

Planning Policy & Conservation

Hambleton District Council

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12/12/2016

Dear Sir / Madam

Hambleton Local Plan: Preferred Options

1. Thank you for consulting with the Home Builders Federation (HBF) on the Hambleton Local Plan: Preferred Options 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 to selected questions.

Question 3: Do you think the Preferred Option for meeting Hambleton's development need is the right approach. If not please identify how the option could be changed.

4. The HBF considers a more aspirational approach to growth should be taken.
5. The preferred option identifies a housing requirement of at least 5,500 dwellings this is aligned to jobs-growth of 178 jobs per annum over the period 2019 to 2035. The HBF is supportive of the identification of the housing requirement being a minimum figure and that it is aligned to a strategy for jobs growth, both of these requirements are considered consistent with the requirements of the NPPF.
6. It is, however, unclear why the plan period is set at 2019 to 2035. This is contrary to the evidence base which considers the housing and employment growth requirements over the period 2014 to 2035. Given that the current, albeit out of date, plan requirements, set within the Core Strategy, over the period 2014 to 2019 are lower than the identified need this is considered unjustified. The HBF recommends

that the plan requirement match the evidence base. To do otherwise is likely to under-estimate need. The full plan housing requirement, based upon the Council's own evidence, would therefore be 6,720 dwellings over the period 2014 to 2035. Completions since the start of the plan period would, of course, be deducted from this requirement.

7. The *October 2016 Strategic Housing Market Assessment Update* (October 2016 SHMA) identifies a housing requirement of 320dpa. This is based upon an alignment of the housing requirement with an economic growth scenario of creating an additional 178 jobs per annum, which represents a 0.4% per annum growth. The aspiration behind this level of jobs growth is questioned.
8. Between 1981 and 2013 a total of 22,283 jobs were created in Hambleton (Figure 7, 2016 Employment Land Review). This equates to an average annual increase of nearly 700 jobs. Whilst much of this growth occurred during the 1980s and early 1990s there has still been growth significantly in excess of 178 jobs per annum since this period. Furthermore the Council's *2014 to 2024 Economic Strategy* identifies a jobs growth rate of 3000 over the 10 year period. This is equivalent to 300 jobs per annum, it is unclear how or if this ambition has been fed into the identified level of jobs growth. An increase in jobs to a similar level would inevitably require a higher housing requirement.
9. Finally the HBF is also aware of other evidence relating to housing needs within Hambleton. This includes work undertaken on two recent appeals. In the appeal at North Stillington Road, Easingwold (APP/G2713/A/14/2217056) an objectively assessed housing need of 458dpa was agreed between both parties (paragraph 18 Inspector's Report), albeit this did not include any market signals uplift. The five year supply position identified a requirement of 637dpa. The appeal at Land off Tanton Road, Stokesley appeal (APP/G2713/A/14/2223624) identified a housing need of 564dpa. Whilst both appeals were based upon the 2012 based sub-national household projections it does point towards a much higher housing need than is currently being planned.
10. The HBF is therefore concerned that the housing requirement is not set over the appropriate time period and is set too low.

Question 17: Do you think the preferred option for affordable housing on exception sites is the right approach? If not please identify how the option could be changed?

11. Subject to the detail of the policy wording the general approach identified is considered appropriate.

Question 23: Do you think the Preferred Option for meeting Hambleton's housing needs is the right approach. If not please identify how the option could be changed. Should we have considered alternative options?

12. No, the HBF does not consider the preferred option to be the correct approach. The preferred option is split into two distinct elements which are discussed separately below.

Housing Allocations

13. The preferred option seeks to phase housing developments to provide 'balanced delivery' and have regards to infrastructure requirements. Whilst phasing based upon the provision of infrastructure is acknowledged artificial dates should not be set as the development may facilitate earlier than anticipated delivery of any infrastructure requirements. In relation to 'balanced delivery' this is not supported. Neither the proposed policy content nor the supporting text indicate why such phasing is necessary, justified or what the negative impacts of early delivery would be. Furthermore such phasing may actually inhibit sites coming forward and reduce flexibility within the plan to deal with changing circumstances, a key element of the NPPF.

14. The HBF also recommends that a buffer of sites be provided over and above the proposed housing requirement. The reasons for the inclusion of such a buffer are two-fold. Firstly the NPPF is clear that plans should be positively prepared, aspirational and significantly boost housing supply. In this regard the housing requirements set within the plan should be viewed as a minimum requirement, this interpretation is consistent with numerous inspectors' decisions following local plan examination. Therefore if the plan is to achieve its housing requirement as a minimum, it stands to reason that additional sites are required to enable the plan requirements to be surpassed. Secondly, it is inevitable, due to a variety of reasons, some sites will either under-perform or fail to deliver during the plan period. A buffer of sites will therefore provide greater opportunities for the plan to deliver its housing requirement. Such an approach is recommended within the LPEG report to Government¹.

¹ Local Plan Expert Group (2016): Report to the Communities Secretary and to the Minister of Housing and Planning

15. The policy also suggests that 'as a means to boost the supply of housing' consideration will be given to allocating proportions of larger sites to smaller developers. This should not be a mandatory requirement upon larger sites as it may create operational difficulties in dealing with such sites. It should only be provided where there is full agreement between the Council, site developer / promoter and a smaller developers are on-board. To do otherwise could stall the delivery of much needed housing.

Windfall Development

16. Whilst the HBF has no objection to a criteria based approach to such development it is important that the criteria are not unduly inhibitive.

Question 24: Do you think the Preferred Option to deliver the appropriate mix of housing sizes, types and tenures is the right approach. If not please identify how the option could be changed.

17. It is considered changes are required to the preferred option. The policy content is split into four key elements each of these are dealt with separately below.

Size and Type of New Market Housing

18. Whilst the HBF is supportive of providing a mixture of housing types the Council should not seek to rigorously apply the percentages identified within the preferred option to every site. It is notable that table 57 of the January 2016 SHMA indicates a range for each property size. This is not reflected in the policy. Furthermore the January 2016 SHMA is clear that these are indicative figures for the whole of the Housing Market Area (paragraph 10.41). It would therefore be unjustified to make such requirements for every site, irrespective of location. The January 2016 SHMA acknowledges that flexibility is required as well as a cognisance that there may be a need for larger properties not only to allow families to grow within Hambleton but also to attract new migrants so as to ensure the economic success of the area (paragraphs 10.42, 10.43 and 10.46). This appears to be ignored within the policy content.

19. It should also be recognised that the SHMA represents a snap-shot in time and reflects need at that time but does not reflect aspiration. Needs and aspirations will change over time and the plan will therefore need to respond to these changes. The Council will also be aware of our previous comments on this issue as part of the

consultation upon the Size, Type and Tenure of New Homes SPD. These comments are still considered valid.

20. The HBF is supportive of account being taken of the economic viability assessment upon this policy.

Affordable Housing

21. The HBF supports the provision of affordable housing. The SHMA identifies a clear and recognisable need. This need must, however, be balanced upon economic viability considerations in accordance with the NPPF (paragraphs 174 to 177). In terms of the target provision the HBF awaits the outcomes of the economic viability assessment prior to coming to a view upon the realism of this policy requirement.
22. In relation to Starter Homes it is noted that the policy suggests this will form part of the 25% intermediate tenure. This suggestion will, however, be dependent upon the forthcoming regulations with regards to Starter Homes which may require a higher mandatory proportion than suggested.

Self-build and Starter Homes

23. The preferred option seeks to provide self/custom build plots on all sites above 10 units. The impact of this will require consideration as part of the economic viability appraisal. If such a policy requirement can be justified it is recommended that flexibility is in-built into the policy to ensure that this requirement does not stall sites coming forward, particularly in areas with limited or no expressions of interest for self / custom build.
24. In relation to Starter Homes we refer to our response to affordable housing above.

Space Standards

25. The evidence required to introduce the optional space standards is set out within the PPG (ID 56-020) this evidence should consider the impact across different housing market character areas and differing tenures. For example whilst the adoption of the internal space standard may prove acceptable for the higher market areas, it may seriously harm regeneration initiatives and town centre schemes. A one-size fits all approach to the evidence base will not capture the

impact that the standard would have across the different market areas, in terms of viability and the need for the standard.

26. The evidence and policy should also take account of whether the space standards should be applied across all forms of residential development, whether new build, extension or conversion. Similarly the evidence should consider the impact upon all types of tenure be it general market family housing, affordable housing, flats and apartments. The Council should demonstrate an understanding of the delivery model for these different forms of new housing and the likely effect of standards upon them.
27. The HBF is unaware of any evidence which points towards a need for the space standard to be applied within the area. The HBF undertakes an annual customer satisfaction survey of new home buyers. This identified that in 2016 86% of buyers were satisfied with the quality of their new home and 92% were satisfied with the internal layout. The full report can be accessed at www.hbf.co.uk. It is therefore clear that the vast majority of new home buyers are very happy with the homes currently being built and they meet their needs.
28. Furthermore the blanket introduction of the space standards may actually reduce choice. This is because many developers have entry level three and four bed properties, some of which may not currently meet the space standard. These types of properties provide a valuable product for those with a need for a certain number of bedrooms but who are unable to afford larger three and four bed properties. The consequent increase in costs and reduction in variety could have a detrimental effect upon affordability and delivery, particularly in more marginal areas.
29. If the introduction of the space standards can be justified the HBF would recommend flexibility in its application. This is required to enable local and site specific needs and constraints to be taken into account as development is brought forward.

Question 30: Do you think the preferred option for water quality and supply is the right approach? If not please identify how the option could be changed. Should we have considered alternative options and if so what are they?

30. The preferred option seeks to ensure 'the efficient use of water'. In terms of housing development this is stipulated by the Building Regulations. Whilst there is an optional standard this can only be implemented with regards to the tests identified within the PPG (ID 56-015).

Information

31. I trust that the Council find the foregoing comments useful as it continues to review its Local Plan. I would be happy to discuss these comments further if required. I would also like to be kept informed of future consultations upon the Local Plan or other planning documents.

Yours sincerely,

Handwritten signature of Matthew Good in black ink.

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