can be considered necessary for soundness.

42. As set out in previous responses, the HBF consider that if the Council wish to retain a requirement for a proportion of homes to be provided as M4(3) the Council will need to be provide the evidence to justify it. The HBF do not consider that this has been provided at present, and as such consider that the requirement within the policy should be deleted.

Older Persons Accommodation

Q12. In its response to the Inspectors' Initial Questions, the Council identified a requirement for 1,423 additional specialist homes for older people over the plan period. It also identified a need for 505 additional care bed spaces for the institutional population. How does the Local Plan ensure that these needs will be met?

43. The HBF does not wish to answer this question at this time.

Q13. Does Policy HG2(c) provide an effective mechanism to ensure that development proposals contribute towards meeting the need for older persons accommodation, where required?

44. The HBF does not wish to answer this question at this time.

Q14. What is the justification for only supporting specialist accommodation in market towns and service villages?

45. The HBF does not consider that it is appropriate to only support specialist accommodation in market towns and service villages, and do not consider that this element of the policy is justified.

Self-Build and Custom Housing

Q15. Has the Council identified a need for self-build and custom housebuilding? If so, how does the Local Plan meet this need?

46. The HBF considers that this is a question for the Council to answer.

Q16. Is the intention to 'work with' various groups under criterion b. effective with regard to the delivery of self and custom build homes? How will the Council encourage the provision of plots for this type of housing, as set out in paragraph 5.30?

47. Many of our members will be able to assist the custom build sector either through the physical building of dwellings on behalf of the homeowner or through the provision of plots for sale to custom builders. The HBF are, therefore, not opposed to the idea of increasing the self-build and custom build sector for its potential contribution to the

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overall housing supply. The HBF would encourage the Council to engage with landowners and to work with custom build developers to maximise opportunities.

Q17. In summary, has the Council assessed the size, type and tenure of housing needed for different groups in the community and is this adequately reflected in the Local Plan, as required by paragraph 61 of the Framework?

48. The HBF consider that Policy HG2 should be flexible and not overly prescriptive. The HBF consider the Plan should focus on ensuring that there are appropriate sites allocated to meet the needs of specifically identified groups of households such as self & custom builders and the elderly without seeking a specific housing mix on individual sites. The Plan should ensure that suitable sites are available for a wide range of developments across a wide choice of appropriate locations.

Issue 2 – Affordable Housing Requirements - Policy HG3

Q1. What is the justification for requiring 30% affordable housing on qualifying sites? What is this based on, how was it calculated and what alternatives were considered?

49. The policy states that on all developments for new market housing, the Council will seek the provision of 30% affordable housing on sites of 10 or more dwellings or 5 or more in designated rural areas. The policy sets out the types of affordable housing to be provided as 1/3 of each affordable rented, social rented and intermediate dwellings. It also provides a viability clause.

50. The HBF does not dispute the need for affordable housing within Hambleton and indeed supports the need to address the affordable housing requirements of the borough. The HEDNA (June 2018) identifies a need for 55 affordable homes per annum in Hambleton. It is not clear however, how this requirement has led to the requirement for 30% affordable homes on sites of 10 or more homes.

51. The NPPF is, however, clear that the derivation of affordable housing policies must not only take account of need but also viability. As set out in our previous responses the HBF has concerns in relation to the viability of this policy, the cumulative impacts of the policy requirements in the Local Plan and the CIL. The Whole Plan Viability Report (June 2019) identifies that there are issues with a number of brownfield typologies, apartments and allocations. The HBF have concerns that this policy will lead to the non-delivery of homes in the Borough. It should be noted that Paragraph 34 of the NPPF (2019) establishes the importance of viability to ensure that development identified in the Plan should not be subject to such scale of obligations and policy burden that their ability to be delivered might be threatened.

Q2. Based on the requirements for qualifying developments to provide 30% affordable housing, how many affordable homes is the Local Plan expected to deliver?

52. The HBF considers that this is a question for the Council to answer.

Q3. How does this compare to the identified need?

53. The HBF considers that this is a question for the Council to answer.

Q4. How does this compare to previous performance? How many affordable homes have been provided as a percentage of total output over the past 5-10 years?

54. Based on information from MHCLG live tables, the HBF calculate that the Council has provided a total of 715 affordable homes over the last 10 years, and 3,094 total net homes. This is an average of 72 affordable homes each year and an average of 23% of the total homes provided.

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Year	Net Additional Housing ¹⁶	Affordable Housing Completions ¹⁷	Proportion of affordable homes
2009/10	283	51	18%
2010/11	285	128	45%
2011/12	141	72	51%
2012/13	115	55	47%
2013/14	169	76	44%
2014/15	305	45	15%
2015/16	361	40	11%
2016/17	546	106	19%
2017/18	416	87	21%
2018/19	473	55	12%
Total	3,094	715	23%
Average	309.4	71.5	23%

The Council's response to the Inspectors' Initial Questions and the Whole Plan and Community Infrastructure Levy Viability Assessment¹⁸ suggest that allocations GTA1, LEB1, LEB2 and SOT1 are not viable when the 30% affordable housing requirement and all other policy requirements are included. The Viability Assessment also identifies a number of development scenarios that would not be viable if required to provide 30% affordable housing.

Q5. Is the 30% affordable housing requirement in Policy HG3 therefore justified? Should the affordable housing requirement be varied to reflect differences in viability across the plan area and/or by type of housing?

55. The HBF consider that there are significant concerns in relation to the viability of the affordable housing requirement. The HBF consider that the affordable housing requirement should either be reduced across the borough, or reduced in certain areas or for certain types or scales of development, to reflect the evidence provided in the Viability Assessment.

Q6. Paragraph 5.47 of the Local Plan states that where affordable housing is provided at less than 30% on approved schemes, the Council will reserve the right to reappraise viability. Is it clear to decision makers, developers and local communities how this will work in practice? For effectiveness, should the policy be explicit about this requirement?

56. The HBF has concerns in relation to how this reappraisal set out in paragraph 5.47 will be implemented and whether it will be considered effective. Very little detail is provided in this text to determine when these reappraisals will occur and with what level of frequency. Reappraisals are not considered a tool to improve viability or incentivise

¹⁶ MHCLG Live Tables – Table 122: Housing Supply, net additional dwellings by LA

<https://www.gov.uk/government/statistical-data-sets/live-tables-on-net-supply-of-housing>

¹⁷ MHCLG Live Tables – Table 1011: Additional affordable housing supply, detailed breakdown by local authority <https://www.gov.uk/government/statistical-data-sets/live-tables-on-affordable-housing-supply>

¹⁸ Core Document SD01

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owners to sell, and as such, the HBF would urge the Council to think carefully about the impact such a mechanism may have on the future delivery of land to the market and what the aims and objectives would be. The HBF would be happy to assist in this deliberation but would strongly suggest some reflection is needed as this approach is more likely to disincentive investment decisions. The HBF consider that if overage and reappraisal clauses are to be used by the Council, the Council should clearly refer to this within the policy, not just the justification text.

Q7. The Council's response to the Inspectors' Initial Questions suggests that affordable housing transfer prices have increased since the Viability Assessment was carried out. What is the latest position on transfer prices and how are any changes likely to affect the viability of housing proposals over the plan period?

57. The HBF does not wish to answer this question at this time.

Q8. What is the justification for suggested modifications M32-M38? Why are they necessary for soundness?

58. The HBF considers that this is a question for the Council to answer.

Q9. What are the timescales for the publication of the Council's Housing Supplementary Planning Document ('SPD'), and what is the justification for requiring proposals to accord with its requirements through Policy HG3?

59. The HBF do not consider that it is appropriate or justified for Policy HG3 to require affordable housing provision to comply with requirements contained in the Council's Housing SPD, as these elements are not being tested and examined as part of the Local Plan Examination.

60. It should be noted that SPDs can build upon and provide more detailed advice or guidance on policies in an adopted local plan, they cannot introduce new planning policies into the development plan and they should not add unnecessarily to the financial burdens on development.

Q10. What is the justification for suggested modification M99? Why is it necessary for soundness?

61. The HBF considers that this is a question for the Council to answer.