

Planning Policy Team
Selby District Council
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SENT BY EMAIL
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12/03/2021

Dear Sir / Madam,

SELBY LOCAL PLAN: PREFERRED OPTIONS

1. Thank you for consulting with the Home Builders Federation (HBF) on the Selby Local Plan: Preferred Options consultation.
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.

Visions and Objectives

3. The HBF supports the inclusion within the vision that 'there will be a range of housing available which meets the needs of the population'.
4. The HBF generally supports the objective in relation to housing which looks to deliver housing to meet the District's future range of needs.

Preferred Approach SG2 - Spatial Approach

5. This policy looks for provision to be made over the Local Plan period 2020 to 2040 for a minimum of at least 8,040 new homes, it also sets out the settlement hierarchy. The housing requirement equates to 402 dwellings per annum (dpa), this appears to be above the LHN identified by the Standard Methodology, which the HBF calculates at 342dpa. However, it is below the housing requirement set out in the current Core Strategy and the number of homes that the Council has been delivering over the last five years.
6. The HBF generally supports the Council in using a housing figure above the LHN, however, the HBF considers that the housing need is likely to be higher than the housing requirement currently identified. The PPG¹ sets out that there may be circumstances

¹ PPG ID: 2a-010-20201216



where it is appropriate to consider whether the actual housing need is higher than the standard method indicates. These include growth strategies for the area, strategic infrastructure improvements, meeting an unmet need from neighbouring authorities and where previous levels of delivery or previous assessments of need are significantly greater than the outcome of the standard method. The HBF recommends that the Council investigate these circumstances and consider if a further increase in the proposed housing requirement is required.

7. For example, Table 1 below clearly shows that previous levels of delivery are significantly above the minimum LHN identified by the standard method and the HBF considers that this highlights the need to identify a higher housing requirement.

Year	MHCLG Net Additional Dwellings
2015/16	439
2016/17	562
2017/18	612
2018/19	625
2019/20	492
Total	2,730
Average	546

Preferred Approach SG10 - Mitigating and Adapting to Climate Change

8. This policy sets out that all new development proposals will be expected to support appropriate measures to mitigate and adapt to climate change in order to meet national and local targets on net zero carbon emissions including the aim for the York and North Yorkshire area to become the first negative carbon sub region. It goes on to seek that all new residential developments provide electric car charging points.
9. It is commendable for the Council to seek to contribute to the aim to become the first negative carbon sub-region, however it is important that the Council's proposed policy approach does not conflict with or cause confusion with the Government's proposals for Building Regulations. As set out in The Future Homes Standard consultation (ended on 7th February 2020) and the Government's response to the consultation, the Government intends to future proof new homes with low carbon heating and world-leading levels of energy efficiency by uplifting standards for Part L (Conservation of Fuel & Power) and changing Part F (Ventilation) of the Building Regulations.
10. The HBF recognises and supports the need to move to The Future Homes Standard but it should be noted that there are difficulties and risks to housing delivery given the immaturity of the supply chain for the production and installation of heat pumps and the additional load that would be placed on local electricity networks in combination with proposals for the installation of electric vehicle charging points (EVCP) in new homes.
11. The HBF is generally supportive of the provision of electric vehicle charging points. However, the HBF would encourage the Council to work with the appropriate

infrastructure providers to ensure a balanced and flexible optimised energy system that has sufficient capacity to meet any standards and requirements set by the Council in this policy and others. The HBF also recommends that the Council ensure that any standards are considered within the viability assessment, it should be noted that the Governments consultation on Electric Vehicle Charging identified an estimated installation cost of approximately £976.

Preferred Approach HG1- Meeting Local Housing Needs

12. The HBF is keen that the Council produces a plan which can deliver against its housing requirement. To do this it is important that a strategy is put in place which provides a sufficient range of sites to provide enough sales outlets to enable delivery to be maintained at the required levels throughout the plan period. The HBF and our members can provide valuable advice on issues of housing delivery and would be keen to work proactively with the Council on this issue.
13. The Plan's policies should ensure the availability of a sufficient supply of deliverable and developable land to deliver Selby's housing requirement. This sufficiency of housing land supply (HLS) should meet the housing requirement, ensure the maintenance of a 5 Year Housing Land Supply (YHLS), and achieve Housing Delivery Test (HDT) performance measurements. The HBF also strongly recommends that the plan allocates more sites than required to meet the housing requirement as a buffer. This buffer should be sufficient to deal with any under-delivery which is likely to occur from some sites and to provide flexibility and choice within the market. Such an approach would be consistent with the NPPF requirements for the plan to be positively prepared and flexible.
14. The Council's overall HLS should include a short and long-term supply of sites by the identification of both strategic and non-strategic allocations for residential development. Housing delivery is optimised where a wide mix of sites is provided, therefore strategic sites should be complimented by smaller non-strategic sites. The widest possible range of sites by both size and market location are required so that small, medium and large housebuilding companies have access to suitable land to offer the widest possible range of products. A diversified portfolio of housing sites offers the widest possible range of products to households to access different types of dwellings to meet their housing needs. Housing delivery is maximised where a wide mix of sites provides choice for consumers, allows places to grow in sustainable ways, creates opportunities to diversify the construction sector, responds to changing circumstances, treats the housing requirement as a minimum rather than a maximum and provides choice / competition in the land market.

Preferred Approach HG2 - Windfall Developments

15. This policy states that in the smaller villages support for small scale development of 5 dwellings or fewer adjacent to the built-up area will be supported. It is not apparent why the Council has set a limit at 5 dwellings; it is considered that the criteria set out in B (1) to (4) are sufficient to ensure that the scale of development would be appropriate to the settlement. The HBF recommends that the reference to 5 dwellings or fewer is removed.

16. In relation to section D of the policy it is not apparent why the Council has referred to some elements identified in paragraph 79 of the NPPF but not others, and why the policy could not just refer to the circumstances as set out in the NPPF.

Preferred Approach HG3 - Creating the Right Type of Homes

Housing Mix

17. Part A of this policy looks for developments to provide a range of house types and sizes to meet the needs identified in the Housing and Economic Development Needs Assessment (HEDNA) or successor documents.
18. The HBF understands the need for a mix of house types, sizes and tenures and is generally supportive of providing a range and choice of homes to meet the needs of the local area. The HBF recommends a flexible approach is taken regarding housing mix which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location. The HBF also recommends that the Council does not limit its evidence base to the HEDNA, which will only ever provide a snapshot in time. The HBF suggests that the Council amend the policy to allow for alternate forms of evidence including for example the Council's Waiting List or information in relation to the market demand and aspirations from home builders.

Nationally Described Space Standards (NDSS)

19. Part B of this policy looks for dwellings to meet the NDSS or any successor standards. The HBF note that the NDSS as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and they retain development viability. As such they were introduced on a 'need to have' rather than a 'nice to have' basis.
20. PPG² identifies the type of evidence required to introduce such a policy. It states that *'where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:*
- **Need** – *evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.*
 - **Viability** – *the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.*
 - **Timing** – *there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions'.*

² PPG ID: 56-020-20150327

21. The Council will need robust justifiable evidence to introduce the NDSS, based on the criteria set out above. The HBF considers that if the Government had expected all properties to be built to NDSS that they would have made these standards mandatory not optional.

Accessible and Adaptable Homes

22. Part C of this policy looks for all new homes to be built to the M4(2) standard, and for developments of over 10 dwellings to provide 5% of homes at M4(3) standards.
23. The HBF is generally supportive of providing homes that are suitable to meet the needs of older people and disabled people. However, if the Council wishes to adopt the higher optional standards for accessible, adaptable and wheelchair homes the Council should only do so by applying the criteria set out in the PPG.
24. PPG³ identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. It is incumbent on the Council to provide a local assessment evidencing the specific case for Selby which justifies the inclusion of optional higher standards for accessible and adaptable homes in its Local Plan policy. If the Council can provide the appropriate evidence and this policy is to be included, then the HBF recommends that an appropriate transition period is included within the policy.
25. The PPG also identifies other requirements for the policy including the need to consider site specific factors such as vulnerability to flooding, site topography and other circumstances, this is not just in relation to the ability to provide step-free access.

Density

26. Finally, Part D of this policy sets the minimum density policies for different areas within the Borough. The HBF considers that the Council should include a level of flexibility within this policy, the HBF would recommend amendments to create greater flexibility to allow developers to take account of individual site characteristics and evidence in relation to demand, market aspirations and viability. The Council will also need to consider its approach to density in relation to other policies in the plan. Policies such as open space provision, space standards and parking provision will all impact upon the density which can be delivered upon site.

Preferred Approach HG4 - Affordable Housing

27. This policy looks for developments of 11 or more dwellings or 0.5ha or more in size to provide a minimum of 20% affordable homes.
28. The HEDNA identifies an affordable housing need of 141 affordable homes each year. The HBF supports the need to address the affordable housing requirements of the borough. The NPPF⁴ is, however, clear that the derivation of affordable housing policies must not only take account of need but also viability and deliverability. There does not

³ PPG ID: 56-007-20150327

⁴ NPPF Paragraph 34

appear to be a viability report available with this document, paragraph 7.33 of the document does refer to an emerging Plan Viability Assessment, but this does not appear to be available at this time. The only viability evidence the HBF could find at this time was from 2009 and is therefore very dated and no longer appropriate to rely on. Therefore, at this point it is not possible for the HBF to comment on the viability of this policy or others within the document. The Council should be mindful that it is unrealistic to negotiate every site on a one-by-one basis because the base-line aspiration of a policy or combination of policies is set too high as this will jeopardise future housing delivery.

29. Part B (2) of this policy states that the where affordable housing is provided it must be built to meet Lifetime Homes standards. It is noted that the Lifetime Homes standard is no longer applicable following the Government's Housing Standards review, Lifetime Homes have now been replaced by the optional Building Regulations accessibility standards (M4(2) and M4(3)). These standards can be introduced via a plan but only where there is specific evidence to justify their inclusion, as set out above. The HBF consider that the Council should remove this reference.
30. Part C states that *'affordable housing sites must provide at least 10% home ownership . . . and a mix of social rented / affordable rent / intermediate rent'*. The HBF appreciate the flexibility of this policy but consider it may benefit from some further clarity as to what will be expected and as to how this mix could be evidenced, this will assist in determining the viability of development.

Preferred Approach HG7 - Self-Build and Custom-Build Housing

31. This policy looks for sites of 50 or more dwellings to provide 3% of the plots to self-builders or to custom house builders subject to demand being demonstrated through the self-build register.
32. Many of our members will be able to assist the custom build sector either through the physical building of dwellings on behalf of the homeowner or through the provision of plots for sale to custom builders. The HBF are, therefore, not opposed to the idea of increasing the self-build and custom build sector for its potential contribution to the overall housing supply. However, the Council's approach is restrictive rather than permissive by requiring the inclusion of such housing on sites of 50 dwellings or more. This policy approach only changes the house building delivery mechanism from one form of house building company to another without any consequential additional contribution to boosting housing supply. Meaning that as currently proposed this policy will not assist in boosting the supply of housing and may even limit the deliverability of some sites and homes. The HBF would recommend appropriate evidence is collated to ensure that house building delivery from this source provides an additional contribution to boosting housing supply. This is likely to include engaging with landowners and working with custom build developers to maximise opportunities.
33. The HBF does not consider that the Council has appropriate evidence to support the requirement for 3% of the total plots on developments of more than 50 dwellings to

provide service plots for custom or self-build housing. PPG⁵ sets out how custom and self-build housing needs can be assessed. The HEDNA provides a very limited review of the Selby Self-Build and Custom Build Register, just setting out the overall numbers of individuals or organisations added each year, this has then been utilised to determine a need for 15dpa. The HBF are concerned that this is not a proper review of the data and does not necessarily identify double counting or whether any of these needs have already been met within Selby or elsewhere or whether these people would actually consider sites located within a larger residential scheme. Therefore, the HBF consider that this policy should be deleted as there is no evidence to support the threshold of 50 dwellings or the 3% proportion.

Preferred Approach HG14 – Provision of Recreation Open space

34. This policy approach looks for residential developments of 10 or more dwellings to provide recreational open space on site at a rate of 60sqm of open space per dwelling. The HBF does not considered that this requirement is justified or evidenced.

Preferred Approach NE2 - Protect and Enhance Green and Blue Infrastructure

35. This policy requires planning applications for major residential development to provide a Green and Blue Infrastructure Masterplan. The HBF notes that this policy does identify that the requirement will be commensurate to the scale of the development. However, the HBF is still concerned that the overly prescriptive requirements of this policy might slow or limit the delivery of homes. The HBF is keen to ensure that this policy does lead to the need to provide significant amounts of additional evidence or require the collection of evidence that will be very time-consuming and may require the need to employ different specialists.

Preferred Approach IC6 - Parking and Highway Safety

36. This policy approach states that provision for parking must be in line with the parking standards for low emission vehicles and charging points, along with cars and cycles. It also states that there should be charging points for electric vehicles on all new residential developments.
37. The HBF are concerned by the limited level of information available with this policy approach. It is not possible to comment on the appropriateness of the standards or level of provision without more details.
38. As set out previously, the HBF is generally supportive of the provision of electric vehicle charging points. However, the HBF would encourage the Council to work with the appropriate infrastructure providers to ensure a balanced and flexible optimised energy system that has sufficient capacity to meet any standards and requirements set by the Council in this policy and others. The HBF also recommends that the Council ensure that any standards are considered within the viability assessment, it should be noted that the Governments consultation on Electric Vehicle Charging identified an estimated installation cost of approximately £976.

⁵ PPG ID: 67-003-20190722

Monitoring Framework

39. The monitoring framework sets out each of the Plan themes along with a collection of indicators to monitor the theme. However, the indicators do not have any targets or actions associated with them, so it is not exactly clear how the indicators will be monitored and how it will be determined if any action needs to be taken to address issues with the delivery of the plan or what those actions may be. The HBF recommends that the Council amend the Monitoring Framework to include more details as to how the plan will actually be monitored, and identifies when, why and how actions will be taken to address any issues identified.

Future Engagement

40. 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.

41. 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,



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