



# THE HOME BUILDERS FEDERATION

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**Sent by Email only**

Date: 18<sup>th</sup> December 2015

Dear Sir / Madam,

## **Harrogate District Local Plan: Draft Development Management Policies Consultation**

1. Thank you for consulting with the Home Builders Federation (HBF) on the Harrogate Local Plan: Draft Development Management Policies Consultation.
2. The HBF is the principal representative body of the house building industry in England and Wales and our representations reflect the views of our membership of multinational PLCs, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year including a large proportion of the new affordable housing stock.
3. We would like to submit the following brief comments to selected questions posed in the consultation document. The HBF will provide a more detailed response at the next stage of consultation.

### ***Questions 3 & 4: Draft Policy SD2 - Criteria for Sustainable Development & Justification***

4. The HBF does not agree with the policy wording based upon a number of issues. Part 3 of the draft policy appears to imply that unless greenfield land is allocated it will not be appropriate for it to be used. This does not pay adequate regard to the principles of sustainable development. Paragraph 3.14 is also confused as it conflates open space with greenfield land which need not necessarily be the same thing.
5. Part 5 of the policy and supporting paragraphs 3.18 and 3.19 require developments to minimise water and energy use. In relation to energy the Government's Housing Standards Review was clear that this was strictly a matter for the Part L of the Building Regulations. The Council will, therefore, be unable to set energy efficiency standards as suggested in paragraph 3.19.

6. In relation to water consumption the Housing Standards Review set out an optional Building Regulations standard which can be introduced through the Local Plan process. The method and criteria for introduction are clearly set out within the National Planning Practice Guidance (PPG), paragraphs 56-013 to 56-017. The majority of the Yorkshire Water area is classified as a low stress area (July 2013: Environment Agency *Water stressed areas – final classification*) and as such the introduction of the optional standard within Harrogate is unlikely to be justified.

**Questions 7 & 8: Draft Policy HS1 - Type, Mix and Density of New Market Housing Units & Justification**

7. Whilst the need to take account of the SHMA in terms of mix, size and type is recognised this must be within the context of the local area, NPPF paragraph 50, and not a plan wide requirement. The current SHMA does not provide this evidence. It must also be recognised that the SHMA only provides a snap-shot in time and the needs will not only vary geographically but also over-time. Therefore rigid requirements would not be appropriate, particularly in a district such as Harrogate. Furthermore issues such as viability, site characteristics and market demands should also be taken into account. The impact of the imposition of this policy upon viability is a key issue which would need to be tested through an appropriate viability assessment. The current assessment, based upon affordable housing, is not considered to adequately address this.
8. In terms of the mix, size and type of property provided through the plan the Council must also have regard to its own aspirations for economic growth expressed through the previous consultation on the Local Plan. The achievement of growth will be reliant upon attracting investors to locate to the Harrogate area. Part of this investment will be based upon the housing offer available and being planned. Furthermore the housing offer should include an element of aspiration to ensure working families are retained within the area and not lost to other areas as this would impact upon the economic prospects of Harrogate.
9. The density requirements identified in the policy appear high, particularly when less urban settings are considered. Whilst the final paragraph of the policy is noted viability should also be a consideration. Nationally across all types of sites densities average around 32dph.
10. Paragraphs 4.7 and 4.8 refer to internal space standards, although these are not referenced within the draft policy. The requirements for the introduction of the internal space standard are referenced within paragraph 4.8, although the effect upon affordability is not noted. Given the issues of affordability already apparent within Harrogate this is likely to be a significant issue if the Council were to consider their introduction. Due to these issues and a current lack of available evidence the HBF does not support the introduction of the internal space standards within Harrogate at this time. The PPG paragraph 56-020 sets out the full requirements for the introduction of such a standard.

**Questions 9 & 10: Draft Policy HS2 - Affordable Housing & Justification**

11. The HBF does not dispute the need for affordable housing within Harrogate. The requirement for 40% from all sites is, however, likely to challenge viability particularly when combined with other policy burdens and obligations. Whilst the 2014 update to the *Affordable Housing Viability Assessment* (AHVA) is noted this does not take account of all policy requirements and burdens likely to emerge within the plan. The HBF also has concerns regarding a number of assumptions used within the AHVA. In this regard the HBF would welcome further involvement in a refresh of the viability evidence base to ensure that it is based upon robust assumptions and requirements.
12. Paragraph 4.14 refers to a 70:30 split social rented: intermediate. The HBF recommend that this split is not applied rigidly due to the impact that social rent cuts are having upon the ability of the industry to attract social housing providers. This is making the provision of such tenures inherently more risky. The Council will no doubt be aware of the recent letter from the minister, dated 9<sup>th</sup> November 2015, urging pragmatism on affordable housing requirements due to these impacts.
13. The policy nor supporting text do not provide reference to the forthcoming requirement for starter homes. Whilst it is recognised that the detail is still emerging it is important that future iterations of the policy pay full regard to this important requirement.

**Questions 61 & 62: Draft Policy MD1 - Monitoring and Delivery & Justification**

14. The draft policy identifies that where the AMR suggests a 10% or greater over or under provision of housing completions by 2035 consideration will be given to alter the release of sites through an SPD. Whilst the HBF supports intervention where the delivery of the housing requirement will not be met, the implied restriction of supply in relation to over-provision is not supported and is considered contrary to the NPPF. Such an approach is also unlikely to be achievable through an SPD as it would essentially be creating new policy. The Council will note that the NPPF, paragraph 153 specifically refers to the use of SPDs assisting applicants and not adding to the burdens on the development process.
15. The implied restriction upon site delivery if 'over-supply' does occur would be contrary to the NPPF requirements for positive planning and the need to boost significantly the supply of housing, any restriction would be the antithesis of this approach. It is worth noting that where this issue has been discussed at local plan examinations the outcome is always that the housing requirement should be seen as a minimum. The placing of a cap would therefore be unsound. It is also unclear why housing should be treated separately to any other form of development in this regard.
16. The HBF would also like to see specific triggers within the monitoring framework which would require a full or partial review of the plan. This could

include the failure to identify a five year housing land supply or not meeting the housing requirement for three consecutive years. This would provide certainty to the plan and ensure that a failing plan is not pursued indefinitely.

**Further Consultations**

17. 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 in the footer to this response for future correspondence.

Yours sincerely,

*MJ Good*

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