

Local Plan
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YORKSHIREDALES

SENT BY EMAIL
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24/09/2020

Dear Sir / Madam,

YORKSHIRE DALES LOCAL PLAN: EXPLORING OUR OPTIONS - AMBITIONS

Thank you for consulting with the Home Builders Federation on the Yorkshire Dales National Park Authority Local Plan 2023-2040 – Consultation 2: Exploring our Options - Ambitions.

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 the proposed options for the Local Plan. These responses are provided in order to assist the Yorkshire Dales National Park Authority (YDNPA) in the preparation of the emerging local plan. The HBF is keen to ensure that the YDNPA produces a sound local plan which provides for the housing needs of the area.

Community Sustainability

The Council proposes three options: no new homes; 30 new homes per year; 70 new homes per year. It is not entirely clear where these options have come from or what evidence there is to support them. However, the consultation document does provide a simple assessment of each of the options.

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'*.

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.

The YDNPA Strategic Housing Market Assessment (SHMA) (November 2019) recommends a 'policy-on dwelling-led annual housing requirement' of 50 dwelling per annum (dpa) across the YDNPA over the plan period 2023 to 2040. It goes on to identify an ongoing need for 30 affordable homes each year. The SHMA has established a baseline for the 10-year period 2023 to 2033 and is based on the 2014-household projections, and has considered the 2016-based projections as an alternate scenario. Given the 2018-based projections are now available, 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.

Carbon Futures

The Council proposes three options: zero carbon; low carbon; status quo. The HBF does not generally object to encouragement for the need to minimise the carbon emissions. The HBF supports moving towards greater energy efficiency via a nationally consistent set of standards and a timetable for achieving any enhancements which is universally understood and technically implementable. The HBF acknowledges that the Government has not enacted its proposed amendments to the Planning & Energy Act 2008 to prevent the Council from stipulating energy performance standards that exceed the Building Regulations but consider that the Council should comply with the spirit of the Government's intention of setting standards for energy efficiency through the Building Regulations. It is the HBF's opinion that the Council should not be setting different targets or policies outside of Building Regulations. The key to success is standardisation and avoidance of every Council in the country specifying its own approach to energy efficiency, which would undermine economies of scale for both product manufacturers, suppliers and developers.

The Government has consulted (ended on 7th February 2020) on The Future Homes Standard. The UK has set in law a target to bring all its greenhouse gas emission to net zero by 2050. New and existing homes account for 20% of emissions. It is the Government's intention to future proof new homes with low carbon heating and world-leading levels of energy efficiency. This consultation addressed:

- options to uplift standards for Part L (Conservation of Fuel & Power) Building Regulations in 2020 and changes to Part F (Ventilation) Building Regulations. An increase in energy efficiency requirements for new homes in 2020 will be a meaningful and achievable stepping-stone to the Future Homes Standard in 2025. This is expected to be achieved through very high fabric standards and a low carbon heating system based on one of two options. The Government's preferred Option 2 proposes 31% reduction in carbon emissions compared to current standards (Approved Document L 2013) delivered by installation of carbon saving technology and better fabric standards. Both options increase costs for housebuilders (estimated costs between circa £2,557 - £4,847 per dwelling);
- transitional arrangements to encourage quicker implementation; and
- clarifying the role of Local Planning Authorities (LPA) in setting energy efficiency standards. The Government is proposing to remove the ability of LPAs to set

higher energy efficiency standards than those in Building Regulations which has led to disparate standards across the country and inefficiencies in supply chains.

The Government wants to create certainty and consistency. The situation is confusing with decisions about technical appropriateness, application and enforcement of energy standards considered by planning officers, committees and Planning Inspectors rather than by qualified Building Inspectors. An uplift to Part L standards in 2020 will improve the energy efficiency of new homes and prepare housebuilders and supply chains in readiness for the further uplift in 2025 to meet the Future Homes Standard so there is no need for LPAs to seek higher standards.

Future Engagement

I trust that the YDNPA 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 black ink, appearing to read 'Joanne Harding', written in a cursive style.

Joanne Harding

Local Plans Manager – North

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