

This consultation statement sets out details of the consultation that informed the production of the draft Housing SPD before public consultation. It also sets out the issues raised during public consultation and how they were addressed in the final version of the SPD.

Initial consultation and engagement

An early draft of the SPD was circulated to Registered Providers active in Hambleton on 11 October 2021:

- Broadacres*
- Thirteen
- Home*
- Karbon
- Yorkshire*
- Together
- Beyond*
- WDH*
- Horton
- North Star*

* Attended the Registered Providers Forum on 14 October 2021

The early draft SPD was discussed at the Registered Providers Forum on 14 October 2021. The main issues raised in discussions were:

- Concerns about the proportion of 1 bedroomed properties being sought as part of the housing mix for affordable homes, with some particular concerns about applying this in rural areas, in relation to older persons accommodation, in relation to the 'bedroom tax' and size of dwellings, specifically flats/apartments.
- Aspects of developer viability were discussed with concerns were being raised with regards to Value for Money and quality being achieved.
- Concern was raised that not all RPs were sticking to the transfer prices. There was also concern that the transfer prices had not been reviewed recently and how they had been applied.
- The inclusion in the draft SPD of affordable housing transfer value specifications for all affordable units was generally supported, but it was thought that there should be a link made to de-carbonisation.
- There was some discussion about First Homes, although it was acknowledged that Hambleton is covered by the transitional arrangements for Local Plan preparation so First Homes would not be required.

In response to these issues the Council made amendments to the draft SPD:

- In relation to housing mix, specifically 1 bedroomed properties, the percentage sought was amended and a preference for a small number of apartments (block of 4) or quarter houses added.
- In relation to the s106 the draft was changed to state that the Council will require a copy of the contract stating what price has been paid for units (transfer price).
- The affordable housing specification was updated for heating to state that a low carbon solution, such as an air source heat pump, would be required with the alternative being a gas boiler, but this would only be acceptable up to 2025 (thereafter a low carbon solution would be required).
- A clarification regarding Homes England funding and s106 agreements was made.

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- The Council's approach to First Homes was clarified.
- Examples and details missing from the early draft, relating to affordable housing provision and commuted payments and Vacant Building Credit, were completed.

Public consultation

The draft Housing SPD was available for comment between 3 March and 20 April 2022. This period was originally intended to end on 19 April, however some technical issues meant that the Council's website was unavailable for much of the day on 19th so the deadline was extended by 24 hours.

The consultation documents included:

- The Housing SPD: consultation draft
- This consultation statement
- A Screening Statement for Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA)

During the consultation period the consultation documents were available on the Council's [consultation portal](#) as well as on the Council's website.

Printed copies were available at the Hambleton District Council offices in:

- **Northallerton:** Civic Centre, Stone Cross, Rotary Way, Northallerton, DL6 2UU
- **Easingwold:** Easingwold Office, Police Station, Church Hill, Easingwold, YO61 3JX
- **Stokesley:** Stokesley Office, Town Close, Stokesley, TS9 5DH

Printed copies were also available at the following libraries:

Bedale Community Library
2 North End
Bedale
DL8 1AA

Great Ayton Library
105b High Street
Great Ayton
TS9 6NB

Thirsk Community Library
Meadowfields, Chapel Street
Thirsk
YO7 1TH

Telephone for opening times: 01609 534573 Telephone for opening times: 01642 723268 Telephone for opening times: 01609 534589

Comments on the SPD could be made:

- **Online:** The Council's consultation portal at <https://consult.hambleton.gov.uk/kse>
- **By email:** planning_policy@hambleton.gov.uk
- **In writing:** Hambleton District Council, Civic Centre, Stone Cross, Rotary Way, Northallerton, North Yorkshire DL6 2UU

Comments received during the consultation

A total of 15 comments were received from 5 consultees.

Issues raised

Issues raised in the comments are concerned with:

- the age of the SHMA and HEDNA documents
- consultation with MOD
- the specific requirements/expectations relating to the mix of housing sizes
- homes meeting accessibility standards
- detail and support for supported housing
- the specific expectations/requirements for information to be provided
- the provision of health infrastructure and affordable housing requirements

How the SPD was amended

The SPD was amended as follows (paragraph and section numbering from the consultation draft):

- Paragraph 3.3 was changed to clarify that the ranges set out in table 3.1 are targets.
- Paragraph 3.14 was changed with the addition of ', particularly specialist housing' at the end of the first sentence.
- Paragraph 3.22 was amended with the addition of a note that hybrid models may also be appropriate, particularly in rural areas.
- The list of categories following paragraph 3.22 was amended with the addition of Supported housing/Supported living.
- A paragraph was added following paragraph 3.27, with details on Supported housing/living schemes.
- A references to the Strategic Housing Market Assessment in paragraph 5.11 was corrected to reference the Housing and Economic Development Needs Assessment.
- Paragraph 5.19 was amended with the addition of ', wherever possible' at the end of the first sentence.
- Paragraph 6.3 was amended to clarify that information should be submitted at the detailed application stage.
- Paragraph 6.23 was amended to indicate that the increase of transfer values would be subject to an affordability check.

The comments received during the consultation are set out in the table below. The comments are set out in document order.

Agent / Consultee	Comment ID	Section	Comment type	Comment
Emma Gomersal Deloitte LLP for Church Commissioners for England	Housing SPD:3	Housing Supplementary Planning Document	Have observations	Having reviewed the draft SPD, we firstly wish to highlight the age of the evidence base upon which the document has been prepared. The draft SPD draws on the findings of the Strategic Housing Market Assessment ("SHMA") published in 2016 and the Housing and Economic Needs Assessment ("HEDNA") of 2018. The SHMA in particular is now significantly aged, with it being six-years since publication. Whilst it is appreciated that the evidence base reflects a point in time, given the potential implications of the draft SPD on the delivery of housing within the district, it is important that it is underpinned by up to date information, which reflects the latest with regards to market requirements and conditions. Subsequently, we would urge the Council to prepare an updated SHMA and HEDNA.
Chris Waldron Defence Infrastructure Organisation	Housing SPD:16	Housing Supplementary Planning Document	Have observations	Having reviewed the supporting documentation in respect of Hambleton District Council Housing SPD proposal there are four areas of interest for the MOD. DIO safeguarding have an area of interest in RAF Leeming and the Statutory Aerodrome Height, Technical, Explosive and Birdstrike Safeguarding Zones surrounding the aerodrome. We have additional interests in RAF Topcliffe with Statutory Height, Explosive and Birdstrike Safeguarding Zones surrounding the airfield and further interest in RAF Linton On Ouse with Statutory Aerodrome Height, Technical, and Birdstrike Safeguarding Zones surrounding the aerodrome. The other specific interest MOD have in the plan area is a new technical asset known as the North WAM Network which contributes to aviation safety by feeding into the air traffic management system in the Northern areas of England. There is the potential for development to impact on the operation and/or capability of this new technical asset which consists of nodes and connecting pathways, each of which have their own consultation criteria. Elements of this asset are located within and/or pass-through Hambleton District Council Housing SPD area of interest.

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<p>Mohammed Rahman North Yorkshire County Council</p>	<p>Housing SPD:17</p>	<p>Paragraph 2.3</p>	<p>Have observations</p>	<p>The aerodrome height safeguarding zone serves to protect the airspace above and around aerodromes to maintain an assured, obstacle free environment for aircraft manoeuvre and ensure that line of sight navigational aids and transmitter/receivers are not impeded. This airspace needs to be kept free of obstruction from tall structures to ensure that aircraft transiting to and from or circuiting the aerodrome can do so safely.</p> <p>Within the statutory consultation areas associated with aerodromes are zones that are designed to remove or mitigate birdstrike risk. The creation of environments attractive to those large and flocking bird species that pose a hazard to aviation safety can have a significant effect.</p> <p>Explosive Safeguarding Zones serve to define areas in the vicinity of storage sites and armed aircraft stands in which land use and building types are regulated to maintain explosives storage licensing standards.</p> <p>Should any Ministry of Defence operational site or asset cease to be operational and/or no longer require the benefit of a designated Statutory Safeguarding Zone, the MOD will notify the DLUHC to initiate the withdrawal of those plans.</p> <p>In summary, the MOD would wish to be consulted within the Hambleton District Council Housing SPD of any potential development within the Statutory Technical safeguarding zones that surround RAF Leeming, RAF Topcliffe and RAF Linton On Ouse which consists of structures or buildings exceeding statutory safeguarding technical criteria. The MOD should also be consulted on any applications for development within the safeguarding zones designated to ensure the operation and capability of the North WAM Network that trigger the criteria set out on the statutory safeguarding plan for that asset.</p> <p>In relation to point 2.3, but also the document more widely – HAS have observed that there could be more guidance around ensuring as much affordable housing as possible and meets the accessible and adaptable standards. This is a key component in allowing people to live in a home of their own (i.e. not a care home) for as long as possible, and for having housing that is suitable for as many people as possible. This is particularly relevant to Supported Living housing. HAS would suggest that 2.3 need expanding on</p>

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				and strengthening if possible. Having looked at some other areas, the Harrogate Borough Council Affordable Housing SPD, section 7 looks like a good example of some expanded wording.
Matthew Shipman Persimmon Homes	Housing SPD:10	Paragraph 2.10	Support	Persimmon Homes strongly supports the revised 'blanket-level' affordable housing requirement of 30% across all sites above the specified threshold. Not only does this ensure there is a consistent level of affordable housing being delivered across the borough to meet the needs of local people, it also ensures that more sites are viable and can be delivered by the Company.
Mohammed Rahman North Yorkshire County Council	Housing SPD:18	Paragraph 3.2	Have observations	Section 3.2 it refers to specialist accommodation and list these maybe underneath that, suggest it refers to flexibility to consider other models of accommodation, such as hybrid accommodation (a mix of accommodation types), in the smaller towns to support our long terms plans for accommodation for a range of age groups and needs of the people we work with.
Emma Gomersal Deloitte LLP for Church Commissioners for England	Housing SPD:4	Paragraph 3.3	Objection	The above [see comment Housing SPD:3] is particularly important in the context of page 10 and 11 of the draft SPD which sets out the proposed anticipated housing mix for new development within the district. Paragraph 3.3 states that the Council "will expect all housing development [our emphasis] to provide a mix of dwelling sizes that accords with the ranges set out in Table 3.1". Paragraph 3.5 goes onto identify that the ranges identified in Table 3.1 are in fact a "target mix". To ensure compliance with Local Plan Policy HG2 it is right that the proposed housing mix is a target. Therefore, the wording of paragraph 3.3 and heading for Table 3.1 should be amended accordingly to ensure that it is consistent with paragraph 3.5 and the Local Plan and that there is no ambiguity for developers in the preparation of proposals or decision-takers.
Matthew Shipman Persimmon Homes	Housing SPD:11	Paragraph 3.3	Have observations	Persimmon Homes is generally supportive of the prescribed mix outlined within this policy, however, it requests that the mix is utilised as a guide and flexibility should be applied in certain circumstances. As is portrayed in the relevant Local Plan policy. For instance, there may be more demand for 1 and 2 bedroom homes in a location within proximity to a town centre. To avoid ambiguity amongst applicants and decision takers, this policy should be re-worded so that it is clear that the housing mix is a 'target mix'.

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Matthew Shipman Persimmon Homes	Housing SPD:12	Paragraph 3.12	Support	Whilst Persimmon Homes strongly supports the approach to ensuring all housing are designed to meet NDSS, of which all of its houses are designed in compliance with, it acknowledges the flexibility the Council are taking in its approach to delivering homes which which may have other benefits for the purchaser.
Matthew Shipman Persimmon Homes	Housing SPD:13	Paragraph 3.15	Have observations	Persimmon Homes acknowledge the requirement and the importance of providing M4(3) dwellings in new developments, but again, it wishes for the wording to be more 'target led' so it is clear that it may be necessary for developments to provide more or less provision, depending on local circumstances.
Matthew Shipman Persimmon Homes	Housing SPD:14	Paragraph 3.19	Objection	Persimmon Homes requires more clarity on how precision self-build/custom plots would be delivered as part of a large housing development. There are concerns around health and safety, delivery timescales and responsibilities for compliance with s106/decision notices, amongst other legislation. The policy, as worded, is also ambiguous and makes it difficult for developers to know whether such plots would be required at the land bid stage.
Mohammed Rahman North Yorkshire County Council	Housing SPD:19	Paragraph 3.22	Have observations	A further category needs adding to cover Supported Housing and Supported Living as specialised housing.
Mohammed Rahman North Yorkshire County Council	Housing SPD:20	Paragraph 3.27	Have observations	After 3.27 – it would be useful to include a further bulletin point regarding Supported Housing and Supported Living to explain why it is needed and that they can speak to our team about it (similar to 3.26 and 3.27 for Extra Care)
Marc Hoenen NHS Property Services Ltd	Housing SPD:15	Development viability	Have observations	We note that the Draft Housing SPD seeks to support the policies of the adopted Local Plan, and contains guidance on the provision of affordable housing, the size and types of homes built and the tenure choice of the homes built in the district. The NHS, Council and other partners must work together to forecast the infrastructure and costs required to support the projected population growth and development across the borough. A vital part of this is ensuring the NHS has the ability to develop additional healthcare infrastructure where necessary. In order to enable the NHS to be able to promptly adapt its estate to changing healthcare requirements, reviews of the NHS

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				<p>estate are undertaken regularly. Reviews of the NHS estate are aimed at improving the provision of healthcare services by increasing efficiencies, including through the disposal of unneeded and unsuitable properties. This means that capital receipts from disposals, as well as revenue spending that is saved, can be used to improve facilities and services.</p> <p>Given their strategic importance, health facilities should be put on a level footing with affordable housing requirements. NHSPS note that developments which bring forward health infrastructure as part of a mixed-use scheme will likely be impacted by viability constraints, including the requirement to provide affordable housing. NHSPS respectfully requests that flexibility might be accorded to NHS owned sites in relation to the provision of affordable housing. This will ensure that capital receipts from disposal sites are not negatively impacted by the requirement to provide affordable housing, and the NHS receives the maximum value from such sites which will in turn be reinvested into healthcare provision in the borough.</p> <p>Conclusion</p> <p>NHSPS respectfully request that the proposed Draft Housing SPD recognises the viability implication of affordable housing requirements on NHSPS owned sites, when considered as part of a mixed-use scheme.</p>
Emma Gomersal Deloitte LLP for Church Commissioners for England	Housing SPD:5	Phasing, paragraphs 5.18-5.19	Have observations	<p>Section 5 of the draft SPD relates to 'Site Delivery Expectations', specifically in terms of the delivery of affordable housing. We have particular concern with paragraphs 5.18 and 5.19 regarding 'Phasing'. The document currently states that, "for multi-phase developments, the maximum and minimum number of affordable housing on each phase will be agreed at the time of the outline application". For large schemes where there are multiple phases and potentially multiple housebuilders involved in the delivery of a site, it is not possible to provide this information at the outline stage. We support the overall aim to phase the delivery of affordable housing throughout a scheme however, whilst an overall contribution can be agreed at the outline stage, the amount to be provided at each phase will heavily depend on viability considerations including, the number of units to be delivered in that phase (which may not be fixed at outline), any other obligations and associated triggers, and the infrastructure that would be</p>

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Emma Gomersal Deloitte LLP for Church Commissioners for England	Housing SPD:6	Paragraph 6.3	Have observations	<p>required to deliver the scheme at the different phases, particularly in the earlier phases where initial infrastructure costs are usually greater. As a result, we strongly urge the Council to review this requirement for the outline stage of a planning application, having consideration for the commercial practicalities of its achievability.</p> <p>Our final comments relate to paragraph 6.3 of the draft SPD which identifies that “in the interests of speeding up the application process”, where there is a requirement to provide affordable housing under Policy HG3 of the Local Plan, the applicant will be required to complete an ‘Affordable Housing Proposal Form’. The form, which the Council propose is submitted at the planning application stage will require details including:</p> <p>” ...c) a site plan identifying the affordable homes accompanied by a schedule showing the type (i.e. house, flat, etc. and number of bedrooms), tenure and size (m2) of each plot. Floor plans must be provided for flatted schemes; and d) floor plans for each dwelling type including furniture layouts.”</p> <p>At the outline application stage when exact unit numbers and layout is unlikely to be fixed, it is not possible to provide this level of information. We strongly urge the Council to amend the draft SPD to reflect this.</p>