

Forward Planning (Room AS67)  
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East Riding

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Dear Forward Planning Team,

### **EAST RIDING LOCAL PLAN UPDATE: DRAFT STRATEGY UPDATE**

1. Thank you for consulting with the Home Builders Federation (HBF) on the East Riding Local Plan Update Draft Strategy Document Update 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.

### **Vision and Objectives**

3. The HBF supports the Council in recognising within the vision the need for settlements to have a choice of homes to meet present and future needs. The HBF supports the Council objective in relation to ensuring a deliverable and flexible supply of housing land to meet local housing requirements and overall regeneration and transformation aspirations.

### **Policy S5: Managing the Scale and Distribution of New Development**

4. This policy states that provision will be made for at least 20,900 (net) additional dwellings (1,100 dwellings per annum (dpa)) in the East Riding between 2020 and 2039. It also sets out the distribution of the dwellings across the principal towns, towns, rural service centres, primary villages, villages and the countryside. The policy goes on to state that the Council will ensure a minimum 5-year supply (plus appropriate buffer) of deliverable sites across the East Riding.
5. The 1,100dpa is a reduction from the adopted Local Plan Strategy document figure of 1,400dpa. However, the 1,100dpa is above the figure identified by the Standard Method Local Housing Need (LHN) calculation. The HBF generally supports the Council in utilising a housing figure over the LHN, as the standard method identifies a minimum annual housing need figure and represents the starting point for determining the number of new homes in the area. There may be circumstances, as set out in the PPG<sup>1</sup>, when it is appropriate to plan for a higher housing need figure than the standard method identifies. These circumstances include where there are growth strategies, strategic

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<sup>1</sup> ID: 2a-010-20201216



infrastructure improvements, an unmet need from neighbouring authorities or where previous levels of housing delivery in the area or previous assessments of need are significantly greater than the outcome of the standard method.

6. The Council have considered the level of completions over the period from 2012/13 to 2019/20 and have identified a net average figure of 1,006dpa, with the last four years having completion levels over 1,100dpa. The Council have also considered the delivery of affordable homes with the Strategic Housing Market Assessment (SHMA) (2019) identifying a net affordable housing need of approximately 264dpa over the period 2018-2039. The HBF considers that it is therefore appropriate to identify a housing figure above the LHN and may indeed be appropriate to consider a higher figure than that currently proposed.

### **Policy H1: Providing a mix of housing and meeting needs**

7. This policy proposes the residential development should contribute to the overall mix of housing in the locality taking into account the current need as set out in the latest Strategic Housing Market Assessment (SHMA), the existing housing stock and current demand.
8. The HBF understands the need for a mix of house types, sizes and tenures and is generally supportive of providing a range and choice of homes to meet the needs of the local area. The HBF recommends a flexible approach is taken regarding housing mix which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location and market. The HBF also considers that it would be appropriate for the Council to refer to other evidence not just the SHMA.
9. The policy goes on to require that all new build dwellings should be built to the Nationally Described Space Standards (NDSS). 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.
10. PPG<sup>2</sup> identifies the type of evidence required to introduce such a policy. It states that 'where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:
  - **Need** – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.
  - **Viability** – the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger

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<sup>2</sup> ID: 56-020-20150327

dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.

- **Timing** – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions’.
11. The Council will need robust justifiable evidence to introduce the NDSS, based on the criteria set out above. The HBF considers that if the Government had expected all properties to be built to NDSS that they would have made these standards mandatory not optional.
  12. The policy also requires a minimum 30% of new dwellings should be built to M4(2) standards. 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 by applying the criteria set out in the PPG.
  13. PPG<sup>3</sup> 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 East Riding which justifies the inclusion of optional higher standards for accessible and adaptable homes in its Local Plan policy. If the Council can provide the appropriate evidence and this policy is to be included, then the HBF recommends that an appropriate transition period is included within the policy.
  14. The PPG also identifies other requirements for the policy including the need to consider site specific factors such as vulnerability to flooding, site topography and other circumstances, this is not just in relation to the ability to provide step-free access.

## **Policy H2: Providing Affordable Housing**

15. This policy requires affordable housing in line with national thresholds and at the levels set out in Table 8, which differ by area and brownfield and greenfield development ranging from 10% to 30%. The policy states that the tenure split, size and type of affordable housing will be informed by the latest SHMA, Viability Study, housing register, housing survey, and level and type of existing affordable housing in the locality.
16. The HBF supports the need to address the affordable housing requirements of the borough. The NPPF<sup>4</sup> is, however, clear that the derivation of affordable housing policies must not only take account of need but also viability and deliverability. The Council should be mindful that it is unrealistic to negotiate every site on a one-by-one basis because the base-line aspiration of a policy or combination of policies is set too high as this will jeopardise future housing delivery.

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<sup>3</sup> ID: 56-007-20150327

<sup>4</sup> Paragraph 34

17. The Government introduced First Homes through a Written Ministerial Statement and PPG in May 2021. First Homes are considered to be part of the affordable housing offer, and according to the PPG a minimum of 25% of all affordable housing units should be First Homes. The HBF considers that this policy will need to be updated to include this requirement. It is also likely that the Viability Assessment will need to be updated to include this requirement.

**Policy H4: Making the most efficient use of land**

18. This policy looks for development to achieve a density of at least 30 dwellings per hectare (dph) where it is within close proximity of a town or district centre, or a railway station or core bus route within the major Haltemprice settlements, principal towns or towns. It goes on to state that lower density development will be appropriate where justified.
19. The setting of residential density standards should be undertaken in accordance with the NPPF<sup>5</sup> where policies should be set to optimise the use of land. The flexibility provided by this policy in relation to certain considerations is noted, this will allow developers to react to some site-specific issues. However, further amendments could be made to create greater flexibility to allow developers to take account of the evidence in relation to market aspirations, deliverability and viability and accessibility.
20. The Council will also need to consider its approach to density in relation to other policies in the plan. Policies such as open space provision, cycle and bin storage, housing mix, residential space standards, accessible and adaptable dwellings, energy efficiency and parking provision will all impact upon the density which can be delivered upon a site.

**Policy ENV1: Integrating high quality design**

21. This policy looks for development to minimise the demand for energy and to maximise the use of decentralised and renewable or very low carbon technologies. It also goes on to state that larger developments will consider how to contribute/share technologies to meet part of their energy needs, and/or increase the sustainability of existing or new development nearby, and be capable of being adapted over time to further upgrade energy efficiency and allow alternative occupancy and/or use.
22. The HBF supports moving towards greater energy efficiency via a nationally consistent set of standards and a timetable for achieving any enhancements which is universally understood and technically implementable. The HBF acknowledges that the Government has not enacted its proposed amendments to the Planning & Energy Act 2008 to prevent the Council from stipulating energy performance standards that exceed the Building Regulations. However, the HBF considers that the key to success is standardisation and avoidance of every Council in the country specifying its own approach to energy efficiency, which would undermine economies of scale for both product manufacturers, suppliers and developers.

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<sup>5</sup> Paragraph 125

23. The Government has consulted (ended on 7th February 2020) on The Future Homes Standard. The UK has set in law a target to bring all its greenhouse gas emission to net zero by 2050. New and existing homes account for 20% of emissions. It is the Government's intention to future proof new homes with low carbon heating and world-leading levels of energy efficiency. The Government wants to create certainty and consistency. An uplift to Part L standards will improve the energy efficiency of new homes and prepare housebuilders and supply chains in readiness for the further uplift in 2025 to meet the Future Homes Standard. Therefore, the HBF does not consider that it is appropriate or necessary for the Plan to include this requirement in policy.

**Policy ENV4: Conserving and enhancing biodiversity and geodiversity**

24. This policy seeks to optimise opportunities to enhance biodiversity, it states that proposals should seek to achieve a net gain in biodiversity.

25. The HBF considers that this policy is not necessary as the Government's proposals as set out in the Environment Bill include a mandatory national requirement for biodiversity gain and transitional arrangements. 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. Furthermore, the Council's preferred policy approach should not compromise viability. There are significant additional costs associated with biodiversity gain, which should be fully accounted for in the Council's viability assessment.

**Future Engagement**

26. 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.

27. 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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