

SENT BY EMAIL  
localplan@hullcc.gov.uk  
4/25/2025

Dear Planning Policy Team,

## **HULL LOCAL PLAN: BEGINNING THE CONVERSATION**

1. Thank you for consulting with the Home Builders Federation (HBF) on the Hull Local Plan Beginning the Conversation 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.
3. We would like to submit the following comments upon this early Consultation document and its ambitions. These responses are provided in order to assist the Council in the preparation of a sound plan, the HBF is keen to ensure that the Council produces a sound local plan which provides for the housing needs of the area.

### **Climate Change and Nature Recovery**

4. The Council suggest that they are looking to be Carbon Neutral by 2030, by cutting emissions and balancing carbon through offsets like tree planting, and Net Zero by 2045. The consultation suggests that the Council will look to promote sustainable design and support biodiversity and nature recovery.
5. The NPPF<sup>1</sup> states that the purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development and supporting infrastructure in a sustainable manner. The NPPF also highlights that sustainable development has three overarching objectives, economic, social and environmental and that these are interdependent. The Council should not be seeking to put one of these objectives above the others in the name of sustainable development.
6. The PPG<sup>2</sup> provides examples of mitigating climate change by reducing emissions: through reducing the need to travel and providing sustainable transport; providing opportunities for renewable and low carbon energy technologies; providing opportunities for decentralised energy and heating; and promoting low carbon design approaches to reduce energy consumption in

---

<sup>1</sup> NPPF December 2024 paragraph 7

<sup>2</sup> PPG ID: 6-003-20140612

buildings. The HBF recommends that the Council seek to ensure that they produce a sustainable Plan which supports a balance of homes and employment and is in line with the guidance provided by the NPPF and the PPG.

7. The HBF considers that it is important that the Council does not set its own standards for development which may differ from the approach being taken by national Government, and that any such policy in relation to cutting emission, low and reduced carbon, local heat and energy solutions are implemented on a flexible basis, and that the Council recognise the decarbonisation of the national grid. This would be in line with the Written Ministerial Statement of December 2023<sup>3</sup>. The Council will also be aware that the Future Homes and Buildings Standards have been consulted upon<sup>4</sup>.
8. Biodiversity net gain (BNG) is mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). Developers must deliver a biodiversity net gain of 10%. There are specific exemptions from biodiversity net gain for certain types of development. The exemptions are set out in paragraph 17 of Schedule 7A of the Town and Country Planning Act 1990 and the Biodiversity Gain Requirements (Exemptions) Regulations 2024.
9. The PPG has recently been updated to provide more information on BNG which may assist the Council as they consider this policy. The PPG<sup>5</sup> states that plan-makers should be aware of the statutory framework for biodiversity net gain, but they do not need to include policies which duplicate the detailed provision of this statutory framework. It also states that it would be inappropriate to include policies which are incompatible with this framework. The PPG<sup>6</sup> is also clear that plan makers should not seek a higher percentage than the statutory objective for 10% BNG, unless justified.
10. The HBF considers that the Council does not need to provide a policy on BNG as this is a statutory requirement as set out in the Act. However, it could be beneficial for the Council to set out areas of strategic importance, and how they will work with the Local Nature Recovery Strategy (LNRS).

## Meeting Housing Needs

11. The document states that a key objective of the Local Plan is to ensure that Hull's housing needs for different groups in the community are met in terms of the quantity, size, type and tenure of new homes.
12. The document goes on to highlight that the housing need for Hull is 993 new homes each year based on the standard method, and that this is an increase from the currently adopted Local

---

<sup>3</sup> <https://questions-statements.parliament.uk/written-statements/detail/2023-12-13/HCWS123>

<sup>4</sup> <https://www.gov.uk/government/consultations/the-future-homes-and-buildings-standards-2023-consultation/the-future-homes-and-buildings-standards-2023-consultation>

<sup>5</sup> PPG ID: 74-006-20240214

<sup>6</sup> PPG ID: 74-006-20240214

Plan. It suggests that meeting the new housing figure will require a complete step change. The HBF considers that this housing figure will need to be considered to reflect the latest government guidance in relation to the Written Ministerial Statement<sup>7</sup>, the standard methodology and the NPPF. The Council may also need to consider if it is appropriate to plan for a higher housing need figure than the standard method indicates to reflect growth ambitions linked to economic development or infrastructure investment as set out in the NPPF<sup>8</sup>.

13. The HBF considers that the Council will need to consider an appropriate balance of development, to ensure that all of their housing needs are met in terms of types and tenures; locations and markets, and to ensure that the Plan can deliver against its housing requirements.
14. The HBF considers that it will be necessary to gather appropriate evidence including a housing needs assessment and a Viability Assessment to determine what types of homes may be needed and can be delivered in Hull. The HBF considers this is likely to include a wide range and variety of homes from homes for first time buyers, to family homes to homes to suit the older population. The HBF would encourage the Council to work with the home building industry working in the area to determine the types of homes that are currently being delivered, and where there is demand from home purchasers.
15. The consultation suggests that the housing market mirrors the national picture with high levels of rent increases and low levels of affordability. It goes on to suggest that the Local Plan has a key role in enabling the delivering of affordable and social homes in Hull, and that the evidence suggests that the need for affordable homes has more than doubled since the current plan was adopted.
16. The HBF considers that it is appropriate for the Council to plan for the affordable needs of its community, and to ensure that it does this in line with the requirements in the NPPF<sup>9</sup>. This should ensure that any affordable housing requirements are clearly set out, are evidenced as viable through an assessment, and that flexibility is provided within the policy where viability may be an issue.

## Healthy communities

17. The consultation document suggests that developers have the potential to positively influence health and wellbeing through maximizing the health benefits of a proposal, minimizing the potential harm and reducing inequalities. It goes on to suggest that Health Impact Assessments (HIA) can be a useful tool in assessing development proposals where there are expected to be significant impacts on health and wellbeing.
18. The HBF generally supports plans that set out how the Council will achieve improvements in health and well-being. In preparing its local plan the Council should normally consider the health impacts with regard to the level and location of development. Collectively the policies in

---

<sup>7</sup> Building the Homes we need – Written Ministerial Statement 30th July 2024

<sup>8</sup> NPPF December 2024 paragraph 69

<sup>9</sup> NPPF December 2024 paragraphs 35, 64-66

the plan should ensure health benefits and limit any negative impacts and as such any development that is in accordance with that plan should already be contributing positively to the overall healthy objectives of that area.

19. The PPG<sup>10</sup> sets out that HIAs are ‘a useful tool to use where there are expected to be significant impacts’ but it also outlines the importance of the local plan in considering the wider health issues in an area and ensuring policies respond to these. As such Local Plans should already have considered the impact of development on the health and well-being of their communities and set out policies to address any concerns. Consequently, where a development is in line with policies in the local plan a HIA should not be necessary. Only where there is a departure from the plan should the Council consider requiring a HIA. In addition, the HBF considers that any requirement for a HIA should be based on a proportionate level of detail in relation to the scale and type of development proposed. Only if a significant adverse impact on health and wellbeing is identified should a HIA be required, which sets out measures to substantially mitigate the impact.

### **Achieving well-designed places**

20. The consultation suggests that the Council seek to introduce new policy requirements setting clear policies for high quality sustainable design that respects local identity as well as introducing Design Codes to guide new developments. The HBF would strongly recommend that the Council seek to work closely with the homebuilding industry in preparing their Design Code to ensure that the Code is realistic, viable and deliverable.

### **Unlocking Development Opportunities**

21. The consultation document highlights a key challenge in relation to delivering viable development, and highlights issues such as high construction costs, low property values and weak demand. The document suggests that the Local Plan could help by identifying suitable land for development, setting clear policies, prioritizing infrastructure improvements and supporting funding bids.
22. The HBF agrees that the viability of development may indeed be a challenge in Hull and will need to be monitored closely. The HBF also generally agrees that the Local Plan can help to address some of these issues by providing certainty for the development industry. The HBF also considers that in order to overcome this challenge it will be particularly important that the Council works very closely with the home building industry to ensure that the suitable sites are identified and appropriate policies are applied, to ensure that the Plan can be delivered.

### **Monitoring**

23. The HBF recommends that the Council include an appropriate monitoring framework which sets out the monitoring indicators along with the relevant policies, the data source and where they will be reported, this should also include the targets that the Plan is hoping to achieve and actions to be taken if the targets are not met. The HBF recommends that the Council provide

---

<sup>10</sup> PPG ID:53-005-20190722

details as to how the plan will actually be monitored, and identifies when, why and how actions will be taken to address any issues identified.

## Viability

24. The Council will also need to ensure that they have considered viability, viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative costs of all relevant policies will not undermine deliverability of the Plan. The Council need to ensure that policy requirements should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned development to be deliverable without need for further viability assessment at the decision-making stage.

## Future Engagement

25. 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.
26. 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,



**Joanne Harding**  
**Planning Manager – Local Plan (North)**  
Email: [joanne.harding@hbf.co.uk](mailto:joanne.harding@hbf.co.uk)  
Phone: 07972 774 229