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SENT BY EMAIL
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14th July 2025

Dear Planning Policy Team,

NORTH YORKSHIRE LOCAL PLAN: OUR FIRST CONVERSATION

1. Thank you for consulting with the Home Builders Federation (HBF) on the North Yorkshire Local Plan: Our First Conversation.
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 multinational 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 on the First Conversation consultation. These responses are provided in order to assist the Council in the preparation of a sound plan, the HBF is keen to ensure that the Council produces a sound local plan which provides for the housing needs of the area.

Plan Period

4. The Plan proposes to cover the period to 2045. The HBF considers that the Council will need to ensure that their Plan covers an appropriate period and that this ensures at least a 15-year period post adoption, this may mean that the Council needs to review the 2045 end date. The NPPF¹ states strategic policies should look ahead over a minimum 15-year period from adoption to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure, and that where larger scale developments form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take in account the likely timescale for delivery.

Vision and Objectives

5. Objective 5 is in relation to meeting specific housing needs it looks to ensure the housing needs of the area are met in terms of mix, housing types and affordability by providing a wide range of high quality and energy-efficient housing.

¹ NPPF 2024 Paragraph 22

6. The HBF considers that meeting the current and future housing needs should be a key part of the vision for the Plan. The HBF considers that the text above from Objective 5 is appropriate and should help to guide the Plan in relation to housing. However, the HBF would encourage the Council to ensure Plan meets all housing needs, including market housing, family homes, homes for older people and homes for first-time buyers, as part of the range of homes provided.

How much development do we need to plan for?

7. The Plan states that the housing need figure for North Yorkshire (including the two National Park areas) is 4,116 homes per year. The Council highlights that this level of housing development is considerably higher than the average annual delivery rates over the past five and ten-year periods (3,145 and 2,800 homes respectively).
8. The HBF notes that due to the housing stock figures being updated in May, the housing need figure has actually increased to 4,155 dwellings per annum.
9. The HBF considers that this housing figure will need to be considered to reflect the latest government guidance in relation to the Written Ministerial Statement², the standard methodology and the NPPF. The Council may also need to consider if it is appropriate to plan for a higher housing need figure than the standard method indicates to reflect growth ambitions linked to economic development or infrastructure investment as set out in the NPPF³.
10. The HBF considers that the Council will need to consider an appropriate balance of development, to ensure that all of their housing needs are met in terms of types and tenures; locations and markets, and to ensure that the Plan can deliver against its housing requirements. The HBF considers that it will be necessary to gather appropriate evidence including a housing needs assessment and a Viability Assessment to determine what types of homes may be needed and can be delivered in North Yorkshire. The HBF considers this is likely to include a wide range and variety of homes, from homes for first-time buyers, to family homes, to homes to suit the older population. The HBF would encourage the Council to work with the home building industry working in the area to determine the types of homes that are currently being delivered, and where there is demand from home purchasers.
11. The HBF considers that it is appropriate for the Council to plan for the affordable needs of its community, and to ensure that it does this in line with the requirements in the NPPF⁴. This should ensure that any affordable housing requirements are clearly set out, are evidenced as viable through an assessment, and that flexibility is provided within the policy where viability may be an issue.

Developing a spatial strategy

² Building the Homes we need – Written Ministerial Statement 30th July 2024

³ NPPF December 2024 paragraph 69

⁴ NPPF December 2024 paragraphs 35, 64-66

12. The Plan provides a set of key principles in relation to the spatial strategy these include meeting local development needs; reinforcing the roles of settlements; addressing infrastructure constraints; locating development where it can be accessed by sustainable transport infrastructure; and avoiding development in locations where there are environmental considerations.
13. The HBF would wish to see the Plan set out a logical settlement hierarchy which meets all the housing needs and addresses all areas of the housing market, with a range of sites proposed for allocation. The Plan should provide for a wide range of deliverable and developable sites across the area in order to provide competition and choice to ensure that housing needs are met in full.

New settlements

14. The Plan suggests that in terms of housing whilst large sites will come forward in the medium to long term their longer 'lead in' and 'build out' timescales mean that smaller and medium sized sites will have an important role in meeting the supply of housing. The Council suggest that several sites have been submitted which could potentially form new settlements or significant urban extensions.
15. The HBF believe that the Plan should provide for a wide range of sites across the Borough in order to provide competition and choice to ensure that housing needs are met in full. This sufficiency of housing land supply should ensure that the Council can meet the housing requirement, ensure the maintenance of a 5-year housing land supply and achieve the Housing Delivery Test. 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.
16. The HBF also notes that the NPPF⁵ requires Local Plans to identify land to accommodate at least 10% of the housing requirement on sites no larger than one hectare, unless there are strong reasons why this cannot be achieved.
17. The HBF considers that there is an opportunity for the Council to consider the potential for new settlements and / or significant extensions to built-up areas through the Local Plan. However, the HBF would expect the Council to be able to evidence of the availability of the land proposed, and the deliverability of development including evidence of the level of provision that is expected from these strategic sites within the Plan period. For example, if supply towards the end of a plan period is to come from the early phases of a major urban extension or new settlement then the Council should be able to demonstrate that those early phases in question are free from technical impediment.

⁵ NPPF December 2023 Paragraph 70

18. The HBF considers that any policy requirements in relation to the new settlements and / or significant extensions to the existing built-up area should be realistic, viable and deliverable. The HBF would strongly recommend that the Council work closely with landowners and developers of these sites to ensure that any policy requirements are appropriate, including those in relation to design, energy efficiency, supporting infrastructure and accessibility.
19. The HBF considers that it is important that all the sites contained within the housing supply are deliverable over the plan period, planned to an appropriate strategy and do not create an over-reliance on one location or type of property.

Settlement hierarchy

20. The Plan highlights that there are over 500 settlements within the North Yorkshire Local Plan area, extending from the major towns of Harrogate and Scarborough, with populations of 60-70,000 people, to countryside villages and hamlets, some of which have fewer than ten homes. The Plan suggests a settlement hierarchy consisting of Major Towns; Key Service Centres; Local Service Centres; Neighbourhood Service Centres; Small Settlements; and Countryside, with settlements in the higher tiers of the hierarchy able to accommodate additional development.
21. The HBF does not comment on individual sites but would wish to see the Plan set out a logical settlement hierarchy which meets all the housing needs and addresses all areas of the housing market, with a range of sites proposed for allocation. The HBF considers that it is generally appropriate for development to be focused in the higher tiers of the hierarchy, however, it is important that this takes into account provision across all areas of the authority, and does not leave areas without opportunities for development to meet local needs and demands. The Council will need to ensure that they have the appropriate evidence base to support their hierarchy and to ensure all needs are met.

Development limits

22. Development limits are lines that are drawn around areas or settlements in the local plan. The Council suggests that the general principle is that inside the boundary certain types of development may be acceptable, but outside of them development would only be allowed in very specific circumstances. However, they also highlight that the use of development limits is not the only option with criteria-based policies as an alternative to direct development. The Council suggests that criteria-based policies could include whether a development respects the form and character of the settlement, its impact on the natural environment or the wider landscape setting or the cumulative impact of development on local service provision.
23. The HBF considers that development limits or criteria-based policies can both work in terms of guiding development. However, whichever policy option is chosen, the HBF would expect the policy to provide a level of clarity regarding where development is considered appropriate, whilst also allowing for flexibility as and when it is needed. This may for example mean that it is appropriate to include a policy in relation to when it is appropriate to allow for devel-

opment outside of the built up area / or development limits dependent on the policy approach chosen, this could have different levels of requirements depending on whether the site is well-related to the existing settlement or whether it is further away.

24. The HBF would encourage the Council to consider whether Green Belt release is likely to be required as soon as they are able, and to undertake a Green Belt Review. The HBF would support the Council in undertaking preparatory work to establish a clear methodology and approach for the Green Belt Review as soon as possible.

Developing growth options

25. The Council have set out potential growth options including: (a) Prioritising growth in and around main urban areas; (b) Achieving a greater proportion of development in larger villages; (c) Dispersing development across a broader range of settlements, including smaller villages; (d) Growing locations that are well-served by existing and/or new high-quality sustainable transport links; and (e) Developing entirely new settlements.
26. The HBF does not consider that it is in a position to comment on which of these growth options is likely to be appropriate without full consideration of the land availability and suitability in each of these approaches. It may be that elements of each approach should be taken forward to garner as many of the positives from each approach, for example supporting the vitality of smaller settlements, but also supporting the development of land within or adjacent to the larger settlements where developments are likely to be sustainable.

Mitigating climate change

27. The Local Plan suggests that the Plan could help to mitigate climate change by: reducing emissions from transport; reducing emissions from new development; identifying locations and/or criteria-based policies for a range of renewable energy technologies; reducing emissions through retrofitting existing buildings, where planning permission is required, and supporting nature-based solutions for carbon capture, storage and carbon offsetting. It also suggests that the local plan could help to adapt to climate change by: building in sustainable design in new development; locating new development in the lowest areas of flood risk and requiring sustainable draining systems; avoiding inappropriate development in vulnerable coastal areas and not exacerbating the impacts of physical changes to the coast.
28. The PPG⁶ provides examples of mitigating climate change by reducing emissions: through reducing the need to travel and providing sustainable transport; providing opportunities for renewable and low carbon energy technologies; providing opportunities for decentralised energy and heating; and promoting low carbon design approaches to reduce energy consumption in buildings. The HBF recommends that the Council seek to ensure that they produce a sustainable Plan which supports a balance of homes and employment and is in line with the guidance provided by the NPPF and the PPG.

⁶ PPG ID: 6-003-20140612

29. The HBF does not consider that it is necessary for development to adopt, as a minimum, measures to limit water usage including the implementation of the optional technical standards for water efficiency. The optional water standard is 110 litres per person per day, the Building Regulations require all new dwellings to achieve a mandatory level of water efficiency of 125 litres per day per person, which is a higher standard than that achieved by much of the existing housing stock. This mandatory standard represents an effective demand management measure.
30. A policy requirement for the optional water efficiency standard must be justified by credible and robust evidence. If the Council wishes to adopt the optional standard for water efficiency of 110 litres per person per day, then the Council should justify doing so by applying the criteria set out in the PPG. PPG⁷ states that where there is a *'clear local need, Local Planning Authorities (LPA) can set out Local Plan Policies requiring new dwellings to meet tighter Building Regulations optional requirement of 110 litres per person per day'*. PPG⁸ also states the *'it will be for a LPA to establish a clear need based on existing sources of evidence, consultations with the local water and sewerage company, the Environment Agency and catchment partnerships and consideration of the impact on viability and housing supply of such a requirement'*. The Housing Standards Review was explicit that reduced water consumption was solely applicable to water stressed areas. Yorkshire and North Yorkshire are not considered to be an area of Water Stress as identified by the Environment Agency⁹. Therefore, the HBF considers that requirement for optional water efficiency standard is not justified nor consistent with national policy in relation to need or viability and should be deleted.
31. The HBF considers that the Council should ensure that any climate change policy is only implemented in line with the December 2023 Written Ministerial Statement¹⁰ which states that *'a further change to energy efficiency building regulations is planned for 2025 meaning that homes built to that standard will be net zero ready and should need no significant work to ensure that they have zero carbon emissions as the grid continue to decarbonise. Compared to varied local standards, these nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes'*. It goes on to state that *'the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current, or planned building regulations, should be rejected at examination if they do not have a well-reasoned and robustly costed rationale'*.

⁷ PPG ID: 56-014-20150327

⁸ PPG ID: 56-015-20150327

⁹ 2021 Assessment of Water Stress Areas Update: <https://www.gov.uk/government/publications/water-stressed-areas-2021-classification>

¹⁰ <https://questions-statements.parliament.uk/written-statements/detail/2023-12-13/hcws123>

Promoting health and reducing health inequalities

32. The Plan suggests that as well as delivering homes that are built to a standard to meet the needs of the community, including being adaptable to the needs of an increasingly elderly population, for example by requiring nationally described space standards in all new homes, or seeking a proportion of new dwellings that are built to standards which allow full wheelchair accessibility, or can be designed to ensure that homes stay warmer in winter and cooler in summer.
33. The HBF has commented in relation to the use of the nationally described space standards (NDSS) and accessible and adaptable housing standards (M4(2) and M4(3)) later in this response, and therefore has not repeated this information here.
34. The consultation suggests that the local plan can include policies requiring Health Impact Assessments (HIA) to be prepared by developers, which identifies and considers the health and wellbeing impacts (benefits and harms) of a proposed development.
35. The HBF generally supports plans that set out how the Council will achieve improvements in health and well-being. In preparing its local plan the Council should normally consider the health impacts with regard to the level and location of development. Collectively the policies in the plan should ensure health benefits and limit any negative impacts and as such any development that is in accordance with that plan should already be contributing positively to the overall healthy objectives of that area.
36. The PPG¹¹ sets out that HIAs are ‘a useful tool to use where there are expected to be significant impacts’ but it also outlines the importance of the local plan in considering the wider health issues in an area and ensuring policies respond to these. As such Local Plans should already have considered the impact of development on the health and well-being of their communities and set out policies to address any concerns. Consequently, where a development is in line with policies in the Local Plan a HIA should not be necessary. Only where there is a departure from the plan should the Council consider requiring a HIA. In addition, the HBF considers that any requirement for a HIA should be based on a proportionate level of detail in relation the scale and type of development proposed. Only if a significant adverse impact on health and wellbeing is identified should a HIA be required, and it should set out measures to substantially mitigate the impact.

Protecting and improving biodiversity

37. The PPG¹² is clear that plan-makers should be aware of the statutory framework for biodiversity net gain, but they do not need to include policies which duplicate the detailed provisions of this statutory framework. It goes on to state that it will also be inappropriate for

¹¹ PPG ID:53-005-20190722

¹² PPG ID: 74-006-20240214

plans or supplementary planning documents to include policies or guidance which are incompatible with this framework. The HBF notes that the PPG¹³ also states that: “... *plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies, they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented*”.

Affordable housing

38. The HEDNA indicates that there is a need for 2,458 affordable homes per annum in North Yorkshire.
39. The HBF considers that it is appropriate for the Council to plan for the affordable needs of its community, and to ensure that it does this in line with the requirements in the NPPF¹⁴. This should ensure that any affordable housing requirements are clearly set out, are evidenced as viable through an assessment, and that flexibility is provided within the policy where viability may be an issue.

Addressing the housing needs of disabled people

40. The consultation suggests that the Local Plan could help to address the needs of people with disabilities by: supporting adaption or extension of existing residential properties to meet changing needs considering the needs of people with disabilities in the design of private gardens and public spaces, and increasing housing choice by providing specialist housing for disabled people.
41. 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. PPG¹⁵ identifies the type of evidence required to introduce a policy seeking the use of the M4(2) and M4(3) standards, 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 North Yorkshire 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.

¹³ PPG ID: 74-006-20240214

¹⁴ NPPF December 2024 paragraphs 35, 64-66

¹⁵ PPG ID: 56-007-20150327

42. The PPG¹⁶ 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, which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings, particularly where step free access can not be achieved or is not viable.
43. The HBF considers that if the Council has the evidence to introduce this policy, it may want to consider the most appropriate way to deliver the homes they require to meet their needs. The HBF considers that this may not always be in the form of M4(3) homes, and may need further consideration.

Addressing the housing needs of older people

44. The consultation suggests that the local plan could support the development of housing that meets the needs of older people through: locating housing developments in places which have access to existing services and facilities; the allocation of land for specific types of housing to meet the needs of older people e.g., retirement living, sheltered housing, extra care etc; the development of new homes that can adapt to residents' needs and allow older people to remain in their homes for longer; the provision of a range of housing types which cater for the needs of older people i.e., smaller housing to allow for opportunities to down-size.
45. The PPG¹⁷ states that the need to provide for older people is critical, and that offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. It goes on to state that Plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people and that Plans need to provide for specialist housing for older people where a need exists¹⁸. It also notes that allocating sites can provide greater certainty for developers and encourage the provision of sites in suitable locations. As such, the HBF considers that the Council needs to work closely with the providers of older persons housing to identify appropriate sites or to provide appropriate policies.

Second homes and holiday homes

46. The HBF does not consider it is appropriate to use the planning system to restrict the ownership of second homes. However, if the Council choose to do this, it will need to fully understand the consequences of any decision to restrict the ownership of new housing stock on the housing market in general. Preventing second home ownership of newly built homes in the area will place more pressure on the existing stock of housing to meet the demand for second homes, which could increase prices of existing homes.
47. The HBF also does not consider that it would be appropriate for North Yorkshire to use limits to occupancy such as a principal residence condition. The HBF have concerns in relation to

¹⁶ PPG ID: 56-008-20160519

¹⁷ PPG ID: 63-001-20190626

¹⁸ PPG ID: 63-006-20190626 & ID: 63-012-20190626

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, along with impacts they can have on residents and future residents in relation to financing.

Self-build and custom build housing

48. The HEDNA sets out that across North Yorkshire, between 2016 and 2024 there has been a total of 1,295 registered expressions of interest in a serviced plot of land for self build and custom house building in North Yorkshire, however during this period there has been a downward trend of interest, and this may be a reflection of individuals being on formerly multiple registers. Further analysis by the national association for the custom and self-build housing sector (NaCSBA) would indicate that there was a need for 829 self-build dwellings in a survey in 2020.
49. The PPG¹⁹ sets out how local authorities can increase the number of planning permissions which are suitable for self and custom build housing. These include supporting neighbourhood planning groups to include sites in their plans, effective joint working, using Council owned land and working with Home England. The HBF considers that alternative policy mechanisms could be used to ensure a reliable and sufficient provision of self & custom build opportunities across the Borough including allocation of small and medium scale sites specifically for self & custom build housing and permitting self & custom build outside but adjacent to settlement boundaries on sustainable sites especially if the proposal would round off the developed form.

Housing standards

50. The Nationally Described Space Standards (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. PPG²⁰ 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, Viability and Timing. 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.
51. The HBF notes that there is a direct relationship between unit size, cost per square metre (sqm), selling price per sqm and affordability. The HBF recommends that the policy approach should recognise that customers have different budgets and aspirations. An inflexible policy approach to NDSS for all new dwellings will impact on affordability and effect customer choice. Well-designed dwellings below NDSS can provide a good, functional home.

¹⁹ PPG ID: 57-025-20210508

²⁰ PPG ID: 56-020-20150327

Smaller dwellings play a valuable role in meeting specific needs for both open market and affordable home ownership housing. The introduction of the NDSS for all dwellings may mean customers purchasing larger homes in floorspace but with bedrooms less suited to their housing needs with the unintended consequences of potentially increasing overcrowding and reducing the quality of their living environment. The Council should focus on good design and useable space to ensure that dwellings are fit for purpose rather than focusing on NDSS.

Monitoring

52. The HBF recommends that the Council include an appropriate monitoring framework which sets out the monitoring indicators along with the relevant policies, the data source and where they will be reported, this should also include the targets that the Plan is hoping to achieve and actions to be taken if the targets are not met. The HBF recommends that the Council provide 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.

Viability

53. The Council will also need to ensure that they have considered viability, viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative costs of all relevant policies will not undermine deliverability of the Plan. The Council need to ensure that policy requirements should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned development to be deliverable without need for further viability assessment at the decision-making stage.

Future Engagement

54. 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.
55. 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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