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**Sent by Email Only**

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Dear Sir / Madam

## Hambleton New Local Plan: Issues and Options

1. Thank you for consulting with the Home Builders Federation (HBF) on the Hambleton Local Plan: Issues and Options Consultation.
2. The HBF is the principal representative body of the house building industry in England and Wales and our representations reflect the views of our membership of multinational PLCs, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year including a large proportion of the new affordable housing stock.
3. We would like to submit the following brief comments to selected questions posed in the consultation document. The HBF will provide a more detailed response at the next stage of consultation.

### **Question 1: Are there any other issues regarding economic growth which you think should be included?**

4. In addition to the issues identified regarding economic growth the Council should also consider the positive economic benefits which are provided as a result of house building and the additional jobs which could be provided locally if an increase to housing delivery were to be achieved. The HBF has recently published two reports which consider the economic impact of house building, '*Building Communities: Boosting Employment*' and '*The economic footprint of UK house building*', both can be accessed via our website at [www.hbf.co.uk](http://www.hbf.co.uk). The *economic footprint* report is supplemented by regional reports which highlight the benefits provided to individual local authorities over the last year. These reports indicate that across North Yorkshire 4,085 additional jobs were created in 2014/15 due to house building activity as well significant funds provided for infrastructure, environmental improvements and council tax.

### **Question 2: Are there any other issues regarding housing growth which you think should be included?**

5. The HBF is pleased to note that a number of key housing issues are identified including the need to increase the rate of house building, meeting identified needs and the links between house building and the local economy. Whilst we are pleased that these issues are raised it is imperative that the plan

deals with the issues in a positive and proactive manner which assists the delivery of much needed housing across Hambleton. This should include policies which support rather than restrict development, which are flexible and able to deal with changing circumstances. The plan will also need to identify sufficient sites not only to meet the plan requirements but also provide choice and flexibility within the market. This should include providing sufficient sites with enough outlets to ensure that the annual plan requirements can be met on a year on year basis.

**Question 8: Are there any other issues regarding cross boundary matters which you think should be included?**

6. The Council will be aware that whilst the Duty to Cooperate is not a duty to agree it does require more than consultation and meetings. It is the efficacy of the engagement throughout the plan making process and the outcomes which flow from such engagement which determine whether the duty has been met.
7. The importance of identified actions resulting from fulfilment of the duty is clearly articulated within the National Planning Practice Guidance (PPG). The PPG states *'it is unlikely that this (the duty) can be satisfied by consultation alone'* and that *'inspectors will assess the outcomes of the co-operation and not just whether local planning authorities have approached others'*.
8. The NPPF requires *'...a continuous process of engagement from initial thinking to implementation'* (paragraph 181). It is therefore essential that engagement over cross-boundary issues such as housing are addressed early and considered through the evidence gathering phases.
9. It is noted that neighbouring authorities have indicated that they will be meeting their own housing needs in full. However a number of those local authorities are still in the process of developing new local plans, such as York and Harrogate, it is therefore essential that this position is reviewed regularly. Furthermore it is unclear whether the housing needs of districts such as Hambleton, Harrogate and York are and will be reflective of the growth ambitions contained within the SEP and any future devolution deal.

**Question 9: Do you think the Local Plan vision is correct?**

10. The key aspects of the vision are appropriate, in terms of meeting development and infrastructure needs, encouraging investment and retaining the character of Hambleton. Whilst laudable the vision lacks clarity on what this means for Hambleton and its constituent settlements and is considered overly generic as it could be applied almost anywhere.

**Question 10: Do you think there is anything else which should be included in the vision?**

11. The vision should include spatial elements which are directly related to the area. It currently lacks any real emphasis upon how and where Hambleton will grow and develop, what is special about the area or how it will build upon its strengths and overcome weaknesses. The vision should be a positive, aspirational statement with a spatial emphasis which sets the tone for the rest of the plan.

### **Questions 11 to 17: Objectives**

12. The objectives are generally considered appropriate, although like the vision they lack spatial emphasis. The HBF is particularly supportive of the following objectives;
- *To provide a scale and mix of housing to meet the diverse needs of the entire community and support the local economy, and*
  - *To promote sustainable and resilient economic growth and infrastructure improvements.*
13. It is important that the plan policies are drafted in a positive manner to ensure that these objectives are met.

### **Question 18a: Do you think a range of 350-450 new homes per year is appropriate for Hambleton, through to 2035?**

14. It is difficult to provide a definitive answer to Question 18a and Question 18b due to a lack of available information at the time of writing, particularly in relation to the Strategic Housing Market Assessment (SHMA) update.
15. The Issues and Options document identifies 6 potential housing requirements. The three lowest figures are based upon the levels identified within the existing LDF. These figures were derived prior to the publication of the NPPF and were heavily influenced by the emerging, and now revoked, Regional Spatial Strategy (RSS). The RSS targets are now substantially out of date and were not an objective assessment of housing need for individual districts, as required by the NPPF. Rather they were the result of agreements upon the distribution of a regional requirement.
16. The RSS was predicated upon a concentration upon the major conurbations such as Leeds and Bradford. This led to a constraint in some areas, including Hambleton. This was clearly set out within the evidence submitted by the Council for the Hambleton Core Strategy (Hambleton Housing Topic Paper).
17. The Council is clear within the cross-boundary issues section of the Issues and Options document that neighbouring authorities are seeking to meet their own needs and not those of Hambleton. It therefore stands to reason that the previous housing requirements contained within the LDF, which are not only based upon out of date evidence but also a defunct regional strategy, are no longer relevant and as such should be dismissed.
18. The remaining potential housing requirements are based upon work undertaken by Edge Analytics for the Council and the evidence provided by appellants at recent section 78 appeals. The most recent of which was the work undertaken by Regeneris for the Land off Tanton Road, Stokesley appeal (APP/G2713/A/14/2223624). This identified an objectively assessed housing need of 564 dwellings per annum (dpa). This work also considered the work undertaken by Edge Analytics and provided a summary of the differences in the two approaches. The Inspectors report on the appeal considered both the Councils evidence and that of the appellant and concluded that an objectively assessed need of 458dpa was appropriate for Hambleton (paragraph 32). This represents the objectively assessed needs

figure identified by the appellant minus a further uplift for market signals. The figure of 458dpa therefore represents the most up to date independently examined view upon the objectively assessed housing needs for Hambleton. The HBF places significant weight upon this study and as such recommends the housing requirement be at least 450dpa.

19. The recent SHMA update, undertaken by GL Hearn, identifies a requirement for just 274dpa. Unfortunately, at the time of writing, it is impossible to verify the robustness of this data as only the conclusions are publicly available. It is not considered appropriate to request views upon an appropriate housing requirement without full disclosure of all available evidence.
20. The SHMA update has taken the 2012 sub national household projections (2012 SNHP) as the starting point. This is considered appropriate. It is noted that these were not available at the time of the Regeneris study.
21. The 2012 SNHP were, however, available at the time of the Stokesley appeal Inspectors Report and the Inspector considered the Regeneris study largely robust. In addition the 2012 sub national population projections (2012 SNPP) were utilised by Regeneris and these were the basis for the 2012 SNHP. Whilst the differing headship rates between the 2012 SNHP and the Regeneris study may partially explain the difference in figures it is unlikely to create such a significant variance between the two studies. The variance is therefore likely to be due to other assumptions made which cannot be scrutinised without the availability of the full SHMA update.
22. It is recognised that the SHMA update does not yet include any work which models the economic growth aspirations of the Council or LEP (paragraph 2.3 Cabinet Papers 9<sup>th</sup> February 2016, item 9). The alignment of housing and economic strategies is a key component of plan making and a failure in this regard is likely to be found unsound by an Inspector. The interim views of the Inspector of the Cheshire East Local Plan Strategy, dated 12<sup>th</sup> November 2014, bear testament to this.
23. **The HBF conclude that, based upon the available information, a figure of at least 450dpa is likely to be required to meet the housing needs of Hambleton.**
24. The published SHMA update conclusions also provide information on housing type and mix, once again due to the lack of available information these cannot be verified. While the HBF is supportive of providing a mixture of housing types the Council should not seek to rigorously apply the percentages identified within Table 57 of the update to every site. The published elements of the SHMA update acknowledge this fact within paragraphs 10.42, 10.43 and 10.46. These paragraphs identify that flexibility is required as well as a cognisance that there may be a need for larger properties not only to allow families to grow within Hambleton but also to attract new migrants so as to ensure the economic success of the area. The Council will also be aware of our previous comments on this issue as part of

the consultation upon the Size, Type and Tenure of New Homes SPD. These comments are still considered valid.

25. The Council will also need to ensure that there are sufficient deliverable sites to meet its housing supply and a 20% buffer due to persistent under-delivery, in conformity with NPPF paragraph 47. The buffer will need to be added not only to the requirement but also any accrued shortfall. The following table identifies the net completions and shortfall, since 2012, against the housing need figures identified within the Stokesley appeal decision and evidence base.

Year	Net Completions	Shortfall at 458 dpa	Shortfall at 565 dpa
2012/13	145	313	420
2013/14	178	280	387
2014/15	305	153	260
<b>Total</b>	<b>628</b>	<b>746</b>	<b>1,067</b>

**Question 18b: Do you think the Local Plan annual housing figure should be lower or higher and why?**

26. See our response to Question 18a above.

**Further Consultations**

27. The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents.

Yours sincerely,

*MJ Good*

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