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17/10/2019

Dear Liz Sheard,

NORTH YORK MOORS NATIONAL PARK LOCAL PLAN: INSPECTOR'S MATTERS, ISSUES AND QUESTIONS

Thank you for consulting with the Home Builders Federation on the North York Moors National Park Local Plan Examination Inspector's Matters, Issues and Questions.

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.

The HBF would like to submit the following comments on selected questions posed within the Inspector's Matters, Issues and Questions.

Yours sincerely,



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Matter 2: Communities – Strategic Policy M (Housing) / policies CO6-CO20

2.1 Does the plan set out an appropriate strategy for addressing the National Park's falling population levels and aging resident population, along with the need to support the local economy?

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 NYMNP 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.

Strategic Policy M

2.2 Is the housing requirement figure, including the figure for affordable housing, based on robust and up-to-date evidence? Is the approach taken to establishing a requirement figure reasonable having regard to national planning policy and guidance?

The North York Moors National Park Strategic Housing Market Assessment (SHMA) was produced in 2016. It has utilised the 2012-based sub-national population projections (SNPP), which are clearly not the most up to date or robust. The Local Plan Housing Topic Paper highlights that the population projections and household projections have been updated since the SHMA was produced and states that they are awaiting the details from Government on changes to the way OAN may be calculated. It states that they will update the SHMA when these details are known. It is not apparent that any further work has been undertaken to determine if the proposed housing requirement figure remains appropriate in light of the latest guidance or the 2014-based household projections.

PPG (ID 2a-014) states that where the data is not available such as in National Parks an alternative approach (to the Standard Method) will have to be used. It goes on to state that such authorities may continue to identify a housing need figure using a method determined locally, but in doing so will need to consider the best available information on anticipated changes in households as well as local affordability levels. PPG (2a-015) also states that

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where data availability does not allow the standard method to be used, consideration will be given to whether it provides the basis for a plan that is positively prepared, taking into account the information available on household formation and affordability. The HBF consider that it may have been appropriate for the National Park Authority (NPA) to have updated the information in relation to the household formation and affordability to ensure that housing requirement is appropriate and robust in line with the guidance set out in the PPG.

The HBF does note that paragraph 11 of the NPPF states that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, unless the application of policies in the NPPF that protect areas of assets of particular importance, such as National Parks, and provides a strong reason for restricting the overall scale, type or distribution of development in the plan area¹. The HBF consider that this is generally in line with the NPAs assertion in the Local Plan Housing Topic Paper that the Park will focus on meeting affordable needs and needs which support the local economy and local communities.

The HBF is however, concerned by the declining population, and would be looking to the Council to ensure that this does not continue. Given that the past delivery rates have been higher than the housing requirement proposed this does not suggest that the Plan is positively prepared or that it is appropriate. As set out previously, the HBF are concerned that the proposed housing requirement will fail to foster the economic and social wellbeing of communities and condemn them to economic decline and lack of housing opportunities. The HBF therefore consider that the NYMNPAs 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.

2.3 Is the strong reliance upon continued delivery from windfall sites and affordable housing schemes reasonable and soundly based, having particular regard to the apparent lack of appropriate development sites identified during the plan's production?

The HBF would expect the NPA to provide strong and compelling evidence that the delivery from windfall sites will provide a reliable source supply in line with paragraph 70 of the NPPF, particularly given the strong reliance on these sites. The HBF would expect this evidence to include information from the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. The HBF are concerned about the lack of certainty created by the reliance on windfall and affordable housing schemes, and would seek assurances from the Council on how they will ensure that homes are delivered to meet their needs.

2.4 Is the plan effective in setting out what is meant by paragraph 3 of the policy and what is expected of development proposals in this regard?

¹ For example Paragraph 172 of the NPPF states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, and that conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas. It goes on to state that the scale and extent of development within these designated areas should be limited.

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The policy goes on to state that *'all new homes should contribute to the provision of a range of tenures, types and sizes of dwellings within the National Park, including accommodation for older people and those needing special facilities, care or support at home. Applications should include information on how the proposal meets the needs identified in the North York Moors Strategic Housing Market Assessment and other local surveys.'*

The HBF considers that it is important that any policy in relation to the mix of tenures, types and sizes of dwellings is workable and ensures housing delivery will not be compromised or stalled due to overly prescriptive requirements or the need to provide significant amounts of additional evidence. 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 HBF therefore recommends a more flexible approach is taken regarding housing mix which whilst taking account of the SHMA findings, the Council will also be cognisant that needs and demand will vary from area to area and site to site and that the need to provide evidence for each and every variation to this very specific mix is likely to delay development and may reduce deliverability of sites.

The HBF appreciates the Council's clarification within Appendix 1 of the Summary of Responses that the Authority is not proposing to 'opt in' to the M4(2) standard. Although it is not entirely clear within the policy or the justification text what the NYMNP expect in relation to accommodation for older people and those needing special facilities, care of support at home.

2.5 To be effective, and to allow for robust monitoring and for compliance with national planning policy, should the plan contain a housing trajectory and indicators of action to be taken if housing deliver is not being achieved?

The monitoring and implementation section identifies indicators for most of the housing related policies, however, there are not always targets identified and there are not any triggers or actions identified as to when or how the NYMNP will react if the targets are not met. The HBF has not noted any identified mechanisms for assisting in the delivery of homes if targets are not met, this could be a simple action like improving the negotiation and mediation skills of the Council officers or working with Councillors to understand the benefits of homes in certain areas. The HBF consider that the monitoring section requires more thought particularly in relation to ensuring the appropriate delivery of homes (including market, local needs and affordable homes), and to ensuring that any issues are addressed in a timely nature.

Policy CO7

2.13 Is it effective to locate in the supporting text (paragraph 7.47) what appears to be worded as policy, in relation to the number of dwellings permitted on windfall sites?

Paragraph 16 of the NPPF states that plans should *'contain policies that are clearly written and unambiguous'*, therefore the HBF consider that it would be more effective to include the text in relation to the number of dwellings from paragraph 7.47 within the policy.

2.14 *Is this supporting text's aim to restrict windfall sites to no more than five dwellings justified and positively prepared? What is the rationale for this number?*

The HBF continue to consider that the five dwellings is a little arbitrary, however, the five dwellings is considered more appropriate than the previous 'infill' text. It is considered that housing in larger villages could help to provide valuable sources of housing supply, whilst maintaining or improving the qualities of the National Park.

Policy CO8

2.15 *Is it effective to locate in the supporting text (paragraph 7.48) what appears to be worded as policy, in relation to the number of dwellings permitted on windfall sites?*

Paragraph 16 of the NPPF states that plans should '*contain policies that are clearly written and unambiguous*', therefore the HBF consider that it would be more effective to include the text in relation to the number of dwellings from paragraph 7.48 within the policy.

2.16 *Is this supporting text's aim to restrict windfall sites to no more than two dwellings justified and positively prepared? What is the rationale for this number?*

The HBF are not clear on the rationale for the two dwellings limit, it is considered this restriction does not lead to a positively prepared plan.

2.17 *Is the policy's approach to affordable housing provision justified and effective?*

As stated previously, paragraph 16 of the NPPF states that plans should '*contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals*'. It is considered that the current approach to affordable housing does not create certainty and may not mean that a decision maker knows how to react to the policy. For example, how will an applicant or decision maker know how much is an appropriate proportion of affordable housing. The lack of certainty may also cause issues for developers in determining whether a site is viable or not.

2.18 *Is the policy's approach to the type of housing that may be permitted in Smaller Villages justified and positively prepared?*

The HBF have concerns with both Policy CO7 and CO8 in relation to the type of housing that may be permitted. The HBF would recommend that flexibility is built into these policies to ensure that the proposed size 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 NYMNP, particularly in relation to appropriately sized family homes.

Policy CO13

2.31 *Is this policy justified and effective given that it refers to a planning condition, the scope or aims of which could change, perhaps substantially, over the life of the plan?*

The HBF do not wish to comment on this question at this time.

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2.32 Is the policy positively prepared having particular regard to the three year time requirement and potential public sector equality implications? What impacts could it have, for example, upon those in need of care, or in need of becoming carers, within three years of moving into the National Park?

The HBF do not wish to comment on this question at this time.