

HBF response to the Harrogate Local Plan Examination Inspector's Matters, Issues and Questions

Matter 2 – Objectively-Assessed Need for Housing and the Plan's Housing Requirement Figure

2.1 Is the objectively-assessed need for housing (OAN), including the figure for affordable housing, as established by the Housing and Economic Development Needs Assessment (HEDNA) 2018, and reflected in the plan's housing requirement figure (policy GS1: Providing New Homes and Jobs) of 14,049 additional dwellings in the period 2014-2035, based on robust and up-to-date evidence?

1. GS1 proposes a minimum of 14,049 new homes over the plan period from 2014 to 2035, this equates to 669 dwellings a year. The HBF is also generally supportive of the identification of the housing requirement as a minimum.
2. Whilst the PPG guidance (ID: 2a-001 to 2a-037) in relation to Housing Needs has now been superseded by the Standard Methodology, it is recognised that this occurred after the 2018 HEDNA was produced.
3. The former PPG (ID 2a-015) identified that the most recent household projections, provided by CLG, should be used to provide the 'starting point' for establishing the OAN. The PPG went on to consider that the CLG household projections may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. The 2018 HEDNA correctly utilised the 2014-based subnational population and household projections (2014 SNPP and SNHP) as its starting point as these were the most up to date at the point of publication. Following publication of the 2018 HEDNA the 2016 based SNHP¹ were released, these may require further consideration, particularly in light of the Government's latest consultation and the target to deliver 300,000 homes a year. It is also noted that within the Government's technical consultation that ONS are quoted as stating that the household projections *"do not take account of how many people may want to form new households but for whatever reason aren't able to, such as young adults wanting to move out of their parents' house, or people wanting to live on their own instead of in a house share. Therefore, household projections are not a measure of how many houses would need to be built to meet housing demand; they show what would happen if past trends in actual household formation continue"*. ONS go on to state that *"although the latest household projections are lower than the previously published projections, this does not directly mean that fewer houses are needed in the future than thought. This is because the projections are based on recent actual numbers of households and are not adjusted to take account of where homes have been needed in recent years but have not been available"*.
4. The demographic analysis correctly considers migration patterns and their impacts upon the demographic starting point. The 2018 HEDNA concludes that it is appropriate to take forward the 10-year migration trends, which sits in the middle of the projections tested. The report suggests that the longer term migration trends includes data issues associated with a degree of unattributable population change. However, the HBF

¹ <https://www.ons.gov.uk/releases/2016basedhouseholdprojectionsinengland>

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would suggest that given that the plan should be seeking to plan positively for growth and boost significantly housing supply, both NPPF requirements, a more positive stance would be to place greater weight upon the pre-recession trend projections (e.g. the period 2001 to 2015 not just 2005 to 2015).

5. The 2018 HEDNA includes an adjustment to ensure that suppressed household formation is not being projected forward and seeks to return the Household Representative Rates (HRR) of the population aged 25-34 back to the levels seen in 2001. The application of an uplift is supported and is considered consistent with the former PPG (ID 2a-015). It is, however, notable that in its recommendations to Government the Local Plan Expert Group (LPEG) identified that an increase to headship rates should be applied to a wider age cohort of 25 to 44. It is evident in figure 11 of the HEDNA that an uplift to the 35-44 age bracket would also be beneficial, given the difference between the Harrogate projection and those for Yorkshire and England.
6. The HEDNA identifies an economic activity rate in Harrogate of those aged 16-64 of 85.1% in 2016. Whilst table 17 breaks down the projected changes to economic activity showing significant increases in activity for those aged 55 or more by 2035, whilst the later retirement aged is acknowledged and activity rates amongst older residents is likely to increase it is debatable if it will be of the order suggested. This is important because of the significant projected increase in Harrogate of the older population. Therefore, to place too great a reliance upon the older age population continuing to take up jobs will have a significant dampening effect upon the housing need projections.
7. The HEDNA discounts the OBR economic activity rates as they do not relate to the economic forecasts that have been developed at a local level. However, the OBR rates are generally considered to provide a robust basis on which to project economic activity and are used in the Government's fiscal planning and it is not clear why that would not be so within Harrogate.
8. The HEDNA identifies that the market signals identify affordability pressures across the district, which would justify an uplift to the housing need. However, it suggests that as the economic-led housing need is already more than double the official starting point that further uplifts are unwarranted.
9. To conclude, whilst much of the methodology is generally considered sound, several the assumptions made within the HEDNA are likely to suppress the calculation of housing needs in the area.

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Matter 4 – Supply of Housing Land

(This Matter focusses on the overall supply of land for housing. The merits of individual site allocations are considered under Matters 7 - 10)

In the light of Matter 2, in relation to the objectively-assessed need for housing, I will reach a conclusion on whether or not the plan's stated housing requirement figure of 14,049 dwellings is sound. Without prejudice to that, but using a working assumption that it is a soundly-based total requirement figure:

4.1 Is the plan's proposal to deliver at least (noting the as yet unquantified numbers from mixed-use allocations) c.13% more dwellings than the 14,049 OAN figure justified? In particular, what is the rationale for double counting the 995 dwelling shortfall (to date, as per proposed modification) when establishing the housing requirement?

1. The HBF consider that 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. The reasons for the inclusion of such a buffer are two-fold. Firstly, the NPPF is clear that plans should be positively prepared, aspirational and significantly boost housing supply. In this regard the housing requirements set within the plan should be viewed as a minimum requirement, this interpretation is consistent with numerous inspectors' decisions following local plan examination. Therefore, if the plan is to achieve its housing requirement as a minimum, it stands to reason that additional sites are required to enable the plan requirements to be surpassed. Secondly, to provide flexibility. A buffer of sites will therefore provide greater opportunities for the plan to deliver its housing requirement. The HBF recommend a 20% buffer of sites be included within the plan.

4.2 Is delivery of this quantum of housing realistic having regard to historic rates in the District?

2. The HBF consider that if appropriate housing land is made available and the proposed developments are not subject to such a scale of obligations and policy burden within the local plan that their delivery is threatened, that the quantum of housing proposed can be delivered.

4.3 Are assessments of dwelling numbers for allocated sites realistic and justified, given apparent constraints that would necessitate having undeveloped areas on some sites to address e.g. flood risk and impact upon heritage assets, affecting many of the sites? Has sufficient regard been had to the density of development surrounding the sites?

3. The HBF does not wish to comment upon the acceptability or otherwise of individual sites. It is, however, important that the Council's assumptions on sites in relation to delivery and capacity 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.

4.4 Are the assumptions about delivery from windfall sites soundly based? Is windfall delivery likely to increase if the Council's approach to development beyond settlement boundaries is found to be sound?

4. Whilst the HBF acknowledges the previously the Council has had a healthy level of development from windfall sites, the HBF considers that historic trends may not always be an accurate reflection of windfall delivery in the future, as we would expect the delivery of homes from these sources will reduce over future years as sites allocated in the Local Plan are brought forward.
5. Given that policy GS3 states that development should not be disproportionate to the existing settlement and provides a set of criteria that development needs to meet the HBF consider that at best this policy may limit the impact of windfalls reducing due to the adoption of the plan.

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6. The HBF are supportive of not including an allowance for windfalls in the first three years of the Plan.

4.5 Does the evidence (in particular Appendix 2 of the plan; Annual Monitoring Report 2017 (SD17); and Five Year Housing Land Supply Update (EBH04)) convincingly demonstrate that a five-year supply of deliverable housing land is likely to exist on adoption of the plan and throughout the plan period?

7. The HBF are concerned in relation to the lack of flexibility provided by the plan in terms of meeting the housing requirement.

8. The following tables are completed using data extracted from the Housing Land Supply Update October 2018.

Table 1: Completions			
Year	Completions (Net)	Housing Requirement	Over / Under Supply
14/15	415	669	-254
15/16	306	669	-363
16/17	366	669	-303
17/18	598	669	-71
18/19 (Apr – Sep)	236	335	-99
Total	1,921	3,011	1,090

9. Table 1 clearly shows that there has been an undersupply of dwellings, whilst it is noted that levels of development have increased over recent years, 1,090 dwellings is a significant undersupply. Further allocations would assist in reducing this under-supply. The HBF recommends that this under-supply is addressed as soon as possible.

Table 2: Housing Land Supply	
Large Sites with planning permission	3316
Small Sites with planning permission	895
Prior Notifications (discounted by 10%)	235
Permission in principle	2
Applications pending	870
Windfall Allowance	194
Total	5,512

10. Table 2 above utilises information from Section 4 of the Housing Land Supply Update October 2018. Whilst it is appropriate for the Local Plan to be tested against the NPPF 2012 as set out in the transitional arrangements, once the plan is adopted the 5-year supply will be tested against the NPPF 2018. The use of the NPPF 2018 could potentially make a significant difference to the 5-year supply with a new definition of 'deliverable'.

11. NPPF (2018) states that '*Sites that are not major development², and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years*'.

² Defined in the NPPF (2018) as 'development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more'.

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Therefore, the HBF would expect the Council to collate clear evidence that housing completions will begin on site within the 5-years, particularly in relation to sites with outline permission, permission in principle, major development and sites pending decisions.

12. However, as the Council does not appear to have this evidence at present the HBF would recommend that a 10% slippage rate is applied to all large sites with planning permission and to all sites with permission in principle. The HBF would recommend that a 20% slippage rate is applied to the applications pending as these are even less certain to come forward than the sites with permission.

Table 3: Housing Land Supply	
Large Sites with planning permission (discounted by 10%)	2984.4
Small Sites with planning permission	895
Prior Notifications (discounted by 10%)	235
Permission in principle (discounted by 10%)	1.8
Applications pending (discounted by 20%)	696
Windfall Allowance	194
Total	5,006

Table 4: Five Year Supply		
A	Core Strategy Housing Requirement for Plan Period (2014-2035)	14,049
B	Core Strategy annual housing rate (A/21 years)	669
C	Five Year housing rate (B X 5)	3,345
D	Actual Completions (2014 to Sept 2018)	1,921
E	Core Strategy expected Completions (B x 4.5) (669 x 4.5)	3,010.5
F	Over / Under Supply of housing delivery (D-E) (1,921-3,010.5)	-1,089.5
G	Five Year housing rate incorporating shortfall (C+(-)F)	4,434.5
H	Buffer (G x 20%) (4,434.5 x 20%)	886.9
I	Five Year housing rate incorporating shortfall and buffer (G + H) (4,434.5 + 886.9)	5,321.4
J	Annual target for next 5 years (I/5) (5321.4 / 5)	1,064.3
K	Deliverable Supply (As identified by the Council)	5,512
L	Housing Land Supply	5.18 years
K	Deliverable Supply (As identified by the HBF)	5,006
L	Housing Land Supply	4.7 years

13. Although the Housing Land Supply Update October 2018 identifies a 5-year supply (5.18yrs) it is by a narrow margin. And whilst the HBF has not undertaken a thorough assessment of all the sites and delivery rates contained in the supply. It would only take one or two sites not too deliver for the supply to be lost (192 dwellings). Indeed, if the slippage rates are utilised as set out in table 3 the Council would no longer have a 5-year supply. To ensure that the plan provides sufficient flexibility to meet the housing requirement over the plan period and

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provides a defensible five-year housing land supply position upon adoption it is recommended further sources of supply are considered.

14. In conclusion, the HBF do not believe that the evidence convincingly demonstrate that a five year supply of deliverable housing land is likely to exist on adoption of the plan and throughout the plan period, as the supply is unlikely to be able to cope with the non-delivery or under-delivery of homes on more than a couple of sites.

(N.B. My ultimate consideration of this question will also be informed by detailed discussion of the deliverability of specific site allocations in Matters 7 - 10.)

4.6 Is it most effective to distribute the housing shortfall to date over the remaining plan period (paragraph 10.30) rather than seeking to deliver it in the first five years? How does this proposal relate to the assumption of accelerated delivery in years four to eight of the plan (Appendix 2)?

15. 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 PPG (ID: 3-044).

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Matter 14 - District-wide policies concerning Housing development (Policies HS1- HS10)

14.1 Policy HS1 – Housing Mix and Density

(a) Is the statement that "The council will seek to balance the housing market..." clear and effective?

1. The HBF consider that it is not entirely clear what is meant by 'balance' in this introductory sentence and consider it may be more appropriate to link the housing mix to need and the aspirations of the local community rather than the need to create a balance.

(b) Is the requirement that 25% of the market units (on developments of 10 or more dwellings) are accessible and adaptable homes consistent with the supporting evidence? Is the evidence provided to support this requirement robust and consistent with national planning practice guidance?

2. The National Planning Practice Guidance (NPPG) states that where a local planning authority adopts a policy to provide enhanced accessibility or adaptability they should do so only by reference to Requirement M4(2) and / or M4(3) of the optional requirements in the Building Regulations and should not impose any additional information requirements (for instance provision of furnished layouts) or seek to determine compliance with these requirements, which is the role of the Building Control Body. This is to ensure that all parties have the clarity and certainty of knowing which standards they have to deal with and can factor these into their plans. For developers, this ensures that the design and procurement complications that previously arose from a series of different standards in different areas are avoided. It was recognised that it was not appropriate to apply Category 2 or 3 standards to all new homes as not all people who buy or move in to new homes need or wish to have such provision. Category 2 and 3 standards were therefore made "optional" with the position being that the case for requiring such standards in future new homes should be made through the adoption of local plan policies that have properly assessed the level of requirement for these standards in the local area, also taking into account other relevant factors including the impact on project viability.
3. PPG (ID 56-07) 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 Harrogate which justifies the inclusion of optional higher standards for accessible and adaptable homes.

Likely Future Need

4. The 2018 HEDNA provides information in relation to the ageing population in Harrogate, with Table 34 suggesting that 31% of the 2035 population will be over 65. The paper highlights that the prevalence of disability rises with age and uses POPPI to source information on the numbers of people predicted to have different disabilities by age and sex. It then uses data from the 2011 Census to provide local data on limiting long term health problems and disabilities. However, figure 45 also identifies that Harrogate has a lower proportion of people with long-term health problems or disability than in Yorkshire / Humber and England, across all age categories including those aged 65 and over.
5. Whilst the HBF does not dispute the ageing population, it is not clear how this ageing population and potential future need reflects in the need for 25% of all new homes to be provided at M4(2) standards. If it had been the Government's intention that generic statements identifying an ageing population justified adoption of the accessible & adaptable homes standards then the logical solution would have been to incorporate the M4(2) as mandatory via the Building Regulations which the Government has not done. The optional

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higher M4(2) standard should only be introduced on a "need to have" rather than a "nice to have" basis. Although there is evidence of an ageing population having regard to the PPG this does not amount to the justification required for the Council to include the optional standard on 25% of new dwellings as specified in Policy HS1.

6. The paper goes on to assume an unmet need of 3.5 wheelchair adapted dwellings per 1,000 households and 3% wheelchair accessibility need based on estimations within the Mind the Step report. Again, the Mind the Step report is an England wide report, and again it could be queried why if this justification is sufficient Government had not introduced the standard as mandatory through the Building Regulation requirements.

Size, location, type and quality of dwellings needed

7. There is limited information provided in relation to the size, location, type and quality of dwellings needed based on future demand. The HBF may have expected to see information in relation to the proportion of people that may need an accessible home from the social rented tenure for example, or in relation to the how the need is consistent across the Borough rather than in particular locations, whether there were any sizes or types of homes that were of particular need for example will it be single people, older couples or will it be family homes with facilities for older or disabled members.
8. Information provided within the HEDNA identifies (Table 40) that people living in social rented homes are more than twice as likely to have a long-term health problems or disability, with only 13% of people living in other tenures. A similar trend is seen in wheelchair users where 7.1% of social tenants are wheelchair users, compared to only 2.3% of owner-occupiers. However, it is not clear how this has been reflected in the requirements within the policy.

The accessibility and adaptability of existing housing stock

9. There does not appear to be any information in relation to the accessibility and adaptability of the existing stock. Therefore, it is not possible to determine how much of the future need could be met within the existing stock.

Overall Impact on Viability

10. Paragraph 173 of the NPPF 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. The proportion of accessible and adaptable homes is above the 10% tested within the Whole Plan Viability Assessment, although this is updated to 25% in the 2018 update it remains evident that there are viability issues.

Conclusion

11. The HBF is supportive of providing homes for older and disabled persons. However, the HBF does not consider that the requirement for 25% accessible and adaptable is necessary, it is considered that local needs can be met without the introduction of the optional housing standards.
12. If the Council wish to pursue this policy the HBF recommends the Council ensure that an appropriate evidence base is available to support this policy in line with that set out in the PPG, that a viability clause is incorporated within the policy and that an appropriate transitional period is provided.

(c) Is the same requirement, with regard to accessible homes, consistent with national planning guidance?

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13. The HBF concerns in relation to this requirement are as set out above.

(d) Is the minimum net density requirement soundly based and evidenced?

Whilst the NPPF, paragraph 47, does indicate local authorities can set out their own approach to housing density this should be based upon local circumstances and not harm the overall objective of boosting significantly housing supply. The HBF recommends the Council ensure that the appropriate evidence is available to support this policy.

The flexibility provided by this policy in relation to certain exceptions is noted, this will allow developers to react to some local site characteristics and demand. However, further amendments could be made to create greater flexibility to allow developers to take account of the evidence in relation to local site characteristics, market aspirations and viability.

The Council will also need to consider its approach to density in relation to other policies in the plan. Policies such as open space provision, space standards and parking provision will all impact upon the density which can be delivered upon site.

14.2 Policy HS2 - Affordable Housing

(a) Is it clear what is meant by "... all qualifying greenfield developments..."?

14. The HBF have understood this to mean those developments meeting the thresholds set below.

(b) Are the thresholds for the provision of affordable housing justified and soundly based?

15. The thresholds set out in paragraphs 2 and 3 of the policy appear to be based on the guidance on Planning Obligations contained within PPG (ID: 23b-031).

16. There may be some confusion as to what will happen once the plan is adopted for any developments of 10 dwellings, as paragraph 2 refers to 11 or more dwellings, paragraph 3 refers to six to 10 and the NPPF (2018) states that decisions should expect at least 10% of the homes to be available for affordable home ownership.

(c) To be effective, given that planning applications may be considered having regard to the revised National Planning Policy Framework (2018), should the threshold in the second paragraph be for 10 or more dwellings?

17. As above, the HBF consider that there may be scope for confusion for developments of 10 dwellings, this will need to be considered.

(d) Does the evidence support the differential requirements between greenfield and brownfield land?

18. The evidence appears to show that there remain viability issues on both brownfield and greenfield sites as highlighted in our previous responses and continuing to be demonstrated in the 2018 Viability Assessment update.

(e) Is the lack of a lower affordable housing target for Ripon justified and supported by the evidence (paragraph 10.26 of Whole Plan Viability Study (EBT101))?

19. The HBF consider that a lower affordable housing target should be considered across the Borough to ensure that homes are delivered. The HBF consider that further consideration should be given to the evidence provided within the Viability Assessments (2016) and (2018).

(f) To be effective, should the policy make reference to the designated Rural Areas map (Map 11.2) within the plan?

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20. It may be useful for the general public if they understood where the designated Rural Areas are and potentially with some text in the justification as to how they are defined.

(g) Is the requirement for affordable dwellings to be accessible and adaptable homes consistent with the supporting evidence? Has national planning practice guidance been followed in relation to the provision of evidence to support this requirement?

21. As set out in relation to policy HS1, the HBF are supportive of the provision of homes for older and disabled persons. However, in order for these policies to be put in place, the Council need to ensure that they have the appropriate evidence to do so, in line with PPG (ID: 56-007). It needs to be clear within the evidence why the provision of all affordable homes at these higher standards is justified. PPG is also clear that Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling (ID: 56-009). Therefore, there will need to be a clear policy for how the Council will work with developers and housing associations to deliver these homes.

(h) Is the same requirement, with regard to accessible homes, consistent with national planning guidance?

22. The HBF concerns in relation to this requirement are as set out above.

14.3 Policy HS3 – Self and Custom Build Housing

(g) Is the policy otherwise justified, effective and consistent with national planning policy?

23. The HBF would recommend appropriate evidence is collated to ensure that house building delivery from this source provides an additional contribution to boosting housing supply. This is likely to include engaging with landowners and working with custom build developers to maximise opportunities.

14.4 Policy HS4 – Older People's Specialist Housing

(a) Is the policy justified, effective and consistent with national planning policy?

24. This policy requires C3 older people's specialist housing to provide affordable housing in line with Policy HS2. As set out previously, the HBF have concerns in relation to HS2, these will also apply in relation to this policy. Particularly in relation to the viability of the requirement for development that includes older people specialist housing. It is evident that extra care housing is not considered viable once the affordable housing is included.

14.5 Policy HS5 – Space Standards

(a) Is the evidence provided to support this requirement robust and consistent with national planning guidance?

25. 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 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.

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- **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’.
26. The Council will need robust justifiable evidence to introduce any of the optional housing standards, based on the criteria set out above. 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 Housing Background Paper provides some limited information in relation to recently built properties.
27. The HBF recommends the Council ensure that the appropriate evidence is available to support this policy in line with that set out in the PPG. For example, at present the evidence has only considered 112 new homes, the HBF would expect the evidence to have covered significantly more dwellings over a longer time period. It is also considered that just collating evidence of the size of dwellings completed does not in itself identify need. It would be expected that the evidence would include market indicators such as quality of life impacts or reduced sales in areas where the standards are not currently being met. 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.
28. The HBF consider that standards can, in some instances, have a negative impact upon viability, increase affordability issues and reduce customer choice. 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.
29. As above, it is considered that the Council should take into consideration any implications the requirements of this policy may have on the viability of a development. Paragraph 173 of the NPPF 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.
- (b) Is it effective to locate what appears to be policy in the supporting text (paragraph 5.43)?*
30. The HBF consider that the transition period should be included within the policy. The HBF note that the transition period is currently proposed to be six months from the adoption of the Plan. Whilst the HBF support the inclusion of a transition period, it is considered that it may be appropriate for further consideration to be given to the length of the transition period given the lead in times for residential development.
- (c) Is the policy otherwise justified, effective and consistent with national planning policy?*
31. The HBF does not consider that this policy is required, it is considered that local needs can be met without the introduction of the optional housing standards.

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Matter 15 – Transport and Infrastructure (policies T11 – T16)

15.6 Policy T15 – Telecommunications

(b) Is the policy justified and effective, having particular regard to whether the criteria are achievable and/or in the gift of the development industry?

32. The HBF generally consider that digital infrastructure is an important part of integrated development within an area. However, the inclusion of digital infrastructure such as high-speed broadband and fibre is not within the direct control of the development industry, and as such it is considered that this policy could create deliverability issues for development and developers. Service providers are the only ones who can confirm access to infrastructure. Whilst, paragraphs 43 to 46 of the NPPF (2012)³ establishes that local planning authorities should seek support the expansion of electronic communications networks it does not seek to prevent development that does not have access to such networks. The house building industry is fully aware of the benefits of having their homes connected to super-fast broadband and what their customers will demand.
33. The HBF consider that in seeking to provide broadband and fibre to homes the Council should work proactively with telecommunications providers to extend provision and not rely on the development industry to provide for such infrastructure.
34. The Council should also note that Part R of the Building Regulations clearly sets the appropriate standards for high speed electronic communication networks, that are within the control of the housebuilder.

(c) Is criterion F sufficiently robust to be considered effective?

35. The HBF considers that encouraging applicants to engage with communication providers and local broadband groups is appropriate.

³ Continued in paragraph 112 of NPPF 2018