

**STATEMENT OF RICHARD COWEN TO THE EXAMINATION IN PUBLIC
INTO THE
HARTLEPOOL LOCAL PLAN
RELATING TO MATTER 3**

1. I make this statement on behalf of the Campaign to Protect Rural England Durham Branch (CPRE).
2. We note the Inspector's comments regarding the proposed consultation on the methodology for calculating the OAN. Clearly, without this, we are talking in a vacuum but we believe that this issue is a very important one that has major implications for the countryside in general and greenfield sites in particular.
3. CPRE has consistently argued that local planning authorities are overestimating their OAN and, as outlined in our representations, we believe that Hartlepool is no exception to this. This is leading to a significant loss of greenfield sites which, if our concerns are justified, is unnecessary but which, once lost, cannot be replaced. As we have stated in our representations, this over-provision may amount to as much as 30%.
4. The issue is therefore extremely important to CPRE. However, we do not attempt to make amendments to proposed Policies relevant to this Matter. Rather we are asking whether or not the OAN is too high. If it is found that it is, then this will need to be reflected and certain provisions removed but we do not believe we can make suggestions on this at this stage of the process.

INSPECTOR'S QUESTIONS

3 –Housing Needs

Issue 1 – Is the Council's objectively assessed housing need of 4,305 soundly based (justified, effective and consistent with national policy) and supported by robust and credible evidence? (NPPF paragraph 159)

The Full Objectively Assessed Housing Need (OAN) Methodology

The OAN is presented in the Plan in Policy HSG1 and preceding text (chiefly at Table 6). The key source material is the final Strategic Housing Market Assessment

(SHMA) 2015 (document HLP06/2) and the SHMA Addendum 2016 (document HLP06/1). In response to initial observations of the Inspector the Council has submitted a Topic Paper on 28 July 2017 (document EX/HBC/24) seeking to provide clarification on the methodology used. Statements responding to the questions are encouraged to cross-refer to these key documents where appropriate. Where representors have considered the full OAN in the published plan not to be sound it would be helpful to the Inspector to understand what adjustments are sought and what alternative OAN and housing requirement figures should be contemplated.

Those with an interest in the OAN for housing are probably aware of the 2017 Housing White Paper's proposal for a standard methodology for calculating OAN and the Government's intention to consult on this proposal in 2017. The Inspector will invite separate written comment from interested parties on the proposed standard OAN methodology when the consultation material is published.

The Housing Market Area

Q1 Is the evidence that Hartlepool Borough is its own housing market area (albeit within a wider functional economic area) robust?

While CPRE does not have the expertise to say what is and what is not a "Housing Market Area", we are concerned about the scale of increased housing development in this area generally. Clearly, as far as Stockton Council is concerned, there is a lot of collaboration in relation to Wynyard, which is situated in both Council areas.

It is noted that Hartlepool Council recognises that about 8% of its workforce lives in County Durham. Durham County Council, in its now withdrawn Plan, set an housing need figure with a view to include a number of residents who would commute to Teesside and Tyneside for work. At present, the "refreshed" County Durham Plan is paused and we do not know how that Council will approach the OAN when the proposals are in fact published. However, we are aware of considerable pressure from developers to build more houses in Sedgefield, some 4 miles to the east of Wynyard. Sedgefield is a small town where there is insufficient employment to support this increase.

While the outcome of some of these applications is not yet determined, there has been considerable concern that an appeal for some 350 houses at Sedgefield has been allowed recently.

As a result, we are not specifically arguing that the Council's assessment of its Housing Market Area is wrong but we do represent that the full impact of development in neighbouring areas needs to be considered perhaps in more detail than is apparent from the Assessments submitted by the Council.

Demographic Starting Point

Q2 Do the 2014-based projections provide the most suitable starting point for establishing the OAN?

CPRE has argued that the 2014 projections should be assessed at other Examinations in Public. It would therefore be inconsistent for us to argue otherwise here. However, the projections have perhaps provided an insight not previously envisaged as to how households are being formed and are likely to develop in the future. This does not necessarily show that the type of housing required is up market or even executive housing but more affordable housing is required as well as more housing for older people

Q3 Does the OAN appropriately consider the likelihood of past trends in migration and household formation continuing in the future? Are the assumptions justified? (What is the period on which the 10year migration scenario (Table 4.1 in SHMA addendum) based?

We believe that our response to Q1 is relevant to this question.

Q4 Is there evidence that household formation rates (notably younger households⁶) have been suppressed by historic undersupply (including recessionary period) and issues of affordability? If yes, what is the evidence and what would be a sensible adjustment and why?

CPRE does not have the information to be able to respond to this question.

Market Signals

CPRE did not make any representations with regard to market signals

Future Jobs

Q8 What are the assumptions regarding future jobs growth and are they justified? Is the OAN appropriately aligned with forecasts for jobs growth?

This is very much a concern for CPRE. While we accept that all local authorities will strive to improve employment in their areas, the fact is that not all can, by definition, be successful in achieving the numbers proposed. We acknowledge that in recent years the North East has been successful in attracting two major employers (Nissan and Hitachi) but we represent that it is unrealistic to expect this scale of inward investment will keep recurring.

As we have mentioned in our representations, we support the regeneration of existing employment areas, some of which are in fact run down. However, we are

sceptical about the number of jobs that will be created notwithstanding the likely initiatives of the Tees Valley Combined Authority.

The lack of more firm evidence about job numbers was a major issue in the now withdrawn Durham Plan. We recognise the need for some speculation but represent that, unless there are some commitments to new jobs in the Hartlepool area, this remains a contentious issue if it is to be relied upon to justify an uplift in the housing stock by some 12%, as we have mentioned in our representations.

Q9 Does the Council's Housing and Employment Growth Paper (EX/HBC/24) provide sufficient clarity on the adjustment that has been made for likely changes in job numbers?

This document refers to the assessment of the TVCA for Hartlepool but we represent it does not address the issue regarding evidence mentioned above in Q8. As a result, we represent that it does not provide sufficient clarity to allay our concerns about the OAN being too high.

Q10 Is the assumption of 70% of all jobs being taken up by existing residents reasonable? Allied to this, is applying the assumption from the 2014 SEP Delivery Plan to halve unemployment justified?

Although CPRE does not have direct evidence related to this, we again draw attention to the developer interest in County Durham and in particular to nearby Sedgefield which may affect this assumption.

Q11 Are the assumptions relating to 15% in-commuting from elsewhere and 15% from wider regional in-migration justified and do they raise duty to cooperate issues? Are other authorities in the Tees Valley area applying similar to meet SEP jobs forecasts?

When CPRE has raised issues about the Duty to Cooperate, it is precisely with this question in mind. We note the comment to our representations on this issue and note that there is no objection from County Durham. Stockton, as we have mentioned, supports the proposals in respect of Wynyard which, it appears, are necessary to make this settlement "sustainable". This may raise questions as to why it was permitted in the first place, but the point in relation to this question is that CPRE is concerned about the number of houses proposed in the Hartlepool area in percentage terms as we have outlined previously and the fact that neighbouring authorities may also be proposing to cater for some of the self-same people.

CPRE represents that this needs careful consideration when determining whether an increase in the housing stock of 12% is justified.

Backlog in provision

Q12 Is the backlog of c.700 units identified at Table 3.3 of the SHMA addendum an appropriate figure?

If we are correct in our analysis above, we represent that c700 is significantly too high a figure

Conclusions on OAN

Q13 Taking all these factors into account is there a robust evidence base for the OAN in Hartlepool as set out in the submitted Plan? Is there a sound basis to arrive at an alternative full OAN?

Clearly, it would be much better if this could be assessed after the government's proposed method for assessing the OAN had been published but we must accept the position we are in. Our National Office will be analysing this method when it is published. It has taken an active part in commenting on the Housing White Paper and proposes to be equally proactive in commenting in the proposed government method.

At present therefore we can only say that we firmly represent that the OAN in this case is based on too optimistic a picture of the future needs of Hartlepool. This, as outlined in the representations we have made to the submission draft, is a common theme with many, if not all, councils and is leading to considerably more greenfield land being identified for housing than, in our opinion, is required.

However, we believe it is premature at this stage to suggest an alternative while we await the government's proposed method for calculating the OAN.

Issue 2 - Translating the OAN into a housing requirement

While affordable housing is important to CPRE, we do not have the expertise to be able to address the specific questions asked in this issue. We are concerned however that there is a great need for housing of all types but that many developments throughout the country, not just Hartlepool, do not reflect this. Indeed, we are aware that on many occasions, when a suitable amount of affordable housing has been a condition of a planning permission, developers have applied to the planning authority under section 73 of the Town and Country Planning Act 1990 to have the number reduced or even removed.

We therefore represent that the Plan should be robust in requiring a suitable amount of affordable housing in the future

Issue 3 - Meeting specific housing needs

Q20 Explain how the needs of different groups in the community have been addressed in the SHMA and then the Plan, such as, but not limited to, families with children, older people, people with disabilities and people wishing to build their own homes. What conclusions does the 2014 SHMA reach in terms of the scale and mix of housing type needed, including in terms of tenure and size? (NPPF paragraph 159) How does the Plan reflect the findings?

While CPRE again cannot comment on the specifics in the Plan relating to the division of types of housing, we are concerned that the vast majority appears to be for family type housing when the latest ONS statistics suggest far more single and elderly persons are in existence and, if anything, that this trend is likely to increase. Table 10 however appears to leave too much to judgement on individual cases rather than providing a formula that each site should work to and so could perpetuate rather than improve the current situation

Q21 Is there evidence for the Plan make specific provision for accommodation for elderly persons either as part of the housing mix (Policy HSG2) or specific allocations for sheltered and supported accommodation?

We represent that at present the methodology for calculating this need is too vague

Q22 Is the Plan justified in seeking the provision of executive housing? Is this necessary to create a balanced housing market? Is the definition at Table 10 on plan 87 of the Plan reasonable?

While Executive Housing is not mentioned in the NPPF, it is we assume a part of “market housing” and as such should be catered for. However, we believe that this market is relatively limited but all local councils appear to be striving to have executive housing estates within their area. Wynyard obviously meets this definition within Hartlepool (and of course neighbouring Stockton) but we are also aware that permission for some 400 executive houses has recently been given to develop a site near Chester le Street in north Durham. While not in the immediate vicinity of Hartlepool, it is not a huge distance away either

While we do not argue that there should be no executive housing catered for in the Plan, we do represent that it should be limited (even in Wynyard) and a proper assessment made of the likely need. The current proposal may lead to a disproportionate amount of executive housing being provided.

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