

Policy 31

Id No Respondent

166 Banks Development Division

Policy 31

Managing Housing Supply

This policy generally encourages LPAs to attempt to control local demand in a way which is restrictive, unrealistic and detrimental to the strategic aims of the region. It is also curiously negative about the concept of housing on industrial land given the encouragement in national planning policy for this type of development.

We urge the deletion of sub-policy (d) to phase the release of housing land to ensure that it does not compromise the successful delivery of housing market restructuring initiatives. This is far too blunt a statement which could have undesirable impacts. Where an LPA is protective of its pathfinder initiative it is likely to have a negative attitude to competing sites. This attitude will often not be in the interests of the area as a whole. If there is to be a comment in this policy relating to renewal it should demand a higher level of evidence that the development will significantly constrain the initiative in question.

We urge the rephrasing of sub-policy (e) so it is more positive. For example “the reuse of employment sites for housing should be considered in light of the any need for long-term employment use and the viability of the site for such use”.

428 Campaign To Protect Rural England

para 3.71

Our reading of PPG3 suggests that 30 dwellings per hectare should be the minimum density accepted rather than the lower end of a range representing an average.

Para 3.73

Obviously housing market areas do not match local authority boundaries. However, it is not appropriate to allow the location of newbuild housing to be determined by market pressures. Equally, the local use of housing-led regeneration by local authorities needs to be monitored and assessed for appropriateness within the context of the locational strategy policies.

An additional policy is needed that defines ‘housing market areas’ within which it would be acceptable for housing allocations to be adjusted between local authorities, as monitoring suggests, without damaging the overall locational strategy policies.

The text should also emphasise the need to allow for existing and new urban open spaces and take regard of the purpose of green wedge and Green Belt policies in the identification of housing sites. Otherwise there will be a high risk of generating settlement cramming, sprawl and coalescence of settlements.

CPRE supports this policy but it should be clearer that the process of de- or re-allocating surplus employment land is an ongoing process, not a single event:

Amend (e):

“... where they are not required for long-term employment use, as informed by ongoing reviews of employment land uptake, and do not...”

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The supporting text should also emphasise the need to allow for existing and new urban open spaces and take regard of the purpose of green wedge and Green Belt policies in the identification of housing sites. Otherwise there will be a high risk of generating settlement cramming, sprawl and coalescence of settlements.

90 Corbridge Village Trust

Policy should be extended to restrict further development when plan targets are reached

202 Durham County Council

Support the need to protect employment land and premises from redevelopment to alternative uses, where they are an essential part of the long-term employment land and premises portfolio. This represents a departure from national guidance PPG3, with its presumption in favour of housing, but is clearly justified by local circumstances and the priority needs of employment in this region.

163 Friends of the Earth North East

Friends of the Earth broadly supports this policy, but revisions are needed in order to avoid unnecessary duplication with the guidance of the PPG3 e.g. in respect of points b) and c). Point e) is premature and over prescriptive; it may be that the necessary review of employment land allocations does provide some opportunities for housing use.

215 Government Office For The North East

Part 'c' LPAs only required to re-consider lapsed planning permissions and allocations whereas firm action is needed to de-allocate or to adopt policies not to renew unsustainable permissions. Part 'e' why is the word 'only' used as infers restricted review of employment land.

195 Grainger Trust

This policy is supported in principle, as it allows a flexible but structured approach to housing land supply and density development.

The need for up to date urban capacity studies is again highlighted, with the recommendation that Local Authorities require up to date assessments to determine appropriate need for housing land allocation

164 Hallam Land Management Ltd

The text in paragraph 3.73 and 3.74 and Policy 31 is generally supported in terms of the need to reconsider unimplemented local plan allocations and the review and updating of urban housing capacity studies.

It is understood that a new PPS3 is due to be published shortly and that it is likely to contain a requirement to identify and provide a five year housing land supply and therefore Policy 31 may require further amendments.

However, it is a major concern that as a result of being over protective of urban regeneration schemes or schemes not progressing as quickly as planned the management of housing supply could frustrate the overall provision of housing and local housing provision, thereby stifling the economic growth that is planned. It is important that the management of housing supply should be flexible enough to respond quickly to change.

Another difficulty with paragraph 3.74 is that it is unclear who the decision maker is as to whether or not an employment site is 'unneeded'. It must also be remembered that if targets are to be set for the delivery of housing in brownfield sites it will be necessary to develop former employment sites for housing.

160 Highways Agency

In 2003/04 approximately 8000 dwellings were built, it is assumed that this will increase to 10,000 per annum for the rest of the RSS period (approx 27% for the Tees Valley, 19% for Durham, 9% for Northumberland and 45% for Tyne & Wear/annum). Housing regeneration initiatives will help improve existing housing stock and thus reduce the need to build more. Annual demolition rates will vary from 4,000 to 2,650. Figures have been produced for all 23 districts for annual net additions to the housing stock, for the three established phases. In total for the NE these are on average about 6,500 /annum. Approx. 65% by 2016 on brownfield sites and with an average density of at least 30/ha in accordance with the

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provisions of PPG3 (Note not all local authorities within the region have completed their housing capacity studies. Local authorities should consider re-use of unneeded employment land but need careful consideration as economic development is crucial to the future of the region)

424 Home Builders Federation

Further to our comments on vacancy rates above, we consider this matter can and should be dealt with Policy 30.

Policy 30 and supporting text will need to be updated as we approach the EiP given PPS3 is likely to be released in November 2005 and include references to a more flexible approach to managing the release of site, the use of floors and ceilings within housing market areas and the requirement of rolling 5 year land supply documents at District level.

273 Member of Public

Another good cop out. Yes, let LDF's manage the supply but what resources and teeth will the people at that level have to make sure it happens that way?

185 Middlesbrough Council

Para 3.73 advises that 'no new land will need to be brought forward until at least post 2011. It is unclear which existing land is being referred to, given that the dwelling provision is shown as a number of units rather than as a land supply. Middlesbrough's Local Plan has uncommitted allocations for 280 dwellings. As LDF need to allocate sufficient land to ensure a five year supply of housing, additional allocations will be required. The reference to no new land being brought forward pre-2011 is therefore inappropriate.

Requested Changes either:

1) the reference in para 3.73 to no new housing land being brought forward pre 2011 should be deleted; or

2) clarification should be included in para 3.73 of exactly what is meant in terms of no new land being brought forward pre-2011.

Para 3.73 does not recognise the need for a strategic greenfield housing allocation as part of the development of Hemlington Grange for a mix of employment and residential uses. The need for a strategic urban extension to the south of Middlesbrough was identified in the Tees Valley Structure Plan. As the RSS will replace the Structure Plan it is important that it reflects the strategic significance of the allocation. The development of this site for a mix of employment and housing uses is essential to the successful regeneration of Middlesbrough, through the provision of employment adjacent to areas of high deprivation and to stem population loss from the urban core of the city region. Consultants appointed by the Council have advised that unless housing can be used to facilitate employment development at Hemlington Grange, the site is likely to remain undeveloped for the foreseeable future.

Requested Changes - Explicit recognition of a sustainable urban extension at Hemlington Grange should be made in para 3.73

338 Northumberland Tyne & Wear NHS

See 23.

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- 152 PD Ports (Victoria Harbour) PD Ports support the proposed approach to managing housing supply. In particular the strong emphasis on prioritising brownfield opportunities is supported. In addition, PD Ports propose that their site, defined in Policy 13, is clearly set out as being of significant strategic importance, ahead of other brownfield sites contained in the urban capacity studies.
There is a strong reasoning based upon North East regional experience to support such an amendment. In more than one authority in the North East, significant numbers of brownfield (and greenfield) sites have come forward for development in recent years, to the extent that there is insufficient capacity to enable the implementation of priority schemes. Until now, there has been no direct central government steer on how to address this issue. In the regional context however, it is considered necessary to provide a clear and succinct policy that preserves the ability for strategic sites (such as the major mixed-use developments in Policy 13, including Victoria Harbour) to deliver ahead of other brownfield sites. We note that part (d) of the policy currently only affords such priority to housing market restructuring initiatives.
- 444 Royal Mail Property Holdings We would like to offer our support to Policy 31 part e) which states that local planning authorities should consider the reuse of employment sites for housing only where they are not required for long-term employment use. We would also like to suggest that there perhaps should be a policy relating to the short term release of land where local planning authorities review the existing allocations for an alternative use.
- 151 Sunderland ARC Managing Housing Supply: the emphasis in this policy on the application of the sequential approach, bringing forward previously developed land (PDL) opportunities first - including new PDL potential identified in up-to-date Urban Capacity Studies - is strongly supported.
- 148 Tees Valley Regeneration TVR support the proposed approach to managing housing supply. In particular the strong emphasis on prioritising brownfield opportunities is supported. In addition, Tees Valley Regeneration propose that these sites, defined in Policy 13, are clearly set out as being of significant strategic importance, ahead of other brownfield sites contained in the urban capacity studies.
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- 105 Tynedale Council Paragraphs 3.73 and 3.74 and Policy 31 This section and policy on managing housing supply is supported. It creates a good basis for dealing with challenges – e.g. regarding the release of phased land or employment land for the early development of housing.

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Paragraph 3.73 The paragraph includes the statement: that while some local authorities “may need to consider identifying more land for release in the future ...no new land will need to be brought forward until at least post 2011 in the RSS period.” This requires some clarification. For example does it mean that there should be no net increase in allocated land, which would allow for unsuitable sites to be deallocated and replaced by more suitable new sites, (e.g. brownfield and/or better located) to be allocated). Such statements should not preclude the allocation of new sites for affordable housing, which is now possible in certain circumstances.

This would be more suitably worded: “phase the release of housing land to ensure that it does not compromise the successful implementation of regional or sub-regional housing market restructuring strategies.” This is because not all housing market restructuring initiatives are necessarily part of a wider strategy beyond a particular local authority boundary.