

The Planning Policy Team
North York Moors National Park Authority
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SENT BY EMAIL
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Dear Sir / Madam,

NORTH YORK MOORS NATIONAL PARK AUTHORITY LOCAL PLAN: CURRENT THINKING (Reg 18)

Thank you for consulting with the Home Builders Federation on the North York Moors Local Plan: Current Thinking Consultation.

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.

We would like to submit the following comments upon selected questions posed within Current Thinking consultation document. These responses are provided in order to assist the North York Moors National Park Authority (NYMNP) in the preparation of the emerging local plan. The HBF is keen to ensure that the NYMNP produces a sound local plan which provides for the housing needs of the area.

Question 2: Do you agree with the overall approach to housing policy set out below? If not, please give your reasons and tell us what alternatives you would prefer.

Please see answers to individual questions below.

Question 3: Do you have any views on the amount of housing that we should be looking to allow in the coming years?

The current thinking document suggests that the authority will plan for 29 new homes each year to help prevent a declining population and to support local communities.

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'.

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 37dpa, yet over this period there has been a declining population. Given this information it would appear reasonable that a figure greater than 37dpa 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.

It is also notable that the population of the park is ageing, 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 ageing demographic. This will inevitably reduce the potential workforce and population vitality in the future. The HBF therefore consider that the NYMNPA 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.

The HBF considers that there is a need to provide more than 29 new homes each year. The HBF considers based on recent delivery rates there is a need to provide more than 37 new homes each year if the NYMNPA is to prevent a declining population and support local communities.

Question 4: Do you agree that new open market housing development should be limited to Helmsley and not permitted in any of the Villages? If not, please give your reasons and tell us what alternative you would prefer.

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 to maintain vitality, provide an appropriate mix of dwellings and preserve the conversion of historic buildings.

Question 6: Do you have any views on whether we should apply local occupancy restrictions and if so on our suggested way forward? Please give your reasons or tell us what alternative you would prefer.

The NYMNPA 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 allow for a flexible approach. It is also considered that exceptions to local occupancy may be appropriate in certain circumstances.

It is noted that inappropriate local occupancy criteria can create issues relating to the marketing and saleability of properties, including accessing mortgages, which inevitably have implications for site viability and delivery.

Question 7: Do you agree that there should be size restrictions for new local needs housing and that large extensions should be resisted? Do you agree with the proposed limits? If not, please give your reasons and tell us what alternative you would prefer.

It should be recognised that the 2016 SHMA provides a 'snap-shot' in time and needs may vary over the lifetime of the plan. The NYMNPA will need to ensure that the proposed limits do not limit the aspirations of local people, or limit the potential for new younger residents to provide or take up economic opportunities within the NYMNPA, particularly in relation to appropriately sized family homes. It is therefore recommended that if a policy is provided which restricts the size of local needs housing there should be some form of flexibility built in.

Question 9: Do you agree with the approach to infill development that we are suggesting? If not, please give your reasons and tell us what alternative you would prefer.

Although the proposed amendment to allow for two dwellings to be developed within a continuously built up frontage is an improvement on the existing policy, it still 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.

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 or two dwellings 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'*.

This definition would also be more in keeping with Policy H2 of the recently adopted Helmsley Local Plan which states *'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 only one dwelling either within the policy text or justification of the Helmsley Local Plan.

Future Engagement

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.

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 cursive script, appearing to read 'J Harding', written in black ink.

Joanne Harding

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