

Planning Policy
Harrogate Borough Council
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SENT BY EMAIL
planningpolicy@harrogate.gov.uk
19/09/2019

Dear Sir / Madam,

HARROGATE DISTRICT LOCAL PLAN MAIN MODIFICATIONS

Thank you for consulting with the Home Builders Federation on the Harrogate District Local Plan Publication Draft.

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

The Council will be aware that the HBF provided comments upon the previous drafts of the plan and attended the Examination Hearing Sessions. For the Harrogate Local Plan to be found sound under the four tests of soundness as defined by the NPPF (2012) (para 182), the Plan should be positively prepared, justified, effective and consistent with national policy. The Plan is considered unsound because of MM2 and MM23. Therefore, the Plan is considered to be inconsistent with national policy, not positively prepared, unjustified and ineffective.

MM2: Policy HS1: Housing Mix and Density

MM2 is not considered to be sound as it is not consistent with national policy for the following reasons:

The HBF is generally supportive of the deletion of the first sentence of Policy HS1, which should help with the clarity of the policy.

The HBF does not however support the deletion of 'and where viable', NPPF 2012 is clear that plans should be deliverable and policy burdens should not threaten the viability of development. The HBF is concerned that without the reference to viability the policy could reduce the deliverability of development in the Borough.

MM23: HS2: Affordable Housing

MM23 is not considered to be sound as it is not considered to be justified or effective for the following reasons:

Whilst the HBF appreciate the use of appropriate language when referring to 'accessible homes' and part 'M4(3)(b)', the HBF continues to consider that this policy is not sound. It remains unclear as to why the Council considers it is necessary to require wheelchair 'accessible' homes as opposed to 'adaptable'. It is also not clear how the policy will be work, as PPG is 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).

Future Engagement

It is hoped that these representations are of assistance to the Council and the Inspector in preparing the final stages of the Harrogate Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

The HBF would like to be kept informed of the production of the Inspectors Report, and the adoption of the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,



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