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01/04/2019

Dear Sir / Madam,

### **CRAVEN LOCAL PLAN: MAIN MODIFICATIONS**

Thank you for consulting with the Home Builders Federation on the Main Modifications of the Craven Local Plan.

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.

#### **MM5: Supporting text to Policy SP3**

The HBF supports the addition of the full table from the SHMA Update 2017 setting out the proportional mix for market housing, affordable housing and overall. The HBF also support the recognition that other sources of evidence should be considered in relation to the mix and range of housing.

The HBF support the reference to the local planning authority being flexible in its requirements for housing mix and density, within part (c).

#### **MM77: Policy ENV3**

The HBF supports the deletion of part (m) and the reference to Lifetime Homes and the amendments to part (u) which adds clarity.

**MM91: Policy H1**

The HBF generally supports the amendments to part (b) to remove reference to 'lifetime homes'.

**MM92: Supporting text for Policy H2**

The HBF continues to have concerns in relation to the proposed amendments to paragraph 6.18 which still looks for circumstances to be 'exceptional' for development proposals to provide a lower proportion of affordable housing. Whilst the use of examples is beneficial, the HBF still have concerns that this requirement is overly onerous on the applicant and may lead to the Council refusing to consider viability evidence and homes not being delivered if some circumstances are not deemed 'exceptional' enough.

**MM93: Policy H2 Affordable Housing**

The HBF consider that the wording 'not less than' in relation to the affordable housing requirement is not necessary and should not be added to the policy.

As set out above, the HBF continues to have concerns in relation to part (d) which states that *'development proposals that seek to provide a lower level of affordable housing contribution, will not be acceptable unless it can be clearly demonstrated that exceptional circumstances exist'*. The HBF has concerns that the Council will limit the circumstances within which viability evidence will be considered and this will lead to homes not being delivered. The HBF continues to consider that this text should be amended to delete the reference to exceptional circumstances and potentially amended to directly refer to viability of development.

**Future Engagement**

I trust that the Council will find these comments useful as it continues to progress its Local Plan to adoption. 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 adoption of the Local Plan and all forthcoming consultations upon associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,



**Joanne Harding**

**Local Plans Manager – North**

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