

Response to housing mix commentary in committee report (SMD/2021/0780)

Persimmon are concerned about aspects of the Officer's report dealing with housing mix, specifically the quantum of 3 and 4 bed houses and how this is treated in policy terms and with reference to the Condition 36 of the hybrid permission (SMD/2021/0456). These concerns are set out below.

Paragraph 7.24 of the committee report

This paragraph refers to the Council's Strategic Housing Market Assessment (SHMA) 2017. Our first concern is that the report does not acknowledge the age of this document (9 years), and the fact that it is largely based on 2014 data, which means that it is now carries little or no weight in the planning balance.

Secondly, and leaving aside the age of the SHMA, the document only suggests an indicative target for housing size pending an early review of the local plan. Indeed, the SHMA recognises that such a target is a policy decision for the local plan, not an evidence-based document. This is set out in paragraph 8.19 of the SHMA below.

'An assessment has been undertaken of the split required between housing size over the plan period. Such housing targets are a policy decision to be made through the Local Plan early review. However, the following indicative percentage targets are recommended for Staffordshire Moorlands, with the intention of rebalancing the stock away from small terraced properties towards better quality, aspirational property types designed to reduce the high levels of net out-migration to adjoining areas. There is also a need for more good quality accommodation designed specifically for the growing elderly population.'

Property Size:60% 1 /2 bed, 40% 3/ 4 bedrooms'

The report at paragraph 7.24 does not make it clear that the suggested housing mix recommended in the SHMA is purely indicative and primarily intended to inform an early review of the local plan. Nor does it acknowledge that the SHMA intended the indicative mix to be applied flexibly when dealing with housing applications, as relatively low levels of housing viability in urbanised parts of the District could be compromised. Furthermore, the SHMA states that:

'This advice, which is primarily needs based must be subjected to further detailed viability assessment through the Council's housing viability work to test the deliverability of the rates.' (SHMA 2017, paragraph 8.20)

Persimmon are unaware of such viability work having been undertaken.

One of the reasons the SHMA is cautious about how the indicative housing mix is applied is because housing has a very clear aspirational element. Therefore, the size of house a person or household actually needs is often very much smaller than the size of house they want or can afford. To evidence this, I have extracted a few key sentences from the SHMA below.

***'There is no exact formula for setting the approach to defining housing size and type requirements and no way to 'model out' the need for judgement when balancing a range of factors.'* (paragraph 7.71)**

***'The figures are indicative and do not take into account a range of critical qualitative considerations. In particular, the modelling does not fully address people's aspirations, individual needs (i.e. a spare room for carers or visitors'.* (paragraph 7.77)**

***'In practice, providing a range of dwelling sizes specifically to match the quantitative need may not address people's aspirations and could discourage more affluent households from moving into the District.'* (paragraph 7.79)**

***'Older couples also aspire to live in detached houses. In terms of supply, 1 and 2 bed flats have contributed significantly to supply over recent years. They are viewed as a short-term housing option for many people.'* (paragraph 7.85)**

'Aspirations are generally for larger homes and the size of dwelling that people need is often significantly smaller than the size of dwelling they actually want or can afford' (paragraph 7.87)

'However, this level of need does not factor in critical issues such as aspirations and viability (paragraph 7.94)

'There is still a need to provide large, better quality dwellings in the District and meet aspirational needs'. (paragraph 7.98 (3))

In view of the above, and disregarding the weight which can be afforded to the SHMA due to its obvious age, it is clear that the SHMA does not prescribe a housing mix comprising 60% 1 / 2 bedroom and 40% 3 and 4 bedroom dwellings. That is clearly a matter for a local plan and the indicative figures provided in the SHMA simply provide a general guide which needs to be applied flexibly. They are also District-wide figures and should not be applied strictly to individual sites.

It follows from the above that there is no friction with Policy H1 (contrary to the assertion in paragraph 7.32 of the report). The proposed development would provide a full range of housing types, sizes and tenures, including 1, 2, 3 and 4 bed dwellings (including bungalows and apartments) and a policy compliant level of affordable housing. In particular, there is no conflict with criterion 3 b) of the Policy because the SHMA is not prescriptive in terms of housing mix and must be applied flexibly.

Similarly, there is no conflict with Condition 36 of the hybrid consent (SMD/2021/0456), contrary to the assertion at paragraph 7.32 of the report. This Condition simply requires the property type and size of dwelling units to reflect local needs standards in the SHMA. As explained above, the SHMA does not prescribe strict housing mix targets, and requires the indicative target to be applied flexibly.

In addition, the SHMA stipulates that further detailed viability work must be undertaken to test the viability of the suggested target rates. As that work does not appear to have been undertaken, and considering the age of the document, Persimmon consider that no weight can be attached to the SHMA in terms of housing mix.

Persimmon respectfully submit that the proposal is fully compliant with Policy H1 and Condition 36.