

Local Plan  
Freepost  
YORKSHIREDALES

SENT BY EMAIL  
localplan@yorkshiredales.org.uk  
25/02/2021

Dear Sir / Madam,

## **YORKSHIRE DALES LOCAL PLAN: EXPLORING OUR OPTIONS – BUILDING NEW HOMES**

1. Thank you for consulting with the Home Builders Federation (HBF) on the Yorkshire Dales National Park Authority Local Plan 2023-2040 – Consultation 3: Building New Homes.
2. 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.
3. We would like to submit the following comments upon the proposed options for the Local Plan. These responses are provided in order to assist the Yorkshire Dales National Park Authority (YDNPA) in the preparation of the emerging local plan. The HBF is keen to ensure that the YDNPA produces a sound local plan which provides for the housing needs of the area.

### **Settlement Hierarchy**

4. The YDNPA propose to create a two-tier settlement hierarchy, with 'towns' as the first category and 'large villages' as the second. The YDNPA proposes that a 'town' will have seven key community services and a definable core of at least 500 addresses, whilst a large village will have at least 40 addresses and either one key service or be in close proximity to a town. Below the level of towns and large villages are numerous small villages, hamlets and farmsteads. These settlements are too small to have retained services of their own and are therefore dependent on other places.

*Q4. Should there be flexibility to permit new homes outside of the two tiers of towns and larger villages in Table 3?*

5. The HBF considers that it may be appropriate to allow for some flexibility to allow for homes to meet a local need outside of the first two tiers.



*Q5. Should this be as an exception to policy for the purpose of addressing specific local housing needs, or should it be a deliberate part of the Local Plan strategy to deliver part of the annual housing target?*

6. The HBF considers that the policy should be flexible enough to allow for homes outside of the first two tiers where a need can be demonstrated.

*Q6. Should the more isolated siting of these homes away from services and utility routes be dependent on off grid solutions for their heating and power?*

7. The HBF considers that the policy should not require homes outside of the first two tiers to be dependent on off grid solutions for their heating or power, although the policy should be flexible enough to allow for this to be considered an appropriate option.

### **Housing Target**

8. 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'*.

9. PPG (ID 2a-014) states that where the data is not available such as in National Parks an alternative approach (to the Standard Method) will have to be used. It goes on to state that such authorities may continue to identify a housing need figure using a method determined locally, but in doing so will need to consider the best available information on anticipated changes in households as well as local affordability levels. The YDNPA Strategic Housing Market Assessment (SHMA) (November 2019) recommends a 'policy-on dwelling-led annual housing requirement' of 50 dwelling per annum (dpa) across the YDNPA over the plan period 2023 to 2040. It goes on to identify an ongoing need for 30 affordable homes each year. The SHMA has established a baseline for the 10-year period 2023 to 2033 and is based on the 2014-household projections, and has considered the 2016-based projections as an alternate scenario. Given the 2018-based projections are now available, the HBF consider that it may have been appropriate for the National Park Authority (NPA) to have updated the information in relation to the household formation and affordability to ensure that housing requirement is appropriate and robust in line with the guidance set out in the PPG.

*Q7. Which of the three options (1: 70dpa, 2: 50dpa, 3: 30dpa) is the most appropriate housing target for the Local Plan between 2023 and 2040?*

10. The HBF notes that a housing requirement of 50dpa would be in line with the SHMA recommendation and that the YDNPA consider that this figure would be sufficient to halt population decline.

### **Housing Mix**

11. The SHMA recommends an overall annual housing target of 50 dwellings per year, with 30 dwellings being affordable. It suggests that of the affordable homes 20 should be affordable rent (90% 1 and 2 bedrooms, 10% 3 or more bedrooms) and 10 intermediate tenures (60% 2 bedrooms and 40% 3 bedrooms). The SHMA recommends that the annual mix should aim at:

- 15% one-bedroom
- 36% two- bedrooms
- 38% three- bedrooms
- 11% four or more-bedroom

It also suggests the following dwelling types:

- 55% houses
- 25% flats
- 20% bungalows

It also recommends that one new dwelling per year should be built at a M4(3) standard and 25% of new dwellings should be built to M4(2) standards.

*Q13. Do you think that the range of bedroom sizes and dwelling types recommended in para 7.3 and 7.4 sounds about right?*

12. The HBF considers that any policy in relation to housing mix will need to be flexible and will likely need to reflect the small numbers of dwellings that are likely to be provided on each site. The policy may need to consider not just the SHMA recommended mix but the needs and aspirations of the market at the time of the proposed development, other available evidence, the local character of the area, and the viability of the development.

*Q14. Subject to viability testing, do you think the mix of affordable housing tenures recommended in para 7.7 is suitable?*

13. It is noted that the proposed tenure of the affordable homes would not be in line with the NPPF requirement for at least 10% of the homes to be available for affordable home ownership should a major development occur. The HBF considers that the viability of development may be key consideration in determining whether the proposed affordable housing mix is appropriate.

*Q15. Do you think the Local Plan should restrict the type and size of new housing built?*

14. The HBF does not consider that the Local Plan should restrict the type and size of new housing built. The HBF considers that any policies in relation to the housing mix, or the type and size of new dwellings should be flexible, to help to ensure that development meets needs and aspirations of those looking to live in the area.

### **Housing development capacity**

*Q24. What do you think is the best technique for controlling where small scale 'windfall' housing development can be located – is it drawing boundaries on a map or using criteria?*

15. The HBF considers that either approach can work, and suggests that the Council considers which option may provide them with the most appropriate and sustainable opportunities for development in the future.

### **Future Engagement**

16. I trust that the YDNPA 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.

17. 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,

A handwritten signature in black ink, appearing to read 'J. Harding', with a stylized flourish at the end.

**Joanne Harding**

**Local Plans Manager – North**

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