

Draft Ripon City Plan

Supporting Document:
Providing New Homes

March 2018



RIPON CITY PLAN

Making a Better Place

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1 Introduction

1.1.1 The provision of more housing is a key element of Sustainable Development. The purpose of this supporting document is to show how the Plan has been prepared over time to arrive at a fair contribution to the district's housing requirement.

2 National Planning Context

2.1 [National Planning Policy Framework](#)

Published: March 2012 by Department for Communities and Local Government

2.1.1 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. The NPPF must be taken into account in the preparation of Local and Neighbourhood Plans and is a material consideration in planning decisions.

2.1.2 The NPPF paragraphs most relevant to the City Plan in relation to Providing New Homes are within the section on "*Delivering a wide choice of high quality homes*" (NPPF, March 2012, Department for Communities and Local Government, Paragraphs 47 – 55). In particular Paragraphs 47, 48 and 50 from the NPPF are relevant:

2.1.3 *47. To boost significantly the supply of housing, local planning authorities should:*

- *use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;*
- *identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;*
- *identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;*
- *for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and*

set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target; and

- *set out their own approach to housing density to reflect local circumstances.*

48. 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 Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.

50. To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should:

- *plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);*
- *identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand; and*
- *where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time.*

2.1.4 In addition, the NPPF also has a specific section on “*Neighbourhood Plans*”. In particular, paragraph 184 highlights that:

184. ... Neighbourhood plans and orders should not promote less development than set out in the Local Plan or undermine its strategic policies.

2.1.5 In March 2018 Government published a review of NPPF for consultation.

2.2 [Planning Practice Guidance](#)

2.2.1 PPG contents relevant to the approach of the City Plan in relation to Providing New Homes are:

2.2.2 Preparation of the plan has been in full recognition that

Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. To facilitate this, local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date Local Plan is in place as quickly as possible. Neighbourhood plans should reflect these policies and neighbourhoods should plan positively to support them. Neighbourhood plans...should not promote less development than set out in the Local Plan or undermine its strategic policies. (NPPF 184)

2.2.3 This is of fundamental importance to the requirement for Ripon to contribute to growth within the district and the provision of new homes and receives direct reference in Planning Policy Guidance

A draft neighbourhood plan...must be in general conformity with the strategic policies of the development plan in force if it is to meet the basic condition. Although a draft Neighbourhood Plan...is not tested against the policies in an emerging Local Plan the reasoning and evidence informing the Local Plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. For example, up-to-date housing needs evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan...contributes to the achievement of sustainable development. (PPG 41-009-20160211)

2.2.4 [PPG ID 41: Neighbourhood Planning](#)

2.2.5 Published: April 2016 by Department for Communities and Local Government Paragraph 9 is particularly relevant to the City Plan in relation to Providing New Homes. This advises on the following issue:

Can a Neighbourhood Plan come forward before an up-to-date Local Plan is in place?

A draft neighbourhood plan must be in general conformity with the strategic policies of the development plan in force if it is to meet the basic condition. Although a draft Neighbourhood Plan is not tested against the policies in an emerging Local Plan the reasoning and evidence informing the Local Plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. For example, up-to-date housing needs evidence is relevant to the question of whether a housing

supply policy in a neighbourhood plan...contributes to the achievement of sustainable development.

Neighbourhood Plans should consider providing indicative delivery timetables, and allocating reserve sites to ensure that emerging evidence of housing need is addressed. This can help minimise potential conflicts and ensure that policies in the neighbourhood plan are not overridden by a new Local Plan.

2.3 [Department for Communities and Local Government Neighbourhood Planning: Written statement - HCWS346](#)

2.3.1 This statement made on 12 December 2016 by the then Minister of State for Housing & Planning & Minister for London referred to protecting the risk to neighbourhood plans housing supply policies in areas where there is not a five year supply of housing. This receives attention in this supporting document for the phrase that “...neighbourhood plans meet their fair share of local housing need ...”. Whilst this terminology follows on the NPPF requirement that neighbourhood plans should not promote less development than set out in the Local Plan, it introduces the concept that there is a “fair” share of local housing need. This is not defined.

2.4 [Housing requirement in neighbourhood plans](#)

2.4.1 The Government has recognised that preparation of some neighbourhood plans is hindered by the lack of an up-to-date local plan. In September 2017 consultation proposals were published by [DCLG - Planning for the right homes in the right places](#). The Government’s proposed approach is set out at para 99 as follows:

99. Therefore, where the local plan is out-of-date and cannot be relied on as a basis for allocating housing figures, we are proposing to set out in guidance a simple formula-based approach which apportions the overall housing need figure for the relevant local authority area/s, based on the latest figures calculated under the new standard approach (once, and assuming, it is introduced), to the neighbourhood planning area. The proposed formula is simply to take the population of the neighbourhood planning area and calculate what percentage it is of the overall population in the local planning authority area. The housing need figure in the neighbourhood planning area would then be that percentage of the local planning authority’s housing need.

2.5 [Draft Planning Practice Guidance - March 2018](#)

2.5.1 Draft PPG addresses the Local Planning Authority responsibility to provide housing requirement figures for designated neighbourhood areas. This would have been of interest for preparation of the Plan.

Ideally, local planning authorities should set housing requirement figures for designated neighbourhood areas as part of their strategic policies. However, it may be necessary for indicative housing requirement figures to be produced (for example where the strategic and neighbourhood plan production timescales don't align or new evidence of housing need is available). There is no set method for local authorities to determine the proportion of the authority's housing need which each neighbourhood should plan for. The housing requirement for a neighbourhood area should be derived from the authority's housing need figure and take into consideration relevant policies and evidence such as the spatial strategy (or the emerging strategy if indicative figures are being set), the Housing and Economic Land Availability Assessment, the population of the neighbourhood area and the role of the neighbourhood area in providing services.

- 2.5.2 In the circumstances of a Local Planning Authority being unable to set a housing requirement for a designated neighbourhood area the neighbourhood planning body would be able to draw on the following guidance.

Where a local authority's strategic policies do not include a housing requirement for a particular neighbourhood area, neighbourhood planning groups may request an indicative figure from the local authority if they wish to plan for housing. If, in exceptional circumstances, a local planning authority has been unable to provide an indicative housing requirement figure within a reasonable timeframe, then the neighbourhood planning group may need to determine a housing requirement figure for the designated neighbourhood area. The latest neighbourhood planning toolkit on housing needs assessment may be used to provide the requirement. Groups will need to proactively engage with the local planning authority through this process. The figure will need to be tested at examination of the neighbourhood plan.

3 Local Planning Authority Context

3.1 [Harrogate District Local Plan – February 2001 \(Augmented Composite\)](#) Published: July 2009 by Harrogate Borough Council

- 3.1.1 The Local Plan for the Harrogate district, of which Ripon is part, comprises the Core Strategy (adopted 2009), policies retained from the 2001 Local Plan and the emerging Local Plan.

3.2 Harrogate District Local Development Framework – Core Strategy

Adopted: February 2009

3.2.1 As regards housing, Policy SG1 of the Core Strategy stated an annual requirement of 390 dwellings for the period 2004-2023. Ripon, as a “principal town”, was given a contribution of 8%; namely an annual rate of 31 dwellings. Owing to the buoyant housing market before the 2008 financial crisis and delivery since, the Core Strategy requirement has been largely delivered in Ripon. (The Core Strategy did not define the geographical extent of “Ripon” nor whether this meant the parish (city) boundary).

3.3 Harrogate District Local Development Framework – Sites & Policies DPD

Withdrawn: May 2014

3.3.1 A Sites & Policies DPD (SPDPD) to articulate the Core Strategy was prepared by Harrogate Borough Council and was submitted for examination in 2013. Arising from the Examiner’s concerns regarding employment and housing matters the DPD was withdrawn in 2014 and work on a new Local Plan begun. This presented plan preparation with a dilemma best explained by the following extract from the Examiner’s letter to HBC of 29 April 2014:

“It is accepted by the Council that the submitted DPD falls considerably short of meeting the objectively assessed need. The DPD seeks to provide 390 dwellings per annum, in line with the Core Strategy, as opposed to the Strategic Housing Market Assessment (2011) projections (sub-national and employment led projections) of 862 and 1,086. Other parties have put forward different – but not dissimilar – figures. This is a very substantial shortfall.

The need for joint working and collaboration where development requirements cannot wholly be met within individual local authority areas is emphasised in the NPPF (paragraphs 178 - 181). As explored at the Hearing, although I appreciate the joint working which has been and is being undertaken with other Councils, it is unlikely that other local authorities will make allowances for housing needs arising in Harrogate. Based on the most up-to-date available evidence it is therefore apparent that the Council’s plan would probably fail by a considerable margin to meet the housing needs of the area.”

3.3.2 The Examiner was pointing to a potentially higher housing target for the district. Whilst it was clear that HBC would be updating its housing evidence it remained unclear as to how soon any specific guidance would be forthcoming to be of assistance for the plan.

3.3.3 The requirement for the plan to be in general conformity with the strategic policies of the Local Plan lead to advice being sought at the time from an independent practitioner (Appendix D) supported by which plan preparation continued. (See 5.3 below).

3.4 Harrogate District Local Plan: Issues and Options Consultation

Published: July 2015 by Harrogate Borough Council

3.4.1 The first event to be of interest to plan preparation was the HBC consultation on spatial options for growth. A housing requirement was suggested based on the interim SHMA assessment of need and updating of information following the approach taken in LCD36a in the previous year. Five options were presented for comment (of eleven that, it was understood, had been considered).

3.4.2 Whilst these offered some insight into HBC thinking on the distribution of growth, little firm guidance could be gleaned. Naturally, focusing growth on the principal towns of Harrogate, Knaresborough and Ripon was presented but limited to the Core Strategy distribution, that had been 8% for Ripon. No alternative options allocating more or less growth to the towns was suggested. A further option identified villages peripheral to the towns for growth. (In Ripon's case the chosen villages generally suffered from constraints.)

3.4.3 A somewhat more radical approach was adopted in the suggestion of allocating growth to defined settlements on the Leeds - Harrogate - York railway line. Finally, the concept of growth close to the A1(M) corridor was suggested. Clearly Ripon's growth could be restrained by the latter options although the city is not far from A1(M) Junctions 49 and 50.

3.5 Harrogate District Local Plan: Draft Development Management Policies

Consultation: November 2015

3.5.1 As part of the development of the new Harrogate District Local Plan, the draft development management policies were published for consultation in November 2015. This included a draft policy in relation to the type, mix and density of new market housing:

Draft Policy HS1: Type, Mix and Density of New Market Housing Units

All proposals for residential development on sites of ten or more dwellings should take into account the Strategic Housing Market Assessment (SHMA) in determining the mix of unit size and type needed to meet housing requirements of the district on each site.

On all other sites, the mix of housing should contribute to the creation of mixed communities having regard to the SHMA and the existing mix of housing in the locality.

New housing will be expected to deliver housing at a density of not less than 30 dwellings per hectare (dph). Higher densities of between 30 and 50 dph will be sought on appropriate sites within the main built up areas of Harrogate, Knaresborough and Ripon. In locations in and adjoining town, city and any other urban centres with a good standard of accessibility to public transport, densities of up to 50 dph will be sought.

These requirements may be relaxed where it can be demonstrated that development at such densities would be detrimental to local character or amenity or there are other constraints upon the site itself, which would prevent these densities being achieved.

- 3.5.2 In addition, there was also a draft policy in relation to affordable housing both of which are relevant to City Plan approach to providing new homes.

Draft Policy HS2: Affordable Housing

All proposals for new residential development (including mixed use schemes and conversions) will be expected to contribute towards meeting the affordable housing need of the district.

In Harrogate, Knaresborough and Ripon on proposals of five or more dwellings, 40% of the dwellings should be affordable and provided on-site. On proposals of one to four dwellings a commuted sum in lieu of on-site provision will be required.

In all other areas on proposals of three or more dwellings, 40% of the dwellings should be affordable and provided on-site. On proposals of one to two dwellings a commuted sum in lieu on-site provision will be required.

3.6 Draft Harrogate District Local Plan November 2016

- 3.6.1 The Draft Local Plan was published for public consultation in November 2016 and revealed the intentions of the emerging Local Plan for housing and other allocations in and surrounding Ripon.

3.6.2 The following sites were allocated for housing:

Site reference	Address	No. of dwellings	Category
Within Ripon Neighbourhood Area			
R1	Bondgate	10	Brownfield
R6	Springfield Close	20	Greenfield
R23	Cathedral Choir School	98	Brownfield
R24	Deverell Barracks	196	Brownfield
R25	Claro Barracks (mixed use area)	540	Brownfield
	Total	864	
Adjacent Ripon Neighbourhood Area			
R8	West Lane, Ripon	430	Greenfield
	Gross total for Ripon	1294	
Committed sites within Neighbourhood Area			
R11	Palace Road	55	Brownfield
R22	Bellman Walk	150	Greenfield
(Both sites under construction August 2017)			

3.6.3 The Draft Local Plan includes policies relevant to housing as regards the plan as follows:

- GS1 Providing New Homes and Jobs
- HS1 Housing Mix and Density
- HS2 Affordable Housing and Starter Homes
- HS3 Custom and Self build Housing

3.7 [Harrogate District Local Plan: Additional Sites Consultation July 2017](#)

3.7.1 Arising from a re-assessment of the full objectively assessed housing need the annual requirement for the district increased from 557 to 669. There is further concern that there need to be sufficient sites to ensure a five-year supply of available housing sites. This resulted in the proposed allocation of two additional sites within Ripon as below.

3.7.2 There is now congruence between the Plan and the Draft Local Plan over brownfield land and the windfall allowance, except as regards greenfield sites which are proposed to provide 73 dwellings. Bellman Walk, a committed greenfield site, is now under construction).

Site reference	Address	No. of dwellings	Category
R5	Land north of Kings Mead	53	Greenfield
R27	Land at Laver Banks	63	Brownfield

3.7.3 Of continuing concern for the Plan is the proposal to allocate greenfield land at West Lane, outside the neighbourhood area yet totally dependent upon Ripon for access and services.

3.7.4 Inclusion of policies in the plan on Housing Mix and Density and Custom and Self-Build Housing should not be in conflict with the Draft Local Plan owing to the application of different locally distinctive thresholds appropriate to Ripon.

3.8 [Harrogate District Local Plan: Publication Draft February 2018](#)

3.8.1 This is the culmination of the various stages of consultation upon the emerging Local Plan. It includes the site allocations from the Draft Local Plan and the Additional Sites consultation.

4 Ripon City Plan Vision and Objectives

4.1 Ripon City Plan – Updating You on Progress Published: December 2013 by Ripon City Plan Committee

4.1.1 Following the initial consultations, the Ripon City Plan Committee published an update in December 2013. This was based upon confirming the mission statement of the Ripon City Plan and confirming the vision and objectives based upon the feedback from the community during the “How could Ripon be better for you?” consultation which took place between April and June 2013.

4.1.2 The vision is stated on pages 16 – 17 of the Ripon City Plan – Proposed Submission Draft Plan, and of most relevance relevant to City Plan in relation to Providing New Homes is this extract:

By the 2020s the city of Ripon will be the acknowledged centre of the predominately rural area of western North Yorkshire between the A1 and the Yorkshire Dales National Park north of the Harrogate and Knaresborough

urban area and south of Richmondshire and Bedale. It will be... a convenient, accessible and attractive place for all to live including families, young people¹, the long-distance commuter, retirees, the elderly and native Riponians.

4.1.3 Furthermore, within this document the objectives of the Ripon City Plan are outlined on pages 17 and 18 and include:

5. *To contribute to meeting the need for new homes by:*
1. *allocating sites for new open market homes and new affordable homes;*
 2. *anticipating the opportunity for using windfall sites for new housing;*
 3. *reinforcing the character and function of Ripon's urban villages*

5 Reports and Information from Public, Practitioner and Industry Bodies

5.1 [York, North Yorkshire and East Riding Housing Strategy 2015 – 2021](#)

Published: May 2015 by the York, North Yorkshire and East Riding Housing Board

5.1.1 The overarching aim of this document is to support and enable economic growth by delivering the housing priorities set out in the Growth Deals from Government primarily to the York, North Yorkshire and East Riding Local Enterprise Partnership (LEP) and Leeds City Region LEP. It seeks also to meet the diverse housing needs and aspirations of local economies and communities.

5.1.2 The target is to increase the annual housebuilding rate to 5400 dwellings of which 1600 are affordable. It does not detail numbers or local distribution of housing recognising the role of Local Plans. Achieving the target require a focus on York and the growth towns (Ripon is not identified as a growth town) to provide infrastructure to unlock major sites and major investment to support affordable housing and bespoke housing initiatives including for older people. The priorities are as follows:

Supply and affordability:

1. *Work with partners to increase the supply of good quality new housing across all tenures and locations (in line with Local Plans/site allocations).*

Geography:

2. *Ensure that our housing stock reflects the needs of urban, rural and coastal communities.*

¹ This was added following 3rd April 2014 focus group meeting

Demography:

3. *Ensure that our housing stock meets the diverse needs of our population at all stages of their lives.*

Quality:

4. *Via policy guidance and negotiation, ensure new homes are of good design and environmental quality regardless of tenure.*
5. *Continue to make best use of our existing stock and ensure that it is of a decent quality to meet the needs of our communities.*
6. *Ensure all homes have a positive impact on health and well being and are affordable to run.*

Homelessness:

7. *Continue to reduce homelessness.*

Vulnerable households and special needs groups:

8. *Ensure housing is allocated fairly and on the basis of need.*
9. *Provide appropriate housing and support for those with specific housing needs.*

- 5.1.3 No specific references are made to Ripon itself in the document. Incidental information reveals that the Harrogate district does have the highest level of income needed to obtain an 80% mortgage (in 2013). Projected falling household size contributes toward an increase in households across the district for the period 2012-2037 of 9149, an annual average of 352. This is based on ONS sub-national projections. The final SHMA for the Harrogate district referenced below would appear to be of greater relevance.
- 5.1.4 There is a substantial projected increase in the proportion of the 65+ years population especially in those above 85 years over the period. Specific reference is made to the expansion of extra-care developments in major towns. Ripon is shown on a map as having two such developments. (Additional developments are known to be under consideration in the city.)
- 5.1.5 Spatial references highlight four current proposals supported by LEP growth deals. None of these is within the Harrogate district. (The opportunity for Ripon's military estate to benefit at some future stage in a similar manner should be considered.)

5.1.6 Chapter 5 of the document sets out proposals to address the priorities. Those with particular spatial relevance for Ripon City Plan appear to be:

Priority 1: Proposal 1

"...delivering the maximum annual housebuilding rate identified in Local Plans."

Priority 1: Proposal 5

"...support self build, custom build and community led housing to add to supply." (Self build and custom house building)

Priority 1: Proposal 6

*"...bring empty properties back into use."
(Windfall housing)*

Priority 2: Proposal 5

*"...address urban housing needs..."
(Propose opportunities)*

Priority 3: Proposal 1

"Increase the number and range of homes suitable for an ageing population..." (Propose opportunities)

Priority 3: Proposal 2

*"Increase the number, quality and range of homes...to enable mixed and sustainable communities."
(Housing supply)*

5.1.7 This is a high level strategic document for the region and district but has little direct content to be considered in preparation of this plan.

6 Harrogate Borough Council Strategies, Reports and Commissioned Evidence

6.1.1 Whilst the HBC Sites & Policies DPD (SPDPD) was withdrawn, two documents submitted were relevant to the preparation of this plan at the time and deserve reference. The first is the Strategic Housing Land Availability Assessment (SHLAA) updated in May 2013. Appraisal of the Ripon section is made in 7.3.1 below. The second is the revised Housing Background Paper LCD36a dated January 2014.

6.2 Housing Background Paper LCD36a (revised) January 2014

- 6.2.1 This document provided the background to Ripon's housing requirement until the withdrawal of SPDPD. It considered the North Yorkshire SHMA of 2011 that had been informed by the ONS 2008 household projections. This had indicated a significantly higher housing figure than the 390 of the Core Strategy ranging from 376 per year under natural change, 862 under sub-national population projections and 1,086 under an employment led scenario.
- 6.2.2 However, in April 2013, DCLG issued Household Interim Projections 2011 to 2021 that for Harrogate indicated that over the ten year period the number of households would rise by the equivalent of 500 per year in marked contrast to the 2008 based estimates for the same period which showed that households would rise by the equivalent of 900 per year. HBC noted that the 2011 figures were much closer to the annual housing requirement set out in the Core Strategy. The document then considered environmental and infrastructure constraints. The outcome in effect was to proceed with the Core Strategy requirement of 390 dwellings per annum.
- 6.2.3 The implication for Ripon was revealed in Table 10 of the document. This table drew together information on delivery, windfall and draft allocations to arrive at a housing requirement. Once this had been distributed in line with Core Strategy Policy SG1, Ripon had a plan period requirement of 624 dwellings of which 577 had been delivered leaving a further 89 to be supplied by 2024. Three sites in Ripon were included as draft allocations: Auction Mart (79), Palace Road (70) and the Cathedral Choir School (112). Early plan preparation thinking revealed concerns about two of the sites; the wisdom of allocating the auction mart at all owing to unstable land concerns (later borne out) and the visual desirability of the extent of development at the Cathedral Choir school. (Palace Road has since received planning permission for 55 extra care dwellings.)
- 6.2.4 The Core Strategy anticipated an annual requirement for Ripon of 31 dwellings which by 2014 would have suggested that around 300 dwellings would have still been required. Even allowing for the loss of 94 dwellings at the auction mart and Palace Road (net yield) and a lesser yield at the Cathedral Choir School to the draft allocations there was concern that the 89 dwellings otherwise to be supplied in Ripon by 2024 would be an undesirable constraint upon the city's sustainable development.
- 6.2.5 Interestingly, the document included the following:

“Recent announcements by the Ministry of Defence in respect of the barracks closure at Ripon means it is likely that, within the life of the plan, a significant brownfield re- development opportunity within the development limit of Ripon will become available. This site offers the potential to deliver a

significant amount of new housing, together with employment and open space provision. (para 4.46)”

6.2.6 Until the SPDPD was withdrawn, this document provided the only information upon which Plan preparation would proceed. It is included here for that reason.

6.3 [Harrogate Borough Council Strategic Housing Market Assessment \(SHMA\) Final Interim Report](#)

Published: February 2015 by Harrogate Borough Council

Prepared by: G L Hearne Ltd

6.3.1 The first important housing output from preparation of the new Local Plan was the Interim Strategic Housing Market Assessment in March 2015. This indicated an annual need for 624 dwellings but was not a target for the Local Plan.

6.4 [Harrogate Borough Council Strategic Housing Market Assessment \(SHMA\) Final Report](#)

Published: September 2015 by Harrogate Borough Council

Prepared by: G L Hearne Ltd

6.4.1 This document provides the most up to date evidence reported to HBC for determining the full, objectively-assessed housing need for the district. It follows national practice as set out in Planning Policy Guidance and contains sections on defining the housing market area and its characteristics. Specific attention is paid to trend based demographic need, economic-led housing requirements, affordable housing need, and housing market dynamics and market signals. Additional consideration is given to the requirement for different sizes of homes and specific groups of the population.

6.4.2 The importance of the document for the City Plan should be in what way it provides a separate approach to housing need in Ripon which the plan should address. However, the analysis of the district does not offer this.

6.4.3 Ripon is identified as being within the Northallerton Housing Market Area in the CLG-defined Gold Standard² and is:

“... defined as having its own local housing market and is also defined as part of the Central North Yorkshire character area which also includes Thirsk, Northallerton and Richmond.”³

6.4.4 Further geographical reference to Ripon is obtained from Travel to Work Patterns derived most recently from the 2011 census. Whilst there are substantial daily flows of 15,000 between the district and Leeds these patterns show:

² Harrogate Borough Council Strategic Housing Market Assessment - paragraph 2.13

³ Harrogate Borough Council Strategic Housing Market Assessment - paragraph 2.22, also see figure 2

"... with no notable flows to Leeds from the north of the district" (para 2.58).

There are also some smaller but notable flows ... from Ripon to Thirsk. ... These particularly flow into Ripon from Thirsk, Leeming and Leyburn.⁴

6.4.5 The influence of Leeds upon the south of the district has a considerable bearing on the approach taken by the SHMA except that recognition is given to:

"However, we also identify Ripon as the focus of another strong source/destination relationship, particularly with other authorities in the north.⁵"

6.4.6 Additionally:

"... The southern settlements and villages of Richmondshire and central Hambleton in particular are likely to have quite a strong relationship to Ripon.⁶"

6.4.7 The SHMA analysis follows national guidance and addresses house price trends and dynamics, commuting flows and migration patterns. This reveals significant integration between Harrogate district and Leeds and to a lesser extent Hambleton district namely paragraph 2.67 states:

"In market-terms (as reflected in the house price analysis) the relationship between Harrogate district and Hambleton is by far the strongest of the authorities analysed. In behavioural terms (shown by migration and commuting flow analysis) the closest links are with Leeds."

6.4.8 Whilst the difference between north and south of the district is acknowledged, nonetheless the SHMA argues that it is supportable to pursue a district-wide approach. Accordingly, it has not been possible for the plan to address any particular or specific characteristic or needs of the Ripon housing market, despite one having been recognised, other than arising from changes in the military estates in Ripon.

"The demands of service families may have some impact on the demand for housing from service families wishing to stay in the area" (para 9.69).

⁴ Harrogate Borough Council Strategic Housing Market Assessment - paragraph 2.58 and 2.59, also see figure 11

⁵ Harrogate Borough Council Strategic Housing Market Assessment - paragraph 2.62

⁶ Harrogate Borough Council Strategic Housing Market Assessment - paragraph 2.69

6.4.9 The SHMA has considered the housing needs of different groups namely, older people, people with disabilities, the black and minority ethnic population, households with children and young households, but once again there is no particular guidance for Ripon.

6.5 [HBC Housing Land Supply Update. October 2015](#)

6.5.1 HBC published a Housing Land Supply Update in October 2015. This refers to the final version of the SHMA published in September 2015 that had been able to take into account the 2012 mid-year population projections. The key output is the significant reduction in the annual need for the district to 518 dwellings. The update advised that there was a 6.6 year supply of housing sites in the district.

6.5.2 The Housing Land Supply Update is based on the position at 30 September 2015. The City Plan will conform to this date. The update identified sites in Ripon that would be available within the five-year supply. These are:

Sites with planning permission	
Red House, Palace Road, Ripon	55
Bellman Walk, Ripon	120
Prior Notification	
The Beeches, Magdalens Road, Ripon	2
SHLAA sites with dwellings deliverable within 5 years	
The Cathedral Choir School, Ripon	98
TOTAL	275

6.6 [HBC Planning Guidance: Negotiating Affordable Housing Contributions. November 2015](#)

6.6.1 This guidance implements Saved Policy H5 of the 2001 HDLP and has regard to NPPF Para 50. For Ripon as a “principal town” the requirement is for sites of 15 dwellings and above or a site with area of 0.5ha and above 40% of dwellings shall be affordable. The mix of affordable dwellings sought is:

- 15% - 1 bedroom
- 60% - 2 bedrooms
- 25% - 3/4 bedrooms

6.6.2 The guidance refers to the Final SHMA and has not sought to change the affordable housing requirement.

**6.7 [Harrogate Borough Council Strategic Housing and Economic Land Availability Assessment – Interim Publication of Sites - Report to Cabinet Member](#)
Published: December 2015 by Harrogate Borough Council**

- 6.7.1 HBC had instigated a “call for sites” in 2014 as part of the process in preparing the SHELAA. This invitation was repeated in late 2015. In January 2016 an initial list of sites submitted for consideration was published. Several sites that had been included in the 2013 SHLAA were not present at this time.
- 6.7.2 The implications of this list for the plan are considered at 7.3 below.

**6.8 [Harrogate District Local Plan: Windfall Allowance Paper](#)
Published: January 2016 by Harrogate Borough Council**

- 6.8.1 This document argues the grounds for inclusion of a windfall allowance within the new Local Plan. It has regard to data over the eleven years 2004 to 2015. This shows delivery of windfall in Ripon (Table 7.4). Size of site is considered in the context of NPPF and SHELAA with a threshold of small sites being <5 dwellings and large sites being 5 dwellings and above.
- 6.8.2 The conclusion is that a district-wide windfall allowance can be substantiated following adjustment of definitions to current best practice and by discounting the two highest and lowest years of the survey period. Accordingly, the moderated annual allowance of 97 dwellings provides a supply of 1,649 dwellings over the period 2018 to 2035.
- 6.8.3 Implications may be deduced for Ripon. Following the document itself, *assuming the spatial strategy of the new local plan remains largely unchanged* (para 8.1), Ripon might be expected to provide 8% of the 1649, namely 132 dwellings. Adjusting this to the plan period (allowing for those sites that should be expected to be delivered by 2018 to be already in the planning system) up to 2030 a yield of 93 dwellings might be expected.

**6.9 [Harrogate District Local Plan: Annual Monitoring Report 2015](#)
Published: December 2015 by Harrogate Borough Council**

- 6.9.1 The document refers to using the overall figure of 518 dwellings per annum, from the SHMA Update, for the period 2014 to 2035, giving a housing requirement for the Local Plan period of 10360 dwellings. This figure, although yet to be confirmed as the Local Plan target figure, was the most up-to-date information available to the HBC (Para 8.4).
- 6.9.2 It is understood that further consideration had been given recently (March 2016) to the full, objectively assessed housing need for the district following expression of concerns by third parties.

6.10 [Harrogate Borough Council Strategic Housing Market Assessment \(SHMA\) Update Report](#)

Published: June 2015 by Harrogate Borough Council

Prepared by: G L Hearne Ltd

6.10.1 This update report provides the final iteration of the components considered to arrive at the full, objectively assessed housing need of 557 dwellings per annum 2014-2035. It comprises the following components:

Official projections	380
Taking account of suppressed housing formation	33
Meeting economic needs	122
Additional market signals uplift	22
Total	557

6.10.2 As noted previously, there is no sub-district analysis or requirement upon which the plan can progress.

6.10.3 This report was considered by HBC Cabinet Member for Planning and Development on 14 July 2016 (see below).

6.11 [Harrogate Borough Council Strategic Housing Land Availability Assessment - Report to Cabinet Member](#)

Published: July 2016 by Harrogate Borough Council

6.11.1 This report summarised the response to the “Call for Sites”. It provided a district-wide overview on the availability of sites but did not provide specific information by area. It was followed by the publication on HBC portal of the full SHELAA and this did reveal the “Ripon” sites put forward and an appraisal of their suitability. It also provided the potential yield from sites considered to be developable.

6.11.2 The significance of this document is that it prompted a fundamental review of the expectation that the plan would allocate sites. Sites referred to in Ripon are as follows:

Ref:	Address	Yield	Phasing yrs	Green/Brown
Within plan area:				
R1	63 Bondgate	10	6-10	B
R3	Littlethorpe Road	35	6-10	G
R5	North of Kings Mead	53	6-10	G
R6	Springfield Close	61	6-10	G
R12	Police Station	11	0-5	B
R13	Snow Close Farm	150/150/131	6-10/11-15/16-20	G
R20	The Beeches*	57	6-10	G
R23	Cathedral Choir School	98	0-5	B
R24	Deverell Barracks	150/46	6-10/11-15	B
R25	Claro Barracks*	150/150/240	6-10/11-15/16-20	B
R26	Former Auction Mart	32	6-10	B
R27	Laver Banks (pt barracks)	150/34	6-10/11-15	B
Outside plan area				
R4	Hutton Bank	150/13	6-10/11-15	G
R8	West Lane	60/150/150/70	All	G

6.12 Harrogate District Local Plan: Annual Monitoring Report December 2016

- 6.12.1 This document (Chapter 8) affirms the annual housing requirement as being 557 with a total district need of 10583 dwellings. There is no spatial disaggregation of the requirement to settlements across the district.
- 6.12.2 Information is provided also on housing completions, housing density, homes for local people, self and custom build housing, gypsies and travellers, sites with planning permission (including large sites and prior approval), sites without planning permission, windfall allowance and the five year supply.
- 6.12.3 Ripon is notable owing to the few references to housing sites within the neighbourhood area. The committed sites in the above table feature in the document. However, the scale of brownfield sites in the regeneration areas proposed in the plan indicates the importance of the contribution that Ripon will make to growth in the district as proposed in the Draft Local Plan.

6.13 Housing and Economic Development Assessment (G L Hearne) July 2017

- 6.13.1 The HEDNA deals with the objective need for housing and employment floorspace, over the period to 2035 and is intended to form part of the evidence base for the preparation of the District Council's Local Plan. It does not make policy decisions regarding what levels of development should be planned for this being for the Local Plan. It provides an integrated evidence base regarding future development needs across uses, recognising for instance that job growth can influence housing need.
- 6.13.2 Of significance is that the HEDNA analyses the district in five distinct area of which Ripon and Boroughbridge is one. As regards housing the key observation is the continuing need for new homes in Ripon to be 2/3 bedrooms.

6.14 Harrogate District Local Plan: Background Housing Paper January 2018

- 6.14.1 This paper is preparatory to consideration of housing matters in the Local Plan. It explains the site selection process. There is no specific explanation of housing matters as regards Ripon.

7 Ripon City Plan Reports, Studies and Consultations

7.1 SHLAA 2013 - RCP Sites Review

- 7.1.1 The May 2013 revision of the SHLAA was considered as an early piece of work in preparation of the plan. The review was based on the city's predominately environmental constraints and perceived infrastructure concerns known at the time.

7.2 [RCP Windfall Housing Study \(Appendix E.b\)](#)

- 7.2.1 This work addressed the potential of the inner area of Ripon to deliver additional housing. The aspiration for this work was to give priority to housing as and when sites in non-residential use close to the city centre become available. The work identified that a ten minute walking time from the Market Place was reasonable for access to the city centre's facilities and amenities on foot. Furthermore, this zone offered the prospect of several significant non-residential premises becoming available over the plan period.
- 7.2.2 Existing policies may inhibit this approach, such as the protection of sites and premises in employment and business use. Whilst there is an important concern regarding the availability of employment sites and premises the plan seeks to address this in the policies proposed in previous chapters. It is not the intention of the plan to identify individual premises that may become available as this might inadvertently lead to closure of otherwise successful businesses or their relocation out of the city.
- 7.2.3 The study did not address opportunities for windfall development across the city as a whole as it was aimed at identifying the role that new housing might have in sustaining the city centre.

7.3 [SHELAA 2016 - Review of interim publication of sites January 2016. RCP Review. \(Appendix E.a\)](#)

- 7.3.1 The publication of sites submitted to HBC has resulted in a review to establish those that would appear to have a potential for housing development that would meet the Plan's objectives. There are two key points to note from the review. The submission of sites within the military estate indicates availability and potential for deliverability within the plan period. Sites between Kirkby Road and Palace Road re-appear from the 2013 SHLAA. There are no compelling reasons why the approach taken toward this area in the Preliminary Draft Plan to resist development should be changed. Sites are shown just beyond the city boundary some of which may be closer to the Market Place than parts of the city within its boundary. Consideration of these sites is beyond the competence of the Plan because they fall outside the plan boundary.

7.4 [Regeneration Areas](#)

- 7.4.1 Supporting Document B addresses the proposal for designation of particular areas as a comprehensive approach to the regeneration of the city. It is not for this chapter to repeat that material but the yield, from in particular Clothierholme and Bondgate Green urban villages, would make a significant contribution to sustainable housing growth, especially in conformity with the Core Strategy and the provision of sites that are more sustainable than others proposed beyond the city boundary.

7.5 Sports fields at Mallorie Park Drive / Studley Road

- 7.5.1 The Ripon Football Club playing field was submitted for consideration as a housing site in the 2013 SHLAA.
- 7.5.2 Following contact from the then Ripon Rugby Club Committee regarding the adequacy of its grounds (adjoining the football club's) and the possibility of relocation led to consideration of the two grounds together.
- 7.5.3 The site is on the edge of the windfall housing zone having reasonable accessibility to the city centre for trips without use of the private car. It offers the opportunity for a range of housing tenures including not only market housing but also affordable and social housing and housing tenures attractive to the elderly as well as special needs and extra care housing.
- 7.5.4 The Draft Plan set out this approach. However, strong representations against it were received from the Rugby Club and supporters following Reg 14 public consultation. Revisions to policy wording are proposed in the Submission Draft City Plan to clarify that the site is not allocated for housing. Should in due course the sites become available then housing could be an acceptable use as suggested in 7.5.4 above. This does not form any part of the housing supply.

7.6 Ripon City Plan Housing Supply (Included in Appendix E.a)

- 7.6.1 Using HBC data as at 30 September 2016, planning permission has been granted for sites as below:

Address	Reference	Units	Status at November 2017	Completed (2014-2016)	In E1?
18 Water Skellgate	11/04199/FUL	8	Final 3 on site	5	Y
rear of above	14/04262/	4	nk	-	Y
3 Old Market Place (Hornblower Tavern)	16/00065/FUL	3	nk	-	Y
80 North Street	15/02124/FUL	5	nk	-	Y
land east of 21 Stonebridgeway	15/04338/OUT	3	site for sale	-	Y

27 Bondgate (former Jewsons)	14/04219/FUL	9	conditions discharge process	-	Y
Finkle Street/ Allhallowgate	15/03080/RG3M AJ	17	further site investigations	-	Y
Lead Lane	15/04266/FUL	1	nk	-	N
3 Water Skellgate (rear City Club)	15/02261/FUL	3	on site	-	Y
Bellman Walk	14/05165/OUTM AJ	150	on site	-	N
South Crescent	15/00330/FUL	1	nk	-	Y
Red House, Palace Road	14/03634/FULM AJ	55	on site	-	N
68/69 North Street	12/03731/FUL	6	nk	-	Y
rear 15 North Street	14/00527	3	site in use as car park	-	Y
25 Bondgate Green	11/05194/FUL renewed	5	nk	-	Y
land rear 21/22 High Skellgate, 25- 27 Water Skellgate and rear 37 Market Place South	15/00522/FUL	9	site for sale	-	Y
Black Swan Yard	15/04905/FUL supersedes 12/03733	6	nk	-	Y
former Station Hotel PH	16/04041/FUL	19	conditions discharge process	-	N
95 Harrogate Road	-	-	Completed	8	N
41/2 Kirkgate	-	-	Completed	1 (net)	Y

Iddersleigh Terrace	-	-	Completed	3	Y
site of 4 Clotherholme Road	-	-	Completed	4	N
former Warehouse restaurant, Court Terrace	-	-	Completed	6	Y
rear of former Wheatsheaf PH, Harrogate Road	-	-	Completed	8	N
82/83 North Street	-	-	Completed	2 (net)	Y
The Beeches, Magdalen Road	Prior notification	2	revised notification	-	Y
totals	-	309	-	37	

7.7 RCP Self-build and custom housebuilding

- 1.1.1. Local practitioners advised that there is a known but unquantified demand for plots for self-build housing in the city and surrounding area. An indirect output from such development is the opportunity for contemporary architecture, an aspiration of the plan.
- 1.1.2. Under the Self-build and Custom Housebuilding Act 2015 local authorities are required from April 2016 to keep registers of individuals and associations of individuals who wish to acquire serviced plots of land to bring forward self-build and custom housebuilding projects. This is a new initiative from Government and is part of various measures to increase housing supply. Whilst it is early days for best practice to become established, it is reasonable for a neighbourhood plan to propose a locally distinctive way forward in the neighbourhood area.

7.8 Housing Requirement November 2017 (Appendix E.c)

- 7.8.1 In July 2017 HBC consulted on additional sites for housing, the requirement having increased owing to an upward revision of annual need to 669 p.a. The Local Plan requirement increased to 14049 by 2352 dwellings from that in the Draft Local Plan consultation November 2016.
- 7.8.2 In September 2017 Government consultation proposals were published by DCLG which proposed a formula for ascertaining a housing requirement for neighbourhood areas where

none was available. Using the proposed formula and applying the 2015 mid-year population estimates the percentage need emanating from Ripon the following annual requirements can be ascertained.

Area	2015 mid-year population	% of requirement	dwellings p.a.
Ripon	16,430	10.46	70
Harrogate district	157,000	100.00	669

7.8.3 In order to align the Plan with the emerging Local Plan the additional housing requirement for the Plan between 2014 and 2030 is 1120 dwellings. Following the format of the Local Plan housing requirement this Plan results in the following requirement for Ripon.

A	Ripon City Plan housing requirement	The amount of additional housing needed to be provided 2014-2030 (70 x 16)	1120
B	Buffer and shortfall	Buffer plus shortfall in years 1-2	+132
C	Housing completions (net)	Number of homes completed since start of plan period (2014-2016)	-37
D	Sites with planning permission	Number of homes to be delivered on sites that have planning permission (at March 2016)	-309
E	Windfall allowance	An allowance for homes that will come from unidentified small sites within plan period	-108
F	Residual requirement to find	Equals A+B-(C+D+E)	798
G	Brownfield supply sites R1, R23, R24, R25, R27 (Table 2)		926

7.8.4 This analysis suggests that Ripon would be providing 128 dwellings more than is proportionately required by the emerging Local Plan; that is 9.8% of the district housing growth:(37+309+108+926=1380 as percentage of 14049).

7.8.5 This is without inclusion of two greenfield sites proposed in the emerging Local Plan within the city boundary and ignoring the very substantial yield from two greenfield sites in the adjoining parishes. If all these four sites were to be allocated in the Local Plan (525 dwellings) it can be argued that Ripon would be providing for 13.6% of the district housing growth ($37+309+108+926+525=1905$ as percentage of 14049).

7.8.6 Appendix E.c contains a full analysis of the housing requirement.

8 Analysis and Commentary

8.1 Introduction

8.1.1 Housing has proven to be the most demanding of all policy areas in preparation of the Plan. This can be attributed to there having been the need for two distinct approaches. This has to be explained in order to demonstrate that reasonable evidence, as itemised above, has been drawn upon.

8.1.2 At the start of the Plan the Core Strategy provided the strategic Local Plan direction. (It indicated that Ripon should provide 8% of the district housing requirement.) The initial public consultation revealed a wish to address affordable housing provision, using brownfield sites and capturing the benefits for growth would arising from closure of the military estate. Accordingly, it was expected that sites would be allocated for housing.

8.1.3 There was already evidence to identify potential sites from the SHLAA 2013. This helped understand where developers and land owners were seeking to develop. This showed also interest in developing the Kirkby Road to Palace Road segment of countryside within the city boundary. (It was also possible to identify sites outside the city boundary over which the Plan would have no competence.)

8.1.4 Inspection of planning decisions revealed other sites: these were usually smaller in size than SHLAA sites. Planning permission has lapsed on a few sites.

8.1.5 HBC in 2014 was then to publish the Sites & Policies DPD. This included the allocation of three housing sites. These were at the former Auction Mart, the former Cathedral Choir School and land at Palace Road (Barnado's).

8.1.6 These sources enabled Plan preparation to address the allocation of sites. Following practitioner advice, a non-statutory Preliminary Draft Plan (PDP) was published for consultation in September 2014. The PDP proposed sites for housing, introduced the concept of Regeneration Areas which, as urban villages, would contain housing (notably the military estate). It also introduced an approach to prioritising housing use for windfall sites close to the city centre. (Appendix E.b.)

8.2 Preparation of the Plan in the context of a new Local Plan

- 8.2.1 The PDP consultation coincided with HBC commencing work to prepare a new Local Plan. It was understood from NPPF that neighbourhood plans would not promote less development than set out in the Local Plan. PPG had also acknowledged that neighbourhood plans may be prepared where the Local Plan is out of date. However, there was clear guidance on the neighbourhood plan having up-to-date housing needs evidence. This would be important for the neighbourhood plan to meet the basic condition on general conformity with the Local Plan's strategic policies.
- 8.2.2 As it was too early to expect the emerging Local Plan evidence base to provide information on housing need and a housing requirement for Ripon, an attempt was made to anticipate the range within which the eventual housing requirement might be proposed in the Local Plan. Population information was available for Ripon and the Harrogate district from the 2014 mid-year estimates prepared by NYCC. Work was carried out to compare different proportions of growth with different district housing requirements. This was to understand in principle how far the potential housing supply identified from earlier work for the PDP could suffice as a contribution to the eventual district housing requirement.
- 8.2.3 Evidence of housing need was sought. A Strategic Housing Market Assessment had been produced for North Yorkshire in 2013 which had presented need on the basis of housing market areas. A further source was the York, North Yorkshire and East Riding Housing Strategy 2015 – 2021. However, in light of PPG it was decided to await publication of the new SHMA being commissioned for the Harrogate district. It was expected to be possible to extract a housing requirement for Ripon and guidance on affordable housing from this evidence.
- 8.2.4 An initial SHMA was published in March 2015 with an indicative annual requirement of 624 dwellings per year. This acknowledged that the district had two housing markets but there was no attempt to distinguish Ripon from the district as a whole. In particular, this meant that it would not be possible to consider a locally distinctive approach to affordable housing as intended. The initial SHMA did enable further work to be done to anticipate whether Ripon would be able to offer a reasonable contribution to district growth. The final SHMA was published in September 2015 with an indicative annual requirement of 557 dwellings per year. This was for the district and was not disaggregated for Ripon.
- 8.2.5 In July 2015 HBC consulted upon issues and options for growth.
- 8.2.6 A "call for sites" had been made for the Local Plan. The output from this was published in December 2015. This updated part of the initial work done in 2014 for the PDP. There also had been ongoing updating of sites with planning permission for the Plan.
- 8.2.7 In early 2016, informal (in that it wasn't written) guidance from the Local Planning Authority advised that preparation of the Plan should concentrate on ascertaining the brownfield

supply of prospective sites. The approach of the new Local Plan was becoming evident, namely, to identify a settlement hierarchy and to allocate sites on the basis of sustainability. Ripon was identified as a main settlement in the emerging Local Plan, the highest tier of settlement where growth was to be concentrated. It became evident that this approach did not include provision of a housing target for Ripon and therefore preparation of this Plan. Dependent upon the sites brought forward, it would be down to the sustainability appraisal as to which would be allocated in the Local Plan.

8.2.8 Owners and developers have put forward several sites in Ripon for inclusion in the new Local Plan. Others are seeking support for sites outside the city boundary, but which would look to Ripon for facilities and services. These were published by HBC in the Strategic Housing and Economic Land Availability Assessment (SHELAA) in 2016. These were assessed for the Plan. (Appendix E.a.) The allocation of any of these is a matter for the new Local Plan. What is significant is that these sites are almost without exception, greenfield. Sites at the Ripon military estate are brownfield.

8.3 Response to the emerging Local Plan

8.3.1 Without any indication of a housing target for Ripon and a sustainability appraisal methodology that, being district-wide, did not include any opportunity for moderation for local distinctiveness it was decided that preparation of the Plan had to take two directions.

8.3.2 One direction was the fundamental decision to withdraw from the allocation of sites owing to there being no substantial evidence to defend them from challenge. This had not been the intention but did not receive adverse representations when the Draft Ripon City Plan was presented for consultation in September 2016 as required by Regulation 14.

8.3.3 Furthermore, work prepared in relation to the allocation of sites is no longer submitted as evidence for this supporting document owing to the above change in direction.

8.3.4 The other direction, following assessment of brownfield and windfall housing opportunities, was to investigate the proportionally of Ripon's contribution based upon the emerging (and changing) district-wide housing requirement. This approach latterly came to be indirectly endorsed by the Government's formula proposed in September 2017 (*Planning for the right homes in the right places*) to assist the preparation of neighbourhood plans in areas where there is no up-to-date Local Plan. (Appendix E.c)

8.3.5 In order to align the assessment as far as possible with the Local Plan, information on site capacity was drawn from that in the Local Plan. Additionally, the increase in housing requirement to 669 dwellings per year was drawn from the HBC Additional Sites consultation in July 2017 for application in the assessment.

8.4 Other considerations

- 8.4.1 The Local Plan contains development management policies that contain thresholds. These policies have regard to density and mix of new market housing and to self-build and custom built housing. Owing to concerns of local distinctiveness, the Plan has been drafted to include similar policies with different thresholds to those proposed for district-wide application.
- 8.4.2 Windfall Housing:
The Plan proposes that Ripon will continue to supply new dwellings by giving priority to redevelopment for housing close to the city centre. This is major support for the continuing flow of windfall housing.
- 8.4.3 HBC has concluded that there is justification to include a trend-based supply of new dwellings through windfall development (para 5.2.9). Some of this provision would arise in Ripon. This could be around 100 dwellings. It may be considerably more if certain premises currently in non-residential use become available. Otherwise supply should be expected to continue through conversion of upper floors and courtyards. It is important to support windfall housing in the sustainable location of proximity to the city centre as and when sites fall vacant. Accordingly, a policy is proposed to address this matter (Policy E1).
- 8.4.4 Density and mix of housing:
The SPDPD proposed a policy seeking both the creation of mixed communities through the placing of site density requirements upon larger sites along with a mix of housing types and size. This approach is continued in the new Local Plan. What matters is that the approach to site density should be appropriate to Ripon especially as regards achieving higher densities in and around the city centre. However, a recent major planning decision allows a disturbing (and unnecessary) visual intrusion of the urban edge upon the countryside. Whilst supporting increased densities it is important to moderate this in inappropriate locations.
- 8.4.5 Ensuring a mix of dwelling sizes a site is one contribution to the creation of mixed communities. This reflects the range of household size. It enables households to “down-size” and remain within a familiar neighbourhood. Evidence to quantify this ambition is not available from the SHMA but the recent HEDNA does affirm that the greater need in Ripon is for 2/3 bedroom dwellings. Given the willingness of housebuilders to include dwellings with four or more bedrooms it is possible to relate the proportion of smaller and larger dwelling sizes within developments in order provide a mix of dwellings and thereby households. Accordingly, it is concluded that a policy is included in the Plan to address these two matters (Policy E.2)
- 8.4.6 Self build and custom housebuilding:
The Plan proposes a way to provide plots for self builders in the context of likely site size in Ripon. The demand for plots and sites for self-build and custom housing is able to be

quantified by the compilation of the register held by HBC required by recent primary legislation. This register is not currently open to inspection, so it is not possible to determine a Ripon requirement at this time. Nevertheless, it is desirable for the Plan to suggest a locally distinctive approach. This needs to be reasonable and proportionate.

8.4.7 It is not desirable to constrain the delivery of small sites (<10 dwellings) by reserving them for this demand. (Such sites should be available through private purchase.) The large sites upon which Ripon's housing land supply substantially rests do suggest that a policy to reserve sites for self-build and custom housing within the site layout offers a way forward, as long as the commitment is time limited. It may be that house builders will find it attractive to provide serviced plots. This is similar to the approach in the emerging Local Plan. However, larger sites in Ripon may well not be as large as those elsewhere in the district. It would be appropriate to promote a policy with locally distinctive thresholds to address this matter (Policy E3).

8.4.8 Affordable housing:

A significant concern from consultation is the affordability of homes in Ripon. The provision of affordable housing is both an expectation arising from public consultation and a requirement of national planning policy and accordingly is set out in the Plan's objectives. The issue is whether the plan reasonably can add anything to the existing saved Local Plan policy. Meanwhile, Government policy and initiatives regarding affordable housing, right-to-buy, starter homes and the like creates a fluid scenario that is difficult for the Plan to grasp with any robust capability. The decision of the Final SHMA not to identify any locally-distinct housing need for Ripon further reduces the basis upon which local affordable housing policy could be considered. Accordingly, it is concluded that affordable housing matters at this time properly has to be the responsibility of HBC and the Local Plan. It is noted that the recently-published government guidance on affordable housing does not require on-site affordable housing provision for sites of less than ten dwellings.

8.4.9 Sites outside the Plan boundary:

The Plan is confined to the city (parish) boundary but this is not necessarily the "Ripon" as defined as a principal town in the Core Strategy. Plan preparation has adopted a robust approach in attempting to demonstrate a plausible requirement that can be met within the city boundary. The Ripon built-up area stretches beyond this boundary into adjoining parishes and the city's influence extends to where there is good accessibility to its facilities and employment opportunities. The SHELAA sites reveal substantial areas of land proposed contiguous with the city boundary or close to it. Some of these are the subject of planning applications or inquiries from owners and developers. The Plan's approach to the housing requirement suggests that sites outside the city boundary would not be required to address Ripon's housing need, especially given the extent of the military estate. However, it will be for the Local Plan to determine whether any of these sites offer opportunities for sustainable development and have synergy with the City Plan's policies and proposals.

8.5 Conclusion

- 8.5.1 The Local Plan's approach to growth and the selection and location of housing sites leaves Ripon, in the absence of a neighbourhood area housing requirement, with the prospect of open ended growth, where what should be expected is planned growth. Accordingly, by following the Government's proposed approach to neighbourhood housing requirement (and reflecting upon its similarity with early work done for the Plan) through the exclusive use of brownfield sites and the Local Plan's windfall allowance, Ripon can contribute a fair share of the district's housing requirement.
- 8.5.2 The approach of the Plan is to maximise the potential yield from brownfield sites and to explicitly resist greenfield development for housing. In order to present a clear commitment to growth in the Plan, as required by NPPF, the three Regeneration Areas are crucial (as has been explained in Supporting Document B), especially the military estate. This is supported by the priority to be afforded to housing redevelopment of windfall sites.
- 8.5.3 It is understood that in due course the Local Plan may result in greenfield sites being allocated in Ripon in conflict with the Plan.
- 8.5.4 Drawing together the above analysis and appraisal of matters appropriate to the provision of new homes in Ripon, policies E1 - E3 are proposed for inclusion in the Plan as set out below.

9 Policy Wording

Following the analysis and conclusion in section 8 above the Plan proposes:

9.1 Policy E1 - Windfall housing priority area

- 9.1.1 Priority will be given to redevelop sites and convert buildings not in residential use within the Windfall Housing Priority Area shown on the Policies Map to residential use, except where such buildings are in current use as a hotel of ten or more lettable bedrooms or are in the Phoenix Business Centre.

9.2 Policy E2 - Density and Size of New Market Homes

- 9.2.1 All proposals will be expected to deliver housing at a density of not less than 30 dwellings per hectare. Higher densities of not less than 40 dwellings per hectare will be sought on sites within the area defined by the outer boundary of Policy E.1 as shown on the Policies Map.

- 9.2.2 These requirements may be relaxed where it is demonstrated that development at such densities would be detrimental to local character or amenity or there are other constraints upon the site itself which would prevent these densities being achieved.
- 9.2.3 These requirements may be relaxed also where it is demonstrated that development at such densities on sites which border onto open countryside, SLAs and sites of nature conservation interest would be detrimental to the city's setting and natural environment. This is to ensure that sufficient space is provided within the development (including both public areas and residential curtilages) in order to accommodate a mature perimeter tree canopy.
- 9.2.4 In order to contribute to the provision of a range of new dwellings development proposals of 10 dwellings or above will be encouraged which include an equivalent number of dwellings smaller than 3 bedrooms for each of those proposed in excess of 3 bedrooms.

9.3 Policy E3 - Support for self-build and custom housebuilding

- 9.3.1 All proposals for residential development of sites for above 20 units should reserve a minimum of 5% of plots for disposal to self-builders. These plots should be offered for disposal not later than two years from the start of site preparation works. Plots which have not been sold within a further two years shall revert to the developer subject to the conditions of disposal not being unreasonable as assessed by an independent surveyor to be appointed by the Local Planning Authority.

10 Complementary Projects

There are no complementary projects requiring to be addressed in this document.

11 Appendices

E.a SHELAA Review of interim publication of sites January 2016

E.b Windfall Housing Study

E.c Review of Housing requirements November 2017