

## Comment

**Consultee** Mr Andrew Ward (1170620)

**Email Address** [REDACTED]

**Address** [REDACTED]

**Event Name** Darlington Local Plan 2016-2036 (Regulation 19)

**Comment by** Mr Andrew Ward (1170620)

**Comment ID** DBLPPS470

**Response Date** 17/09/20 15:49

**Consultation Point** Policy H 1 Housing Requirement (Strategic Policy) ([View](#))

**Status** Processed

**Submission Type** Email

**Version** 0.10

**Question 1b**

**Do you consider that the Local Plan sound?** No

### Question 2

**Do you consider that this part of the Local Plan is unsound because it is not: (tick all that apply)**

- Positively prepared
- Justified
- Consistent with national policy

### Question 3a

#### Your Comments

**Please give details of why you consider that this part of the Local Plan is not legally compliant or unsound or fails to comply with the Duty to Cooperate.**

The calculation of housing need does not follow the standard method as required by the NPPF, nor does it demonstrate, using well-evidenced and justifiable methods, that there are exceptional circumstances that exist which would justify an alternative approach.

The housing requirement is based upon the Darlington Strategic Housing Market Assessment (SHMA) 2017, which states that the document should not be considered in isolation, and also that much of the Darlington SHMA 2015 remains as the most recent evidence base. The National Planning Policy Framework advises that exceptional circumstances reflect current and future demographic trends and market signals, yet this report appears to mainly be based on 2015 evidence.

The NPPF also states that policies should be clearly written and unambiguous; however, this does not seem to be the case with the Housing Requirement calculation. How local administrative data such as NHS patient registers, the number of school children and those aged over 65 is used to justify that exceptional circumstances exist to deviate from the standard methodology is not clear. Administrative data is also subject to flaws as in the period 2011-2016 there was an influx of EU workers into the area, many of whom have now left.

Furthermore NPPF suggests that exceptional circumstances may also exist where current market signals indicate such a deviation to be exceptional. The SHMA stated that on the whole market signals do not indicate any need for housing adjustment. Darlington does not have a housing shortage and the market currently reflects this in terms of availability and pricing. No exceptional circumstances, therefore, exist in terms of market signals which would justify the need to increase the housing supply.

The plan includes several assumptions which have been made but does not evidence what these assumptions are and how exactly they have increased the number of dwellings by over 100% above the standard methodology calculation.

The housing requirement makes an allowance for economic growth and 7,000 full-time additional jobs over the plan period but there is no evidence to support this. The recent arrival of Amazon may have created new jobs, but this should not be taken as evidence that 7,000 full-time additional jobs will be created in Darlington over the plan term. Amazon is a welcome addition to help the local economy and create jobs, but such large strategic investments tend to be one off's, and job creation like that has not been seen for some time in Darlington. The jobs created by Amazon have only served to partially offset the many jobs lost in the past few years. When you also consider that Amazon are continually looking to use automation with robot technology to replace its workforce, one wonders just how many of these jobs will exist in a few years-time.

It is not clear whether or not these 7,000 additional jobs are in fact, only replacing the jobs lost over the last number of years, and if they are, this would not be evidence to support an increase in the housing requirement. Interestingly, the economic projections Darlington purchased from Oxford Economics to predict future growth forecast for the period 2016-2036 negative growth. Darlington chose to ignore this and relied instead on the SHMA data. The SHMA, itself, refers to the projected 7,000 jobs as "aspirational" and states that this figure includes full and part-time workers. The SHMA 2017 contradicts and does not support the 7,000 full-time equivalent additional jobs quoted in the plan.

Support for economic growth in itself is not evidence that it will actually materialise and in this plan, there is no evidence founded on facts to support that it will. Aspirational figures are not 'exceptional circumstances that exist' which justify an alternative approach to the standard method of calculation.

"Brexit" is likely to have a substantial effect on the economy yet there is no mention of the potential impact that it will have on these estimates. This is yet another demonstration that the 'exceptional' circumstances leading to the deviation from the standard methodology do not reflect current circumstances.

Notwithstanding the above, Covid-19 has had a significant effect on economic growth with many businesses cutting back on jobs and plans to expand. To not re-examine the housing allocation, or the estimate of 7,000 new jobs in the light of the current and future effects of the Covid-19 ongoing virus is not, in our opinion, being honest or realistic. This only goes further to support the fact that the evidence supporting the housing allocation is not justifiable given current circumstances and that the evidence the plan purports to use is not clearly founded by facts.

Overall, the exceptional circumstances upon which Darlington Council have based their deviation from the standard methodology are assumptions, estimates and guesswork, none if of which is current, justifiable, or evidenced on facts.

#### Question 4

##### Changes Sought

**Please Note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. There is the opportunity to attach Word or PDF files before submitting your comment.

***After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues identified for examination.***

**Please set out what change(s) to the Local Plan you consider necessary to make it legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text.**

A transparent and justifiable method of demonstrating that 492 dwellings are required is needed, being a Local Authority reporting to its electorate, and that this has to be broken down into a calculation which identifies what the standard methodology is and how each of the categories in the 'local administrative' data used contributes to the deviation and how they are 'exceptional'.

The estimates included in the plan, with regards to the Council forecast housing requirement and 'aspirational' economic growth, must be reviewed in the light of the existing and future challenges: notably the

- impacts of Covid-19, including the start of the second wave in the North East,
- the impact of Brexi, and
- the local economic position once the furlough scheme has ended.

#### **Question 5**

##### **Attendance at Examination Hearings**

**If your representation is seeking a change, do you consider it necessary to participate in the examination hearings?** No, I do not wish to participate at the examination hearings

#### **Question 6**

**Do you request to be notified that the Local Plan has been submitted to the Secretary of State for independent examination under section 22(3) of the regulations and to be notified of the adoption of the Local Plan?** Yes, I request to be notified