

Harrogate District Local Plan: Housing Background Paper Submission Update



August 2018

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Housing Background Paper

1 Introduction

- 1.1** Local Planning Authorities are required to ensure that their Local Plans meet the development needs of their area as far as this is consistent with the policies set out in the National Planning Policy Framework (NPPF).⁽¹⁾
- 1.2** This paper provides the context to the council's approach to the housing components of the Harrogate District Local Plan and demonstrates how the district's objectively assessed housing needs can be delivered through sites allocated in the Local Plan and the development management process. It provides information on:
- The national, regional and local policy context;
 - The housing requirement within the Plan and how it has been determined;
 - Specific housing needs;
 - The identified housing land supply and trajectory; and
 - The approach to the Optional Housing Technical Standards.
- 1.3** A Housing Background paper was published alongside the draft Local Plan in November 2016. Following publication of the draft Local Plan, the council commissioned an update of the assessment of the district's housing and economic development needs (the Housing and Economic Development Needs Assessment - HEDNA), using the latest available demographic evidence and up-to-date econometric forecasts and the assessment of Gypsy and Traveller Accommodation needs.
- 1.4** An updated Housing Background Paper was published alongside the Publication Local Plan in January 2018. This updated the analysis relating to the objective assessment of housing need, housing supply and specialist accommodation to reflect the evidence provided by the HEDNA.
- 1.5** This update to the Housing Background Paper reflects the latest available information (as at the end of March 2018) on housing completions and permissions.
- 1.6** The following evidence base documents should be read alongside this background paper:
- Harrogate Housing and Economic Development Needs Assessment (Justin Gardner and GL Hearn, May 2018)
 - Harrogate Strategic Housing and Economic Land Availability Assessment (HBC, December 2017)
 - Gypsy and Traveller Accommodation Assessment (Opinion Research Services, June 2017)
 - Whole Plan and CIL Viability Assessment (HDH Planning & Development Ltd, October 2016) and Local Plan Viability Update and CIL Viability Assessment (HDH Planning & Development Ltd, May 2018)

¹ A revised NPPF was published in July 2018. However, for the purposes of examining the Harrogate District Local Plan the policies in the previous NPPF (2012) will apply (paragraph 219 of the NPPF, 2018). As such, NPPF references in the Housing Background Paper are, unless otherwise stated, to the 2012 NPPF. These transitional arrangements also apply to the Planning Practice Guidance.

1 Introduction

- Harrogate Infrastructure Capacity Study (O'Neill Associates, Fore Consulting and DTZ, 2016)
- Traffic Modelling (Jacobs, 2016)
- Harrogate Local Plan Sustainability Appraisal/Strategic Environmental Assessment (HBC, August 2018)
- Harrogate Borough Council Draft Economic Growth Strategy 2017 - 2035
- New Settlement Background Paper (HBC, November 2017)

2 Policy Context

National Policy Context

National Planning Policy Framework

- 2.1** The core planning principles of the National Planning Policy Framework (NPPF) (paragraph 17) state that to underpin plan making '.. Every effort should be made objectively to identify and then meet the housing,...needs of an area, and respond positively to wider opportunities for growth...' and that local authorities should 'meet their objectively assessed need with sufficient flexibility to adapt to change, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF taken as a whole, or where specific policies in the NPPF indicate development should be restricted'.
- 2.2** In seeking to achieve this local planning authorities (LPAs) should have a robust understanding of the housing requirements in their area, and the NPPF identifies the measures required to support delivery of market and affordable housing to meet the identified needs.
- 2.3** Specifically the NPPF (paragraph 47) identifies what actions local planning authorities should undertake to boost significantly the supply of housing, including:
- ensuring that the Local Plan meets the full objectively assessed need for market and affordable housing in the housing market area, identifying key sites which are critical to the delivery of the housing strategy over the plan period;
 - identifying and updating annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirement with an additional 5% or 20% buffer (dependent on past record of housing delivery) to ensure choice and competition;
 - identifying a supply of specific developable sites or broad locations for years 6-10 and where possible for years 11-15.
- 2.4** The NPPF (paragraph 50) sets out the approach that local planning authorities are expected to take in order to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable and mixed communities. Specifically, it requires that 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 within the community;
 - identify the size, type and tenure of housing that is required;
 - set policies for meeting affordable housing needs where these have been identified;
- 2.5** In order to plan for and deliver new housing, local planning authorities should have a clear understanding of the housing needs within their area. This should be informed by the preparation of a Strategic Housing Market Assessment (SHMA) (paragraph 159). The SHMA should identify the scale, mix and tenure of housing that the local population is likely to need over the plan period.

2 Policy Context

- 2.6** To establish realistic assumptions about the availability, suitability and the likely economic viability of land for housing, local authorities should also prepare a Strategic Housing Land Availability Assessment (paragraph 159). Harrogate Borough Council has combined this with an assessment of economic land in the form of the Strategic Housing and Economic Land Availability Assessment (SHELAA).
- 2.7** The NPPF also suggests (paragraph 52) that the supply of new homes might best be achieved through planning for larger scale development such as new settlements or extensions to existing towns and villages and that local authorities should consider whether that is the best way to achieve sustainable development.
- 2.8** To promote sustainable development in rural areas the NPPF (paragraph 55) indicates that housing should be located where it will enhance or maintain the vitality of rural communities.
- 2.9** The NPPF is also clear that councils must ensure that their plans include any unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Planning Practice Guidance

- 2.10** The Planning Practice Guidance (PPG) provides more detailed guidance on the methodology behind objectively assessing and evidencing development needs for housing (both market and affordable) and the SHELAA.
- 2.11** The guidance sets out that an assessment of need should be realistic and based on future scenarios that could reasonably be expected to occur. It outlines that estimating future need is not an exact science but that the starting point should be the latest household and population projections. However, it goes on to say that upward adjustments should be made where other relevant factors, such as market signals, point to the supply side having been constrained, or to improve affordability.

Gypsy and Travellers and Travelling Showpeople

- 2.12** The Planning Policy for Traveller sites (August 2015) sets out specific guidance relating to traveller sites. It states that local planning authorities should develop fair and effective strategies to meet needs through the identification of land for sites, which should be planned over a reasonable timescale. Pitch (for Gypsies and Travellers) and plot (for Travelling Showpeople) targets which address the likely permanent and transit site accommodation needs of travellers should be set. The policy also states that in producing their Local Plans, LPAs should:
- Identify and update annually, a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets;
 - Identify a supply of specific, developable sites or broad locations for growth, for years 6 -10 and, where possible, for years 11 -15.
- 2.13** There is no longer a requirement to undertake a specific accommodation assessment but the duty for the Local Plan to be informed by robust evidence remains.

Self-build and Custom Housebuilding Act 2015

- 2.14** The Act requires local authorities to establish and maintain a register of people seeking to acquire land to build or commission their own home. The requirement to keep a register took effect on the 1 April 2016. The Housing and Planning Act 2016 required local authorities to grant development permission in respect of enough serviced plots of land to meet the demand for self build and custom housebuilding in their area.
- 2.15** Regulations⁽²⁾, which came into effect in October 2016 provided more detail on how the register should be managed and set out details of how authorities must comply with their duty to grant sufficient development permissions to meet the demand on their register.

Housing and Planning Act 2016

- 2.16** The Housing and Planning Act 2016 made provision for a number of changes to the planning system including the requirement for all local planning authorities to promote the delivery of starter homes in their areas.⁽³⁾
- 2.17** The Act also included provisions to require local authorities to establish and maintain registers of particular types of land in their area.⁽⁴⁾⁽⁵⁾

The Housing White Paper - Fixing our Broken Housing Market

- 2.18** Published in February 2017, the [Housing White Paper](#)⁽⁶⁾ set out the government's strategy to boost housing supply and create a more efficient housing market, with measures aimed at ensuring the right homes are built in the right places, speeding up build out rates and diversifying the housing market. Many of the proposed changes involved amendments to the NPPF and these have been reflected in the revised version of the NPPF published in July 2018.⁽⁷⁾
- 2.19** Measures include:
- Introduction of a standardised approach to calculating assessed housing needs;
 - Ensuring Plans focus on having clear policies to address the housing requirements of particular groups such as older and disabled people;
 - Requiring local authorities to provide a clear strategy to maximise the use of suitable land in their area including making use of brownfield land (except where this would conflict with other NPPF policies, to accommodate objectively assessed needs;
 - Supporting development of small sites with an expectation that local authorities will have policies to support small windfall sites;

2 Self-build and Custom Housebuilding Regulations 2016 and Self-build and Custom Housebuilding (Time for Compliance and Fees) Regulations 2016

3 Starter homes have previously been defined as market housing with a 20% reduction on the normal market price and limited to first time buyers under the age of 40 and capped at £250,000. However, the revised NPPF (July 2018) does not define Starter Homes but rather indicates that this will come through secondary legislation.

4 The Brownfield Land Register Regulations 2017 and associated Permission in Principle Order 2017 came into effect in April 2017. These set out the criteria for determining inclusion of a site in the Register, what information is required to be included in the Register and the procedures for granting Permission in Principle on certain sites.

5 For further information on the Harrogate District Brownfield Land Register see https://www.harrogate.gov.uk/info/20101/planning_policy_and_the_local_plan/1049/brownfield_land_register

6 For further information see <https://www.gov.uk/government/collections/housing-white-paper>

7 For the purposes of examining the Harrogate District Local Plan the policies in the previous NPPF (2012) will apply (paragraph 219 of the NPPF, 2018).

2 Policy Context

- Identify through development plans and brownfield registers land to accommodate at least 10% of the housing requirement to be on sites no larger than one hectare;
- Amending the definition of affordable housing to include a wider range of products including social rented housing, starter homes, discounted market sale housing, affordable private rent housing and intermediate housing;
- Requiring local authorities to ensure that on major development sites at least 10% of all homes should be available for affordable home ownership; and
- Ensure plans and proposals encourage higher density development.

Regional Policy Influences

Leeds City Region Strategic Economic Plan 2016-2036

2.20 The Strategic Economic Plan (SEP) was approved in May 2016 and sets out the priorities to deliver the growth agenda across the City Region area. The vision of the LEP is to be a globally recognised economy where good growth delivers high levels of prosperity, jobs and quality of life for everyone. Harrogate is identified as an area enjoying high employment and strong levels of enterprise with resident earnings and skills above average but facing a significant challenge in that the average workplace earnings are lower than regional and national rates and for those residents who commute elsewhere. This is compounded by high house prices and a costly private rental market: Harrogate is one of three areas in the City Region with worsening housing affordability.

2.21 A key priority of the SEP is to increase housebuilding across the City Region not only to deliver homes but also support economic growth and employment opportunities. Harrogate is not identified in the SEP as one of the housing growth areas but actions identified in the SEP to accelerate the pace and rate of house building across the region are relevant for the preparation of the Local Plan.

York, North Yorkshire and East Riding Strategic Economic Plan

2.22 The SEP was approved in March 2014 and an update published in 2016. The vision of the LEP is to make York, North Yorkshire & East Riding the place to grow a small business, combining a quality business location with a great quality of life. The priorities of the plan are:

- Profitable and successful businesses
- Become a global leader in agri-food and the bioeconomy
- Develop inspired people
- Ensure successful and distinctive places
- Providing a well connected economy

Local Policy Influences

Harrogate Draft Economic Growth Strategy 2017 - 2035

2.23 The Economic Growth Strategy supports the council's vision for the district as the best place to live, work and visit and the primary corporate priority of 'A Strong Local Economy'. It identifies high housing costs as being a barrier to working-age people staying in or moving to the district and taking up local employment opportunities.

Policy Context 2

Neighbourhood Plans

- 2.24** Neighbourhood Plans enable local communities to develop a vision and planning policies for their designated areas. Where a Neighbourhood Plan is adopted or emerging before an up to date Local Plan is in place, LPAs should take account of it when preparing the Local Plan. The weight to be given to an emerging Neighbourhood Plan will depend on the extent to which there are unresolved objections: it can gain weight once the Neighbourhood Plan is published and the level of objection is known.
- 2.25** Currently six Neighbourhood Plans are being prepared (Ripon, Knaresborough, Rocliffe and Westwick, Dishforth, Pannal and Otley⁽⁸⁾). The Ripon Neighbourhood Plan has been submitted to the council for examination but as there are outstanding objections it can only be afforded limited weight.⁽⁹⁾

Duty to Cooperate

- 2.26** A separate Duty to Cooperate paper has been published which sets out the council's engagement with local authorities in North Yorkshire and the Leeds City Region, including on housing issues.
- 2.27** To date no local planning authority had formally approached the council to ask about accommodating some of their housing need. There is, therefore, currently no evidence of a shortfall in the wider area which needs to be added to the district's identified housing target.

8 The Otley Neighbourhood Plan area falls mainly within the Leeds City Council boundary

9 For further information see https://www.harrogate.gov.uk/info/20103/neighbourhood_planning/575/ripon_neighbourhood_area

3 The Requirement

3 The Requirement

Housing and Economic Needs Assessment

- 3.1** The Harrogate HEDNA was published in July 2017⁽¹⁰⁾ and replaced the SHMAs published in September 2015 and June 2016.
- 3.2** The HEDNA provides a 'non-constrained' assessment of future housing requirements i.e. it does not take account of constraints relating to land supply, environmental constraints, infrastructure provision or any policy decisions.

Housing Market Area

- 3.3** A Housing Market Area (HMA) is defined in the PPG as a 'geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work'.
- 3.4** The SHMA (2015) provided an analysis of the HMA within which Harrogate sites. This analysis highlighted a complex set of relationships in respect of housing market geographies in operation across the district. It identified significant links between the south of the district (including Harrogate and Knaresborough) and Leeds and in the north of the district (including Ripon) with Hambleton, although to a lesser extent. However, the analysis concluded that the assessment of housing needs for Harrogate district alone was appropriate given that the district sits across more than one HMA and the interactions between them.
- 3.5** The complete analysis of the housing market geographies can be found in the [SHMA \(2015\)](#).⁽¹¹⁾ As this analysis is relatively recent, the HEDNA has not sought to redefine it.

Housing Sub-Areas

- 3.6** To help inform policies in the Local Plan, the HEDNA has identified five sub-areas:
- Eastern Rural
 - Harrogate and surrounds
 - Knaresborough and surrounds
 - Ripon and Boroughbridge
 - Western Rural
- 3.7** For each sub-area the HEDNA provides an analysis of the need for different types and sizes of property. This has been informed by consultation with local estate agents and development sales offices.

Determining the Objectively Assessed Need

- 3.8** There are two stages to identifying the housing target for the Local Plan. At the first stage, the council is required to undertake an objective assessment of the need for new homes covering market and affordable housing: the objectively assessed need (OAN). The second

10 An erratum report was produced and made available in May 2018 to correct Figure 73 and provide some additional commentary in respect of this. No other changes were made.

11 For further information see https://www.harrogate.gov.uk/downloads/download/41/evidence_base_documents

The Requirement 3

stage involves translating this into a target for the number of homes to be provided. At this point, policy objectives can be taken into account. This includes the consideration of the capacity of the area's supply of deliverable and sustainable land, any cross-boundary un-met housing need, and the authority's wider policy objectives.

- 3.9** This paper provides a summary of the HEDNA analysis of identifying the OAN. The full analysis can be found in the HEDNA report⁽¹²⁾.

Population and Household Projections

- 3.10** In line with the PPG, the starting point for objectively assessing housing need was the use of the most recent official household and population projections.⁽¹³⁾ These make assumptions about likely household formation rates, rates of fertility and mortality and levels of in-migration into the district.
- 3.11** The PPG continues by saying that household projection based estimates of housing need may require local adjustment to reflect factors affecting local demography and household formation rates not captured in past trends. The HEDNA, therefore, tested the implications of the following sensitivity scenarios:
- 2015 mid year population estimates;
 - 10 year migration trends;
 - 14 year migration trends; and
 - Unattributable population change and 14 year migration trends.
- 3.12** This testing found that there was some uncertainty: both the longer term trend scenarios showed a notably higher level of housing need in comparison to the official projections but that continuation of shorter term trends in international out-migration would result in a lower need.
- 3.13** However, the HEDNA analysis observed possible suppression of household formation in the 25-34 age group in the past (which was projected to continue into the future) and that an adjustment to address this was appropriate. This increased the need by 48-53 dwellings per annum (dpa) depending on the demographic scenario.
- 3.14** Given the uncertainties in the scenario testing, the HEDNA suggested a pragmatic response would be to view the demographic need as a range from the official starting point (337 dpa) to the longer term trend (410 dpa) once adjustments to the household formation rates were applied.
- 3.15** However, the HEDNA concluded that the demographic need became largely academic once consideration was given to the economic needs of the district.

Uplift

- 3.16** The PPG sets out that consideration should be given as to whether the housing need should be increased in order to:
- Support economic growth, based on an interrogation of trends and forecast for future growth in employment;
 - Improve affordability, taking account of evidence from market signals and of the need for affordable housing.

13 2014-based CLG household projections published in July 2016 and the ONS 2014-based sub-national population projections (SNPP) published in May 2016.

3 The Requirement

Economic growth

- 3.17** The PPG sets out that consideration should be given to the interaction between the housing market and economy and whether delivery of housing based on demographic projections is consistent with anticipated levels of employment growth in terms of providing enough workers.
- 3.18** The HEDNA concludes that an adjustment for economic growth is justified in order to support the forecast growth in employment over the plan period. An uplift of 200 dwellings is considered justified. As with the demographic analysis an additional uplift to the household formation rate for the 25-34 age group was applied.

Affordable housing and market signals

- 3.19** The HEDNA found that there was a modest need for affordable housing in comparison to the economic requirement and that if developer contributions at current policy levels were maintained the affordable housing need would be met in full. There was, therefore, no requirement to make an uplift to the overall housing need figure as a result of affordable housing need.
- 3.20** In respect of market signals, the evidence highlighted notable market signals and affordability pressures in the district. Whilst this would justify an uplift to the housing need this should be made to the demographic starting point but as the economic-led housing need is already more than double the official starting point the HEDNA concludes that further uplifts are unwarranted.

Dealing with any Shortfall in Housing Delivery

- 3.21** It has now been established that the assessment of need is at the point at which it is produced and that authorities are not required to bolt on any shortfall of housing delivery to new housing requirements.⁽¹⁴⁾
- 3.22** The HEDNA considers housing need between 2014 - 2035. Any shortfall in housing delivery prior to the 2014 starting point has been considered and taken into account in the adjustments made and this is reflected in the OAN figure.

Conclusion

- 3.23** After considering several alternative scenarios, the HEDNA concludes that the final OAN for Harrogate district is 669 dwellings per annum or 14,049 dwellings over the plan period.

Specific Housing Needs

Affordable Housing

- 3.24** As well as considering the overall need for housing, the HEDNA also undertook an assessment of the affordable housing need in the district. This used the Affordable Needs Assessment Model, as set out in the PPG. The HEDNA considered both the current unmet affordable housing need and the projected future affordable housing need in the context of the existing affordable housing stock having regard to a range of factors including the number of emerging households, housing waiting list demand, house prices and income levels.

The Requirement 3

- 3.25** Overall the HEDNA analysis identified a need of just under 4,400 affordable homes in the period from 2014 to 2035, equating to a requirement for 208 additional affordable homes per annum. This would mean that around 30% of the 669 dpa arising through the economic based scenario should be affordable.
- 3.26** Compared to previous assessments in 2015 and 2016, the HEDNA analysis would seem to be showing that affordable needs are declining over time. However, the reality is that the figures can vary and are specific to the point at which the analysis is undertaken. When the specific figures for individual components of need are looked at, the key difference is a reducing level of newly forming households in need. This is largely driven by reducing projected household growth in the CLG projections rather than any changes in the overall affordability of housing or the supply of re-lets.
- 3.27** In the PPG (paragraph 029) it states that the total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing, given the probable percentage of affordable housing to be delivered by market housing led developments.
- 3.28** For this reason, the target set in the Local Plan for affordable housing provision needs to balance need and likely delivery. The delivery of housing depends upon its financial viability and should the affordable housing target be set too high, both market and affordable housing will fail to be delivered.
- 3.29** The proportion of affordable housing that it is economically viable to deliver through planning obligations, taking account of the impact of the requirement for sites to deliver starter homes, has been established through the Whole Plan Viability Study, which assessed the impact of requiring different levels of affordable housing provision.

Gypsy and Travellers

- 3.30** A Gypsy and Traveller Accommodation Assessment (GTAA) was carried out in 2017 and identified a relatively low level of need for future pitch provision over the plan period for households that meet the planning definition of a Gypsy or Traveller. The Planning Policy for Traveller Sites requires Local Plans to identify a supply of specific deliverable sites sufficient to provide five years worth of sites. Of the six pitches identified by the GTAA as being required, four are in the first five year period 2017 - 2022.
- 3.31** The identified requirements are:
- 2017 - 2022: 4 pitches
 - 2022 - 2027: 1 pitch
 - 2027 - 2032: 1 pitch

Travelling Showpeople

- 3.32** There is no authorised Showperson's yard in the district and the GTAA did not identify a need for one during the plan period.

Elderly and Specialist Housing Need

- 3.33** Harrogate has a population that is older than the national average: in 2015, 22% of the population was estimated to be aged 65 or over. With the projected increase in this age group over the plan period, the 85+ age group is projected to increase by 134%, the HEDNA has looked at the need for specialist housing for older people and those with specialist needs such as long term illness.

3 The Requirement

- 3.34** Whilst the majority of older people will live in mainstream housing there will be a need for new specialist accommodation provision such as sheltered housing and extra care provision. The HEDNA has drawn on data from the Housing Learning and Information Network (Housing LIN) to provide an indication of the potential level of additional specialist housing that might be required for older people in the future, although the amount and type of specialist accommodation required will depend on a range of factors including individual choice.
- 3.35** The Housing LIN toolkit suggests that there should be around 170 units of specialist accommodation per thousand people aged over 75 years. For the district, the change in the population aged 75+ would indicate a potential need for around 1,000 units over the plan period, with a broad tenure split of 40% rented (affordable housing) and 60% market housing.
- 3.36** The HEDNA also identifies that there may also be a requirement for additional Registered Care provision, such as nursing and residential care homes. The demographic modelling indicates an increase of around 1,400 people living in institutions over the plan period.

Self Build and Custom Housing

- 3.37** Since April 2016, when the Self Build Register became operational, 233 individuals and two associations had registered an interest in acquiring serviced plots.⁽¹⁵⁾

Local Plan Housing Target

- 3.38** The NPPF is clear that LPAs should seek to meet their OAN in full unless there is a lack of physical capacity or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. Where this is the case, then an LPA should work with neighbouring authorities to assess the role they could play in accommodating some of the unmet need.
- 3.39** In setting the housing target for the Local Plan, therefore, it is necessary to consider if the OAN figure can be met in terms of any constraints to delivery.
- 3.40** A number of Local Plan evidence documents have considered land supply (SHELAA), development viability (Whole Plan Viability Study), the social, environmental and economic effects of development (Sustainability Appraisal) and the capacity of existing or need for new infrastructure to support the scale of planned growth (Infrastructure Capacity Study). These have identified that there are no fundamental constraints to delivery in terms of land availability, viability, environmental capacity and infrastructure capacity. There is, therefore, considered to be no justification for setting a Local Plan housing target lower than the OAN or requesting that neighbouring local authorities take some of the housing need.
- 3.41** The PPG states that it may also be appropriate to consider an 'uplift' in translating the OAN into a plan target, for instance to help deliver affordable homes.
- 3.42** The council has considered whether an uplift to the OAN for policy reasons would be justified i.e. to deliver affordable homes, but has concluded that this is not necessary. The reasons for this are:
- A proportion of those households in need will already be living in accommodation. If they move into affordable housing then their current dwelling will become available for someone else;
 - The private rented sector makes a significant contribution to meeting the needs of households requiring support to meet those needs and might be expected to continue to do so.

The Requirement 3

- 3.43** The starting point for the Local Plan housing target, therefore, will be to meet the OAN figure for the district of 669 dwellings per annum, or 14,049 dwellings in total, over the plan period.

4 Delivering the Requirement

4 Delivering the Requirement

- 4.1** The NPPF requires local planning authorities to actively manage housing land supply demonstrating how a five year supply of deliverable housing land will be maintained to meet the overall housing target.
- 4.2** This section sets out how the council intends to achieve this.

Historic Delivery

- 4.3** An analysis of completions provides an understanding of past development trends and allows consideration of the extent to which they will continue into the future.
- 4.4** The historic completion rates in Harrogate district since 2008 are set out in Table 4.1.

Table 4.1 Housing Completions (net) 2008 - 2018										
	2008/9	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/2018
Completions (net)	388	351	261	188	200	183	415	306	362	598
Housing Requirement	390 ⁽¹⁾	390	390	390	390	390	669 ⁽²⁾	669	669	669
Over/Under Supply	-2	-39	-129	-202	-190	-207	- 254	-363	-307	-71

Table 4.1 Housing Completions (net) 2008 - 2018

1. Annualised housing figure from adopted Core Strategy
2. Annualised housing figure from HEDNA (2017)

- 4.5** Between 2008 and 2018, 3,252 new homes were provided, equating to 325 dpa. Over the past five years, average completion rates have been 372 dpa.
- 4.6** There has been considerable variation in the delivery rates per annum over this time with the highest number recorded in 2017/18 (598 dwellings) and the lowest in 2013/14 (183 dwellings). Compared to the annualised housing requirement (applicable at the time), this has not been met over the ten year period.
- 4.7** The level of delivery experienced can, however, be expected given the context of delivery: in common with the rest of the country, the downturn in the economy had an impact on the district's housing market which is only recently starting to show signs of recovery; the lack of supply of allocated housing sites as old Local Plan allocations were largely built out; and the lead in time for construction on sites granted planning permission arising from planning processes and infrastructure requirements.
- 4.8** Since the start of the new plan period in 2014, 1,681 (net) new homes have been completed. This is 995 dwellings below the requirement of 2,676 dwellings (based on 669 dpa).
- 4.9** This shows that the historical trends evidenced above, including low housing delivery experienced during the economic downturn have continued into the plan period. In addition, the annual housing requirement identified through the HEDNA of 669 dpa, represents a significant increase on that previously set out in the adopted Core Strategy.

Delivering the Requirement 4

Housing Buffer

- 4.10** The NPPF establishes that to provide choice and flexibility and to encourage development to come forward, local authorities should provide an additional 5% buffer of housing land unless there is evidence of persistent under delivery in which case a 20% buffer should be provided.
- 4.11** As illustrated above, over the past 10 years housing delivery has not matched or exceeded the total housing target expected for that period. As such, in calculating the housing requirement the council needs to provide for a 20% buffer.
- 4.12** A 20% buffer has, therefore, been applied to the housing requirement over the first five years.

Housing Trajectory

- 4.13** The housing trajectory shows how the Local Plan housing target will be delivered. It comprises completions to date and sites from which the council anticipates delivery during the plan period. This includes sites with planning permission, windfall sites and allocations and outlines the actual or predicted delivery rates envisaged from these sites and shows how this level of delivery affects the district's housing target year on year.
- 4.14** There are two commonly used approaches to calculating housing supply:
- Sedgefield - which deals with any shortfall in delivery within the first five year period; and
 - Liverpool - which spreads the shortfall over the remainder of the plan period.
- 4.15** Whilst the PPG encourages the use of the Sedgefield method, it is not mandatory in either the NPPF or PPG.⁽¹⁶⁾
- 4.16** Applying the Sedgefield approach would result in an annual requirement of 868 dwellings per annum (669 plus shortfall of 199 dwellings) for the first five years of the Plan. This would rise to 1,041 dwellings when the 20% additional buffer (208 dwellings) is added.
- 4.17** This compares to average completion rates over the past five years of 372 dpa and a longer term average over the past 10 years of 325 dpa. Delivering 1,041 dwellings per annum would be a significant step change for the market to deliver in a short period. It is also clear that simply increasing the housing target does not lead to increased delivery. Setting unrealistic targets can impact significantly on delivery of housing as every year the target is not met, the target is increased for subsequent years.
- 4.18** A significant element of the housing supply over the plan period will be met through the development of a new settlement. The draft Local Plan proposed two possible locations for a new settlement, Flaxby and Green Hammerton, although the draft Local Plan was clear that only one location would be included in the Publication Local Plan.
- 4.19** At the Additional Sites consultation stage, a preference was given for the Green Hammerton proposal. However, having considered the evidence and key issues raised during the Additional Sites consultation, the council has concluded that the optimum approach to ensure the best possible place making solution for the future would be to continue to focus on the

¹⁶ The Draft Planning Practice Guidance published in March 2018 indicated that shortfalls against planned requirements should be dealt with within the first five years of the plan period but where a LPA wished to deal with past under delivery over a longer period, this should be established as part of the plan making and examination process.

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Green Hammerton option, but to introduce additional flexibility to enable full consideration of adjoining land which has also been promoted as a new settlement. In the Publication Local Plan, therefore, a broad location for a new settlement in the Green Hammerton/Cattal area has been identified. The detailed planning of the new settlement will be taken forward through the preparation of a separate Development Plan Document (DPD). Further information on the assessment of options for a new settlement location can be found in the New Settlement Background Paper 2017.

- 4.20** The new settlement might reasonably be expected to deliver around 1,000 new dwellings within the plan period. It represents a significant element of the overall housing supply and will require sufficient lead in time for the preparation of the DPD and planning application process to be undertaken and the early infrastructure provision needed to support the new settlement put in place.
- 4.21** Taking into account the longer lead in time for both the new settlement and other large allocated sites means that they will not contribute to early housing delivery, although once they start delivery they will provide significant levels of housing throughout the rest of the plan period.
- 4.22** Given these circumstances, it is unrealistic to assume the shortfall in housing delivery will be met in the first five years and the council consider, therefore, that the use of the Liverpool method to calculate the housing supply position over the plan period would ensure that there is a realistic prospect of achieving the planned land supply (as required by the NPPF, paragraph 47) and ensure that the plan is ‘aspirational but also realistic’ (NPPF, paragraph 154).

Housing Supply

- 4.23** The housing trajectory comprises several components of housing supply:⁽¹⁷⁾
- Housing completions since the Local Plan base date (see historic delivery section above)
 - Existing planning permissions
 - Windfall allowance
 - Prior Approvals
 - Allocations

Existing Planning Permissions

Large sites

- 4.24** Large sites are those that accommodate 10 or more units. It includes sites where, as at 31 March 2018, they:
- Were under construction; or
 - Had planning permission either outline or full but development had yet to commence.
- 4.25** These sites will contribute to meeting needs particularly in the early part of the plan period. The assessment of expected delivery from sites takes account of the guidance and tests outlined in the NPPF. As part of the regular updating of the five year housing land supply statement, developers and agents associated with individual sites have been contacted for

¹⁷ The housing figures in this paper use the latest available full year housing supply information, which at the time of preparation is April 2018.

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information on when they anticipate construction to commence (if it has not already done so) and the expected build out rate for each site. This information has been used to inform the site delivery rates included in the housing trajectory.

- 4.26** A non-implementation rate is not applied to large sites as it is assumed, based on historic information, that they will all be built out eventually: the anticipated commencement date and annual delivery from each site having regard to progress to date and constraints such as delivery timing of required infrastructure is assessed and reflected in the housing trajectory.

Small sites

- 4.27** Small sites (of nine or less units) includes sites under construction and with planning permission. The anticipated rate of completions have been apportioned over the first five year period.
- 4.28** A non-implementation discount (19%) has been applied to small site commitments (excluding sites under construction). The discount is based on an assessment of small sites granted planning permission over a 10 year period, how many of these were started and how many completed.

Windfalls

- 4.29** The NPPF states (paragraph 48) that LPAs '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 SHLAA, historic windfall delivery rates and expected future trends, and should not include residential gardens'. The PPG adds that broad locations can be identified in years 6-15, which could include a windfall allowance based on geographical areas but this must follow the same criteria as paragraph 48.
- 4.30** A windfall allowance paper was prepared in January 2016 and analysed the past and expected future delivery of windfall sites in the district. It found that the principle of including a small site windfall allowance was justified.⁽¹⁸⁾ As small sites with a current planning permission are likely to make up small site completions in the next three years an allowance for windfalls in this period has not been made to avoid any double counting.
- 4.31** The plan includes a small site windfall allowance which totals 1,358 over the 14 year period from 2020/21. No windfall allowance is included for sites of five or more dwellings in order to avoid any potential double counting with sites identified in the SHELAA. Although such sites are in reality likely to come forward at some point during the plan period, they will provide an additional source of land supply.
- 4.32** Similarly, although dwellings built on garden land have been excluded from the windfall allowance calculation in accordance with the NPPF, the analysis of historic delivery from small sites identified that development on garden land continued to deliver an average of 36 dwellings per annum. This will, therefore, also provide an additional source of supply.

Permitted Development and Prior Approval

- 4.33** Legislative changes introduced more flexibility about the conversion and re-use of existing buildings from commercial, office/industrial and agricultural use to residential use without the need for planning permission. Some of these permitted development rights are for a temporary period only and/or subject to limitations on the floorspace/units created and a prior approval process.

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- 4.34** At 31 March 2018, 252 dwellings had received prior approval. This included 50 dwellings through conversion of agricultural buildings, three through the conversion of buildings in A1/A2 use, 198 through the conversion of offices and two through the conversion of a building in B8 use.
- 4.35** A 10% non-implementation allowance for sites identified through the prior approval process but which were not started at 31 March 2018 has been applied.
- 4.36** No allowance has been made for the contribution this source might make to housing supply beyond those that already have approval as there is not currently sufficient evidence, given these changes have only been in operation for a relatively short period of time, to demonstrate a sustained impact on housing supply. This is because firstly, there are a number of factors that impact on a decision to bring a site forward and whether or not this should be via the prior approval process and there is no certainty that the initial trend will continue, secondly some of the permitted developments are intended to operate for a time limited period and thirdly many of the sites are for fewer than five units and, therefore, would be captured by the windfall allowance.

Residual Housing Requirement

- 4.37** The calculation of the residual (net) housing requirement for the remainder of the plan period is set out in Table 4.2 below.

Table 4.2 Calculation of the Residual Housing Requirement (2018/19 - 2034/35)			
A	Local Plan housing requirement	The amount of additional housing needed to be provided 2014-2035 (669 x 21)	14,049
B	Shortfall	Shortfall in years 1-4 of plan period	+995
B	Housing completions (net)	Number of homes completed since start of plan period (2014-2018)	- 1,681
C	Committed sites	Number of homes to be delivered on sites that are under construction or have planning permission (yet to start) (at March 2018)	- 5,841
D	Windfall allowance	An allowance for homes that will come from unidentified small sites within plan period (97 x 14)	- 1,358
E	Residual requirement to find	Equals A+B-(C+D+E)	6,164

Table 4.2 Calculation of the Residual Housing Requirement (2018/19 - 2034/35)

- 4.38** Through the Local Plan, therefore, there is a need to find land for at least 6,164 new dwellings.

Strategic Housing and Economic Land Availability Assessment

- 4.39** The SHELAA forms part of the technical evidence base to inform the preparation of the Local Plan. It provides a high level assessment of the availability, suitability and achievability of sites for development and whether and when sites will come forward for development.
- 4.40** In line with guidance set out in the NPPF and PPG, the assessment of housing land availability has been combined with the assessment of available economic land. The first SHELAA was published in July 2016 and the most recent update published in December 2017. In the SHELAA update a total of 559 sites were reviewed or assessed for the first time: 488 for their potential for housing; 34 for employment potential; three for either housing or employment potential; two for their potential for housing, employment or as a Traveller site; one for a Traveller site and 20 for mixed use.

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- 4.41** The sites were assessed to determine whether and when they were likely to be developed. Each site was assessed on the basis of its:
- Suitability for development - were there any policy restrictions, physical problems, potential impacts or environmental conditions that might render the site as unsuitable
 - Availability for development - were there any legal or ownership issues that might prevent a site from being developed
 - Achievability for development - were there any market, cost or delivery factors that might impact on when a site was developed.
- 4.42** Since starting to prepare the SHELAA, a number of sites had obtained planning permission. These sites were excluded from further detailed assessment under the SHELAA as they were considered to remain suitable and deliverable locations for development. Of the remaining sites, 110 were considered to be deliverable within the next five years (with the capacity for 2,177 dwellings) and 223 sites (with the capacity for 31,313 dwellings) were expected to be developable after five years.

Local Plan Allocations

Housing Allocations

Local Plan

- 4.43** The sites submitted to and assessed through the SHELAA have formed the starting point for identifying sites for allocation in the Local Plan together with a number of other sites submitted to the council outside the SHELAA process, for example in response to the publication of the draft Local Plan. All sites have been assessed in a consistent way and the methodology for selecting sites for allocation can be found in Appendix 2.
- 4.44** The draft Local Plan identified 76 sites to be allocated for housing or an element of housing development. As set out in Section 3, as a result of changes to the demographic starting point and increased economic growth prospects, the OAN for the district is 669 dpa or 14,049 over the plan period. This represented an increase of some 2,300 homes over that planned for in the draft Local Plan. In order to meet this revised figure and provide flexibility in case any housing sites did not deliver at the rate anticipated, the council identified a further 25 sites for allocation and amended boundaries for three of the sites originally included in the draft Local Plan.⁽¹⁹⁾
- 4.45** Following a review of consultation responses to all of the proposed allocations, the council decided that three sites should not be taken forward due to land ownership or other issues and the site area of several others should be amended in order to address matters raised by respondents. The Publication Local Plan (January 2018), therefore, included 76 allocated housing sites, where planning permission had yet to be granted.⁽²⁰⁾
- 4.46** The council has not applied a non-implementation rate to allocated sites on the basis that only those sites with a realistic chance of coming forward for development have been allocated and/or any constraints to delivery have been identified and the impact of this reflected in the trajectory phasing and delivery rate for each site.

19 Further information regarding the identification of the additional sites can be found in Harrogate District Local Plan: Additional Sites Consultation July 2017.

20 Some of the sites included as allocations in the draft and Publication Local Plans have subsequently received planning permission.

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Neighbourhood Plans

- 4.47** The council supports Neighbourhood Planning in the district. Of the Neighbourhood Plans currently under preparation, only the Knaresborough Neighbourhood Plan and Ripon City Plan have reached an advanced stage of preparation. A draft Knaresborough Neighbourhood Plan was published for consultation in September 2017. The Ripon City Plan has now been submitted to the council for examination.⁽²¹⁾
- 4.48** Neither the Knaresborough Neighbourhood Plan or the Ripon City Plan propose the allocation of specific housing sites. However, the Ripon City Plan has identified regeneration areas within which new housing could come forward as part of a wider mix of uses. One of the regeneration areas covers the Claro and Deverell Barracks, which the draft Local Plan proposes to allocate (sites R24 and R25).
- 4.49** As such, the Local Plan housing land supply does not make an allowance for any housing contribution that may come forward through the City Plan as this is already accounted for through the Barracks allocation or windfall allowance (unidentified sites within the regeneration areas).

Delivery and Phasing

- 4.50** The housing trajectory (Appendix 1) does not prescribe when sites should come forward but does make some assumptions regarding likely delivery taking into account any developer interest, how actively a site is being promoted and whether the site is already being progressed through the planning application process (some sites are currently subject to outstanding outline/full planning applications for development or pre-application enquiries). Sites currently in operational use have been assumed not to be deliverable until a later phase of the plan period.
- 4.51** The council has taken a cautious but realistic and pragmatic view of delivery from sites. However, the anticipated delivery of the strategic sites, including the new settlement and larger allocations, is likely to change as delivery will be informed by the preparation of future site specific masterplans and phasing plans and, in the case of the new settlement, a separate DPD.
- 4.52** In some cases, the development of specific sites may not be possible without improvements in supporting infrastructure such as utilities or highways improvements, or growth in one area may not be possible until another linked area has been completed. Site specific infrastructure requirements have been considered through the Infrastructure Capacity Study and the Infrastructure Delivery Schedule identifies key elements of infrastructure, implementation timing and whether that infrastructure element is critical to delivery of planned growth. In some circumstances, to ensure development of a site(s) does not proceed until the provision of this infrastructure, it may be necessary for development to be phased and conditions on a planning permission or a planning obligation may be used to secure this phasing arrangement.
- 4.53** The housing trajectory comprises a variety of sites in terms of size, character and location and provides for a mix of greenfield and previously developed land. Providing such a range of sites should assist in improving housing delivery through the provision of opportunities for different types of housebuilder.

²¹ The pre-submission Otley Neighbourhood Plan was published for consultation in September 2017 but there are no housing proposals or policies affecting those parts of the Neighbourhood Plan Area within Harrogate district.

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Flexibility

- 4.54** The NPPF indicates that plans need to be sufficiently flexible to respond to changing circumstances.
- 4.55** As shown by the housing trajectory, provision is made to deliver between 15,836 homes over the plan period exceeding the proposed Local Plan housing requirement by 1,787 (12.7%) dwellings. This equates to 754 dpa over the plan period. This is intended to build a degree of contingency and flexibility into the housing trajectory to ensure that the objectively assessed housing needs of the district are met and that a continuous five year supply of housing is maintained, as required by the NPPF.
- 4.56** There will also be additional flexibility through:
- Brownfield Register - certain sites included in the brownfield register may be granted planning permission through the new 'permission in principle'.⁽²²⁾ Although the district does not contain extensive areas of previously developed land, a number of smaller sites have been included in the register and will be subsequently developed.⁽²³⁾
 - Greenfield windfalls - no account has been taken of any development of garden land which may become available throughout the plan period. It is recognised that such sites have played a part in delivering housing in the district and it is likely that they will continue to come forward, obtain planning permission and be built out during the course of the plan period, adding to the supply and choice of housing land.
 - Permitted developments
 - Neighbourhood Plans
 - Sites outside development limits - Policy GS3: Development Limits includes the provision for development, including housing, of a scale appropriate to the role and size of settlements to come forward on sites adjoining the development limit subject to certain criteria being met. In addition, some changes to the development limits of settlements in the settlement hierarchy have been made, which will provide further opportunities for infill development.

Five Year Supply on Adoption

- 4.57** The Local Plan is required to deliver a five year housing land supply from the outset. In accordance with the current Local Development Scheme, Table 4.3 below assumes the Local Plan will be adopted in spring 2019. This shows that at the point of adoption there will be 9.7 years supply of housing land.

22 The location, uses and minimum and maximum amount of residential development will be granted permission when a site is included in Part 2 of the register. These matters can not be re-opened when an application for approval of the technical details of a development i.e. what it will look like, is made at a later date

23 For further information about the Harrogate District Brownfield Register see https://www.harrogate.gov.uk/info/20101/planning_policy_and_the_local_plan/1049/brownfield_land_register

4 Delivering the Requirement

Table 4.3 Five Year Housing Land Supply at 1st April 2019

Five Year Housing Land Supply	
Five Year Requirement 01/04/2019 to 31/03/2024	4,365
Annual Requirement	873
Predicted Housing Land Supply	8,288
Number of Years Supply (8288/873)	9.5

Table 4.3 Five Year Housing Land Supply at 1st April 2019

Risks to Delivery and Monitoring

- 4.58** The potential risks to achieving the level of housing delivery identified in the draft Local Plan are set out below.

Economic Conditions

- 4.59** Although the economy has seen some recovery in recent years, nationally housebuilding starts and completions continues to be inconsistent year on year. The council is unable to influence this but can seek to work closely with house-builders/site promoters active in the district to understand what constraints there may be on individual site delivery and actions needed to unlock the site and facilitate delivery.
- 4.60** The Housing White Paper included a package of proposals to give communities, local authorities and developers the support and backing to tackle blockages in the development process and build homes more quickly. Depending on the outcome of the White Paper consultation regarding these proposals, the council will consider which of these measures can best assist in delivering a consistent improvement in build out rates across the district.

Infrastructure Provision

- 4.61** Delivery risks can arise due to the need to provide necessary infrastructure particularly in relation to costs if they are higher than anticipated or if there is uncertainty about when the infrastructure would be provided. The Infrastructure Capacity Study prepared to support the Local Plan, recognises that the level of growth must be supported by the necessary infrastructure and has been developed in partnership with key stakeholders and service providers to identify infrastructure needs, delivery costs and barriers to implementation.
- 4.62** Failure to deliver infrastructure to support growth would be a significant issue and the Infrastructure Delivery Plan identifies the specific infrastructure required to deliver the development of the allocated sites. The council is working with service providers (Yorkshire Water etc.), statutory agencies (Environment Agency, Highways England) and site developers to ensure the identified infrastructure is delivered to support development.

Economic Viability

- 4.63** A Plan Wide Viability Assessment has been prepared in order to appraise the viability of the Local Plan in terms of the impact of its policies on the economic viability of the housing development expected to be delivered during the Plan period. The study considered policy requirements that might affect the cost and value of housing development. The assessment considered a range of site typologies (based on the type of sites submitted for assessment as part of the SHELAA).

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- 4.64** In addition, where a developer can provide robust evidence that development of a site would not be economically viable, the council takes a flexible approach to planning obligations reducing the obligations required where necessary to enable the development to come forward.

Release and Expected Build Out Rate of Sites

- 4.65** Risks could arise if sites with planning permission and allocated sites do not come forward quickly enough for whatever reason or anticipated delivery rates are not as expected. To mitigate such risks, measures the council can take include:
- Assessing risks to site deliverability and identifying appropriate actions to reduce risk;
 - Establishing relationships and working in partnership with developers - this could involve the formation of a development team to include key service and infrastructure providers as well as developers and the necessary specialist expertise;
 - Pre-application discussions with developers/owners to increase certainty in the development process and to address any planning issues early on.

Monitoring and Review

- 4.66** The Local Plan is supported by a monitoring framework, which identifies and monitors the indicators necessary to determine whether Local Plan policies and proposals are being successfully implemented. The housing trajectory demonstrates how the housing allocations together with existing commitments meet the housing requirement each year.
- 4.67** Monitoring of housing permissions and the number of houses started and completed each year is carried out on an annual or more regular basis with the outcome reported through publication of the assessment of the five year housing land supply and the Annual Monitoring Report.
- 4.68** This continuous monitoring should highlight patterns of development. If it becomes apparent that housing targets are not being met the remedial action as set out above can be put in place to get development back on track. Pro-longed under performance would have significant risk implications for the successful delivery of the overall growth strategy and in such circumstances the council may have to consider a review of the Local Plan.

Specific Housing Need

- 4.69** Section 3 identified the specific housing needs to be met during the plan period. The approach to be taken in the Local Plan is set out below.

Affordable Housing

- 4.70** Since the start of the plan period 323 new affordable homes have been delivered through a mix of development and acquisition and there is planning permission for a further 851 units (this includes units both under construction and where development has not commenced as at 31 March 2018).⁽²⁴⁾
- 4.71** The actual proportion of affordable housing that it is economically viable to deliver through planning obligations, has been established through the Whole Plan Viability Study. This takes account of the impact of widening the definition of affordable housing to include starter homes.

²⁴ This does not include sites where an indicative amount of affordable housing provision has been agreed but the final amount will be determined through the submission of reserved matter planning applications.

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4.72 To deliver affordable housing, the council will:

- deliver affordable homes through its own housing development programme;
- work with developers to secure affordable housing through planning obligations on qualifying sites;
- identify opportunities to secure affordable housing through acquisition - this includes the purchase of individual properties on the open market and acquiring properties on development sites being developed by housebuilders; and
- securing grant funding from Homes and Communities Agency for specific projects through the Affordable Homes Programme.

Gypsy and Travellers

4.73 As indicated in Section 3, there is an identified requirement to provide six additional pitches, four of which are required in the five year period covering 2017-2022. To meet this identified need, it is proposed through the Local Plan to make a limited alteration to the Knaresborough Green Belt to provide insets within the Green Belt to accommodate the allocation of three existing private gypsy and traveller sites.

Elderly and Specialist Housing Need

4.74 A policy has been included in the Local Plan (Policy HS4) that enables provision for specialist accommodation for older people where this would meet an identified need. The housing needs of older households may also be met through the provision of homes that are adaptable. As set out in Section 5, the council propose to require a proportion of both market and affordable developments to meet the higher Building Regulations accessibility and adaptability requirements where development deliverability is not compromised.

Self Build and Custom Housing

4.75 The demand for self build/custom housing will be met through the provisions of Policy HS3. This requires the provision of at least 5% of dwelling plots on strategic sites of 500 dwellings or more, to be made available for sale to self-builders, subject to appropriate demand at the time being identified. The opportunity afforded by windfall sites in providing self build plots is also recognised.

Housing Technical Standards 5

5 Housing Technical Standards

- 5.1** In March 2015, the government announced the outcome of a review of housing standards. The aim of the review was to simplify and rationalise the large number of local housing standards applied by local authorities to new homes.
- 5.2** Following the review, the ability of local authorities to set their own technical standards or requirements relating to the construction, internal layout or performance of new dwellings was removed. The review also resulted in the withdrawal of the Code for Sustainable Homes and Lifetime Homes standards.
- 5.3** Instead, the review led to the setting of national technical standards including amended building regulations, new optional building regulation standards (for access and water) and an optional national minimum space standard.
- 5.4** Local planning authorities can apply these optional standards, with the requirement set out in Local Plans, where there is sufficient evidence to demonstrate the need for the additional standards in their area and to do so would have no adverse impact on development viability.
- 5.5** All optional requirements must be applied through planning policy by way of a condition attached to planning consents. However, the optional standards for water efficiency and access are enforced through Building Regulations and the space standards through the planning system.
- 5.6** The PPG sets out the areas of evidence that should be considered by a local authority in determining whether it would be necessary or justified to introduce the optional standards.
- 5.7** This paper sets out the evidence in respect of the optional building regulation standards for water efficiency, access and the nationally prescribed space standard.

Water Efficiency

- 5.8** Part G of the Building Regulations includes requirements for water efficiency in residential properties. They require a maximum water consumption rate of 125 litres/person/day. The new optional standard would reduce this to 110 litres/person/day. The optional higher standard would be met through either a fittings based approach, which imposes maximum consumption rates for various fittings such as WCs, basin taps and showers, or calculating a whole house water consumption using a 'water efficiency calculator' for new homes.
- 5.9** Guidance in the PPG is that the optional standard should only be applied where there is evidence of a clear need and the impact of viability has been considered. The PPG recommends sources of evidence to establish if there is a need for such requirements (see Appendix 3).

Does the evidence support a need for the optional water efficiency standard?

- 5.10** Harrogate forms part of the much larger Yorkshire Water area which as a whole is not classified (under the Environment Agency's Water Stressed Area Classification) as an area of water stress. Whilst greater water efficiency has significant benefits and should be encouraged on housing developments there is no clear justification for inclusion of the higher optional technical standards at this time.
- 5.11** As there is no evidence of clear need, the impact of introducing this standard on development viability has not been tested.

5 Housing Technical Standards

Accessibility

- 5.12** Accessible housing standards emerged in response to a number of different needs including:
- Designing out barriers to independent living;
 - Improving the range of housing choice for disabled people;
 - Mitigating the cost to social welfare and the health system arising from an ageing population.
- 5.13** Following the Housing Standards review, the optional standards are:
- M4(2) Accessible and adaptable dwellings
 - M4(3) Wheelchair user dwellings, which includes
 - Wheelchair adaptable
 - Wheelchair accessible
- 5.14** In respect of M4(3) there is a distinction between the two with wheelchair adaptable dwellings allowing for simple adaptation of the dwelling to meet the needs of occupants who use wheelchairs and wheelchair accessible meeting the needs of occupants who use wheelchairs. The PPG states that wheelchair accessible homes should only be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling i.e. social housing.
- 5.15** Local Plans should clearly state what proportion of new dwellings should comply with the requirements. Policies should also take into account site specific factors such as vulnerability to flooding, site topography and other circumstances which may make a specific site less suitable for M4(2) or M4(3) compliant dwellings, particularly where step free access cannot be achieved or is not viable. Where step free access is not viable, neither of the optional requirements in Part M should be applied.
- 5.16** In considering whether to introduce the optional accessibility requirements for accessibility, the PPG suggests local authorities should consider the following:
- The likely future need for housing for older and disabled people (including wheelchair user dwellings)
 - Size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes)
 - The accessibility and adaptability of existing housing stock
 - How needs vary across different housing tenures
 - The overall impact on viability
- 5.17** To assist local authorities in considering the introduction of this requirement, the PPG provides a link to a data sheet providing sources of information that can be drawn upon to inform need assessments (see Appendix 3). The HEDNA has also assessed the likely need for accessible and adaptable dwellings during the plan period. As local data on the need for housing for wheelchair users is difficult to obtain, the HEDNA has used analysis of national data and applied the findings of this to the district's household growth figures.

Housing Technical Standards 5

Does the evidence support a need for the optional access standard?

- 5.18** The HEDNA highlighted that accommodating the housing needs of older people would be an issue during the period of the local plan. Whilst some of this need may be met through the provision of specialist accommodation, it might be expected that a proportion of older people would seek to remain in their own home for as long as possible.
- 5.19** The older population of the district is increasing and as people age so does the prevalence of mobility issues. The data sources (Appendix 3) project a significant increase in the number of over 75s living alone by 2035 and significant increases in the number of people with limited mobility and limiting long term illnesses (above that expected for England over the same period). This suggests there will be an increased need for suitable homes that can be adapted to meet their inhabitants' changing requirements. The HEDNA has also identified the need for around 5% of the total projected household growth to be adaptable.
- 5.20** Ensuring housing meets the needs of occupiers across the life cycle presents challenges for housing provision. There is, therefore, evidence to support a policy requiring more accessible homes in the district and the Local Plan policy proposes that 25% of new market homes should be accessible in accordance with standard M4(2). For new affordable homes 100% should be accessible in accordance with standard M4(2) and within this 10% should meet M4(3).
- 5.21** As there is evidence of need, the impact of introducing accessible housing on development viability has been tested through the Whole Plan Viability Assessment (WPV).

Internal Space Standards

- 5.22** The amount of space in a home influences how people live. At its most basic level, the space in a home impacts on:⁽²⁵⁾
- how and where people prepare and eat food;
 - how people deal with household waste and recycling;
 - how possessions are stored and how the living space looks and feels to inhabit;
 - what furniture can be used and the activities it enables;
 - whether people can socialise with guests or other members of the household;
 - how much privacy people have for studying, working, relaxing or leisure; and
 - whether there is room for additional changes to the environment, for example to make life easier if the circumstances or health of members of the household change.
- 5.23** The space available in homes in the affordable housing sector is particularly important because these homes are occupied intensively. Households are allocated the minimum amount of space they require, with young children expected to share bedrooms. Where homes are fully occupied it is therefore important to ensure that the space available is sufficient to meet needs.
- 5.24** Space standards are intended to ensure that new dwellings provide a reasonable level of internal space to undertake day to day activities, at a given level of occupancy.
- 5.25** The Nationally Described Space Standard (NDSS) deals with internal space within new dwellings and is suitable for application across all tenures. It sets out requirements for the Gross Internal Area (GIA) of new dwellings at a defined level of occupancy as well as floor areas and dimensions for key parts of the home, notably bedrooms, storage and floor to ceiling height.

5 Housing Technical Standards

- 5.26** The PPG states that where a need for internal space standards are identified, local authorities should take account of need (based on evidence on the size and type of dwellings currently being built), viability of imposing the standards and timing to allow a reasonable transitional period.
- 5.27** In January 2016, desktop research of a number of recent housing developments was undertaken. This included both new homes for sale (or subject to contract) on Rightmove (where information was taken from the floor layout plans) and proposed housing developments where a planning application had been submitted (where information was taken from the development layouts submitted with the application, where this was available).
- 5.28** In total 112 new homes, both market and affordable, across 26 developments were assessed. This included small sites of less than 10 units up to major sites of over 100 units and covered both volume house builders and small local builders.
- 5.29** The assessment indicated that:
- Overall, whilst the majority of larger properties met or exceeded the NDSS, the majority of two and three bedroom market properties failed to meet the NDSS and evidence from current planning applications suggested that smaller market homes, particularly on larger sites built by volume housebuilders, rarely met the NDSS;
 - The deviance from the NDSS ranged from -36% below (a two bedroom market flat) to +186% above (a six bedroom market house) the required NDSS;
 - At the upper end of the property market (in terms of size and price) it was more likely the GIA would be in excess of the NDSS for that sized property;
 - In several market properties rooms described as bedrooms on the layout plans did not meet the required space standard to be described as such, although these rooms were, in most cases, alternatively described as office/study thereby enabling the NDSS for the smaller property to be met; and
 - Affordable properties were mostly below the NDSS, anywhere between 0.7m² and 14m² (based on the lower floorspace requirement for that house type).
- 5.30** The research undertaken shows that 2 and 3 bedroom houses are generally being built below the NDSS. The SHMA identifies that it is this size of housing most likely to be required to meet housing needs during the plan period. The evidence supports the case to implement a policy requiring homes to be built to the NDSS.
- 5.31** The WPV study has considered the impact of the NDSS on development viability and the concludes that the inclusion of this requirement in the Local Plan will not affect development viability.

Appendices

1 Housing Trajectory

Appendix 1 Housing Trajectory



Figure 1.1 Housing Trajectory

Site Selection Process 2

Appendix 2 Site Selection Process

Site Selection Process

The selection of sites for allocation in the Harrogate Local Plan went through a five stage process.

Stage 1: Data gathering

A desktop study was undertaken using all known map based information about sites. All sites were visited by planning policy officers and site descriptions and notable characteristics of the sites collated. This information has formed the base data upon which the site assessments have been made.

Stage 2: Initial Sift

Using the desktop information all sites were considered against the criteria listed below to sift out those sites that were unsuitable for allocation at this time:

- Site size/previous permission
 - Site is too small to be allocated i.e. less than 0.25 hectares
 - Site has planning permission
- Showstoppers
 - Site is subject to international or national designation for biodiversity
 - Site is subject to international or national designation as a heritage asset
 - Site falls within Flood Zone 3 or removal of affected area would result in area of less than 0.25 hectares
 - No physical point of access from the adopted highway into the site and no evidence to suggest one can be achieved

Sites listed below do not meet one of the above criteria and have been considered inappropriate for allocation. They have been sifted out at this stage and have not been subject to any further assessment or consideration.

Table 3.1 Sites Sifted Out at Stage 1

Settlement	Site Ref	Location	Reason Sifted Out
Baldersby	BD1	Village Farm	Planning permission for residential development
Beckwithshaw	BK1	Land at Moor Park	Access cannot be achieved
Bilton in Ainsty	BA1	Land at Bilton in Ainsty	Access cannot be achieved
Birstwith	BW2	Land adjacent River Nidd	Access cannot be achieved
Birstwith	BW8	Land adjoining Kerry Ingredients	Access cannot be achieved
Bishop Thornton	BT3	Land south of West Grove	Planning permission for residential development
Bishop Thornton	BT4	Land at West End Farm	Below threshold

2 Site Selection Process

Table 3.1 Sites Sifted Out at Stage 1

Settlement	Site Ref	Location	Reason Sifted Out
Boroughbridge	B1	Land south of Brickyard Road	Planning permission for employment development
Boroughbridge	B5	Rear of Langthorpe Manor	Planning permission for residential development
Boroughbridge	B9	Paddocks at Back Lane	Planning permission for residential development
Boroughbridge	B16	Riverside Sawmills	Planning permission for residential development
Boroughbridge	B17	Land off Leeming Lane	Planning permission for residential development
Burton Leonard	BL2	Land to north of North Fields	Access cannot be achieved
Burton Leonard	BL4	Land to west of High Peter Lane	Access cannot be achieved
Burton Leonard	BL5	Land to east of High Peter Lane	Access cannot be achieved
Cattal	CA3	Land part of The Aubert	Access cannot be achieved
Copt Hewick	CH1	Land at Corner Farm	Planning permission for residential development
Dacre	DC1	Land at Oakroyd, Dacre	Site no longer available
Dacre Banks	DB2	Land at Dacre Banks	Access cannot be achieved
Darley	DR11	Land off Main Street	Access cannot be achieved
Darley	DR16	Land adjacent to the Wellington Inn	Below threshold
Dishforth	DF5	Manor House Farm	Access cannot be achieved
Ellingstring	EL1	Land at Ellingstring	Below threshold
Farnham	FH1	Land to the rear of The Old Cottage	Below threshold and planning permission for residential development
Ferrenby	FR4	Former Hexagon Motors site	Below threshold
Green Hammerton	GH1	Hall Farm, Back Lane	Access cannot be achieved
Grewelthorpe	GW1	Land at Maryfield	Below threshold
Grewelthorpe	GW2	Land at White House	Access cannot be achieved
Grewelthorpe	GW3	Land at Bellwood	Below threshold
Hampsthwaite	HM1	Land west of Brookfield	Planning permission for residential development
Hampsthwaite	HM3	Land at Hollins Farm	Access cannot be achieved
Harrogate	H45	Bluecoat Park	Planning permission for residential development
Harrogate	H47	Kingsley Farm	Planning permission for residential development
Harrogate	H50	Land at Penny Pot Lane	Planning permission for residential development
Harrogate	H54	17 Green Lane	Planning permission for residential development
Harrogate	H62	Land adjacent to Oak Beck Park	Below threshold
Harrogate	H64	Tower Street car park	Below threshold
Harrogate	H85	Former oil storage site, Bogs Lane	No highway access
Harrogate	H87	Land adjacent Knox Saw Mills, Knox Lane	Site no longer available
Hopperton	HIP1	Land off Hopperton Road	Below threshold
Hopperton	HIP2	Land adjacent to The Homestead	Below threshold
Hopperton	HIP3	Land off Hopperton Street	Below threshold
Hopperton	HIP4	Land off Hopperton Street	Below threshold
Killinghall	KL9	Land at Daleside Nurseries	Planning permission for residential development
Kirk Deighton	KD5	Land to the south west of Wetherby Road	Below threshold
Kirk Hammerton	KH2	Pool Land Classics, Station Road	Planning permission for residential development

Site Selection Process 2

Table 3.1 Sites Sifted Out at Stage 1			
Settlement	Site Ref	Location	Reason Sifted Out
Kirk Hammerton	KH3	Land at rear of Elmwood House, York Road	Access cannot be achieved
Kirk Hammerton	KH8	Land east and west of Parker Lane	Access cannot be achieved
Kirk Hammerton	KH10	Land at South View Gardens	Access cannot be achieved
Kirk Hammerton	KH12	Kirk Hammerton Business Park	Planning permission for residential development
Kirkby Overblow	KO1	Land at Walton Head Lane	Access cannot be achieved
Knaresborough	K3	Land at Coatham House, Forest Moor Road	Below threshold
Knaresborough	K4	Land at Bridge Farm, Bar Lane	Access cannot be achieved
Knaresborough	K8	Land at Harrogate Road	Access cannot be achieved
Knaresborough	K9	Victoria Cottage and Coal Yard, Thistle Hill	Access cannot be achieved
Knaresborough	K13	Land west of Abbey Road	Planning permission for residential development
Lofthouse	LF1	Park House	Access cannot be achieved
Markington	MK2	Land south of High Street	Site no longer available
Marton le Moor	ML2	Land east of Cana Lane	Planning permission for residential development
Masham	M9	Land to the east of Marfield House	Access cannot be achieved
Masham	M10	Land at Foxholme Lane	Access cannot be achieved
Melmerby	MB4	Land south of Grange Farm	Access cannot be achieved
Minskip	MS3	Land east of Harrogate Road	No highway access
Pateley Bridge	P3	Nidderdale Motors Ltd	Below threshold
Pateley Bridge	P8	Land adjacent to Mill Cottages	Below threshold
Pateley Bridge	P9	Land off The Sidings	Below threshold
Ripley	RP1	Land off Orchard Lane	Planning permission for residential development
Ripon	R2	Mallorie Park	Access cannot be achieved
Ripon	R11	Former Doublegates Quarry	Planning permission for residential development
Ripon	R22	Red House, Palace Road	Planning permission for residential development
Ripon	R30	Victoria Grove car oar	Below threshold
Scotton	SC3	Land at Mire Syke Lane	Planning permission for residential development
Shaw Mills	SM1	Land west of Shaw Mills	Below threshold
Shaw Mills	SM2	Land to the east of Clint Terrace	Below threshold
Spofforth	SP1	The Old Railway Cutting	Access cannot be achieved
Summerbridge	SB2	Land adjacent Summerbridge Methodist Church	Planning permission for residential development
Summerbridge	SB4	Land at New York Mill	Access cannot be achieved
Summerbridge	SB6	New York Mill	Access cannot be achieved
Tockwith	TW7	Southfield Lane	Planning permission for residential development
Tockwith	TW9	Land west of Blind Lane	Access cannot be achieved
Tockwith	TW10	Land off Kendal Gardens	Access cannot be achieved
Wighill	WH1	Land west of the village	Access cannot be achieved

Table 2.1 Sites Sifted Out at Stage 1

2 Site Selection Process

Stage 3: Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA)

To ensure the assessment of all remaining sites was carried out in a clear, consistent and robust manner a SA/SEA decision making framework was prepared using the SA/SEA objectives for the Local Plan. The SA/SEA objectives cover environmental, social and economic issues and are designed to ensure a complete assessment of all strands of sustainability. This is in accordance with the three strands of sustainable development set out in the NPPF and reflects advice within the NPPF that these three roles are mutually dependent.

The SA/SEA report sets out in detail the methodology used to assess the effects of the site options on sustainability objectives. The report also includes detailed matrices showing the outcome of the SA/SEA assessment on all remaining sites.

The matrices demonstrate that the assessment of each site has been carried out in the same level of detail. They also allow a comparison of the sites performance and highlight where significant effects have been predicted.

As a result a number of sites were considered to have the most positive and/or least adverse effect on the SA/SEA objectives and were considered as part of the next stage.

Stage 4: Identification of additional factors which may affect the deliverability of a site

Further consideration of the sites which have been subject to SA/SEA has also been undertaken to consider the following detailed factors:

- Does the highway access limit the capacity of the site;
- Does the topography of the site affect the way it could be developed i.e. reducing the overall capacity of a site, increasing build costs;
- Is the proposed use compatible with the neighbouring uses;
- Would development in this location be harmful to the local landscape, character of the settlement, conservation area and its setting or a listed building and its setting or could this harm be mitigated;
- Is the current use of the site, if it is in use, the most appropriate and should it be retained;
- How does the site relate to the existing pattern of development.

The assessment has been carried out using comments provided by the highway authority (North Yorkshire County Council) and the council's consultancy team (conservation, ecology, landscape officers).

To ensure consistency a number of questions were prepared together with a series of answers which determined how the sites would be assessed against each of the criteria. This employed a traffic light colour coding. Each colour referred to a specific answer to the question and provided a consistent and transparent means of assessing sites making judgements about sites as explicit and objective as possible.

Stage 5: Assessment of site deliverability

Consideration was then given to the deliverability and developability of sites with regard to the advice of paragraph 46 footnotes 11 and 12 of the NPPF.

Site Selection Process 2

This was informed by the deliverability assessment undertaken for the most recent SHELAA and considered the following factors:

- The site is available for development - the owner is known to be willing for the site to be developed and it has actively been promoted through the SHELAA or plan making process;
- There has been development interest in the site - the site is promoted by or has the involvement of a developer or pre-application discussions have taken place or detailed planning reports prepared to support development;
- There is no physical constraint on/adjacent the site which would prevent it from being developed;
- There is no known impediment to development which might affect viability.

Conclusion

As a result of the assessment process it is clear that a number of sites could be considered for allocation. The final selection of preferred housing allocations was based on the information collected and assessed, as outlined above. These sites are deemed to be the most sustainable and deliverable overall and are consistent with the Local Plan growth strategy.

3 Housing Technical Standards Evidence

Appendix 3 Housing Technical Standards Evidence

Water Efficiency

Table 4.1 Water Efficiency	
Evidence Source	Findings
Environment Agency Water Stressed Areas Classification 2013	The Yorkshire Water area is identified as an area of moderate stress now and also for a range of future growth scenarios. With an overall assessment as 'not serious', the district is not considered to be an area of serious water stress
Yorkshire Water Resource Management Plan 2014	The district is served by the Grid Surface Water Zone, which covers all but a small part of Yorkshire. The whole of the area will be in supply deficit from 2018/19. The solutions identified in the Management Plan are a mix of demand reduction (including customer efficiency although this refers primarily to metering) and asset development
Humber River Basin Management Plan 2015	This refers to the inclusion of policies in Local Plans requiring tighter water efficiency measures - but this applies across the whole of the Humber area and does not identify specific areas under pressure
Local Water Cycle Study	No local study prepared for Harrogate district
Consultations with the local water and sewerage company, the Environment Agency and catchment partnerships	Environment Agency - have commented (in response to Local Plan Issues & Options consultation) that the Local Plan should include a policy seeking the optional technical standard but provided no justification to support this position. No response to this issue at Draft Local Plan stage. Yorkshire Water - have not raised this as an issue in response to any Local Plan consultations or as part of wider infrastructure discussions

Table 3.1 Water Efficiency

Accessibility

Table 4.2 Accessibility					
Evidence Source	Indicator	Findings			
Local Authority Housing Statistics Data set	Numbers of households that are on the waiting list that have had to move on medical grounds or welfare grounds, including grounds relating to disability Levels of local authority housing stock 2016-17: 3,852	Year	People on waiting list	People needing to move on medical or welfare grounds including disability	% of waiting list total
		2012-13	2,666	740	28
		2013-14	2,341	774	33
		2014-15	1,687	430	26
		2015-16	1,592	239	15
		2016-17	1,426	253	18
Continuous REcordings (CORE)	Data on social housing statistics	2016-17: 11 properties let were wheelchair standard			
Personal Independence Payments (PIP)	Numbers claiming personal independence payments (replaced disability living allowance)	April 2017 Total claims: 2,019			

Housing Technical Standards Evidence 3

Evidence Source	Indicator	Findings
		Number receiving highest rate of award (enhanced mobility and enhanced daily living): 634
Census Data 2011	Number of households containing one person with LTHPD	15,332 (23%)
	Projected percentage increase in number of households containing one person with LTHPD ⁽¹⁾	9,500 (36%)
Population Estimates	Projected change in population of older age groups 2014-35 (from SHMA)	65+ age group - 32.9% 75+ age group - 55.6% 85+ age group - 127.3%

Table 3.2 Accessibility

- Source: HEDNA (demographic modelling and 2011 Census)

Current Need ⁽¹⁾	Projected Need (2014-2035)	Total	Total Household Growth	% Wheelchair Accessible
238	354	592	11,787	5%

Table 3.3 HEDNA Assessment of Need for Wheelchair Accessible Homes

- The HEDNA has applied rates obtained from analysis of national data to the projected household growth figure for the district. These are: unmet need for wheelchair adapted dwellings equivalent to 3.5 per 1,000 households; projected future need from around 3% of households; and tenure split of around 7.1% of social tenants to be wheelchair uses and 2.3% owner occupiers.

In addition to the sources identified in the PPG, information from POPPI (Projecting Older People Population Information), which is designed to explore the possible impact demography and certain conditions may have on populations aged 65 and over, was assessed.⁽²⁶⁾

	Harrogate					Projected increase 2017 - 2035
	2017	2020	2025	2030	2035	
Number of people aged 65 and over unable to complete at least one mobility task ⁽¹⁾⁽²⁾	6863	7395	8540	9813	11159	Harrogate 38.5% North Yorkshire 39% England 36.5%
Number of people aged 65 and over with a limiting long term illness whose day-to-day activities are limited a little ⁽³⁾	8659	9258	10546	11788	12933	Harrogate 33% North Yorkshire 30% England 31%
Number of people aged 65 and over with a limiting long term illness whose day-to-day activities are limited a lot ⁽⁴⁾	6293	6755	7879	8913	10076	Harrogate 37.5% North Yorkshire 36% England 35%

3 Housing Technical Standards Evidence

Table 4.4 POPPI data						
	Harrogate					Projected increase 2017 - 2035
	2017	2020	2025	2030	2035	
Total population aged 75 and over predicted to live alone ⁽⁵⁾	8602	9491	11520	1209	14295	Harrogate 40% North Yorkshire 42% England 36.5%

Table 3.4 POPPI Data

1. Activities include: going out of doors and walking down the road, getting up and down stairs, getting around the house on the level, getting to the toilet, getting in and out of bed.
2. Figures are taken from Living in Britain Survey (2001), table 29. The prevalence rates have been applied to ONS population projections of the 65 and over population to give estimated numbers predicted to be unable to manage at least one mobility tasks listed, to 2035.
3. Figures are taken from ONS 2011 Census, long term health problem or disability by health by sex by age. Numbers have been calculated by applying percentages of people with a limiting long-term illness in 2011 to projected population figures.
4. For figures source see table note 3.
5. Figures are taken from the General Household Survey 2007, table 3.4 (percentage of men and women living alone by age, ONS). Numbers have been calculated by applying percentages of men and women living alone to projected population figures.

