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Dear Sir / Madam,

## Hull Local Plan: Publication

1. Thank you for consulting with the Home Builders Federation (HBF) on the publication version of the Hull Local Plan.
2. The HBF is the principal representative body of the house building industry in England and Wales and our representations reflect the views of our membership of multinational PLCs, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year including a large proportion of the new affordable housing stock.
3. We would like to submit the following comments. **The HBF would also wish to participate in the examination in public hearing sessions to debate these matters further.**

## Plan Period

4. The HBF is pleased to note that the plan period has been extended to 2032 from 2030. This should provide a 15 year time horizon, post adoption, and accords with our previous comments at the preferred options stage of the plan. It should, however, be noted that the evidence base has not been updated to match the plan period, this could lead to issues of soundness discussed later in our comments.

## Duty to Co-operate

5. The HBF is pleased to note, within paragraphs 2.28 to 2.40 of the consultation document that the Council is working proactively with East Riding of Yorkshire Council (ERYC), the Homes and Communities Agency (HCA) and Local Enterprise Partnership (LEP) on cross boundary issues.
6. The importance of identified actions resulting from fulfilment of the duty is clearly articulated within the National Planning Practice Guidance (NPPG). The National Planning Practice Guidance (PPG) states *'it is unlikely that this (the duty) can be*

*satisfied by consultation alone’ and that ‘inspectors will assess the outcomes of the co-operation and not just whether local planning authorities have approached others’.*

7. The Hull and ERYC Joint Planning Statement demonstrates close working relationships between the two Councils. This is considered essential due to the fact that the Housing Market Area (HMA) crosses administrative boundaries and the issues of economic viability within Hull. It is noted that paragraph 21 of the ERYC Local Plan: Strategy Inspector’s report identifies that;

*“...The Council has worked with Hull City Council to arrive at a figure intended to represent the objectively assessed need for housing in the housing market area. This is a clear example of close co-operation of the kind sought by the DtC and encouraged in national policy.”*

8. The *Duty to Co-operate Statement (June 2016)* whilst short on detailed actions also identifies areas of joint working upon housing issues. This combined with the Joint Planning Statement identify positive progress has been made in relation to the duty.
9. It is, however, the efficacy of this work that concerns the HBF. It is notable that the Joint Planning Statement is now 3 years old and as such the HBF is keen to explore how issues of under-delivery across the Housing Market Area (HMA) are and will be dealt with. Furthermore and more fundamentally the Hull housing requirement does not appear to pay sufficient regard to the needs emanating from neighbouring ERYC. This is considered a failing against the duty to co-operate, we discuss this in greater detail within our comments upon Policy 3 below. There is also limited detail on how the economic ambitions of the LEP are being translated into the local plan and in particular housing delivery.

### **Spatial Vision and Strategic Priorities**

10. The HBF is generally supportive of the vision and strategic priorities, particularly the emphasis upon economic growth and prosperity. It is, however, important to ensure that these ambitions are closely aligned to housing delivery. The delivery of housing also has wider social and economic benefits. The HBF has recently undertaken a study upon the economic impact of house building entitled *‘The economic footprint of UK house building’* this report can be accessed via our website at [www.hbf.co.uk](http://www.hbf.co.uk). This report is also supplemented by a regional report

which highlights the benefits provided to individual local authorities over the previous year.

### **Policy 3: Housing requirement and site allocations**

The policy is considered unsound as it is not effective, justified, consistent with national policy or positively prepared.

11. The Council has not updated its evidence with regards to the objectively assessed need for housing (OAN) since the previous consultation upon the plan (Preferred Options Consultation, October 2015). Whilst it is noted that in response to our previous comments the Council considers its OAN to be robust (Hull Local Plan - Report on Consultation) we consider our previous comments remain valid. In this regard to ensure they are before the Inspector they are reproduced and updated. It should also be noted that since the previous consultation the Inspector of the ERYC Local Plan Strategy has published his final report which has implications for this plan, these are discussed below.

12. The lack of an update is also an issue for the plan. This is because the plan period (2016 to 2032) and the evidence base (2013 to 2032) do not match. This may lead to inaccuracies within the identified housing requirement. This will need to be explored.

13. The policy identifies an annual housing requirement of 760dpa. The HBF consider this should be identified as a minimum to accord with the NPPF requirements for plans to be positively prepared and boost significantly housing supply.

14. The housing requirement is based upon an OAN calculation of 642dpa (rounded down to 640) a level of demolitions and the housing delivery backlog between 2011 and 2016. The HBF has a number of concerns with the suggested requirement which are set out below.

### **Backlog and Demolitions**

15. The current consultation document identifies 120dpa gross to account for demolitions and housing delivery backlog, accrued between 2011 and 2016 (paragraph 5.6), over the plan period. Notwithstanding the fact that the PPG identifies that any backlog should be made good over the first five years, or

assistance sought from neighbouring authorities, this accounts for a total of 1,920 dwellings over the plan period (2016 to 2032).

16. The amount of actual shortfall accrued over the period 2011 to 2016 is difficult to determine as the net figures identified within the 2016 Strategic Housing Land Availability Assessment (2016 SHLAA) (figure 3.2) bear no resemblance to those reported within the most recent Authority Monitoring Report (AMR 2013-14). This disparity needs to be explained.

17. The overall amount of demolitions anticipated is identified within the 2016 SHLAA is identified as 849 over the plan period or an average of 53 dwellings. Whilst it is recognised there has been significant housing market renewal within Hull over recent years, the allowance for demolitions appears very low when considering the past trends set out in the table below.

Year	04/05	05/06	06/07	07/08	08/09	09/10	11/12	12/13	13/14
Demolitions	462	338	295	372	375	455	211	309	327

Sources Hull CC AMR 2010, 2014 Note: Data for 10/11 was not found.

18. The annual average over this period (excluding 2010/11) is 349 dwellings, nearly 7 times higher than the allowance suggested within the consultation document. The need for a higher demolitions allowance would, based upon the information above, appear justified.

19. In order to justify the level of backlog and demolitions the Council should provide additional evidence prior to the examination.

### **Objectively Assessed Need (OAN)**

20. The HBF has considered the 2013 SHMA and 2015 Updated Objectively Assessed Need for Housing in Hull (2015 OAN update). The OAN within the plan is based upon the 2015 OAN update. Whilst we agree with much of the methodology and conclusions we do have a number of concerns which are summarised below, against the various sub-headings.

### Demographic analysis

21. The HBF agrees that the study was correct to utilise the 2012 sub national household projections (2012 SNHP) as the starting point for determination of the OAN. It is, however, notable that these have subsequently been updated by the

2014 SNHP. These projections show a slightly lower starting point than the 2012 SNHP which will require consideration. The PPG (ID 2a-015) is clear that the national projections may require adjustment to take account of local demography. In this regard the 2015 OAN update sensitivity tests changes in the assumptions upon future migration patterns and household formation rates. The HBF agrees with the undertaking of such sensitivity testing, particularly with regard to previous delivery and migration in Hull.

22. In terms of migration rates the study considers 3 scenarios which are set out within paragraph 3.46. The OAN figure is set utilising the '*SNPP with 10-year Domestic Migration*' scenario. The HBF recognises the relevance of this scenario but also considers that the '*10-year Migration Trends*' scenario has merit and is worth further consideration. Our reasons for this is are that the 2012 SNHP and SNPP were both significantly affected by high net out-migration in Hull over the period of the recession, this is also true of the 2014 SNPP and SNHP. Therefore whilst the '*SNPP with 10-year Domestic Migration*' scenario seeks to partially address this through a longer term view the international migration element will still inevitably be constrained by the 2012 based projections and the inherent bias towards more recent trends. The use of 10 year migration trends has been used successfully used at numerous local plan examinations across the country and is therefore considered a recognised and sound approach.
23. The issue of household formation rates is, in our view, not fully considered within the 2015 OAN update. The update fails to consider whether the headship rates identified within the 2012 SNHP should be adjusted to take account of the impact of the recession and whether a full or partial return to previous trends identified in the 2008 SNHP is warranted, based upon an improving economic picture. This issue is also relevant for the 2014 SNHP.
24. This issue of headship rates is particularly important within the 25 to 34 year old age group, which will have the highest propensity to form households and take-up jobs within the city. This age group is predicted to have a negative trend in terms of household formation over the plan period. Whilst this issue is discussed any amendment to an alteration of the headship rate is discounted within paragraphs 5.37 to 5.40 of the 2015 OAN update. The HBF disagrees with this approach.
25. It is recognised that the headship rate figure remains higher for this age group within Hull than regional averages and neighbouring ERYC. But this alone is not

justification to simply discount this phenomena as a market correction. The higher than regional average rates are likely to be due to affordability factors within Hull, with many parts of ERYC and the wider region having significantly worse affordability issues to Hull.

26. We consider a negative trend to be a significant issue which is likely to be linked to past trends upon the availability of suitable accommodation within the city, poor delivery rates and areas of market failure. Given that the Council is actively seeking to address these issues it would appear prudent to consider an uplift in headship rates amongst this group, to reverse the negative trend. It is also notable that the Government is actively trying to boost home ownership, particularly amongst younger age groups through initiatives such as *'Help to Buy'* and *'Starter Homes'*. The PPG notes that the household projections do not take account of such policy interventions by Government (PPG ID 2a-015)

27. Furthermore the Council is promoting economic growth. If, as suggested by the Council, a significant proportion of the new jobs are taken up by existing unemployed residents then the propensity to form a household amongst this age group is likely to increase, not decrease, as they have more available income. This is supported by table 11, 2015 OAN update. In addition if such economic activity rates are not achieved then this will require an increase in in-migrants of working age to take up the jobs, once again suggesting a modest increase in the headship rates amongst this key group.

#### Economic Driven Projections

28. The HBF notes the economic scenarios tested in the 2015 OAN update. We are, however, concerned that no scenarios which consider the rate of job growth advocated within the plan have been undertaken. Paragraph 4.9 of the consultation document identifies a job creation target over the plan period of 7,500. These figures arise from the ambitions of the City Plan which seeks to provide jobs growth of 7,500 over a 10 year period. This rate is significantly above the tested *'REIU policy on'* scenario, which considers a level of job creation of just 1,790 over the period 2013 to 2030. The NPPF and PPG are clear that economic and housing strategies should be aligned. The failure to consider this issue is considered a significant flaw in the plans evidence base and needs to be addressed.

#### Market Signals

29. The HBF agrees that many of the market signals analysed within the 2015 OAN update would not appear to warrant an uplift in the OAN. The exceptions to this, in our view, are; overcrowding, rate of development, affordability and affordable housing need. Each of these are discussed in turn detail below. It is also worth noting that the SHMA update does not cover all of the market signals outlined within the PPG (ID 2a-019), specifically land prices. This should be rectified to ensure a robust evidence base is in place prior to submission.

30. The need for an uplift in the OAN based upon market signals is set out within the PPG. The HBF would draw attention to the fact that whilst some signals may not appear to warrant an uplift the PPG is clear that;

*‘..A worsening trend in **any** of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections..’* (our emphasis ID 2a-020)

31. The 2015 OAN update (table 14) identifies a clear worsening of overcrowding between the period 2001 and 2011, increasing from 6.4% to 8%. This rate is significantly higher than regional or neighbouring authorities and the rate of increase is also marginally higher than the national average. It is also notable, table 14, that the percentage of people living in HMOs has similarly grown above national and regional averages and the rate stands above the regional average and neighbouring authorities. Paragraphs 5.32 and 5.33 (2015 OAN update) suggest this increase in overcrowding and HMO occupation is a symptom of previous under-delivery within the city.

32. The rate of development has been woefully below previous plan targets for a significant period. Between 2004/5 and 2009/10 a net total of just 1,376 dwellings were provided (2010 AMR). The corresponding target within the now revoked Regional Spatial Strategy (RSS) required net dwelling completions of 2,880 dwellings over the same period. This amounts to an under-supply of 1,504 dwellings over the period. This will inevitably have impacted upon past rates of migration and household formation.

33. The lower quartile affordability trend between 1997 and 2013 has generally been a steadily worsening picture within the city (2015 OAN update, figure 20) and continues to be so. The most recent statistics from ONS suggest that the lower quartile house price to income ratio has further increased from 3.80 in 2013 to 4.20

in 2015. This is a cause for concern and consideration should be given to addressing this. It is, however, recognised that on this market signal Hull appears to fare considerably better than national or regional averages.

34. Given the market signals information discussed above we consider there to be a justification for a moderate uplift of the proposed OAN. Recent local plan examinations in Eastleigh, Canterbury and Uttlesford have identified that a 10 to 20% uplift is appropriate.

35. The absolute level of need for affordable housing within the city is relatively high with an annual requirement for 154 affordable dwellings. The viability of sites within Hull clearly will not be able to provide sufficient affordable housing to meet this need, based upon currently proposed levels of development. In such cases the PPG recommends;

*"...An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes..." (ID 2a-029)*

36. The HBF notes that the 2015 OAN update identifies the impacts of affordable housing need upon the overall OAN, concluding no upward adjustment is required. This is disputed given the fact the OAN will not deliver the affordable housing needs of the city. Furthermore the figure of 154 is based upon the role of the Private Rented Sector in meeting affordable housing. Such an approach has been criticised by a number of local plan Inspectors. In the case of Eastleigh the Inspector's Report notes;

*"...there is no justification in the Framework or Guidance for reducing the identified need for affordable housing by the assumed continued role of the PRS in the LHA..." (paragraph 34),*

37. The High Court has also considered this issue (Oadby and Wigston BC v SoS and Bloor Homes). Hickinbottom J noted that the PRS is not affordable housing and that any approach that allows the private sector to take up the shortfall in affordable housing delivery constitutes a policy-on approach.

38. The 2015 OAN update does not provide any evidence demonstrating what the level of affordable housing need in Hull would be if no allowance were made for a



contribution by the PRS. In this regard the soundness of the affordable housing need is highly questionable.

East Riding of Yorkshire Council Local Plan: Strategy Inspector's Report (25<sup>th</sup> January 2016)

39. The Inspector's report into the ERYC Local Plan: Strategy is important in the context of Hull not only because it is a neighbouring authority but also because of the acknowledged fact that the Hull HMA covers both authorities. In determining the housing requirement for ERYC the Inspector notes that whilst each local authority had undertaken work upon its own OAN the analysis of the HMA was provided as one figure relating to the whole HMA area (paragraphs 64 and 65). Whilst recognising that the identification of Hull's OAN was not a matter for his judgement in the case of the ERYC plan it was acknowledged in relation to the Hull 2015 OAN update that;

*"The main point of note is that none of the options are based on an employment-led scenario. Yet both Councils agree that the needs and requirements of the HMA must be founded on a consistent application of the scenarios selected. That is to say that if housing in one part of the HMA is founded on an employment-led scenario, then so must the other – one cannot 'mix and match' employment-led and demographic scenarios within one HMA."*  
(Paragraph 85, ERYC Inspector's report)

40. Given that the Council has not updated its OAN calculation and it is still based upon a demographic-led approach this does question the soundness of the plan and the efficacy of its actions under the duty to co-operate, as discussed earlier.

41. Furthermore the Inspector notes;

*"The East Riding and Hull City Councils have agreed an 'apportionment approach'. Under this, East Riding will provide less housing than either its objectively assessed need or its identified requirement. Hull will make up this 'shortfall' such that the housing needs and requirements of the HMA overall are met. From the table above, the 'shortfall' amounts to 533 dwellings per annum..."* (Paragraph 92, ERYC Inspector's report)

42. Based upon the 'employment-led policy on' scenario within the 2015 OAN update a total of 394 homes would be required within Hull. Therefore by adding the

need from ERYC (533dpa) this would create a net requirement for Hull of 927dpa for Hull. This is significantly greater than the 760dpa gross requirement currently being planned. This figure is, however, likely to be an over-simplification as it takes no account of the shortfall in delivering the 533 within Hull from ERYC over the period 2012 (start of the ERYC plan) to 2016.

#### OAN Conclusion

43. The OAN and housing requirement figures for Hull appear fundamentally flawed. They do not match the plan period, are not supported by robust data, do not take adequate account of market signals or the apportionment and need to align with the requirements from ERYC. In this regard the HBF recommend significant further work be provided prior to submission of the plan. This may require further consultation prior to submission.

#### **Allocations**

44. Whilst the HBF does not wish to comment upon the acceptability or otherwise of specific sites it is noted that the plan provides a supply buffer of just 312 dwellings over the plan period (figure 5.2). This is inclusive of a significant reliance upon windfalls. This is not considered sufficient to account for potential under or none delivery of allocations or existing permissions. This is particularly relevant within a city such as Hull which has viability and environmental challenges, particularly flood risk. The HBF recommend that a larger buffer equivalent to 20% of the overall requirement be included. This would allow for flexibility and choice within the market and enable the plan to deal with under-delivery from the various sources of supply.

#### **Policy 4: Housing regeneration and brownfield land**

The policy is not considered sound as it will not be effective.

45. The NPPF paragraph 111 enables local authorities to set targets for the percentage of development upon previously developed land. Given the geography and constraints within Hull it is understandable that the Council has chosen to support a high proportion of brownfield redevelopment. Such targets must, however, be justified by evidence and ensure delivery of the overall housing requirement. It is also important that the brownfield target is set over the full plan period so as not to impose artificial constraints upon sites coming forward.

46. The June 2016 Local Plan and CIL Viability Assessment (2016 LPCVA) identifies viability issues across large parts of the city and importantly has not

included any allowance for abnormal costs. Given the nature of brownfield sites it is likely that abnormal costs will be encountered. This may reduce delivery from brownfield sites. Therefore whilst it is noted that around 60% of allocated sites are brownfield it does not mean that all will be delivered, as discussed against Policy 3 we recommend a buffer of sites be provided. The HBF therefore recommend part 6 of the policy be deleted and the reference to a target of 60% be retained solely within the supporting text.

### **Policy 5: The type and mix of housing**

The policy is considered unsound as it is not justified or effective.

47. Part 1 of the policy requires at least 60% of all market housing on sites of 100 or more to be three bedrooms or greater. It is recognised that this is designed to rebalance the housing stock and is identified by the SHMA. Whilst the HBF does not dispute the evidence it is recommended that flexibility be factored into the policy requirements to allow for specific site characteristics, as well as market demand at the time of the development.
48. Parts 2 and 3 of the policy set out affordable housing contributions across different parts of the city. It is notable that viability considerations are only included within zones 1 and 2. Whilst zones 3 and 4 may, in general, be more viable the policy should allow flexibility across all site for site specific issues. This is particularly relevant given that the 2016 LPCVA does not take abnormal costs into account (paragraph 7.10).
49. The LPCVA indicates that the affordable housing requirement of 10% in zones 1 and 2 are too high (paragraph 7.21). Whilst it is recognised that the policy does suggest less may be accepted based upon viability grounds, this is inappropriate given the evidence before the Council. The NPPF is clear (paragraphs 173 to 175) that the cumulative burdens of plan policies and requirements should not threaten the viability of sites. The current policy position in relation to zones 1 and 2 will mean that nearly every site within this area, accounting for nearly half of the supply (44%) will require negotiation. This provides no certainty for the industry and ultimately is likely to have a negative impact upon delivery. The HBF consider that a zero rate of affordable housing should be set within this area.
50. Furthermore whilst the 2016 LPCVA suggests the levels of affordable housing provision within other parts of the city are viable the HBF does have a number of

concerns with the assumptions used within the study, some of which are discussed below. Firstly only nominal amounts of section 106 and 278 contributions are included (£1,500 per unit). This is despite a long-list of infrastructure projects requiring developer contributions identified within the Council's 2015 Infrastructure Study. These figures should be verified.

51. The study also only provides 1.5% for marketing. This is way below the 3 to 5% suggested by the Local Housing Delivery Group. Finally, whilst it is recognised that developer profit will vary between sites and developers a blended figure of 20% GDV has been widely accepted in numerous appeals and studies. The study only utilises 18%. The HBF has recently undertaken research upon the need for a reasonable profit which supports a figure of 20% GDV. Given these concerns we consider the viability of affordable housing may be compromised within other zones across the city.

52. The HBF therefore recommend further justification is provided for the assumptions utilised in the 2016 LPCVA and the affordable housing targets.

53. Part 7 of the policy includes an ambiguous statement that the Council may require housing development to provide a proportion of suitable plots for custom and self-build housing. This is not justified and the effect upon viability is not assessed. The policy, as written, will provide no certainty for the development industry whether such plots will be required now or in the future. It is recommended that this part of the policy be deleted.

### **Policy 6: Housing space standards**

The policy is unsound as it has not been justified by relevant evidence.

54. The evidence required to introduce the optional space standards is set out within the PPG (ID 56-020) this evidence should consider the impact across different housing market character areas and differing tenures. For example whilst the adoption of the internal space standard may prove acceptable for the higher market areas, it may seriously harm regeneration initiatives such as the housing regeneration areas identified in Policy 4. A one-size fits all approach to the evidence base would not capture the impact that the standard would have across the different market areas, in terms of viability and the need for the standard.

55. The evidence should also take account of whether the space standards should be applied across all forms of residential development, whether new build, extension or conversion. Similarly the evidence should consider the impact upon all types of tenure be it general market family housing, affordable housing, flats and apartments. The Council should demonstrate an understanding of the delivery model for these different forms of new housing and the likely effect of standards upon them.
56. The HBF is unaware of any evidence which points towards a need for the space standard to be applied within the city. Rather there is a simple statement at paragraph 5.37 that it is more likely to meet the needs of residents. It should be noted that the annual HBF customer satisfaction survey of new home buyers identified that in 2016 86% of buyers were satisfied with the quality of their new home and 92% were satisfied with the internal layout. The full report can be accessed at [www.hbf.co.uk](http://www.hbf.co.uk). It is therefore clear that the vast majority of new home buyers are very happy with the homes currently being built and they meet their needs.
57. Furthermore the blanket introduction of the space standards may actually reduce choice. This is because many developers have entry level three and four bed properties, some of which may not currently meet the space standard. These types of properties provide a valuable product for those with a need for a certain number of bedrooms but who are unable to afford larger three and four bed properties. The consequent increase in costs and reduction in variety could have a detrimental effect upon affordability and delivery, particularly in more marginal areas. Given that the Council is already failing to meet its affordable housing needs in full this should be a key consideration.
58. Whilst it is noted that the policy has been considered within the viability appraisal the HBF does question the veracity of the conclusions. Paragraph 7.22 (2016 LPCVA) suggests that the introduction of the standards will increase viability. This assumption is clarified by footnote 55 which states;

*“Viability is improved because most developers base their revenue projections on a sale value per sq.ft. Therefore, whilst larger units incur additional costs they also create additional “value which outweighs the extra cost.”*

59. This assumes that the full extra cost will be met by the purchaser, with obvious implications for affordability, including affordable housing products. It also assumes it would have no impact upon development density. Whilst the impact may be minimal on some sites, those in areas of high density or apartment schemes are likely to suffer. The assumptions made within the 2016 LPCVA are therefore considered overly simplistic.
60. Furthermore as suggested by the 2016 LPCVA the introduction of the space standards will inevitably lead to an increase in the cost of individual dwellings. These costs will in many cases have to be borne, at least in part, by the end purchaser. This will impact upon the affordability of new homes across Hull and as such may have consequential impacts upon the need for affordable housing. Given that the city is already struggling to deliver its affordable housing need this should be given careful consideration.
61. If the introduction of the space standards can be justified the HBF would recommend flexibility in its application. This is required to enable local and site specific needs and constraints to be taken into account as development is brought forward.
62. Finally the PPG requires a reasonable transitional period following the adoption of the policy to enable developers to react to the new requirements. If the introduction of the space standards can be justified the HBF recommends that the Council discuss the length of the transitional period with the industry. Given the time taken to negotiate land deals and prepare applications for submission a period of at least 12 months is likely to be required post document adoption, this period should be included within the policy.

### **Policy 21: Designing for housing**

The policy is considered unsound as it is not justified or effective.

63. Part 1 of the policy introduces a requirement to achieve at least 9 green scores upon the Building for Life 12 (BfL12) principles. Plan paragraph 9.36 suggests this is required to raise design standards across the city. The HBF is supportive of good design and BfL12. Indeed we are one of the key partners in its production. It is also the case that many of our members already adhere to its principles. The achievement of 9 green scores does, however, appear rather arbitrary. It takes no

account of individual site characteristics or viability considerations. It is also unclear whether and how the Council will undertake an assessment against BfL12.

64. Rather than an arbitrary score which must be achieved, whatever the situation, it is recommended that BfL12 be used as a framework for discussing design issues. In this regard it is recommended that part 1 of the policy be amended to read;

*Housing development should **have regard** ~~be designed according to the Building for Life principles and will be required to achieve at least 9 green scores out of 12, minimise amber scores and avoid red scores~~ **which will be used to assess design quality.***

65. Part 2 of the policy refers to housing densities of 30 to 40 dwellings per hectare and higher in city centres. The HBF is supportive of the plan not requiring fixed densities. It is unclear whether the density requirement is gross or net of site area or how compatible it is with other policies such as Policy 6 and the requirements contained within table 12.5.

66. Parts 3 and 4 encourage, rather than require, developers to include a proportion of dwellings which meet the optional accessibility standards. The Council's stance is considered pragmatic due to the inherent difficulties in providing this type of standards across Hull. It is also clear that the costs involved with the optional standards have not been considered within the 2016 LPCVA, nor have other elements of the required evidence (PPG ID 56-007) been provided. The Council cannot therefore insist upon delivery at this point in time.

## **Monitoring**

The monitoring is considered to be unsound as it will not be effective.

67. The monitoring section lacks any details upon when a review of the local plan may be triggered to rectify delivery failures. In terms of housing such triggers could include the lack of a five year supply or delivery below the anticipated housing trajectory.

## **Information**

68. I would like to be made aware of the following;

- Submission of the plan for examination;
- The publication of the examiner's recommendations and any publicly available correspondence regarding the plan; and the
- Adoption of the plan.

69. I would be happy to discuss any of the issues raised in this representation further prior to submission of the document.

Yours sincerely,

*MJ Good*

**Matthew Good**

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