

## **Matter 5: Meeting particular housing needs**

### **Housing mix (policy H4)**

*The Council has proposed modifications to the opening paragraph of policy H4 to encourage, rather than expect, housing developments to provide a mix of housing, and to require consideration of the site's character.*

#### **Q5.1. Is the Council's proposed modification to the opening paragraph of policy H4 necessary to make the Plan sound and, if so, would it be effective in so doing?**

1. The HBF considers that the proposed modification to the opening paragraph of policy H4 is appropriate and adds flexibility to the policy whilst still providing guidance for development. The HBF understands the need for a mix of house types, sizes and tenures and is generally supportive of providing a range and choice of homes to meet the needs of the local area. It is, however, important that any policy is workable and ensures that housing delivery will not be compromised or stalled due to overly prescriptive requirements or the need to provide significant amounts of additional evidence. The HBF would also highlight the need for creating a housing market that will attract investors to Darlington, and to provide an element of aspiration to ensure working people and families are retained within the area.

*The Council has proposed a modification to policy H4 to reduce the requirement for the proportion of new homes that are accessible and adaptable from 80% to 47% to take account of the latest strategic housing market assessment.*

#### **Q5.2. Is the Council's proposed modification to the requirement in policy H4 for accessible and adaptable homes necessary to make the Plan sound? Is the modified requirement (47%) justified by up to date and proportionate evidence including about need and viability having regard to relevant national guidance ?**

2. The proposed modification to Policy H4 looks to reduce the proportion of M4(2) homes to be provided from 80% to 47%, it continues to requirement 9% of market housing to meet M4(3) standards. The HBF considers that the reduction in the requirement for homes to be built to the M4(2) standard is an improvement.
3. The HBF is generally supportive of providing quality living environments for residents both now and in the future. However, if the Council wishes to adopt the higher optional standards for accessible and adaptable homes the Council should only do so by applying the criteria set out in the PPG. It is incumbent on the Council to provide a local assessment evidencing the specific case for Darlington which justifies the inclusion of optional higher standards for accessible and adaptable homes in its Local Plan policy. PPG<sup>1</sup> 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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<sup>1</sup> PPG ID 56-07

Home Builders Federation (HBF) (1164373)  
response to the Darlington Local Plan Examination  
Inspector's Matter, Issues and Questions

4. Section 4 of the SHMA 2020 looks at the needs of different groups, this has superseded the SHMA 2015 although some of the data used is the same. The section in relation to housing for people with disabilities suggests that there is a minimum need for adapted housing between 2016 and 2036 of 4,948 households. The section in relation to housing for Wheelchair Users highlights this 4,948 households and states that this represents at least 56% of the overall housing need for Darlington, it goes on to identify that this number would represent the combined need for both M4(2) and M4(3) dwellings. It suggests that of this 4,948 households that at least 790 wheelchair adapted homes would be required, and this is around 9% of the overall housing need. The viability or achievability of these proportions are not considered within the SHMA.
5. However, no further information is provided in relation to the adaptability and accessibility of the existing stock, or the size, location, type and quality of dwellings needed based on future demand. The HBF may have expected to see information in relation to how the need is consistent across the Borough rather than in particular locations, whether there were any sizes or types of homes that were of particular need for example will it be single people, older couples or will it be family homes with facilities for older or disabled members. It is considered that the policy lacks finesse with no regard to the type or location of the housing being provided.
6. PPG<sup>2</sup> also states that policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. Therefore, there will need to be a clear policy for how the Council will work with developers and housing associations to deliver these homes. This will also need to give consideration to the significant additional costs associated with the provision of M4(3(2b)) dwellings.
7. The NPPF<sup>3</sup> establishes the importance of viability testing to ensure that policies do not undermine the deliverability of the plan. The Council will need to be mindful that it is unrealistic to negotiate every site on a one-by-one basis because the base-line aspiration of a policy or combination of policies is set too high as this will jeopardise future housing delivery. Paragraph 5.7.21 of the Viability Assessment suggests that the additional costs associated with providing the M4(2) and M4(3) standards had no material impact on viability. However, the HBF is concerned that the Viability Assessment shows that low value areas are not viable, and that there are marginal brownfield typologies in the medium and high value areas. The HBF considers that the cumulative impact of the requirement for M4(2) and M4(3) alongside other requirements will still play a part in the viability of development and should be considered as such.
8. The PPG<sup>4</sup> is clear 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*

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<sup>2</sup> PPG ID: 56-009

<sup>3</sup> Paragraph 34 of the NPPF

<sup>4</sup> PPG ID: 56-008

*access is not viable, neither of the Optional Requirements in Part M should be applied'. This does not seem to have been taken into account within this policy.*

9. The HBF does not consider that this policy is required, it is considered that local needs can be met without the introduction of the optional housing standards. However, if the Council wish to pursue this policy the HBF recommends the Council ensure that an appropriate evidence base, including full viability testing, is available to support this policy in line with that set out in the PPG, that each of the requirements for consideration as set out in the PPG are contained within the policy and that appropriate viability and feasibility clauses are provided. The HBF also recommends that a transitional period is included within the policy to allow for homebuilders to adjust to the new requirements.

### **Affordable housing (policies H5 and H6 and appendix E)**

*Paragraph 6.5.2 in the Plan refers to 160 affordable homes being needed each year over the plan period. However, the Council's response to PQ30 proposes a modification to this to reflect the findings of the latest strategic housing market assessment which indicates a need for a total of 4,646 affordable homes in the plan period (which represents 233 per year).*

*The Council's response to PQ30 advises that a total of 1,954 affordable homes are expected to be built during the plan period on sites with planning permission and allocations based on the requirements of policy H5.*

### **Q5.3. Are the affordable housing requirements of policy H5 table 6.5, which sets out three different levels of affordable housing for different parts of the Borough (which are defined on the map in Appendix E), justified by up to date and proportionate evidence relating to need and viability?**

10. Policy H5 requires the provision of affordable housing in residential schemes of 10 or more dwellings, there is a range of requirements from 10% to 30% dependent on ward. The policy goes on to suggest that affordable housing provision should provide 50% affordable rent and 50% as other affordable products. However, the Council are proposing a modification to this policy in relation to the tenure split. Where there is a 10% affordable requirement this would be 100% affordable home ownership, for the 20% areas they will be 50% affordable rent and 50% affordable home ownership and 30% will be 65% affordable rent and 35% affordable home ownership.
11. The Strategic Housing Market Assessment (SHMA) 2020 identifies an overall affordable housing need of 4,646 dwellings over the plan period or 233dpa. The SHMA breaks this down as a planned overall need for 2,175 social rent dwellings for people unable to afford, 1,077 affordable rent dwellings for people unable to afford and 1,394 dwellings for people aspiring to home ownership. Whilst the SHMA does not appear to recommend a tenure split for the affordable homes if it was based on the needs identified in this document it would suggest approximately 70% should be from social or affordable rent and 30% should be for affordable home ownership.
12. Paragraph 6.5.4 of the Local Plan suggests that the tenure split have been derived from the SHMA and Viability Assessment. However, this document was produced prior to the SHMA 2020 and is therefore assumed to be based on earlier iterations of the SHMA.

13. The Housing Topic Paper suggested that the 70:30 proportions have to be considered in the context of local viability and policy consideration. It goes on to highlight that the overall level of affordable housing is unlikely to be met and that the policy took into account different priorities. It is assumed this is in relation to the potential increased viability of alternate forms of affordable tenures, which may help to ensure that more homes are delivered.
14. 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, this is set out in Paragraph 34 which states that such policies should not undermine the deliverability of the plan. The viability assessment<sup>5</sup> clearly concludes that in the low value areas schemes are unviable and are unable to contribute to either S106 or affordable housing provision, and that some of the medium value areas are not viable and the majority of the remainder are marginal. The Council should be mindful that it is unrealistic to negotiate every site on a one-by-one basis because the base-line aspiration of a policy or combination of policies is set too high as this will jeopardise future housing delivery.

*The Council's response to PQ31 proposes a modification to the affordable housing tenure split in policy H5 to take account of national policy and the latest strategic housing market assessment.*

**Q5.4. Is the Council's proposed modification to the affordable housing tenure split in policy H5 necessary to make the Plan sound and, if so, would it be effective in so doing?**

15. The HBF considers that the modifications proposed by the Council in relation to Policy H5 are appropriate and are more in line with the requirements of the NPPF.

*The Council's response to PQ32 advises that whilst "executive housing" is not clearly defined, there is a market for larger homes on larger plots. The Council's justification for exempting such developments from the requirement to provide affordable housing on-site is that the "product" would be too large to allow an affordable solution, registered social landlords would not be interested in taking on such properties, and that relatively high land values would mean better value could often be achieved through an off-site contribution.*

**Q5.5. Is the exemption for executive housing schemes to provide on-site affordable homes consistent with national policy which aims to create mixed and balanced communities, or otherwise justified?**

16. The HBF does not wish to comment in relation to this question, at this time.

*The Council's response to PQ33 proposes a modification to policy H6 to ensure consistency with national policy relating to entry-level exception sites adjacent to settlements .*

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<sup>5</sup> Table 10 page 69

**Q5.6. Is the Council's proposed modification to H6 relating to entry-level exception sites necessary to make the Plan sound and, if so, would it be effective in so doing?**

17. The HBF does not wish to comment in relation to this question, at this time.

**Residential development in the countryside (policy 7)**

*Policy H3 allows for new housing within the development limits of settlements defined on the policies map. Policy H6 allows for rural exception sites and was considered under affordable housing above. Policy H7 deals with other residential development in the countryside (outside development limits).*

*The Council has proposed modifications to policy H7 aimed at ensuring that it is consistent with national policy, justified and effective with regard to residential development in the countryside, including the replacement of existing residential buildings and new dwellings for rural workers.*

**Q5.7. Are the Council's proposed modifications to policy H7 necessary to make the Plan sound and, if so, would they be effective in so doing?**

18. The HBF does not wish to comment in relation to this question, at this time.

**Housing intensification (policy 8)**

*The Council has proposed modifications to policy H8 aimed at ensuring that it is consistent with national policy, justified and effective with regard to backland garden development and supplementary planning documents.*

**Q5.8. Are the Council's proposed modifications to policy H8 necessary to make the Plan sound and, if so, would they be effective in so doing?**

19. The HBF does not wish to comment in relation to this question, at this time.