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SENT BY EMAIL
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Dear Planning Policy Team,

HAMBLETON LOCAL PLAN: MAIN MODIFICATIONS

1. Thank you for consulting with the Home Builders Federation (HBF) on the Hambleton Local Plan Main Modifications.
2. 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.

MM01: Paragraph 1.2

3. The HBF supports the Council in extending the plan period to 2036 to ensure consistency with national policy.

MM06: S2: Strategic Development Needs

4. The Council propose to amend this policy to increase the plan period to 2036 and to increase the housing requirement to 6,930 net new homes, retaining the 315 dwellings per annum. It also includes text setting out what will happen should housing delivery fall below 95% of the annual requirement for the previous three years.
5. The HBF considers that extending the plan period is appropriate and supports the Council in increasing the housing requirement to reflect the additional year. The HBF considers that the additional text in relation to the monitoring of housing delivery and what action will be taken to address any issues is beneficial.

MM45: HG2: Delivering the Right Type of Homes

6. The Council propose to amend this policy to require a large-scale development to provide 9% of market housing as M4(3a) wheelchair adaptable dwellings and 30% of affordable housing to meet M4(3b) standards subject to physical site conditions and other planning considerations. The Council are defining large scale as 50 or more dwellings.



7. As set out in the HBF's response to the Post Hearing consultation, the HBF considers that the Council does not have the appropriate evidence to support the introduction of the optional standards, M4(3a) and M4(3b). The HBF continues to consider that this policy requirement is not sound as it is not effective or consistent with national policy. The NPPF¹ is clear that the optional standards for accessible and adaptable housing should only be used where this would address an identified need for such properties. The PPG² sets out the evidence that a local planning authority (LPA) can be considered in determining the need for the optional standards in relation to accessibility and adaptability standards, including the likely future need for housing for older and disabled people (including wheelchair user dwellings); the size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes); the accessibility and adaptability of existing housing stock; how needs vary across different housing tenures; and the overall impact on viability. The provision of M4(3a) and M4(3b) homes can have considerable implications for the viability and deliverability of a development. The HBF does not consider that the information provided in the Note on Accessible Housing, or the Viability Assessment is sufficient to identify a need for homes to be built to the optional standards. *The HBF considers that the policy should be deleted in order to make the document sound.*
8. However, if the policy is to be retained if the Council does provide the appropriate evidence, including viability, and this policy is to be included, then the HBF continues to recommend that the policy should:
 - take into account site specific factors such as vulnerability to flooding, site topography and other circumstances which may make the site less suitable for M4(2) and M4(3) compliant dwellings as set out in PPG;
 - ensure that if step-free access is not viable that M4(2) and M4(3) should not be applied; and
 - ensure an appropriate transitional period is included.

MM47: HG3: Affordable Housing Requirements

9. The Council proposed to amend this policy to make reference to 'be transferred at transfer price'. The HBF is concerned in relation to the lack of information provided in relation to this requirement, and how appropriate it will be for different types of affordable housing provision.
10. The Council also propose to include text that states that where a lower level of provision is initially agreed, the Council may require developers to enter into an agreement that will allow affordable housing contributions to be increased in the future should higher levels become achievable. The Council will also reappraise viability on subsequent phases of large schemes.
11. The HBF considers that there may be some circumstances where allowing a lower level of affordable housing and reviewing the affordable housing contribution over the lifetime of the development can be utilised to bring forward the delivery of homes. However, the

¹ NPPF 2021 Footnote 49

² PPG ID: 56-007-20150327

HBF has significant concerns around the implementation of this policy and how frequently it will be used. It is considered this will add further burdens to any developer who will need to reproduce viability assessments at a potentially regular basis, going against Government initiatives which are looking to reduce the need for viability assessments. The HBF considers that this policy may cause unnecessary uncertainty and additional risk for developers, and that such disincentivising of developers could become an impediment to the development process and compromise the deliverability of large sites particularly those phased and implemented over long time periods. *The HBF considers that the policy should be deleted in order to make the document sound.*

MM56: E3: The Natural Environment

12. The Council propose to amend this policy to state that 'all development will be expected to demonstrate the delivery of a net gain for biodiversity'.
13. The HBF considers that this amendment to the policy in relation to biodiversity net gain for all development is not necessary as the Government's proposals as set out in the Environment Bill include a mandatory national requirement for biodiversity gain. The Government also intends to make provision for a transition period of two years, the specifics of this transition period will provide clear and timely guidance on understanding what will be required and when. The HBF does not consider that it is appropriate for the Council to seek the net gain at this time, as this is likely to compromise viability. There are significant additional costs associated with biodiversity gain, which should be fully accounted for in the Council's viability assessment. *The HBF considers that the policy should be deleted in order to make the document sound.*

Future Engagement

14. 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.
15. The HBF would like to be kept informed of the production of the Inspectors Report and the adoption of the Plan and all other consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,



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