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Dear Carole Crookes,

STOCKTON-ON-TEES LOCAL PLAN: POLICY H4(8) MEETING HOUSING NEEDS NOTE

Thank you for consulting with the Home Builders Federation on the Stockton-on-Tees Local Plan.

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.

Following on from the concerns raised at the Examination into the Stockton Local Plan and your email of the 17th July 2018, the HBF welcomes the opportunity to comment on the Council's revised evidence Note in respect of Policy H4(8) and the requirement for enhanced M4(2) Category 2 and M4(3) Category 3 dwellings.

Policy H4(8) – Meeting Housing Needs

Paragraph 8 introduces new housing standards including that 60% of homes to meet building regulation M4(2) 'accessible and adaptable dwellings' with a proposed modification adding 8% of market homes to meet M4(3(2a)) and 7% of affordable homes to meet M4(3(2b)). The Policy H4 Housing Need note suggests potential amendments to this policy changing this proportion to 56% M4(2) and 8% of housing to meet M4(3) requirements.

The HBF would draw the attention of the Inspector to our previous responses to this policy requirement as many of our concerns remain. The Housing Standards Review made it very clear that the enhanced standards were a 'need to have' rather than a 'nice to have' with appropriate safeguards put in place. 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.

Whilst there have been improvements in the information provided, the HBF have concerns that there are areas where significant jumps and assumptions are made in relation to the data projected forward.

The HBF have significant concerns that the evidence still does not provide all the information required by the PPG, for example in relation to the size, location, type and quality of dwellings needed. There is no supporting evidence identifying the required size or house types for these properties it is not clear whether there is a need for properties with one bedroom or multiple bedrooms or for properties of 1 storey or 2 or 3 or for families, couples or single people. Without identifying the specific needs, the industry and the Council cannot be sure what will be delivered will be acceptable to meet the needs of those residents in 'need'. The policy cannot therefore be considered to be justified or effective.

There is also no evidence provided as to whether all of the sites contained within the plan are appropriate for this type of accommodation. The policy, as currently written, applies equally to homes near the core town centres or local centres as to those on the edge of the settlement or a village. This blanket requirement does not take account of the needs or requirements of these various groups or the desirability for older and disabled persons to be situated closer to services and facilities. It would not be beneficial to have an accessible home if once the resident leaves the front door, they are unable to easily access nearby services.

There is also limited information in relation to the accessibility and adaptability of the existing stock, this is based on assumptions based on the general housing mix in the housing market area. However, the data contained within the note contradicts the evidence collated within the Household Surveys as part of the SHMA (2016, Part 2, para 5.24), which suggests that only 13% of people did not consider their current home suitable for adaptations. This is primary information and should be given weight in any consideration of the existing stock. It is these sorts of assumptions that contradict locally gathered evidence that form the basis for the policy, which does question the reliability of the evidence and the policy.

Based on these assumptions the note suggests a minimum need for adapted housing of 5,766 dwellings this would equate to 57% of the housing requirement. This is significantly above the 18% of the housing requirement which would be required if the 13% from the Household Survey is utilised. Whilst paragraph 4.25 highlights that this would represent the combined need for both M4(2) and M4(3) housing, therefore, suggesting that the need would be lower for just the M4(2) requirement. The evidence also does not consider those who would prefer to live in specialist accommodation rather than market housing, again, potentially suggesting that the figure should be lower in relation to individual sites. This is also highlighted within the note at paragraph 5.8 which states that targets for specialist housing could reduce the proportion of general needs housing that would need to meet the M4(3) requirements, and it would be assumed by the same logic the M4(2) requirements.

The note has also given no consideration to the proportion of these people that would live within market housing or affordable homes which could impact on the potential viability of the development. Therefore, the HBF continue to have concerns that there is not sufficient evidence to support this policy, and there is not the evidence to support the proportions proposed.

And as has been pointed out throughout our representations, the viability evidence continues to show the issues with viability of development within Stockton-on-Tees and the cumulative impact of policy requirements such as this can only make that situation worse.

The HBF would also continue to highlight that the NPPG is clear that 'local Plan policies should also take into account site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings, particularly where step free access cannot be achieved or is not viable. Where step-free access is not viable, neither of the Optional Requirements in Part M should be applied' (ID: 56-008). This does not seem to have been taken into account within this policy.

The HBF do not consider that the need for enhanced standards has been demonstrated. In particular there has been inadequate consideration of the existing stock in Stockton, the locational needs or the viability implications. It is recommended that if the Council wish to increase the amount of specialist housing within the borough, then they should consider allocating additional land specifically for this form of development so as to attract specialist developers to the area. If a proportional policy were to be retained it is considered that a significantly reduced figure should be used, to reflect the inadequacies in the evidence and uncertainties around the potential contribution of the existing stock and alternate housing solutions, and the types of housing required.

The HBF appreciate the opportunity to comment on this additional information.

Yours sincerely,



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