

The Planning Policy Team  
North York Moors National Park Authority  
The Old Vicarage  
Bondgate  
Helmsley  
York  
YO62 5BP

18/11/2016

Dear Sir / Madam,

## **North York Moors National Park Local Plan: First Steps**

1. Thank you for consulting with the Home Builders Federation (HBF) on the North York Moors National Park Local Plan: First Steps consultation.
2. The HBF is the principal representative body of the house building industry in England and Wales and our representations reflect the views of our membership of multinational PLCs, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year including a large proportion of the new affordable housing stock.
3. We would like to submit the following comments upon selected questions posed within 'Part 2 – Main Issues' of the consultation. 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.

### **Question M3. Do you have any suggestions for our objectives, or any priorities you wish to see covered?**

4. The HBF is generally supportive of the initial thoughts outlined and welcome the recognition within the final bullet that the park will;

*“...need local communities and businesses to prosper so that the next generation will have to opportunity to live, work and look after the North York Moors...”*

5. To compliment this initial thought the HBF consider the plan should include statements within its vision and objectives relating to economic growth and housing needs.

**Question M8. Do you have any views on whether infill sites should be defined differently (and if so, how)?**

6. The current reference to infill sites being able to “...*accommodate no more than one dwelling*” appears rather arbitrary and lacks the flexibility required to deal with the wide range of sites which may come forward and provide valuable sources of housing supply. This can be achieved whilst maintaining or improving the qualities of the National Park.
7. The HBF consider that simply removing the latter part of the definition would ensure the scale of development is limited due to the reference to ‘small’ but also provide flexibility where it would allow more than one dwelling to be accommodated. The amended definition would therefore read;

*“a small gap within a continuously built up frontage within the main built-up area of the settlement”*

8. This definition would also be more in keeping with Policy H2 of the recently adopted Helmsley Local Plan which reads;

*“Proposals for new residential development on sites located within the defined Development Limit will be supported where the site comprises a small infill gap and/or fulfils the relevant policy requirements set out in the Ryedale Local Plan Strategy or North York Moors Core Strategy and Development Policies Document...”*

No reference is provided to accommodating one only dwelling either within the policy text or justification of the Helmsley Local Plan.

**Question M9. What are your general views on the amount of new housing we should be planning for in the North York Moors and what do you think our main objective should be when setting a housing target? Should we have a housing target?**

9. The HBF considers that the NYMNPA should provide a housing target within the plan. The NPPF, paragraph 47, is clear that Local Planning Authorities should;

*“...use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this*

*Framework...*

10. Whilst it is recognised national parks tend to sit within a variety of housing market areas, usually based upon surrounding towns, the NPPF requirement does not exclude National Park Authorities. The National Park Authority will therefore need to work closely with the relevant local authorities to determine its housing need and subsequent requirement.
11. In terms to the scale of housing provision the HBF is cognisant 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*”. In this regard the plan should, as a minimum, seek to stem, if not reverse, population decline.
12. 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 36dpa, yet over this period there has been a declining population. Given this information it would appear reasonable that a figure greater than 36dpa 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.
13. It is also notable that the population of the park is aging, 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 aging demographic. This will inevitably reduce the potential workforce and population vitality in the future. The HBF therefore consider that the National Park Authority 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.

**Question M10. Should the new Local Plan policies aim to limit further population decline and encourage a more balanced age demographic?**

14. Yes, we refer to our response to question M9 above.

**Question M11. Do you think we should have a policy on the type and size of new homes and if so do you agree that we should be focussing on smaller houses? Are there any particular types or sizes of housing that you think are needed?**

15. The HBF does not dispute the evidence contained within the 2016 SHMA it must however be recognised that this takes little account of aspiration or the needs of potential in-migrants to the park. If the National Park Authority wish to promote a balanced community and attract younger residents to provide and take-up economic opportunities it will also need to provide appropriate family accommodation.

16. It is therefore recommended that if a policy is provided some form of flexibility is in-built in terms of type and size. It should also be recognised that the 2016 SHMA provides a 'snap-shot' in time and needs may vary over the lifetime of the plan. This is recognised by the proposed main modifications to the Yorkshire Dales National Park Local Plan, which is still undergoing examination.

**Question M12. Do you have any views on how our current policy focusses on certain places for different tenures – market, affordable and local needs – and whether any changes are needed?**

17. To provide a balanced mix of opportunities and the potential to attract in-migrants to improve the economy and social wellbeing it is recommended that a flexible approach to policy is required. Whilst it appears reasonable to focus the majority of market and affordable provision within the larger settlements it is considered limited opportunities should also be provided within smaller settlements. This could be new development is required to maintain vitality, provide an appropriate mix of dwellings and preserve the conversion of historic buildings.

**Question M13. Do you have any views on the type of affordable housing that we should be looking to support through our policies?**

18. The types of affordable housing provided should be informed by a thorough understanding of need and viability. It is also important the plan clearly mirrors the forthcoming requirements for 'Starter Homes'.

**Question M14. Do you think that we should accept some market housing on rural exception sites to help fund affordable housing? If so, in what areas?**

19. Yes, this will ensure that the need for affordable housing within the area is met.

**Question M15. Should our current policy of restricting some new housing to local occupancy only continue? If so, do you have any thoughts on whether current eligibility criteria and the 'cascade' should be modified?**

20. The National Park is currently losing population, to stabilise its population and maintain the vitality of the park will require alternative methods of delivery. Whilst local occupancy housing may still have a role to play it is recommended that the eligibility criteria and 'cascade' be amended to provide a more flexible approach. It is also considered that exceptions to local occupancy may be appropriate in certain circumstances.

21. The current criteria create issues relating to the marketing and saleability of properties, including accessing mortgages, which inevitably have implications for site viability and delivery. It is noted that the Yorkshire Dales National Park Local Plan is seeking to relax its local occupancy criteria to provide greater flexibility.

**Information**

22. The HBF would be happy to discuss these comments further with the National Park Authority prior to the next stage of consultation. We would also like to be kept informed of any future opportunities to comment upon this or any other local plan document.

Yours sincerely,



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