

**Date: 28<sup>th</sup> February 2017**

**Consultee ID: 757334**

**Matter 3**

## **HULL LOCAL PLAN EXAMINATION**

**Matter 3: Does the Plan identify an adequate supply of housing land and contain sound policies to ensure that it will be effective in meeting housing requirements in a timely manner?**

1. The following hearing statement is made for and on behalf of the Home Builders Federation. This statement responds to selected questions set out within Matter 3 of the Inspector's *Schedule of Matters, Issues and Questions* (exam ref: HLP010).
2. The Inspector's Issues and Questions are included in bold for ease of reference. The following responses should be read in conjunction with our comments upon the submission version of the Local Plan, dated 7<sup>th</sup> September 2016 and the Hull Local Plan Proposed Changes consultation, dated 31<sup>st</sup> January 2017. The HBF has also expressed a desire to attend the examination hearing sessions.

### **Issue 3.1: Proposed Housing Allocations**

***Is the allocation of each of the sites listed in Tables 5.6-5.12 justified?***

3. The HBF does not wish to comment upon the acceptability or otherwise of individual sites. It is, however, important that all allocations conform with the delivery requirements set out within footnote 11 of NPPF paragraph 47.

***Are the numbers of dwellings assumed to be built on each site (a) in 2016-2021 and (b) 2021 to 2032 set out in Tables 5.6-5.12 reasonable and justified by the available evidence?***

4. The HBF recommend that this is agreed with the developer of the site wherever possible. The recently published Housing White Paper acknowledges the importance of realistic delivery levels and recommends a new Housing Delivery Test. Whilst the HBF has not undertaken its own assessment of the sites identified within the SHLAA it is noted that some of the levels of delivery appear ambitious.

### **Issue 3.2: Windfalls**

***Is the inclusion of a windfall allowance of 50 dwellings per year throughout the Plan period justified and consistent with national policy?***

5. The HBF understands that the windfall allowance is based upon average delivery levels from small sites (paragraph 3.7, 2016 SHLAA, exam ref: H003) over the period 2006 to 2016. The 2016 SHLAA refers to the source of this information being *Hull City Council's housing completion monitoring*. This information does not currently appear to be included within the examination documents and as such its veracity cannot be examined.
6. The HBF would also anticipate a discount upon the delivery from windfalls for at least the first three years of the plan period. This is to account for the fact that a significant proportion of windfalls which are likely to be completed over the next three years will already benefit from planning permission to be constructed in this period, and therefore there will be an element of double-counting with existing permissions. The SHLAA itself identifies at least a one year lead-in time from gaining permission to commencing on site (table 4.1). Including a discount upon windfalls over the first few years is commonplace amongst many other plans found sound at examination.

***Is the inclusion of a windfall allowance of 250 in the current five year supply justified and consistent with national policy?***

7. No, as discussed above a discount should be provided for at least the first three years.

**Issue 3.3: Five Year Supply**

***In light of your answers to the questions above, what do you consider the current five year supply to be?***

8. The HBF has not undertaken a thorough assessment of the rates of delivery identified within the five year supply and as such it is difficult to provide a definitive position. However, given our concerns raised above it is considered likely that the actual five year supply is lower than stated.
9. It is also noted that no discount has been applied for the non-implementation of permissions. This is considered a flawed approach. Many permissions will not be implemented for a host of reasons, not least changing economic or personal circumstances and some permissions being sought for reasons of valuation only. A common approach throughout many local plans is either to set a non-implementation allowance based upon previous rates or to adopt a 10% requirement. The HBF consider that the Council should re-consider its position upon this issue.

10. The recently published December 2016 *Authority Monitoring Report* (examination ref: LOC014) identifies a five year supply of 4.34 years (table 4.5). This is inclusive of the issues raised above and also includes the under-supply (row f) after the buffer as discussed in our matter 2 statement this is considered a flawed approach. Given our matter 2 statement and utilising the Council's information upon supply the HBF consider that the Council has a slightly lower supply of approximately 4.3 years. This is, however, not taking account of the issues raised above. It is, however, clear that the Council cannot demonstrate a five year housing land supply.

11. The HBF also suggest that given the HMA is a cross-boundary figure the five year supply should be calculated on a similar basis. This is particularly important given that Hull is tasked with delivering an element of need from neighbouring East Riding of Yorkshire.

***Does the plan identify sufficient land and opportunities for housing development, and contain appropriate policies and mechanisms, such that a five year supply of housing land is likely to be available throughout the plan period?***

12. No, the HBF consider that a greater buffer of sites should be provided to ensure that the housing requirement is met, as a minimum, and to provide choice and flexibility within the supply and deal with changing circumstances, all key NPPF considerations.

13. Table 4.1 of the Local Plan incorporating the proposed changes (exam ref: HLP008) identifies a total supply of 12,472 dwellings over the plan period. It is noted this varies from the 12,714 identified at paragraph 3.12 of the SHLAA. Once projected demolitions are removed (Table 4.1, H003) the net supply reduces to 10,908 dwellings. This provides a buffer of 988 dwellings or approximately 10%. Whilst the provision of a buffer is supported and consistent with the NPPF a larger buffer is considered appropriate in the case of Hull. This conclusion is based upon previous under-delivery, the lack of a non-implementation allowance and a reliance upon windfalls.

14. The HBF recommends a buffer closer to 20% be considered. This is consistent with the recommendations of LPEG to Government.

### **Issue 3.4: Housing Trajectory**

***In order to be justified and effective, should the Plan contain a housing trajectory to illustrate the housing requirement and expected rate of housing delivery during the next five years and over the plan period as suggested by the Council in its response to one of the Inspector's Preliminary Questions [HLP007-R Q12(b)]?***

15. Yes.

### **Issue 3.5: Housing on Brownfield Land**

***Is the target set out in policy 4(6) for a least 60% of new housing to be built on brownfield sites realistic but aspirational?***

16. The HBF would anticipate that a significant proportion of sites within Hull are brownfield due to the nature of the city. It is, however, recommended that the 60% target be indicative only. This is important due to the potential viability implications inherent upon some of the sites, as demonstrated by the Council's economic viability assessment (exam ref: ID002).

***Is it clear how policy 4(6) is intended to be applied by decision makers such that it will be effective?***

17. No, the HBF recommends that a flexible approach be taken towards meeting the target and that it should be indicative based upon the evidence before the examination. It would be inappropriate to refuse otherwise sustainable sites simply because the Council is not achieving its target in any one or number of years. Such an approach would undermine meeting the housing requirement set by the plan.

### **Issue 3.6: Potential Main Modifications**

***What specific changes, if any, are needed to ensure that the plan will be effective in meeting housing requirements by identifying an adequate supply of "deliverable" and "developable" sites and containing sound policies to ensure that sufficient dwellings will be delivered in a timely manner over the plan period?***

18. The HBF recommend a greater buffer of allocations be provided to ensure there is sufficient choice and flexibility within the plan. Additional allocations, over and above those already identified, could be released based upon triggers such as the lack of a five year supply or a 10% deviation below the housing trajectory.

Yours sincerely,

*MJ Good*

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