

Comment

Consultee	Mr Brian Wood (1251033)
Address	[REDACTED]
Event Name	Darlington Local Plan 2016-2036 (Regulation 19)
Comment by	Mr Brian Wood (1251033)
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Consultation Point	Policy H 1 Housing Requirement (Strategic Policy) (View)
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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)

- 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 Government's standard methodology yields a housing delivery target of 3,476 over the Plan period. Housing commitments at present, and completions since 2016, total 4974 dwellings. I therefore do not agree that any further allocation of housing land is necessary to meet Darlington's needs.

The existing over-commitment of land for development runs the risk of encouraging low-density sprawl and discouraging the regeneration of the town centre. The vast quantity of new dwellings over the Plan period and beyond (including commitments and completions, 16718 dwellings – 13242 more than necessary) is not justified by any rigorous investigation of housing need. If housing allocations were necessary, a rigorous process should have been followed to determine how much land was required, to assess the suitability for development of the available land, and to choose the best locations for development.

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.

I would expect to see a rigorous investigation of housing need broken down into a calculation identifying what the standard methodology calculates, and how, each element of the local administrative data increases this figure. Given the impact of Covid-19 and the impacts of Brexit I would expect to see these taken into account in the estimates included in the plan specifically with regards to the housing requirement and economic growth.

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?

No, I do not request to be notified