

Date: 28th February 2017
Consultee ID: 757334
Matter 4

HULL LOCAL PLAN EXAMINATION

Matter 4: Is policy 5 likely to be effective in ensuring that identified needs for affordable housing are met in the housing market area to an extent that is justified and consistent with national policy?

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 4 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 7th September 2016 and the Hull Local Plan Proposed Changes consultation, dated 31st January 2017. The HBF has also expressed a desire to attend the examination hearing sessions.

Issue 4.1: Affordable Housing Needs

Is the Plan based on appropriate evidence about the need for affordable housing in the City over the plan period?

3. The HBF does not dispute the need for affordable housing across the city, the Council identifies a net requirement for 2,256 affordable units over the plan period (exam ref: HLP005-R).

Does the Plan clearly identify the level of need for affordable housing, and is that level justified by the evidence?

4. The HBF has no further comments.

Issue 4.2: Affordable Housing Provision

Is the identification of five different housing market value zones in the City justified by the evidence, and do these zones represent an appropriate basis for establishing differential affordable housing requirements?

5. The HBF has no objection to this.

Is the requirement for 15% of homes on sites of 11 or more dwellings in housing market value zone 5 (very high) justified?

6. I refer the Inspector to our response to the Publication version of the Local Plan (paragraphs 48 to 51). The HBF retains its concerns in relation to these issues.

Is the requirement for 10% of homes on sites of 15 or more dwellings in housing market value zone 3 (medium) and zone 4 (high) to be affordable housing or starter homes justified?

7. I refer to our response above.

Is the approach to the provision of affordable housing in housing market value zone 1 (city centre) and zone 2 (low) clear such that it would be effective, and is it justified?

8. The HBF does not have a specific issue with the wording. However, as previously noted within our comments upon the Publication version of the plan (paragraph 49), a 10% contribution when applied cumulatively with other contributions is unlikely to be viable. Given that the plan is seeking to promote regeneration of the city this is considered counter-intuitive and may hinder such regeneration. It is therefore considered a more realistic target be provided which is viable in the majority of cases.
9. Furthermore the flexibility provided to zones 1 and 2 should be applied across all zones. Whilst other zones may, in general, be more viable the policy should allow flexibility across to take account of site specific issues. This is particularly relevant given that the 2016 LPCVA does not take abnormal costs into account (paragraph 7.10).

Issue 4.3: Starter Homes

Is it appropriate for policy 5(2) to refer to starter homes as contributing to meeting the identified need for affordable housing?

10. Yes, the Government's recently published housing white paper, paragraphs A.119 and A.120 are clear that the Government intends to amend the definition of affordable housing contained within the NPPF to include starter homes.

Issue 4.4: Potential Main Modifications

What specific changes are needed to the Plan to ensure that the Plan is sound with respect to affordable housing?

11. I refer to the points provided above.

Yours sincerely,

MJ Good

Matthew Good

Planning Manager – Local Plans

Email: matthew.good@hbf.co.uk

Tel: 07972774229