

Planning Policy,
Planning Services,
Middlesbrough Council,
PO Box 504,
1st Floor - Civic Centre,
Middlesbrough,
TS1 9FY.
Email: planningpolicy@middlesbrough.gov.uk

20/01/2017

Dear Sir / Madam,

Middlesbrough Local Plan Review: Issues Paper

1. Thank you for consulting with the Home Builders Federation (HBF) on the Middlesbrough Local Plan Review: Issues Paper.
2. The HBF is the principal representative body of the house building 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.
3. The HBF is supportive of the Council in undertaking a review of its Local Plan. We are keen to work with the Council to ensure a sound plan is produced which facilitates an increase in the rate of house building across the plan area. Within this regard we would also welcome further engagement with the industry throughout the production of the plan.
4. We would like to submit the following brief comments and responses to selected questions posed within the consultation document. The HBF will provide more detailed comments at later stages of plan production. Our primary concern is the delivery of housing and as such our responses focus upon this issue.

S1: How to Deliver Growth

Is growth the right strategy for Middlesbrough? If so what should it look like?

5. Yes, the HBF considers that growth is the right strategy for Middlesbrough.

6. The level of housing growth should as a minimum meet the objectively assessed housing needs (OAN) of the area. The Local Plan provides an opportunity to provide a supportive framework enabling substantial levels of growth across Middlesbrough and the wider Tees Valley. It is considered important that Middlesbrough seeks to play an important role within the Northern Powerhouse and delivers the economic ambitions set out within the Tees Valley Strategic Economic Plan (TVSEP). Failure to positively plan to meet the TVSEP ambitions will inevitably mean that the area continues to lag behind national levels of growth and prosperity.

S2: Should development be focused on greenfield locations / S4: Brownfield v greenfield

Should we be looking to deliver the majority of our development needs on greenfield sites? Should development be focused on brownfield sites?

7. The HBF does not wish to comment upon the exact mix of development sites required within the plan. It is, however, considered that a mixed portfolio of greenfield and brownfield sites of differing sizes across the plan area is most likely to ensure that the housing needs of the area are met in full.
8. In terms of housing sites it is important that whichever sites are included in the Council's housing trajectory they should conform with the deliverability criteria set out in Footnote 11 of the NPPF (para 47). In this regard the Council will need to give careful consideration to the extent of policy burdens it places upon new housing development. The cumulative impact of any policy requirements and burdens should be such that it preserves viability, inclusive of an appropriate buffer to deal with unknown site issues. The HBF and our members would be happy to provide advice to the Council in this regard.

H1: Housing numbers

Is the current housing requirement for Middlesbrough correct or does it need to be amended?

9. Without undertaking a detailed assessment of the OAN for the area it is difficult to comment upon whether the housing requirement should be amended.
10. During the examination of the 2014 Housing Local Plan the HBF supported the Council's ambition to reduce out-migration from the city. We were, however, concerned that the housing requirement set within the Housing Local Plan was at

the lower end of an acceptable range to achieve this goal. In this respect we would be concerned if the housing requirement within the plan were suggested to be any lower than currently identified.

11. It is clear that since the publication of the Housing Local Plan new official population and household projections have been released. At the time of writing the most up to date projections are the 2014 based population and household projections. In conformity with the National Planning Practice Guidance (PPG) (ID 2a-015 and 2a-016) these should be taken as the starting point for determining an OAN and housing requirement. To ensure that the Local Plan is found sound at examination the updated projections should therefore be taken into account.

12. Whilst the most recent population and household projections are a starting point other factors such as past rates of delivery, suppression of household formation, market signals, affordable housing need, economic signals and demolition programmes should also be taken into account prior to determining an OAN.

Should the figure be higher to support economic growth if so by how much?

13. In converting an OAN into a housing requirement the HBF consider that the ambitions of the TVSEP and its implications for Middlesbrough should be considered. The inclusion of enhanced rates of job creation as identified in the TVSEP will not only support the Mayor's Vision of strengthening and diversifying the economy but will also compliment national ambitions for a Northern Powerhouse. The plan will need to match the housing requirement with the economic strategy accordingly. The HBF has not undertaken any modelling of the housing requirement it is therefore difficult to confirm the exact amount of additional housing required to match the economic growth envisaged by the TVSEP.

What impacts will housing growth have on infrastructure needs?

14. Housing delivery and growth has a positive impact upon infrastructure through the provision of new roads, schools, affordable housing, open spaces, etc. The HBF report '*The Economic Footprint of Housebuilding*' identifies the wide range of economic and social benefits which flow from new housebuilding. It is important that these infrastructure benefits are recognised within the plan.

H2: Affordable housing

How should the Local Plan deliver affordable housing? Should this be located on site within developments or off site to assist the delivery of regeneration?

15. The plan should seek to deliver affordable housing in a variety of ways, both through funding mechanisms, where available, and as part of market led schemes, where viable.
16. The Council will recall that the HBF was broadly supportive of its position in relation to affordable housing during the examination of the Housing Local Plan, including the intent to deliver a proportion of the requirement off-site. It is, however, considered important that the evidence base underpinning the affordable housing need and delivery be updated. This will need to include an updated economic viability assessment of the cumulative impact of all plan policies and requirements. The HBF and our members would be happy to provide input into the viability assessment.

How much and what type of affordable housing should we be delivering?

17. The previous evidence base supporting the Housing Local Plan identified a need for 189 additional affordable dwellings per annum. Whilst this evidence will need updating it is important that the Council seek to meet this need where possible. The need and delivery must, however, be balanced against the impact upon site viability.
18. Given the previous level of need and viability evidence it is unlikely that the Council will be able to deliver its full affordable housing needs based upon the current housing requirement. In such circumstances the PPG advises that an increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes (ID 2a-029).
19. The type of affordable housing delivered will largely be determined by the SHMA. It is, however, important that flexibility is retained within any policy to ensure that local site characteristics, viability and need are taken into account. The policy must also take account of any requirement for Starter Homes.

H6: An ageing population

Should we be enabling older people to stay in their own homes, which potentially puts extra pressure on existing housing? Or should we be looking to meet the needs of older people through the provision of bungalows, retirement villages and extra care facilities? If so where should this provision be located?

20. The HBF supports the provision of new housing for older people. It should, however, be noted that a range of responses will be required to meet the diverse needs of this group. The HBF would support the allocation of specific sites to assist in meeting these needs. Ideally these should be located close to facilities and services.

21. A policy which encourages specific accommodation for older people on other allocations may also be appropriate. We would not support mandatory requirements for a specific percentage of bungalows or similar on sites due to the impact this has upon delivery and viability.

H7: Self and custom build housing

How should self and custom build housing be delivered? Should this be through the allocation of small parcels of land or should it be provided as part of the development of large sites?

22. The Council should determine the level of interest in self and custom build prior to setting any policies upon this issue. The HBF recommends that any policy provides a supportive policy framework rather than placing mandatory requirements upon individual sites or above a site size threshold. This is because the imposition of self and custom build requirement upon sites will inevitably have an impact upon site viability and creates additional difficulties in site delivery. The inclusion of a mandatory policy is particularly problematic in areas with limited or no expressions of interest for self / custom build.

E1: Employment land

What level of economic growth and how much employment land should we plan for?

23. The HBF consider that the plan should seek to deliver the relevant proportion of jobs for Middlesbrough as set out within the TVSEP.

DC1: Duty to Cooperate

What are the duty to cooperate issues that should be considered by the Local Plan?

How should they be addressed?

24. Given the geography of the Tees Valley there are strong housing market relationships between the different authorities. These relationships will need careful consideration. The plan will, therefore, need to consider issues of housing need and delivery not only across the plan area but also whether it is required to assist meeting the needs of neighbouring areas.

25. The delivery of the economic ambitions and consequent housing growth of the TVSEP should also be considered.

Information

26. The HBF would be happy to discuss any of the comments made within this response with the Council prior to the next stage of consultation. I would also be pleased to be kept informed of the progress of the plan and any future opportunities to comment or be involved in the preparation of the plan or other planning documents.

Yours sincerely,

MJ Good

Matthew Good
Planning Manager – Local Plans
Email: matthew.good@hbf.co.uk
Tel: 07972774229