

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

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.