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Dear Sir / Madam,

HARTLEPOOL RESIDENTIAL DESIGN SPD

Thank you for consulting with the Home Builders Federation on the Hartlepool Residential Design Supplementary Planning Document (SPD).

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. We would like to submit the following representations.

Format and Clarity

Firstly, there are issues of clarity within the SPD, it is not always clear what is being required of development. The document would be greatly improved if it was clear what was a requirement and what is guidance, and further information was provided to justify the requirements.

Nationally Described Space Standard (NDSS)

Paragraph 4.13 states that *'the Council will therefore require new housing developments to have regard to these standards when designing schemes and house types'*. Details from the nationally described space standard (NDSS) are then reiterated within the blue box titled 'How to provide adequate internal space' and Table 1.

The Council will be aware that these enhanced standards, as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and they retain development viability. As such they were introduced on a 'need to have' rather than a 'nice to have' basis. The PPG provides clear guidance in relation to these standards.

PPG (ID 56-018) states that where a local planning authority wishes to require an internal space standard, they should only do so by reference in their Local Plan to the nationally described space standard (NDSS). This SPD is not a Local Plan and it is therefore not considered lawful to introduce an internal space standard through this document.

PPG (ID 12-028) also states that SPDs *‘should build upon and provide more detailed advice or guidance on the policies in the Local Plan. They should not add unnecessarily to the financial burdens on development’*. Again, it is therefore not considered appropriate for the NDSS to be a requirement of the SPD.

PPG (ID 56-020) identifies the type of evidence required to introduce a policy for internal space standards. It states that *‘where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:*

- ***Need*** – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.
- ***Viability*** – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.
- ***Timing*** – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions’.

Therefore, even if the Council were to be looking to prepare a Local Plan policy to introduce this requirement, they would need robust justifiable evidence to introduce this standard, based on the criteria set out above. The HBF consider that if the Government had just expected all properties to be built to NDSS that they would have made these standards mandatory not optional.

In conclusion, the HBF strongly object to the inclusion of the NDSS as a requirement within this SPD and recommend that any reference to an internal space standard is removed.

Adaptable Homes

Paragraph 4.57 provides guidance on providing an adaptable home. The HBF have concerns that many of the proposals identified within the blue box titled ‘How to create an adaptable homes’ are elements that are contained within the Building Regulations requirements for an M4(3) home.

PPG (ID:56-008) states that *‘where a local planning authority adopts a policy to provide enhanced accessibility or adaptability they should do so only by reference to Requirement M4(2) and / or M4(3) of the options requirements in the Building Regulations and should not impose any additional information requirements or seek*

to determine compliance with these requirements, which is the role of the Building Control Body'.

Again, PPG also identifies the evidence that is required to introduce a policy in relation to higher accessibility, adaptability and wheelchair housing standards, 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.

The HBF does not consider that the Council has the necessary evidence to support this requirement, and the HBF consider that local needs can be met without the introduction of the optional housing standards. Whilst the HBF support the provision of accessible and adaptable homes and would not object to the Council supporting their provision. The HBF do strongly object to the SPD as currently written with the inclusion of the Adaptable Homes requirements within this SPD and recommend that any reference to adaptable homes is removed.

Viability

It is considered that the Council should take into consideration any implications the requirements of this SPD may have on the viability of a development. Paragraph 34 of the NPPF (2018) established the importance of viability to ensure that development identified in the Plan should not be subject to such scale of obligations and policy burden that their ability to be delivered might be threatened.

Future Engagement

I trust that the Council will find these comments useful as it continues to progress this SPD. 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 the progress of this document. Please use the contact details provided below for future correspondence.

Yours sincerely,



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