

Forward Planning
Room FS32
East Riding of Yorkshire Council
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Dear Sir / Madam,

EAST RIDING LOCAL PLAN REVIEW: OPTIONS DOCUMENT

Thank you for consulting with the Home Builders Federation on the East Riding Local Plan Review Options document.

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. Our comments upon the main modifications are provided below.

The industry is keen to work with the Council to ensure a sound plan is produced which facilitates the delivery of an appropriate number of homes across East Riding. Within this regard we would also welcome further engagement with the industry throughout the production of the plan.

Scale of housing development

The current Local Plan sets a housing requirement of 1,400 dwellings each year. The MHCLG Standard Method sets an indicative housing figure of 991 dwellings each year for the period 2016 to 2026 utilising the 2014-based household projections or 705 dwellings each year for the period 2017 to 2027 using the 2016-based household projections. The indicative housing figures produced by the Standard Method are significantly below the currently adopted housing requirement.

The Council will be aware that MHCLG have been undertaking a consultation in relation to changes to the parts of PPG relating to the standard method for assessing local housing need. The consultation highlighted that the Government's priorities continue to be deliver more homes and to do so faster. It also identified that the recent household projections (2016-based) have led to some areas reconsidering the

number of homes to plan for, however, the document is very clear that the 2016-based are not a justification for a lower housing need.

It is also noted that within the Government's technical consultation that ONS are quoted as stating that the household projections *"do not take account of how many people may want to form new households but for whatever reason aren't able to, such as young adults wanting to move out of their parents' house, or people wanting to live on their own instead of in a house share. Therefore, household projections are not a measure of how many houses would need to be built to meet housing demand; they show what would happen if past trends in actual household formation continue"*. ONS go on to state that *"although the latest household projections are lower than the previously published projections, this does not directly mean that fewer houses are needed in the future than thought. This is because the projections are based on recent actual numbers of households and are not adjusted to take account of where homes have been needed in recent years but have not been available"*.

The figure generated by the standard method should therefore be considered as the minimum starting point, it is noted that it relies on past growth trends, which in the case of the East Riding may have been impacted by poor housing delivery. The HBF considers that there are circumstances where an uplift will be appropriate such as where growth strategies are in place (for example the Northern Powerhouse) or where funding is in place to facilitate growth.

The Council suggest three options in relation to the scale of housing:

- Option 1 – Standard Methodology
- Option 2 – Standard Methodology but with an uplift to address affordable housing needs
- Option 3 – A lower requirement in East Riding to support the development and regeneration of the City of Hull.

The HBF consider that the Council should consider the Standard Method the starting point for the housing requirement and should consider whether it appropriately reflects the affordable housing needs, households who may want to form new households and the economic growth of the area. The HBF would also query if there has been a significant change in the Plan Strategy for the Local Plan. If not, the Council should also consider what, if anything, has significantly changed, to the extent shown in the difference between the currently adopted housing requirement and that in the Standard Method, between now and when the adopted plan was examined.

Housing mix

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. It is, however, important that any policy is workable and ensures that housing delivery will not be compromised or stalled due to overly prescriptive requirements. 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.

Housing standards

The HBF consider that the optional housing standards can, in some instances, have a negative impact upon viability, increase affordability issues and reduce customer choice. It is considered that the Council should take into consideration any implications the requirements of this policy may have on the viability of a development and the deliverability of much needed housing both market and affordable.

The HBF does not consider that a policy on housing standards is required, it is considered that local needs can be met without the introduction of the optional housing standards.

Nationally Described Space Standards

PPG (ID 56-020) identifies the type of evidence required to introduce such a policy, at present the HBF is not aware of any such evidence for East Riding. The PPG 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 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'.*

The Council will need robust justifiable evidence to introduce any of the optional housing standards, based on the criteria set out above.

M4(2) (accessible and adaptable dwellings), and M4(3) (wheelchair user dwellings)

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.

PPG (ID 56-07) 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 recommend that an appropriate transition period is included within the policy.

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; and that policies for wheelchair accessible homes should only be applied to dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.

Self- and custom-build

Many of our members will be able to assist the custom build sector either through the physical building of dwellings on behalf of the homeowner or through the provision of plots for sale to custom builders. The HBF are, therefore, not opposed to the idea of increasing the self-build and custom build sector for its potential contribution to the overall housing supply. However, the HBF would not support Option 3 which seeks to establish a proportion of larger allocated sites being made available for self or custom build housing. This policy approach only changes the house building delivery mechanism from one form of house building company to another without any consequential additional contribution to boosting housing supply. The HBF would encourage the Council to engage with landowners and to work with custom build developers to maximise opportunities.

Affordable housing

The HBF does not dispute the need for affordable housing within East Riding and indeed supports the need to address the affordable housing requirements of the borough. The HBF support the Council in their recognition that the need for affordable housing is unlikely to be met through the delivery of market-led schemes alone, and the need to amend the policy to reflect the broadened definition of affordable housing.

Future Engagement

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.

The HBF would like to be kept informed of the progress of the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,



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