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Dear Sir / Madam,

MIDDLESBROUGH LOCAL PLAN: PREFERRED OPTIONS

Thank you for consulting with the Home Builders Federation on the Middlesbrough Local Plan Preferred Options document.

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.

Strategic Objectives

The HBF is generally supportive of Objective A to achieve a growing population and Objective D to deliver a range of high quality homes that meet local needs and aspirations.

Housing

The HBF note paragraph 5.2 which states that *'in order to support this growing population and for Middlesbrough to deliver its aspirations for economic growth, we need to provide quality places where people want to live, meeting the needs of its indigenous population and those choosing to migrate to live in the town to support inward investment opportunities'*.

LP13 Housing Strategy

The HBF generally supports the need to deliver a wide-ranging mix of house types and sizes to meet the needs of communities and to support economic growth, but would like to ensure that flexibility is maintained within this policy to reflect market demand and aspirations, not just housing need. The HBF consider that the Council

need to be aware that a SHMA will only ever identify current deficits and reflects a snap-shot in time. The HBF would like to ensure flexibility within this policy as it goes forward to acknowledge that the mix can vary both geographically and over the plan period.

Again, the HBF generally supports the provision of homes to provide for an increasingly elderly population. However, if the Council are seeking to introduce parts of the new optional housing standards then the 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. It is incumbent on the Council to provide a local assessment evidencing the specific case for Middlesbrough which justifies the inclusion of optional higher standards for accessible and adaptable homes. Evidence of an ageing population does not in itself justify the requirements of this policy, and without appropriate evidence the HBF would not support the introduction of this policy.

LP14 Housing Requirement

It is noted that the SHMA identifies an OAN of 425dpa, that the existing adopted HLP has a figure of 410dpa and that the CLG proposed standard methodology identifies a figure of 267dpa. The HBF note the recognition in paragraph 5.15 that the CLG figure does not take account of economic aspirations.

The proposed policy looks to deliver a minimum of 7,650 net additional dwellings between 2016 and 2034 (425 net additional dwellings per annum). It also looks to maintain a rolling five-year supply of deliverable housing sites with an additional buffer of 20% to provide a realistic prospect of achieving the planners supply and to ensure choice and competition in the market for land.

The HBF note paragraph 5.22 which aims to deliver additional housing above the housing requirement to further boost the local economy, and that the Council is setting a target to deliver 500 new homes each year for the first 10 years of the plan.

The HBF are generally supportive of utilising a housing figure that reflects the OAN and considers the economic aspirations of the Council and the SEP. The HBF are also supportive of the need to maintain a five-year housing land supply and the provision of additional buffer of sites.

LP15 Housing Allocations

The proposed policy states that it will make an allowance for density efficiencies from existing housing allocations; make an allowance for sites with planning permission; and make an allowance for windfall sites as well as allocating additional land for housing development.

It is not clear at this stage what work has been undertaken to confirm that density efficiencies are feasible. The HBF seek assurances that the Council will work with developers and key stakeholders for these existing allocations to ensure that the efficiencies are appropriate.

It is also not clear at this stage what work has been undertaken to ensure the extant planning permissions are deliverable and developable or that their trajectory for delivery would see them come forward within the plan period. The HBF would normally expect a lapse rate to be applied to the sites that currently have planning permission and have not yet commenced, this lapse rate would allow for changing circumstances which may lead to some sites not being brought forward. The HBF would recommend a thorough assessment of extant consents with input from the housebuilding industry and other key stakeholders and the addition of a lapse rate to the allowances.

The HBF consider that once Middlesbrough have adopted a plan with allocations, it would stand to reason that the level of windfall development will reduce and diminish as a source of supply. Due to the uncertainties over future supply from windfalls, the HBF would recommend that supply from windfalls is removed, and that is used as part of a buffer to boost supply and to ensure choice and flexibility in the supply. It is also recommended that the Council monitor the provision that windfall development is making to the delivery of homes in the Borough to ensure that this supply remains and is continuing to provide additional flexibility and the opportunity to boost housing supply.

LP16 Affordable Housing

The proposed policy is looking to require housebuilders to provide a minimum of 15% affordable homes on development of 11 or more with specific wards.

The policy will need to take account of the proposed changes to the definition of affordable housing proposed within the draft NPPF and to the proposals within paragraph 65 which look for at least 10% of the homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required or prejudice the ability to meet the affordable housing needs.

The HBF supports the need to address the affordable housing requirements of the borough. The NPPF is, however, clear that the derivation of affordable housing policies must not only take account of need but also viability. The Viability Report clearly identifies that there are some viability issues with affordable housing provision for example paragraph 12.8 highlights that brownfield sites are unable to bear affordable housing. It is noted that a viability clause is proposed to be included within this requirement, whilst this is supported it should not be used as a mechanism to justify an unsustainable affordable housing target.

LP25 General Development Principles

The proposed policy states that development will be permitted where it incorporates energy efficiency measures into the fabric of the building to exceed minimum standards.

The HBF consider that any mandatory requirements in relation to energy efficiency would be contrary to the Government's intentions, as set out in Fixing the Foundations and the Housing Standards Review, which specifically identified energy requirements for new housing development to be a matter solely for Building Regulations with no optional standards. The Deregulation Act 2015 was the

legislative tool used to put in place the changes of the Housing Standards Review. This included an amendment to the Planning and Energy Act 2008 to remove the ability of local authorities to require higher than Building Regulations energy efficiency standards for new homes. Transitional arrangements were set out in a Written Ministerial Statement in March 2015. The HBF recommend that the Council ensure that this policy is effective, justified and consistent with national policy.

Future Engagement

I trust that the Council will find these comments useful as it continues to progress its Local Plan. 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 production of the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Joanne Harding', written in a cursive style.

Joanne Harding

Local Plans Manager – North

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