

Forward Planning
East Riding of Yorkshire Council
County Hall
Beverley
East Riding
HU17 9BA



SENT BY EMAIL
forward.planning@eastriding.gov.uk
18/10/2024

Dear Planning Policy Team,

EAST RIDING OF YORKSHIRE COUNCIL LOCAL PLAN: SCHEDULE OF PROPOSED MAIN MODIFICATIONS

1. Thank you for consulting with the Home Builders Federation (HBF) on the East Riding Local Plan Main Modifications 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. The HBF notes that a consultation on the NPPF and the standard method for calculating housing need has commenced part way through the examination of the East Riding Local Plan, and that this may have implications for the adoption of the Plan, the policies it contains and how the Plan is used going forward.

MM/11 to MM/15 – 4.62 & Policy S5

4. The Council propose to amend the figures in Policy S5 in relation to the distribution of dwellings and in relation to the local housing need identified by the standard method. The HBF does not consider that this policy is sound, as it is not justified or consistent with national policy.
5. The HBF remains concerned that the housing requirements identified in the Plan do not reflect the actual housing needs in the area and that it is appropriate for a higher housing requirement to have been used. The Building the Homes we Need Written Ministerial Statement (30th July 2024) clearly states that we are in the middle of the most acute housing crisis in living memory, and that the Government will be taking the tough choices needed to improve affordability, turbo charge growth and build the 1.5 millions homes that we have committed to deliver over the next five years. It goes on to highlight that planning is principally a local activity, and it is right that decisions about what to build and where should reflect local views, but that they are also clear that these decisions should be about how to deliver the housing an area needs, not whether to do so.



6. The HBF notes that the Government are proposing to amend the standard methodology for calculating the local housing need, this proposed methodology would give East Riding a housing need of 2,088dpa. Over the Plan period 2020 and 2039 this would equate to 39,672 dwellings, this is significantly over and above the 1,100dpa annual housing requirement and 20,900 overall requirement. This is clearly in line with the concerns highlighted by the HBF that the housing requirement is currently insufficient to meet needs.
7. The HBF also notes that the proposed NPPF includes transitional arrangements which state that the policies of the Framework will apply for the purposes of preparing a Local Plan from the publication date plus one month, unless the local plan has been submitted for examination before the publication date plus one month. However, where this applies, Local Plans that reach adoption with annual housing requirement that is more than 200 dwellings lower than the relevant published Local Housing Need figure will be expected to commence plan-making in the new system at the earliest opportunity to address the shortfall in housing need. The HBF recommends that the Plan should include a further modification in relation to a review of the Plan to ensure that these housing needs are met at the earliest opportunity, this could include a text similar to that included by Bedford within their Plan and provided for information in Appendix 1 of this response.
8. The HBF continues to consider that the Council should have set a higher housing requirement, and that based on the proposed NPPF, even if it does not do so at this point that Council will be required to do so at the earliest opportunity. The HBF considers that it is preferable for the Council to work within a plan-led system and as such the HBF would continue to recommend that the Council amends the current plan.

MM/27 – Paragraph 5.32

9. The Council propose to amend paragraph 5.32 to state that ‘affordable housing may also be sought from specialist housing proposals classed as C2 where this is justified’.
10. The HBF does not consider that this proposed modification is sound. The HBF considers that seeking affordable housing from sheltered housing / older person housing schemes is not justified, is not consistent with the NPPF and is not viable. The Local Plan Viability Study clearly identifies (tables 10.5 and 10.6 and paragraph 10.81) that across both sheltered housing and extra care the residual value is less than the EUV suggesting that the development of specialist housing for older people is unlikely to be viable and in any event, it will be unlikely to be able to pay for affordable housing or significant levels of developer contributions. The NPPF¹ is clear that Plan should set out the contributions expected from development, that this should include setting out the levels and types of affordable housing provision required and that such policies should not undermine the deliverability of the Plan.

¹ Paragraph 34

MM/35 – Policy H4

11. The Council propose to amend the policy so that proposals should provide a minimum of 30 dwellings per hectare (dph) and a density of above 35dph where the site is within the proximity of a town or district centre or a railway station or a core bus route with the Major Haltemprice settlements, principal towns or towns.
12. The HBF considers that this amendment is generally appropriate. The HBF considers that the setting of residential density standards should be undertaken in accordance with the NPPF² where policies should be set to optimise the use of land, this should include the use of minimum density standards for town centres and other locations that are well served by public transport. Whilst the HBF appreciate the flexibility provided by this policy, it will be important that both applicants and decision makers know what will be expected in terms of density of development.
13. In relation to the considerations identified in part B of this policy this will allow developers to react to some site-specific issues, including the character of the surrounding areas, however, the HBF would suggest that further amendments should be made to create greater flexibility to allow developers to take account of the evidence in relation to market aspirations, deliverability, viability and accessibility.

Future Engagement

14. I trust that the Council will find these comments useful as it continues to progress its Local Plan to adoption. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.
15. The HBF would like to be kept informed of the publication of the Inspectors Report, the adoption of the Plan and further 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

Phone: 07972 774 229

² Paragraph 125

Appendix 1 – Bedford Local Plan (adopted January 2020)

Policy 1 - Reviewing the Local Plan 2030

The Council will undertake a review of the Local Plan 2030, which will commence no later than one year after the adoption of the plan. An updated or replacement plan will be submitted for examination no later than three years after the date of adoption of the plan. In the event that this submission date is not adhered to, the policies in the Local Plan 2030 which are most important for determining planning applications for new dwellings will be deemed to be 'out of date' in accordance with paragraph 11 d) of the National Planning Policy Framework 2019.

The plan review will secure levels of growth that accord with government policy and any growth deals that have been agreed. The planning and delivery of strategic growth will be aligned with the delivery of planned infrastructure schemes including the A421 expressway, Black Cat junction, East West Rail link and potentially the A1 realignment.

The review will also serve to build stronger working relationships with adjoining and nearby authorities and may result in the preparation of a joint strategic plan based on a wider geography.

