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Sent by Email only

22/09/2016

Dear Sir / Madam,

Darlington Local Plan 2016 – 2036: Sustainability Appraisal Scoping Report

Thank you for consulting with the Home Builders Federation (HBF) on the Darlington Local Plan Sustainability Appraisal (SA) Scoping Report.

The HBF is the principle representative body of the housebuilding industry in England and Wales and our representations reflect the views of our membership of multinational PLCs, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year including a large proportion of the new affordable housing stock.

We wish to make the following brief comments to the questions posed within the consultation document.

Are there any other plans, policies or programmes that you think should inform the Sustainability Appraisal of the Darlington Local Plan?

The list of regional documents includes the Yorkshire and Humber RSS, presumably as Darlington Borough area abuts the Yorkshire and Humber region. Given that this document has been revoked the HBF would not recommend that only minimal weight is given to this plan.

The sub-regional documents do not include the Tees Valley Unlimited Strategic Economic Plan (2014). It is considered that this plan should be provided due consideration.

Have we identified all of the relevant issues? If no, what other issues should be included and what are the objectives needed to tackle them?

The HBF consider the identified issues to be broadly reflective of those experienced within Darlington. We are particularly supportive of the identification of;

- Shortfall in overall housing compared with needs, and
- Shortfall in affordable housing provision, especially in rural areas.

As issues which need to be tackled through the plan.

Do the objectives adequately address the issues identified? Is the decision making criteria appropriate?

The SA objectives are generally considered appropriate, the HBF particularly welcome the inclusion of objective 1;

“Provide a mixture of affordable, well designed and sustainably located new housing, and improve the standard of existing housing, especially to provide for young people, families and older people.”

In terms of the decision making criteria there is no reference to meeting the full needs for both market and affordable housing. The current criteria relates solely to affordable housing. It is therefore recommended that the decision making criteria be amended as follows (**in bold**);

*“Will it deliver **market and** affordable homes to meet identified Borough needs **in full?**”*

Within objective 10 the Council may wish to consider the economic benefits of housebuilding. The March 2015 HBF document ‘*The Economic Footprint of UK Housebuilding*’ provides a good analysis of the economic impacts of the industry. This main report is also supplemented by regional reports which can be accessed at www.hbf.co.uk.

Objective 11 refers to health. The decision making criteria make no reference to the health benefits associated with good quality housing. Indeed modern planning originated in reaction to the unsanitary, overcrowded and inhumane conditions of nineteenth century industrial cities and sought to improve environmental conditions including housing. More recently there is a substantial body of evidence indicating that the provision of good quality housing has a wide variety of health benefits. The Council may wish to consider the following reports (although there are many others);

- Chartered Institute of Environmental Health (2008): Good Housing Leads to Good Health (2008);
- TCPA (2012): Reuniting health with planning: healthier homes, healthier communities; and
- House of Commons Communities and Local Government Committee (2013): The role of Local Authorities in health issues.

Darlington Council recently gained Healthy New Towns status for the eastern growth zone in the town. This should be referred too and considered in the context of housing and health.

Information

I trust that the Council will find the above comments useful as it continues to develop its SA Framework and Local Plan. I would be happy to discuss any of the comments made within this response in greater detail if necessary.

The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents.

Yours sincerely,

MJ Good

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