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SENT BY EMAIL
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Dear Planning Policy Team,

RYEDALE LOCAL PLAN REVIEW: DISTRIBUTION OF DEVELOPMENT CONSULTATION

1. Thank you for consulting with the Home Builders Federation (HBF) on the Ryedale Plan Review Distribution of Development consultation.
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.

Question 1: Which factors do you see as being important reasons that should influence where we should locate new development, in particular housing development?

3. The HBF considers that it is important that the spatial distribution of sites follows a logical hierarchy, provides an appropriate development pattern and supports sustainable development within all market areas. The NPPF sets out how important it is that a sufficient amount and variety of land comes forward where it is needed and to meet the needs of groups with specific housing requirements.

Housing numbers

Question 13: Do you think we should deliver more housing than the Government requires in its 'Standard Method' to deliver other aspirations such as more affordable housing (including social rent), infrastructure, and support wider economic development in the district?

4. The HBF considers that the Council should deliver more housing than the Government requires in its Standard Method to deliver other aspirations such as more affordable housing, infrastructure, and support wider economic development. The HBF considers that this would be in line with the Government's objective to boost the supply of housing. The Council should consider the circumstances where housing need may be higher than the Standard Method identified Local Housing Need (LHN) as set out in the PPG these include where there are growth strategies; strategic infrastructure improvements; meeting an unmet need; where previous levels of housing delivery are higher; or previous assessments of need, which may mean that housing requirement should be a higher figure than the LHN indicated by the standard method.



Local Needs Occupancy

Question 14: Should we continue to use the Local Needs Occupancy Condition? Yes/No please explain

5. The HBF does not consider that it is appropriate to continue to use the Local Needs Occupancy condition. The HBF does not consider that this is in line with current policy and consider that it does not support the objective to boost supply or promote sustainable development in rural areas where it can enhance or maintain the vitality of rural communities.

Primary Residence Condition

Question 15: Do you have any views on the use of a primary residency occupancy condition for new dwellings in your community? Yes/No please explain

6. The HBF seeks assurances from the Council that this requirement will not be an impediment to the effective delivery of homes. The HBF has concerns in relation to these restrictions and the potential implications they could have on the delivery of homes, including the potential to deliver infrastructure and other policy requirements set out in the plan and the impacts on future financing and rights of occupants. The HBF also has concerns on the impact these restrictions could then have on the second-hand home market which may see significant price rises, as these homes are not subject to restrictions seen in the new build sector.

Housing Delivery for Specific Tenures

Question 16a: Do we make specific allocations which will be only for Self-Build properties?

Question 16b: Do we employ a set of criteria to assess Self-Build homes by- what should those criteria be- what is most important?

7. The HBF considers that it would be appropriate to make specific allocations for Self-Build properties. The HBF considers it may also be appropriate to include a set of criteria to assess self-build homes by, although it is likely these requirements may be similar to other residential development requirements. The Council will need to consider the evidence they have in relation to the need for self-build and custom-build homes, in relation to the numbers required, the location, the deliverability and the viability.

Development Limits

8. The Council propose that when land is identified or 'allocated' to meet future development needs, the Development Limits are reconsidered as part of this process and expanded to accommodate the site/allocation.

Question 17a: Do you agree with this approach? Yes/No please explain

9. The HBF considers that it is appropriate to amend the development limits where sites are allocated for development or to allow for increased opportunities for infill or windfall development as part of the strategy of the Plan going forward.

Changes to other Policies in the Ryedale Plan- Local Plan Strategy

10. The Council propose to update Policy SP14 (Biodiversity) in relation to requiring Biodiversity Net Gain, as part of the Environment Act, and Policy SP16 (Design) in relation to design codes, and the delivery of Green/Blue Infrastructure.

11. The Council will know that the Government is already looking at the most appropriate approach to biodiversity net gain. The HBF considers that the Council should not deviate from the Government's proposals on biodiversity gain as set out in the Environment Act and the emerging regulations. This legislation and accompanying regulations will require development to achieve a net gain for biodiversity. This nationally required gain provides certainty in achieving environmental outcomes, deliverability of development and costs for developers. The mandatory national requirement will not be a cap on the aspirations of developers who want to voluntarily go further. The mandatory requirement offers developers a level playing field nationally and reduced risks of unexpected costs and delays.
12. The Council are also looking to explore the application of minimum space standards, through Policy SP4 (Type and Mix of New Housing) and build standards in relation to accessibility.
13. The NDSS as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and they retain development viability. As such they were introduced on a 'need to have' rather than a 'nice to have' basis. Adoption of optional NDSS should be done in accordance with the NPPF¹, it states that '*policies may also make use of the NDSS where the need for an internal space standard can be justified*'. A policy requirement for NDSS should be justified by credible and robust evidence. PPG² identifies the type of evidence required to introduce such a policy.
14. The HBF is generally supportive of providing homes that are suitable to meet the needs of older people and disabled people. However, if the Council wishes to adopt the higher optional standards for accessible, adaptable and wheelchair homes the Council should only do so where this would address an identified need for such properties as set out in the NPPF³ and by applying the criteria set out in the PPG.
15. PPG⁴ identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. It is incumbent on the Council to provide a local assessment evidencing the specific case for Ryedale which justifies the inclusion of optional higher standards for accessible and adaptable homes in its Local Plan policy.
16. The Council also propose to review the current policy on Renewable and Low Carbon Energy (SP18) to make it more relevant and active in what it is seeking to achieve to help deliver our aspirations to significantly reduce carbon emissions in this Plan period. This will involve looking at building sustainability, including energy efficiency, and renewable energy targets and build standards, and responding to climate change adaptation and mitigation.

¹ Paragraph 130f and footnote 49 of NPPF 2021

² ID: 56-020-20150327

³ Paragraph 130(f) footnote 49 of NPPF 2021.

⁴ PPG ID: 56-007-20150327

17. The Council will be aware that the Government has recently published the new Building Regulations for Part L, F and S in relation to conservation of fuel and power ventilation and Electric Vehicle Charging and has already consulted on the Future Homes Standard. And as such there are now nationally set standards for domestic dwellings in relation to carbon emissions and for the provision of electric vehicle charging points. The HBF would strongly recommend that the Council looks to work with these nationally defined standards and does not seek to repeat them or amend them within their planning policy.

Future Engagement

18. 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.

19. 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,



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