

**Craven Local Plan
Inspector's Matters, Issues and Questions for Examination**

**Matter 1 – Compliance with the Act and Regulations, the Habitats Regulations
and Strategic Flood Risk Assessment**

Issue 1 – Duty to Cooperate

Q1. What strategic, cross-border matters have arisen through the preparation of the Local Plan and what cooperation took place to resolve them? Has the cooperation between neighbouring authorities been constructive and proactive?

Q2. What actions were identified as a result of dialogue with neighbouring authorities? What were the outcomes and how did they shape the preparation of the Plan?

Q3. Is the *Memorandum of Understanding between Craven District Council and the Yorkshire Dales National Park Authority* (Appendix 1 to the *Duty to Cooperate Statement Update*¹) the most up-to-date position on cross-boundary issues relating to housing? Does it reflect the latest evidence on housing needs?

Q4. How were the levels of 'significance' determined in Chapter 6 of the *Duty to Cooperate Statement Update*? How have they been reflected in the preparation of the Local Plan and dialogue with neighbouring authorities?

Q5. How were issues surrounding economic growth considered with neighbouring authorities? What actions were identified as necessary as a result of dialogue and what were the outcomes?

Q6. Has the Duty to Cooperate under sections 22(5)(c) and 33A of the 2004 Act and Regulation 4 of the 2012 Regulations been complied with, having regard to advice contained in the National Planning Policy Framework (the 'Framework') and the National Planning Practice Guidance (the 'PPG')?

1. The Council have prepared a Cross-boundary Strategic Issues and Duty to Cooperate Statement, this details the cross-boundary issues and the bodies that the Council have worked with. Appendix 1 contains the MoU between the Council and the Yorkshire Dales National Park Authority, this provides a level of agreement on the housing figure for Craven, it does not however provide details on how the full OAN will be met across the housing market area. The key concerns of the HBF relate to housing need and delivery, and the need for the authorities of the housing market area to work together to ensure that the need is met, and homes are delivered. The HBF consider there is still further work to do on this issue.
2. The 2017 SHMA update increases the OAN to 242 dwellings per annum, with 206 dwellings attribute to the Craven Local Plan area, and 36 dwellings to the Yorkshire Dales National Park. The Yorkshire Dales Local Plan was adopted in 2016, it looks to expand the supply of housing to meet a target of 55 new dwellings each year. Paragraph 4.3 of this document states that the 55 dwellings can be disaggregated into the three main housing market areas of Richmondshire (18), Craven (27) and South Lakeland (10). However, the Yorkshire Dales Local Plan covers more than just the Craven district HMA. It is therefore not clear how the OAN identified by Craven will be provided for within the National Park, and as mentioned previously this is not covered by the MoU or the Duty to Cooperate Statement. It is noted that previously the Local Plan had chosen to utilise the figure for the whole of Craven district as its housing figure ignoring any contribution to be made by the Yorkshire Dales Local Plan.

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Matter 2 – Objectively Assessed Need and the Housing Requirement (Policy SP1)

Issue 1 – Housing Market Area ('HMA')

Q1. What evidence supports the use of a HMA for Craven, having particular regard to levels of containment and household migration? Does it accord with national guidance in the PPG?⁷

Q2. How has evidence relating to commuting patterns been taken into account? Does this support the use of a HMA for Craven?

Q3. How does the proposed HMA relate to neighbouring authorities?

1. The PPG guidance (ID: 2a-001 to 2a-037) in relation to Housing Market Areas has now been superseded by the Standard Methodology. However, the guidance that was in place at the time the SHMA was prepared had suggested that housing market areas can be broadly defined using three different sources of information: house prices and rates of change in house prices; household migration and search patterns; contextual data e.g. travel to work areas, retail catchment areas and school catchment areas.
2. The SHMA highlights that in relation to household migration the origin containment ratio is 58.8% and the destination containment ratio is 60.7% (para. 3.19) this is significantly below the 70% PPG threshold. The SHMA also highlights that 66.7% of people who live in Craven work in Craven and that 67.5% of workers in Craven live in the district (para 3.23), again, this is below the 75% that the ONS use as part of their definition of a Travel to Work Area. However, the SHMA highlights that the neighbouring areas have established HMAs in their own right and although they recognise interactions with other area, Craven has not been included as part of their HMAs. Therefore, Craven has had to identify itself as its own HMA, although it does still recognise interactions with other areas, this appears to be a pragmatic approach.
3. The complexity of the area is clearly set out within the evidence within the SHMA, whichever HMA(s) is chosen the Council will need to ensure that they work closely with their neighbouring authorities to ensure that an appropriate level of housing is delivered.

Issue 2 – Population and Household Projections

Q1. What is the demographic starting point derived from the 2014-based household projections? How does this compare to the latest mid-year estimates? What are the reasons for the differences?

Q2. How has the “re-based” scenario (141 dpa) been calculated?

Q3. Why has the SHMA⁸ assessed internal rates of migration over 6 years and 15 years? What are the reasons for the variation?

Q4. How does the SHMA consider household formation rates, what are they based on and are they robust?

Q5. Paragraph 6.11 of the SHMA and the table that follows (Table 6.1) applies a partial return “...in which the 2014-based headship rates for the 25-34 age group return to a mid-point between the 2014 and 2008-based rates by 2033”. Have the same adjustments been made for other age groups?

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Q6. What are the main reasons for the change in the demographic starting point from the 2016 SHMA Update⁹ (188 dwellings)?

Q7. How has the need for accommodation for older people, especially older people who want to stay in their own home, been taken into account in establishing the housing requirement? Is this set out in the Local Plan?

4. The SHMA highlights that an alternative headship rate has been applied which considers 'a partial return' in which the 2014-based headship rates for the 25-34 age group return to a mid-point between the 2014 and 2008 based rates by 2033. It considers Edge Analytics report which notes that '*across the UK, younger adult age groups have seen the most significant change in household formation over the last ten years, due to a combination of housing undersupply and affordability issues*'. The HBF considers that an amendment to the headship rate for the 25-34 age group is appropriate. The HBF notes that this group were particularly hard-hit by the recession and as such the headship rates are likely to have been significantly depressed. The HBF considers it is prudent to introduce an uplift in headship rates amongst this group, to reverse this negative trend. This is supported by NPPF requirements to boost housing supply and in line with a Government that is actively trying to boost home ownership, particularly amongst younger age groups through initiatives such as 'Help to Buy' and 'Starter Homes'.

Issue 3 – Market Signals

Q1. The PPG¹⁰ advises that household projections should be adjusted to reflect appropriate market signals, as well as other market indicators. How does the evidence demonstrate that Craven is performing with regard to:

- Land prices;
- House prices;
- Rents;
- Affordability;
- Rate of development; and
- Overcrowding.

5. The HBF support the inclusion of a market uplift. The SHMA identifies that house prices have been increasing and the affordability of median house prices has been worsening, with an increase in the house price ratio from 7.0 in 2005 to 8.3 in 2016.

Issue 4 – Affordability

Q1. How has affordability been assessed as part of the SHMA? How does the House Price Ratio and the Rental Affordability Ratio compare with neighbouring authorities and the national average?

Q2. How have ratios determined the level of uplift proposed to the demographic starting point? Is the proposed uplift justified and based on available evidence?

Q3. What impact will the proposed uplift have on issues relating to affordability in Craven?

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6. Table 5.2 appears to compare the House Price Ratio (HPR) and Rental Affordability Ratio (RAR) with comparator districts, Yorkshire and Humber and England. It shows that the House Price Ratio in Craven is 8.3 and is higher than the majority of the comparator districts, and higher than the figures for Yorkshire and Humber and England. The rental affordability ratio is 36.3 and is higher than all of the comparator districts and the Yorkshire and Humber figure, it is however, lower than the England average.
7. The SHMA suggests that the market uplift is based on the Local Plan Expert Group (LPEG) recommendations. Appendix 6 to the LPEG report states that '*where the HPR is at or above 7.0 and less than 8.7, **and/or** the RAR is at or above 30% and less than 35%, a 20% uplift should be applied; and where the HPR is at or above 8.7, **and/or** the RAR is at or above 35%, a 25% uplift should be applied*'. This suggests that a 25% uplift would be appropriate for Craven.
8. It is expected that an appropriate uplift in housing provision should help to address the affordability issues identified, helping to counter worsening affordability in the Borough.

Issue 7 – Housing Requirement

Q1. Is the housing requirement justified and is it based on robust, up-to-date and available evidence? If not, what should the housing requirement be, and how have alternative figures been calculated?

9. Allowing for the comments above the HBF is generally satisfied that the housing requirement is based on appropriate evidence.

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Matter 3 – Affordable Housing Need (Policy H2)

Issue 1 – Definition of Affordable Housing

Q1. Does the Plan include a definition of affordable housing? If not, in order to be effective should one be included?

1. The NPPF provides a definition of affordable homes, it would be appropriate for the Local Plan to refer to this, this may be preferable to the text currently contained within paragraph 6.14 of the Plan. The HBF do not consider it is necessary to reiterate the NPPF definition within the plan.

Issue 2 – Affordable Housing Need

The SHMA states that there is an annual imbalance of 126 affordable dwellings per year. This is expressed as the overall need from the housing register compared with the current supply of affordable housing. In response, Policy H2 requires a minimum of 30% of dwellings on qualifying sites to be affordable.

Q1. What is the difference between the affordable housing need identified in Policy H2, and the uplift applied to the demographic starting point to reflect affordability issues in Policy SP1?

Q2. 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?

Q3. Based on the requirements for qualifying developments to provide 30% affordable housing, how many affordable homes is the Local Plan expected to deliver?

Q4. How does this compare to the identified need?

Q5. 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?

Q6. The PPG states that an increase to the total housing figures should be considered where it would help deliver the required number of affordable homes. Has an uplift to the housing requirement for this reason been considered? If so, where is this set out?

Q7. What is the justification for requiring proposals of 6-10 dwellings on greenfield sites in designated rural areas to make an equivalent financial contribution?

2. The SHMA suggests a 20% uplift to the demographic requirement to take account of market signals and affordability. This affordability appears to relate to the house price ratio and rental affordability ratios, rather than the need for 'affordable housing'. Policy H2 appears to be based on the 'affordable housing' need, e.g. housing for households who are unable to access suitable housing without financial assistance. The SHMA does not suggest an adjustment to take account of the need for affordable homes.
3. The SHMA identifies an imbalance of 126 affordable dwellings each year and suggests that a policy seeking 30% of new homes to be affordable will address a 'considerable' proportion of this need. Given the housing requirement of 230 net additional dwellings, and that the affordable housing policy only applies to greenfield sites of 11 dwellings or more, or 6 or more in designated rural areas, it seems unlikely that the imbalance will be considerably addressed. However, in determining the appropriate policy the Council will also have had to consider the viability of development in providing these affordable homes. The NPPF is clear that the derivation of affordable housing policies must not only take account of need but also viability. Paragraph 173 of the NPPF established

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the importance of viability testing to ensure that the sites and scale of development identified in the Plan should not be subject to such scale of obligations and policy burden that their ability to be developed might be threatened.

4. The HBF has concerns in relation to the language used in the policy, particularly reference to 'exceptional circumstances', it would be more appropriate to refer to the viability of development, as this is most likely to be the reason for the need to reduce the provision of affordable housing. The HBF proposes that the policy is modified as follows: '*Development proposals that seek to provide a lower level of affordable housing contribution will ~~not be~~ **only** be acceptable ~~unless~~ **where** it can be ~~clearly demonstrated that~~ **the development would not be viable unless the exceptional circumstances exist which justify a reduced** affordable housing contribution **is reduced**'.*
5. The Planning Practice Guidance (PPG) (ID: 23b-031) is clear that '*in designated rural areas, local planning authorities may choose to apply a lower threshold of 5-units or less. No affordable housing or tariff-style contributions should then be sought from these developments. In addition, in a rural area where the lower 5-unit or less threshold is applied, affordable housing and tariff style contributions should be sought from developments of between 6 and 10-units in the form of cash payments which are commuted until after completion of units within the development. This applies to rural areas described under section 157(1) of the Housing Act 1985, which includes National Parks and Areas of Outstanding Natural Beauty*'. This is in line with the Written Ministerial Statement (WMS) (Nov 2014), which also stated that for 5 units or less affordable housing contributions should not be sought and that for 6 to 10 units contributions should be sought as cash payments to be commuted until after completion of units.

Issue 3 – Viability

Q1. How have the residential typology assumptions been defined in the Local Plan Viability Assessment and Local Plan Viability Assessment Addendum Report?¹² Do the scenarios for Skipton (up to 290 units) and the rest of the District (up to 150 units) reflect the allocations in the Plan?

Q2. How have existing use values been determined? Are they based on appropriate available evidence?

Q3. How have infrastructure costs and other contributions been taken into account in the calculation of scheme viability?

Q4. Is the 30% affordable housing requirement viable for all types of housing, supported by viability evidence?

1. The HBF would provide a note of caution in relation to existing use values and highlight that in order for housing to be delivered it will be important to ensure that the land values achieved are sufficient to ensure that land is brought to the market.
2. Whilst the HBF consider that the 30% requirement is an improvement, caution needs to be taken over the language used within the policy which identifies this as a minimum

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requirement. The HBF considers that it is unrealistic to negotiate every site on a one by one basis because the base-line aspiration of a policy or combination of policies is set too high. This is in line with paragraph 173 of the NPPF (2012) which established the importance of viability testing to ensure that the sites and scale of development identified in the Plan should not be subject to such scale of obligations and policy burden that their ability to be developed might be threatened.

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Matter 6 – Housing Land Supply

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?

Q2. How does the five-year housing land requirement compare to previous rates of delivery?

Paragraph 47 of the Framework states that to boost significantly the supply of housing, local planning authorities should identify and update annually a deliverable five-year supply of housing, with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and completion in the market for land. Where there has been a record of persistent under delivery this should be increased to 20% to provide a realistic prospect of achieving the planned supply and also to ensure choice and competition in the market for land.

Q3. Taking a longer-term view, how has the Council performed against previous annual housing requirements? Does this represent the 'persistent undersupply' defined by the Framework? In this context, should the buffer be 5% or 20%?

Q4. If a 20% buffer applies, should this be applied to the basic five-year requirement, or the five-year requirement and any undersupply?

Q5. If there has been an undersupply, should this be addressed within the next five years (the 'Sedgefield' method), or over the remainder of the plan period (the 'Liverpool' method)? Is the Council's approach consistent with the PPG which advises that local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible?¹⁵

Q6. Taking the above into account, what is the five-year housing land requirement?

1. The Craven Local Plan identifies a housing requirement of 4,600 net additional dwellings over the period 2012 to 2032, equivalent to a housing requirement of 230 dwellings each year.
2. Table 1 below identifies the delivery of homes against the Housing Requirement during the plan period. It clearly demonstrates an undersupply of housing within the plan period. The HBF recommend that this undersupply should be addressed within the next five years, using the Sedgefield method. This is considered to be in compliance with the Governments ambitions to boost housing supply and the PPG (ID 3-035).

Table 1: Housing Delivery (Plan Period)				
Year	Net Dwelling Completions¹	Housing Requirement	Over / Under Supply	Cumulative
2012/13	118	250	-132	-132
2013/14	36	250	-214	-346
2014/15	128	250	-122	-468
2015/16	187	250	-63	-531
2016/17	230	250	-20	-551
2017/18	230	250	-20	-571

¹ Taken from Table 3 of the Draft AMR

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Total	929	1,500	-571	
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3. Taking a longer-term view, the Council has not/ delivered the proposed housing requirement over eight of the last ten years, as set out in Table 2 below. The HBF consider that this represents a persistent under-supply and that as such a 20% buffer would be appropriate.

Table 2: Housing Delivery (Longer Term)				
Year	Net Dwelling Completions²	Housing Requirement	Over / Under Supply	Cumulative
2008/09	289	250	39	39
2009/10	83	250	-167	-128
2010/11	129	250	-121	-249
2011/12	267	250	17	-232
2012/13	118	250	-132	-364
2013/14	36	250	-214	-578
2014/15	128	250	-122	-700
2015/16	187	250	-63	-763
2016/17	230	250	-20	-783
2017/18	230	250	-20	-803
Total	1,697	2,500	-803	

4. Taking the above into account the HBF consider that the five-year housing land requirement is 1,921.2 dwellings or 384 dwellings each year. This allows for the shortfall in housing delivery to be addressed using the Sedgefield method, and adding in the 20% buffer to allow for choice and competition in the market. Table 3 below sets out how the 5-year supply has been calculated.

Table 3: Calculating the 5 Year Requirement		
A	Proposed Housing Requirement (2012 – 2032)	4,600
B	Annual Housing Requirement (A/Plan Period) (4,600/20 = 230)	230
C	Five Year housing rate (= B x 5) (= 230 x 5)	1,150
D	Actual completions (Plan period)	929
E	Proposed Housing Requirement expected Completions (= B x 6) (= 230 x 6)	1,380
F	Surplus / Shortfall in housing delivery (= D – E) (= 929 – 1,380)	-451
G ^L	Five Year Requirement (Liverpool) (incorporating surplus / shortfall) (= C – ((F/remaining plan period)x5))	1,311

² Taken from Table 3 of the Draft AMR

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	(= 1,150 - ((-451/14)*5))		
G ^S	Five Year Requirement (Sedgefield) (incorporating surplus / shortfall) (= C - F) (= 1,150 - (-451))		1,601
		Liverpool	Sedgefield
H ^{5%}	Buffer (5%) (= G ^L x 5%) (= 1,311 x 5%) (= G ^S x 5%) (= 1,601 x 5%)	65.55	80.05
I ^{5%}	Five Year Requirement (incorporating surplus / shortfall and buffer) (= G + H ^{5%})	1,376.55	1,681.05
J ^{5%}	Annual target for next 5 years (= I ^{5%} / 5)	275.31	336.21
H ^{20%}	Buffer (20%) (=G ^L x 20%) (=1,311 x 20%) (=G ^S x 20%) (=1,601 x 20%)	262.2	320.2
I ^{20%}	Five Year Requirement (incorporating surplus / shortfall and buffer) (= G + H ^{20%})	1,573.2	1,921.2
J ^{20%}	Annual target for next 5 years (= I ^{20%} / 5)	314.64	384.24

Issue 2 – Supply Methodology

The PPG¹⁶ states that planning permission or allocation in a development plan is not a prerequisite for a site being deliverable in terms of the five-year supply. Local planning authorities will need to provide clear evidence to support the deliverability of sites, ensuring that judgements on deliverability are clearly and transparently set out.

The PPG¹⁷ also advises that the size of sites will be an important factor in identifying whether or not a housing site is deliverable within five years. Plan makers should consider lead-in times and build-out rates to ensure a robust five-year housing land supply. Taking this into account:

Q1. What evidence is there to indicate that the sites with planning permission will come forward as illustrated in the Craven Local Plan Housing Trajectory 2012 to 2032 (2018 Update for Submission)¹⁸?

Q2. Are there any sites in the Housing Trajectory which have a resolution to grant planning permission subject to the completion of a planning obligation? If so, how has this been taken into account in determining deliverability?

Q3. How does the Housing Trajectory take into account sites with outline planning permission, compared to sites with full planning permission?

Q4. What lead-in times and build-out rates have been applied to sites with planning permission?

Q5. Have the same lead-in times and build-out rates been used for sites across Craven? If so, is this appropriate and justified?

Q6. How has the Council calculated the deliverability of sites without planning permission? Have different lead-in times and build-out rates been used?

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Q7. How has the Housing Trajectory taken into account 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?

Q8. Based on the latest evidence available, is the estimated delivery of sites realistic, reasonable and justified?

5. The HBF do not wish to comment on the deliverability, lead in times and build out rates of individual sites. However, the Council's assumptions on deliverability, lead-in times and delivery rates should be realistic, based on evidence, supported by the parties responsible for housing delivery and sense checked by the Council based on local knowledge and historical empirical data.
6. Where standardised lead-in times and build out rates are applied the HBF would expect the Council to be transparent as to how these rates have been determined and to provide the evidence that this has been based on, for example evidence of historic trends. Without this information it can be difficult to determine if the rates applied are realistic, reasonable and justified.
7. The Housing Trajectory does not appear to have taken into account that some sites may not come forward due to unforeseen circumstances and does not appear to have included a lapse rate or an allowance for non-deliverability. The HBF would normally expect a lapse rate to be applied to the sites that currently have planning permission and have not yet commenced, along with any sites that do not have permission. This lapse rate would allow for changing circumstances which may lead to some sites not being brought forward.

Issue 4 – Windfall Allowance

Paragraph 48 of the Framework states that local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the SHLAA, historic windfall delivery rates and expected future trends, and should not include residential gardens. Taking this into account:

Q8. What allowance has been made for windfall sites coming forward over the first five years, and thereafter throughout the plan period?

Q9. What is this based on and is it justified on appropriate available evidence?

Q10. Having regard to the answers provided to the questions above, and questions regarding the OAN for housing under Matter 2, will there be a five-year supply of deliverable housing sites on adoption of the Local Plan?

8. Whilst the plan does not appear to make an allowance for windfall sites as such it does appear to include an allowance for small sites within Tier 5. The HBF would expect the Council to provide compelling evidence, as set out in the PPG and NPPF (2012), that these sites will continue to provide a reliable source of supply. It is considered that the Council will need to monitor the provision that windfall development is making to the delivery of homes in the Borough to ensure that the supply remains and is continuing to provide additional flexibility and the opportunity to boost housing supply.

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Issue 5 – Future Supply

Paragraph 47 of the Framework states that local planning authorities should also identify a supply of specific, developable sites or broad locations for growth for years 6-10, and, where possible, years 11-15.

Q1. How has the Council arrived at the figures in the Housing Trajectory for years 6-10 and 11-15?

Q2. What factors were taken into account in arriving at the figures in the Housing Trajectory? Are they justified and based on appropriate available evidence?

Q3. Is there likely to be a sufficient supply of housing land throughout the lifetime of the Plan?

9. As set out previously, the HBF do not wish to comment on the deliverability, lead in times and build out rates of individual sites. However, the Council's assumptions on deliverability, lead-in times and delivery rates should be realistic, based on evidence, supported by the parties responsible for housing delivery and sense checked by the Council based on local knowledge and historical empirical data.
10. Where standardised lead-in times and build out rates are applied the HBF would expect the Council to be transparent as to how these rates have been determined and to provide the evidence that this has been based on, for example evidence of historic trends. Without this information it can be difficult to determine if the rates applied are realistic, reasonable and justified.
11. The Housing Trajectory does not appear to have taken into account that some sites may not come forward due to unforeseen circumstances and does not appear to have included a lapse rate or an allowance for non-deliverability. The HBF would normally expect a lapse rate to be applied to the sites that currently have planning permission and have not yet commenced, along with any sites that do not have permission. This lapse rate would allow for changing circumstances which may lead to some sites not being brought forward.

Issue 6 – Flexibility

Q1. What flexibility does the plan provide in the event that some of the larger sites do not come forward in the timescales envisaged?

Q2. Is it necessary to have a review mechanism in the Plan to consider progress against these, and other sites, and to identify any appropriate steps to increase supply if required?

12. The HBF consider that the supply should be more than the housing requirement, to allow for flexibility and respond to changes in circumstances. It is important that the plan should seek not only to provide sufficient development opportunities to meet the housing requirement but also to provide a buffer over and above this requirement.
13. The HBF recommends that appropriate targets are introduced and that specific monitoring triggers are used, with actions identified along with appropriate timescales. This will help to ensure that action will be taken when a target is not met, and a policy needs reviewing.

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Matter 7 - Affordable Housing Provision (Policy H2)

Issue 1 – Addressing Affordable Housing Need

Q1. What is the justification for having a different policy requirement for affordable housing on greenfield and brownfield sites?

Q2. Is it appropriate to require decision-makers and developers to negotiate the level of affordable housing on a case-by-case basis for brownfield sites?

Q3. What is the justification for requiring development proposals to demonstrate 'exceptional circumstances' where a lower level of affordable housing is proposed?

Q4. Under what circumstances might the Council apply vacant building credit and "reduce on-site and/or financial contributions accordingly"? Is the approach consistent with advice contained in the National Planning Practice Guidance?

Q5. Which settlement does Policy H2 III) apply to? Is it clear to decision-makers, developers and local communities?

Q6. Is it clear under what circumstances off-site contributions will be acceptable in lieu of on-site provision? How will a decision-maker determine whether or not an off-site contribution is "preferable in terms of achieving housing and planning objectives"?

Q7. Is Policy H2 consistent with national planning policy concerning the thresholds for affordable housing?

1. The HBF are not aware of the justification for having a different policy requirement for affordable housing on greenfield and brownfield sites, the typologies used within the Viability Assessment 2017 all appear to be greenfield. Therefore, the HBF are not in a position to comment as to whether this difference is appropriate.
2. The HBF do not consider that it is appropriate to require decision-makers and developers to negotiate the level of affordable housing on a case-by-case basis for all brownfield sites.
3. The HBF has concerns in relation to the language used in policy H2, particularly reference to 'exceptional circumstances', it would be more appropriate to refer to the viability of development, as this is most likely to be the reason for the need to reduce the provision of affordable housing. The HBF do not consider that there is any justification for requiring development proposals to demonstrate 'exceptional circumstances'. The HBF proposes that the policy is modified as follows: *'Development proposals that seek to provide a lower level of affordable housing contribution will ~~not~~ **only** be acceptable ~~unless where~~ it can be clearly demonstrated that **the development would not be viable unless the** ~~exceptional circumstances exist which justify a reduced~~ affordable housing contribution **is reduced**'.*
4. The HBF considers it would be beneficial to define which settlements Policy H2 III applies to as it would provide clarity to those using the policy.
5. Planning Practice Guidance (PPG) (ID: 23b-031) is clear that *'in designated rural areas, local planning authorities may choose to apply a lower threshold of 5-units or less. No affordable housing or tariff-style contributions should then be sought from these developments. In addition, in a rural area where the lower 5-unit or less*

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threshold is applied, affordable housing and tariff style contributions should be sought from developments of between 6 and 10-units in the form of cash payments which are commuted until after completion of units within the development. This applies to rural areas described under section 157(1) of the Housing Act 1985, which includes National Parks and Areas of Outstanding Natural Beauty'. This is in line with the Written Ministerial Statement (WMS) (Nov 2014), which also stated that for 5 units or less affordable housing contributions should not be sought and that for 6 to 10 units contributions should be sought as cash payments to be commuted until after completion of units.

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Matter 8 – Housing Mix and Density (Policy SP3)

Issue 1 – Housing Mix

Q1. What is the justification for Policy SP3 a) which sets out a specific mix of house types that will be required as part of proposals for new residential development?

Q2. Is it appropriate to apply the same mix of house types across the plan area? For example, how would a decision-maker ensure that proposals for new development made an efficient use of land and promoted or reinforced local distinctiveness, especially in highly accessible urban locations?

Q3. Does Policy SP3 apply to all housing, including proposals for affordable housing?

Q4. Does the Local Plan include sufficient flexibility to allow for changing circumstances in the mix of new housing required?

1. The policy criteria appear to be based on the findings and recommendations of the Council's background paper 'Approaching Housing Density and Mix' (Feb 2017) (Submission Document Ho001), which is based on the recommendations within the SHMA 2017 (Table 7.1). However, Appendix D of the SHMA states that *'the purpose of this analysis has been to consider the likely dwelling type and size requirements of households'* this is not clearly not intended as a definitive proportion, and in fact the conclusion made by Arc is much more general and states that *'there are three key dwelling types particularly required across Craven: 2, 3 and 4 bedroom houses'*. It is also clear from the data considered that a small change in assumptions could make a significant difference to the mix required this is particularly the case in relation to link between household type/age of Household Reference Person and dwelling type/size, which the SHMA acknowledges is difficult to ascertain.
2. Whilst the HBF notes that this policy has been amended to increase flexibility and this is generally considered an improvement. There is still potential for significantly more flexibility to be added to the policy. This would help to ensure that development proposals within different parts of the plan area are appropriate to their location, local needs and would allow for changing circumstance. The HBF considers that it is important that any policy is workable and ensures housing delivery will not be compromised or stalled due to overly prescriptive requirements or the need to provide significant amounts of additional evidence.
3. The HBF therefore continues to recommend a more flexible approach is taken regarding housing mix which whilst taking account of the SHMA findings is also cognisant that needs and demand will vary from area to area and site to site and that the need to provide evidence for each and every variation to this very specific mix is likely to delay development and may reduce deliverability of sites.
4. The HBF proposes that the policy is modified as follows:
 - *The mix and density of new housing developments will ensure that land is used in an effective and efficient manner to address local housing needs. ~~This will be achieved in the following ways:~~*
 - a) ~~The local planning authority will use the housing mix set out below as a general guide for achieving an appropriate overall mix of new housing across the plan area and across all tenures;~~

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- ~~• Homes with 1-2 bedrooms—39%~~
- ~~• Homes with 3 bedrooms—44%~~
- ~~• Homes with 4 or more bedrooms—17%~~

~~b) The local planning authority will use 32 dwellings per hectare (net) as a general guide for achieving an appropriate overall housing density across the plan area and across all tenures;~~

The local planning authority will **work with developers to deliver housing that contributes to the identified needs taking** ~~apply the general guides, set out in parts a) and b) above, flexibly to ensure that individual proposals across the plan area are able to take~~ account of local variations in housing need, **local characteristics**, scheme viability or other site-specific circumstances, which may indicate that a different housing mix or density is required in order to achieve local plan objectives.

Issue 2 – Housing Density

Q1. What is the justification for Policy SP3 b) which sets out a standard density of 32dph across the plan area and across all tenures?

Q2. Is it appropriate to set out a density target for the whole plan area given the differences between towns such as Skipton and Settle and more rural areas?

Q3. How does Policy SP3 ensure that development will optimise the use of land, especially in urban locations that are well served by public transport?

Q4. Is it clear to decision-makers, developers and local communities what density of development will be required and where? Is the policy effective?

5. Again, the policy criteria appear to be based on the findings and recommendations of the Council's background paper 'Approaching Housing Density and Mix' (Feb 2017) (Submission Document Ho001). The document highlights that the mix of housing proposed is likely to influence the density of housing, it then goes on to explain that the Council has examined ten recently approved proposals to consider this relationship. Utilising the densities from this small sample and the housing mix set out in SP3(a) the Council has determined an indicative density of 37dph, however, taking into account the Open Space requirement the Council suggests the density would reduce to 32dph.
6. Whilst the HBF notes that this policy has been amended to increase flexibility and this is generally considered an improvement. There is still potential for more flexibility to be added to the policy to ensure that development proposals within different parts of the plan area are appropriate to their location and local needs The HBF considers that it is important that any policy is workable and ensures housing delivery will not be compromised or stalled due to overly prescriptive requirements or the need to provide significant amounts of additional evidence.

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Matter 9 - Specialist Housing for Older People (Policy H1)

Issue 1 – Housing for Older People

Q1. Paragraph 6.2 of the Local Plan states that the number of people across Craven District aged 65 or over is projected to increase from 14,000 in 2015 to 21,200 by 2037. What provision does the Local Plan include to ensure that this need is met?

Q2. By reference to the SHMA, paragraph 6.4 of the Local Plan also refers to research which suggests that the majority of older people (generally upwards of 65%) want to stay in their own homes. How has this been factored into account in establishing the overall housing needs for Craven?

Q3. How will 'sustainable locations' be determined for the purposes of Policy H1? Is this clear to decision-makers, developers and local communities? Is the policy effective?

Q4. Is it clear what is expected of developers under Policy H1 b)? Is the policy effective in this regard?

Q5. What is the justification for Policy H1 b) and where is this set out in the evidence base? Is the requirement consistent with advice contained in the PPG?

1. The HBF do not consider that it is clear what is expected of developers under Policy H1(b). Since the publication of the Written Ministerial Statement (March 2015), which introduced the Government's Housing Standards and the subsequent amendments to the PPG, Council's should no longer be seeking the incorporation of the Lifetime Homes standards. The equivalent optional housing standard is Building Regulation M4(2). However, this standard can only be introduced through a Local Plan subject to specific evidence requirements, including the effect upon viability. The PPG (ID 56-007) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. It is incumbent on the Council to provide a local assessment evidencing the specific case for Craven which justifies the inclusion of optional higher standards for accessible and adaptable homes.
2. The HBF also note that Policy H1 requires proposals for the provision of specialist housing for older people to be in accordance with Policy H2 for affordable housing and INF3 for open space and sports facilities. However, the Council's Viability Report Addendum highlights the viability issues that are common for supported living and identifies issues with the delivery of the 30% housing target. The Council should be mindful that it is unrealistic to negotiate every site on a one by one basis because the base-line aspiration of a policy or combination of policies is set too high as this will jeopardise delivery. The HBF would expect site by site negotiations to occur occasionally rather than routinely and would recommend that this policy has a lower more appropriate affordable housing requirement.
3. HBF propose that the policy is modified as follows:
 - The HBF recommend that the Council removes reference to accordance with policy H2 and INF3 and includes a more appropriate affordable housing target and open space contributions or provision. Ensuring that specialist homes are viable and deliverable.

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- The HBF recommend the Council ensure they have the appropriate evidence to support the introduction of part (b) of this policy or that the elements that are not justified are deleted from the policy.

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Matter 16 – Landscape, Heritage and Design (Policies ENV1, ENV2 and ENV3)

Issue 3 – Design – Policy ENV3

Q1. What are sensitive uses for the purposes of Policy ENV3 f)? What is the justification for requiring impact assessments to demonstrate that there would be no detrimental impact on future residential amenity? Is it clear to decision-makers, developers and local communities what is required?

Q2. Does the Local Plan make sufficient provision for inclusive design and accessible environments in accordance with paragraphs 57, 58, 61 and 69 of the Framework?

Q3. Is Policy ENV3 consistent with paragraph 59 of the Framework which states that design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area?

Q4. Is it clear to decision-makers, developers and local communities what is required of proposals for new development under Policy ENV3 i)?

Q5. What is the justification for encouraging developers to build new homes to 'Lifetime Homes' standards? Is this consistent with national planning policy and guidance?

1. Criterion (i) looks for development proposals to be accessible and inclusive and to everyone. Whilst the HBF is generally supportive of providing for the needs of older people and other specialist groups, it is not clear what this policy is requiring of home builders. PPG (ID 56-07) identifies the type of evidence required to introduce a policy for accessible and adaptable homes, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. It is incumbent on the Council to provide a local assessment evidencing the specific case for Craven which justifies the inclusion of optional higher standards for accessible and adaptable homes. Evidence of an ageing population does not in itself justify the requirements of this policy, without appropriate evidence the HBF would not support the introduction of this policy.
2. Whilst within part (m) developers are encouraged to build new homes to the 'Lifetime Homes' standard so that they can be readily adapted to meet the needs of those with disabilities and the elderly as well as assisting independent living at home. The Council will probably be aware that the Lifetime Homes standard is no longer applicable following the Government's Housing Standards review. Lifetime Homes have now been replaced by the optional Building Regulations accessibility standards. These standards can be introduced via a plan but only where there is specific evidence to justify their inclusion, as set out above. The HBF is unaware that the Council can provide the necessary evidence at this stage and as such this criterion is not supported.
3. It is also considered that the Council will also need to consider the potential cost of the requirements set out in parts (i) and (m) as if these principles are taken as requirements for development they are likely to impact on the viability and deliverability of development.