

Economic Strategy and Spatial Planning  
Stockton on Tees Borough Council  
Municipal Buildings  
Church Road  
Stockton on Tees  
TS18 1LD

SENT BY EMAIL  
spatialplans@stockton.gov.uk  
08/11/2018

Dear Sir / Madam,

## **STOCKTON ON TEES LOCAL PLAN: MAIN MODIFICATIONS CONSULTATION**

Thank you for consulting with the Home Builders Federation (HBF) on the Stockton on Tees Local Plan Main Modifications consultation

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.

The HBF are pleased to see that the Council are now close to the completion of their Local Plan and we would like to submit the following representations in response to the Council's proposed main modifications.

### **MM05: SD3**

The HBF are generally supportive of the proposed amendments to Policy SD3, the HBF consider that the changes generally provide clarity on the first steps the Council will take to respond to shortfalls in housing delivery. However, the HBF considers the policy could go further and have suggested some additional wording below:

*'The housing requirement of the Borough will be met through the provision of sufficient deliverable sites to ensure the maintenance of a rolling five year supply of deliverable housing land. **Should it become apparent that a five year supply of deliverable housing land cannot be identified at any point within the plan period, or delivery is consistently falling below the housing requirement, the Council will work with landowners, the development industry and relevant stakeholders and take appropriate action in seeking to address any shortfall. This could include supporting the development of sustainable housing sites that would make a positive contribution to the five-year supply of housing land.***

**are well related to the settlement and are consistent with other relevant policies in the Local Plan.'**

**MM24: H4**

Whilst the HBF support the reduction in the requirement for new homes to meet the M4(2) standard, the HBF still consider that the proposed proportion is still too high and could impact on the deliverability of homes.

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, including the required evidence set out in the PPG. Whilst there have been improvements in the information provided, the HBF continue to have concerns about the assumptions made and the lack of evidence in relation to elements required by the PPG, for example in relation to the size, location, type and quality of dwellings needed. The HBF also continues to have significant concerns in relation to the viability of these requirements and the cumulative impact of this and other policies on the delivery of homes in the area.

The HBF continue to object to the policy requirements in relation to M4(3) homes and continue to consider that the policy is not particularly clearly written in relation to the requirements for M4(3)(2b) homes.

The HBF support the proposed text in paragraph 5.44 which provide an appropriate level of clarity in relation to the Optional Standards.

**MM47: ENV1**

Whilst the HBF still do not consider that the reduction in CO2 emissions or energy requirements are appropriate, the HBF considers that the proposed policy wording is an improvement.

**Future Engagement**

I trust that the Council and the Inspector will find these comments useful as they continue to progress the 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.

The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,



**Joanne Harding**

**Local Plans Manager – North**

Email: [joanne.harding@hbf.co.uk](mailto:joanne.harding@hbf.co.uk)

Phone: 07972 774 229