

M9. Meeting Specific Housing Needs

The overall housing requirement was considered under matter 2, and the overall land supply was considered under matter 8. This matter is concerned with whether the Plan would be effective in helping to ensure that the housing needs of different groups in the community can be met.

a) Type and mix of housing

Is policy 19 justified and consistent with national policy, and will it be effective in helping to secure an appropriate mix of dwellings types and sizes?

The HBF do not wish to comment on this question, at this time.

b) Affordable housing

Are the affordable housing contributions set out in policy 15 Table 8 for sites of over 10 dwellings in the different value areas shown on map F justified? Would the policy be effective in helping to meet the need for an additional 836 affordable homes per year between 2016 and 2035 referred to in paragraph 5.98 of the Plan?

Is the requirement in policy 15 that affordable housing should be provided with a tenure mix of 70% affordable rented housing and 30% intermediate products consistent with national policy or otherwise justified including in terms of meeting local housing needs and viability?

Would policy 15 be effective in ensuring that at least 10% of homes on major sites are available for affordable home ownership as referred to in NPPF paragraph 64?

Are the requirements in policy 15 relating to the off-site provision of affordable housing consistent with national policy or otherwise justified?

The HBF have concerns that the affordable housing contributions set in policy 15 are not justified. As set out in our previous responses and our Matter 1 Statement, the HBF is concerned with the viability of the affordable housing requirements, and the cumulative impact of this and other policies within the Plan. The HBF is also concerned about a number of the assumptions that have been made within the Viability Assessment. As a result of these concerns in relation to viability, the HBF consider that the policy requirement should either be reduced to viable levels or should be amended to include greater flexibility and allow for the policy requirements to be reduced where viability and deliverability would be an issue. Given the changes to the NPPF, particularly paragraph 57, the HBF consider it is necessary to ensure that policies are viable at the Local Plan stage, otherwise it will not be possible to assume that planning applications in line with the Plan are viable.

Given the housing requirement of 1,308dpa, it seems unlikely that the affordable housing policy will provide the 836 affordable homes required each year between 2016 and 2035. Therefore, it is likely that alternative sources of provision will be required. It is also considered that increasing the housing requirement would help to increase the provision of affordable homes and that further consideration should be given to an uplift.

It is not clear how paragraph 64 of the NPPF which states that '*planning policies and decisions should expect at least 10% of the homes to be available for affordable home*

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ownership' has been taken into account in the preparation of Policy 15. It is not evident how Policy 15 would ensure 10% of dwellings are provided for affordable home ownership.

c) Housing for older people and specialist housing

The Council's response to PQ9 (accessible and adaptable housing) is relevant to this issue.

Is the requirement in policy 15 for a minimum of 10% of private or intermediate housing on sites of over 10 dwellings to be of a design and type that would increase the housing options of older people justified and consistent with national policy? Would the policy be effective in meeting identified needs for accessible and adaptable housing? If not, would the Council's proposed main modification make policy 15 sound?

Are the requirements in policy 15 relating to the provision of specialist housing for older people, vulnerable adults and people with disabilities justified and consistent with national policy?

The HBF is supportive of the provision of housing for older people. It is, however, important that this compliments rather than burdens the mainstream market supply. Paragraph 61 of the NPPF considers that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies including those for older people. Therefore, if there is sufficient evidence to support a policy in relation to older people this could be included. However, it is not clear how the need for 10% of homes to be provided as either level access flats, level access bungalows and multi-generational family housing products has been identified. The HBF would recommend that the policy is amended to create a supportive framework for housing for older people rather than placing a burden on all housing sites.

The Council's response to PQ9 proposes to include a new requirement for 66% of dwellings on sites of 5 or more units to be built to M4(2) standards. This is a significant increase on the policy included within the Submission document which sought 10% of housing on sites of 10 or more to provide homes to increase the options for older people and that these homes need to be built to the M4(2) standards. The HBF do consider that the Council's proposed policy is sound.

The HBF do not consider that the Council has appropriate evidence to support either the requirement for homes to be provided to the M4(2) standard. PPG (ID:56-002) is clear that *'local planning authorities will need to gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in their Local Plans'*. The HBF do not consider that Durham Council have gathered an appropriate evidence base or justified the setting of this policy. The SHMA information seems to be mainly based around the need for specialist housing. The HBF also have significant concerns that the introduction of the accessibility standards could have an impact on the deliverability of new homes, particularly when considered as part of the cumulative viability impacts of policy, and would therefore be contrary to the Government's objective of significantly boosting the supply of homes, as set out in the NPPF.

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.

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HBF do not agree with the Council that the provided evidence suggests that new housing developments of 5 or more should provide 66% of all new homes to meet the Building Regulation M4(2) accessible and adaptable homes.

It must be remembered that all new homes will be built to part M4(1). According to Part M of the Building Regulations meeting M4(1) will ensure reasonable provision for most people, including wheelchair users, to approach and enter the dwelling and to access habitable rooms and sanitary facilities on the entrance storey. As such these standards are likely to be suitable for the majority of people.

It is assumed that the SHMA 2019 provides the evidence base for this policy, within figure 59 it sets out the minimum and maximum need for adapted housing at 20,014 to 43,716 households between 2016 and 2035. However, the SHMA does note that even the lower end of this range is 80% of the planned housing requirement for County Durham.

Likely Future Need

Whilst the HBF does not dispute the ageing population within County Durham as set out in the SHMA, it is not clear how this ageing population and potential future need reflects in the need for 66% of all new homes (sites of 5 or more) to be provided at M4(2) standards. The SHMA identifies the population aged 65 or over is expected to increase by 40,800 persons between 2016 and 2035. If it had been the Government's intention that generic statements identifying an ageing population justified adoption of the accessible & adaptable homes standards, then the logical solution would have been to incorporate the M4(2) as mandatory via the Building Regulations which the Government has not done. The optional higher M4(2) standard should only be introduced on a "need to have" rather than a "nice to have" basis. The evidence does not demonstrate this need.

Size, location, type and quality of dwellings needed

There is very limited information in relation to the size, location, type and quality of dwellings needed. The HBF may have expected to see information in relation to the how the need is consistent across the Borough rather than in particular locations, the need for all types and sizes of homes to be accessible for example is it appropriate to identify an ageing population and then suggest that family homes need to be accessible. It therefore may be appropriate to include information in relation to the sizes or types of homes that were of particular need for example will it be single people and older couples or will it be family homes with facilities for older or disabled members.

The accessibility and adaptability of existing housing stock

The SHMA sets out some information from the English Housing Survey in relation to the potential for adaptation, which suggests that around half of homes have the potential to be adapted without major works. There is very limited data in relation to the actual stock within County Durham.

The impact on viability

Whilst the report tries to downplay the viability issues by highlighting that the additional costs in relation to the M4(2) requirements are small, and that the M4(2) standard has a marginal negative impact on scheme viability, it is evident that where sites already have viability

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issues any addition to the cost will be detrimental to the delivery of the scheme. There are clearly viability issues within the area, and rather than seeking to address these concerns the Council are continuing to add to the viability burden. It is clear that the Council's own evidence is not supportive of this policy, and that it indicates it could lead to the non-delivery of homes.

The HBF do not consider that this policy should be taken forward. However, if the policy is to be retained the HBF consider that there should be flexibility within Policy 15 to address site specific circumstances which may make it difficult to achieve M4(2) standards. PPG (ID: 56-008) states 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*'. Therefore, the HBF considers that these elements should be included within the policy.

Again, if the policy is to be included within the Plan the HBF would also recommend that the Council include an appropriate transitional period. This will help to ensure that developers have time to amend housing designs to the housing standards and for the additional costs to be taken into account when obtaining the site and determining the layout and designs. As far as possible, the HBF consider that Policy 15 should not apply to sites that have already been contracted or purchased as this could impact on their deliverability.

d) Children's homes

Is policy 18, which only permits the development of children's care homes if certain criteria are met, justified and consistent with national policy?

The HBF do not wish to comment on this question, at this time.

e) Rural housing

Are policies 10, 11 and 12 consistent with national policy relating to rural housing including through development of existing buildings (policy 10 parts h to k); rural exception sites (policy 11 parts a to d); and rural workers' dwellings (policy 12)?

The HBF do not wish to comment on this question, at this time.

f) Travellers

Is policy 17, which permits the development of new traveller sites, extensions to existing sites and temporary stop-over areas provided that certain criteria are met, justified and consistent with national policy? Would it be effective in ensuring that identified needs for gypsy, traveller and travelling showpeople accommodation can be met?

The HBF do not wish to comment on this question, at this time.