

**Dear Sir /Madam,**

**3 August 2012**

**Morley Carr Farm Planning Application - Five Year Deliverable Housing Supply 2012-2017**

The Morley Carr Farm Action Group recognises that the five year supply of housing is an important factor. The Morley Carr Farm Site is currently outside of the boundaries for development, however we realise that a failure to prove that the five year supply can be delivered means that Stockton Borough Council needs to review sites with a view to improving supply and may have to consider Morley Carr Farm. As a result we have spent some time reviewing the relevant document.

It is difficult for us to review Stockton Borough Council's figures for housing requirement, we have traced it back to the Core Strategy but have no means of verifying these figures, and therefore, we have focused on supply.

We believe that the calculations in the document resulting in an estimated 4.08 years supply are flawed as they do not take into account empty homes brought back into use. According to the Empty Homes Organisation (link on Stockton Borough Council's website) in 2011 there were 2,770 empty houses in Stockton, of which 1,025 had been empty for at least six months and yet Stockton Borough Council is considering wholesale housing development on green field sites.

We know that Stockton Borough Council has begun an "Empty Homes to Happy Homes" project in conjunction with Vela Homes and Coast & Country Housing to bring long-term empty housing back into use. This is expected to bring 199 houses back into use over seven years, using a simple straight line pro rata calculation this would add 142 houses to the supply for 2012 to 2017. In addition to this the empty houses team is still working to bring houses back into use. According to the Stockton Borough Council website they brought 69 units of accommodation back into use in 2010/2011. If their work continues at this level this will add a further 345 houses to the five year supply. We believe this to be a conservative estimate as we would expect the success of the team to increase with experience.

The addition of these houses would bring the supply to 3,032 which would prove a 4.86 years supply, a shortfall of just 86. As mentioned this is a conservative estimate, a projected 6% increase in supply year on year as a consequence of improved results from the empty houses team since 2011 would result in a slight over supply. Perhaps the empty houses team could provide an estimate of likely successes for the next five years.

We also believe that the housing trajectory includes outdated figures for Allens West. Planning permission was given in 2009 for 500 dwellings and this is shown in the trajectory but a development of 845 was approved at the Planning Meeting on 30 May 2012, perhaps this has been overlooked as the status of this application has not been updated on the SBC Planning website. Unfortunately we are not in a position to recalculate the five year supply to take this into account as we have no information about phasing.

Additionally there have been many recent planning permissions granted for small projects that have not been reflected in the trajectory, a quick count from May to June 2012 gives something in the region of fifty, again we are not in a position to recalculate as we do not know phasing.

As a result we request that your figures be revised to take into account empty houses being put back into use and updated planning approvals. Surely this should be a living document and as such updated on a regular basis rather than be a snapshot at a given date.

Yours faithfully

Morley Carr Farm Action Group