

Yorkshire Dales Local Plan,
Yoredale,
Bainbridge,
Leyburn,
North Yorkshire,
DL8 3EL
Email: localplan@yorkshiredales.org.uk

23/06/2016

Dear Sir / Madam,

Yorkshire Dales Local Plan: Additional Modifications Schedule

1. Thank you for consulting with the Home Builders Federation (HBF) on the proposed additional modifications the Yorkshire Dales Local Plan 2015-2030.
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.

MOD 10 (page 5, Introduction)

The HBF is concerned that the planning authority has not fully discharged its requirements under the duty to co-operate.

3. The proposed modification provides limited additional detail in terms of cross-boundary issues. It is, however noted that the Council has produced a '*Strategic planning (Duty to Cooperate) statement*' as part of its evidence base for the submitted plan. Unfortunately neither the additions, contained in appendix 2 of the modifications schedule, nor the additional evidence overcome our concerns in relation to the duty to co-operate. These are set out in more detail within our comments upon the submitted plan and matter 1 examination hearing statement.
4. The primary concern of the HBF relates to the provision of housing. In this regard it is notable that the second draft of the Craven Local Plan, consulted upon during spring 2016 identifies a need for 34 dwellings per annum (dpa) to be allocated to the Yorkshire Dales National Park (paragraph 4.9 of the draft Craven Local Plan), to meet the needs of the parts of Craven District which are located within the Park. The housing requirement of the National Park, as submitted, identifies a total requirement of just 55dpa, just 21 dwellings over the suggested need emanating from Craven. It is unclear if and how the identified needs from Craven have been taken into account. This, in our view, would represent a failing under the duty to co-operate. Given that the Park also includes parts of South Lakeland and Richmondshire, an additional 21dpa is unlikely to be sufficient to meet the full needs of the National Park. It is also notable that Richmondshire District Council submitted objections in relation to the calculation of housing need identified within the plan.

MOD 16 (page 7, Strategic Objective Policies, Objective 3)

The proposed amendment is considered unsound as it is not positively prepared.

5. The HBF supported the previous wording of Objective 3 which sought to increase “..the proportion of young adults and people of working age living in the Park”. Our support for this objective was based upon the very real need to ensure an increased proportion of younger age residents to support jobs and services. This is recognised by the submission version of the plan (paragraph 1.26). The proposed amendment appears to dilute this ambition and need.

MOD 21A (page 15, Policy SP4)

6. Whilst the HBF did not make specific comment upon Policy SP4 prior to submission the removal of the reference to the ‘Yorkshire Dales Design Guide’ is supported.
7. The wording as indicated in the submitted plan would provide development plan status to a non-statutory guide. This is considered inappropriate, particularly as the design guide could be amended without undergoing the same rigour of examination as a plan policy.

MOD 26 (page 19, Business and Employment)

The proposed amendment is considered unsound as it is not positively prepared.

8. I refer to our comments upon MOD 16 above.

MOD 35 (page 34, Policy C1)

9. The removal of the reference to ‘infill’ is supported and provides for a more coherent and transparent policy wording.

MOD 36 (page 34, Policy C1)

10. The inclusion of the reference to viability considerations is supported. This amendment does not, however, overcome our fundamental concerns with the policy as set out within our comments upon the submitted plan.

MOD 37 (page 34, paragraph 4.4)

The proposed modification is considered unsound as it is not justified.

11. Within our comments upon the submission version of the plan the HBF drew concern to the lack of identified allocations. In the interests of brevity this is not repeated here. The proposed modification does not overcome these concerns.

MOD 95 (page 129, appendix 6)

The proposed modification is considered unsound as it is not justified nor positively prepared.

12. Whilst the need for local occupancy restrictions within the National Park is understood the proposed amendment seeks to add further restrictions to the existing criteria. These additional criteria concerning length of contract and hours of work are most likely to directly affect those which the plan is trying to attract, namely the younger population. This would run counter to the plan objectives.

13. It is not uncommon within the current job market for zero or limited hours contracts and contracts of less than 12 months, at least on an initial basis for those starting out in work. The proposed criteria would further restrict the available pool of potential occupants for a development and as such will increase the inherent risk involved. This could have a negative impact upon the levels of development proposed within the Park and the ambition to increase the younger age population.

MOD 97 (page 130, appendix 7)

14. Whilst the HBF remains sceptical regarding the validity and viability of the conservation levy, the acknowledgement of need to consider viability is supported.

Information

15. I would be happy to discuss any of the above comments in greater detail prior to the formal commencement of the examination hearing sessions.

Yours sincerely,

Handwritten signature of Matthew Good in black ink.

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