

Planning Policy Team  
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SENT BY EMAIL  
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20/06/2019

Dear Sir / Madam,

## **NORTH YORK MOORS LOCAL PLAN: PRE-SUBMISSION DRAFT**

Thank you for consulting with the Home Builders Federation on the Pre-Submission Draft version of the Local Plan for the North York Moors.

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

We would like to submit the following comments upon selected policies within the Pre-Submission consultation document. These responses are provided in order to assist the North York Moors National Park Authority (NYMNPA) in the preparation of the emerging local plan. The HBF is keen to ensure that the NYMNPA produces a sound local plan which provides for the housing needs of the area.

### **Strategic Policy M – Housing**

*Strategic Policy M – Housing is not considered to be sound as it is not positively prepared and justified for the following reasons:*

This policy looks for a minimum of 551 new homes (29 per year) to be completed over the plan period. In terms to the scale of housing provision the HBF is mindful of the status of the area as a National Park and therefore does not consider unrestricted housing growth should occur. It is, however, important that the National Park retains its vitality and places due weight upon its duty to; *'seek to foster the economic and social wellbeing of local communities'*.

The evidence contained within the 2016 Strategic Housing Market Assessment (2016 SHMA) suggests that to halt population decline and maintain a steady population would require a net housing requirement of 29 dwellings per annum (dpa). This does, however, appear at odds with the fact that since 2008 levels of delivery have been running at 37dpa, yet over this period there has been a declining population. Given this information it would appear reasonable that a figure greater than 37dpa is required. Otherwise it is likely, given recent experience, population decline will continue. This will fail to foster the economic and social wellbeing of communities and condemn them to economic decline and lack of housing opportunities.

It is also notable that the population of the park is ageing, with growth in the over 60s increasing by more than 30% and those under 15 and 30-44 declining by 23% and 31% respectively. Whilst this is, perhaps, not surprising it does indicate potential difficulties in maintaining economic and social wellbeing with a stagnant population size but ageing demographic. This will inevitably reduce the potential workforce and population vitality in the future. The HBF therefore consider that the NYMNPA may wish to consider the viability of other housing scenarios, not covered in the 2016 SHMA, which seek to address this loss of working age population over the period of the plan.

The HBF considers that there is a need to provide more than 29 new homes each year. The HBF considers based on recent delivery rates there is a need to provide more than 37 new homes each year if the NYMNPA is to prevent a declining population and support local communities.

The HBF does support the Council using the word 'minimum' in relation to the provision of 551 new homes and the recognition that more than 29 dwellings each year could be provided. The HBF appreciates the Council's clarification within Appendix 1 of the Summary of Responses that the figure will not be used to limit the development of good schemes that meet local needs.

The policy goes on to state that *'all new homes should contribute to the provision of a range of tenures, types and sizes of dwellings within the National Park, including accommodation for older people and those needing special facilities, care or support at home. Applications should include information on how the proposal meets the needs identified in the North York Moors Strategic Housing Market Assessment and other local surveys.'*

The HBF considers that it is important that any policy in relation to the mix of tenures, types and sizes of dwellings is workable and ensures housing delivery will not be compromised or stalled due to overly prescriptive requirements or the need to provide significant amounts of additional evidence. It should be recognised that the 2016 SHMA provides a 'snap-shot' in time and needs may vary over the lifetime of the plan.

The HBF therefore recommends a more flexible approach is taken regarding housing mix which whilst taking account of the SHMA findings is also cognisant that needs and demand will vary from area to area and site to site and that the need to provide

evidence for each and every variation to this very specific mix is likely to delay development and may reduce deliverability of sites.

The HBF appreciates the Council's clarification within Appendix 1 of the Summary of Responses that the Authority is not proposing to 'opt in' to the M4(2) standard. Although it is not entirely clear within the policy or the justification text what the NYMNPA expect in relation to accommodation for older people and those needing special facilities, care of support at home.

### **Policy CO7 - Housing in Larger Villages**

*Policy CO7 is not considered to be sound as it is not positively prepared or justified for the following reasons:*

This policy permits development of 'principal residences' or 'affordable housing' on suitable 'small sites', each of these terms is defined within the justification. The HBF seek assurances from the Council that the need for dwellings to be either a principal residence or affordable housing will not be an impediment to the effective delivery of homes. The HBF have concerns in relation to these restrictions and the potential implications they could have on the delivery of homes, including the potential to deliver infrastructure and other policy requirements set out in the plan and the impacts on future financing and rights of occupants. It is noted that the NYMNPA have utilised the NPPF affordable housing definition, this is supported.

The HBF support the change from an 'infill site' to a 'small site', which allows for no more than 5 dwellings. Whilst the number is still a little arbitrary, it is considered more appropriate for the area and could help to provide valuable sources of housing supply, whilst maintaining or improving the qualities of the National Park.

The policy goes on to state that the dwellings should have an internal floor area of no more than 93 sq metres, unless, it is an affordable home and a specific need has been identified. The NYMNPA will need to ensure that these proposed size limits do not limit the aspirations of local people, or limit the potential for new younger residents to provide or take up economic opportunities within the NYMNPA, particularly in relation to appropriately sized family homes. It is therefore recommended that there should be some form of flexibility built in to this policy.

### **Policy CO8 - Housing in Smaller Villages**

*Policy CO8 is not considered to be sound as it is not positively prepared or justified, for the following reasons:*

This policy permits 'local needs' or 'affordable housing' on suitable 'small sites' within the main built up area of the village. Policy CO13 sets out the local connection criteria that will be applied to local needs housing schemes, it is appreciated these criteria are wider in some cases than those currently applied. However, the HBF consider that as the National Park is currently losing population, particularly working age people, to stabilise the population and maintain the vitality of the park the NYMNPA should consider alternative methods of housing delivery. Whilst local needs housing may still have a role to play it is recommended that the eligibility criteria in Policy CO13 is drafted to provide a flexible approach or that this policy as a whole is amended to provide a more flexible approach. It is considered that

exceptions to local needs housing may be appropriate in certain circumstances, to allow for areas and communities to repopulate with working age people.

### **Policy CO13 - Local Connection Criteria for Local Needs Housing**

*Policy CO13 is not considered to be sound as it is not positively prepared or justified, for the following reasons:*

The NYMNPA is currently losing population, to stabilise its population and maintain the vitality of the park will require alternative methods of delivery. Whilst local needs housing based on a local connection may still have a role to play it is recommended that the eligibility criteria allow for a flexible approach. It is also considered that exceptions to the local connections criteria set out may be appropriate in certain circumstances. It is noted that inappropriate local connections criteria can create issues relating to the marketing and saleability of properties, including accessing mortgages, which inevitably have implications for site viability and delivery.

### **Monitoring and Implementation**

*The monitoring and implementation section is not considered to be sound as it is not effective for the following reasons:*

The monitoring and implementation section identifies indicators for most of the housing related policies, however, there are not always targets identified and there are not any triggers or actions identified as to when or how the NYMNPA will react if the targets are not met. The HBF has not noted any identified mechanisms for assisting in the delivery of homes if targets are not met, this could be a simple action like improving the negotiation and mediation skills of the Council officers or working with Councillors to understand the benefits of homes in certain areas. The HBF consider that the monitoring section requires more thought particularly in relation to ensuring the appropriate delivery of homes (including market, local needs and affordable homes), and to ensuring that any issues are addressed in a timely nature.

### **Future Engagement**

I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

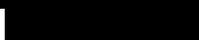
The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,



**Local Plans Manager – North**

Email: 

Phone: 

This form has two parts:

- Part A – Personal Contact Details.
- Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make. This form is editable, meaning the only parts that can be filled in/alterd are those indicated by 'click to enter text'. It is important that personal contact details are included for each representation. If you are having difficulties filling out the form please contact us at [policy@northyorkmoors.org.uk](mailto:policy@northyorkmoors.org.uk) or 01439 772700.

### PART A – Personal Contact Details

<b>Title:</b>	█
<b>First Name:</b>	█
<b>Surname:</b>	█
<b>Job Title (where relevant)</b>	Local Plans Manager - North
<b>Address:</b>	Home Builders Federation █ █
<b>Organisation or Group:</b>	Home Builders Federation (HBF)
<b>Postcode:</b>	█
<b>Telephone no:</b>	█
<b>Email Address:</b>	█

## PART B – Your representation(s)

*Please use a separate sheet for each representation*

### 3. To which part of the Local Plan does this representation relate?

Paragraph?	<input type="text" value="Click here to enter text."/>	Policy?	<input type="text" value="Please see separately attached letter."/>	Policies Map?	<input type="text" value="Click here to enter text."/>
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### 4. Do you consider the Local Plan is:

a) Legally compliant?	Yes	<input type="text" value="Click here to enter text."/>	No	<input type="text" value="Click here to enter text."/>
b) Sound?	Yes	<input type="text" value="Click here to enter text."/>	No	<input type="text" value="Please see separately attached letter."/>
c) Complies with the Duty to Co-operate?	Yes	<input type="text" value="Click here to enter text."/>	No	<input type="text" value="Click here to enter text."/>

### 5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or its compliance with the duty to co-operate, please use this box to set out your comments.

**Please see separately attached letter.**

(Continue on a separate sheet / expand box if necessary)

### 6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at question 5 above where this relates to soundness. You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

**Please see separately attached letter.**

(Continue on a separate sheet / expand box if necessary)

**Please Note:** Your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he / she identifies for the Examination.

### 7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the Examination?

No, I do not wish to participate at the oral

**Yes, I wish to participate at the**

Yes, I wish to participate at the oral

[ ]

Examination

**Examination.**

Examination

**8. If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary.**

To debate the comments made within our representations further and in greater detail. To ensure that the industry can respond to any additional evidence provided by the Council or others following submission of the plan.

*Please Note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the Examination.*

**Signature**

[ ]

**Date**

**24<sup>th</sup> May 2019**