

## Comment

**Consultee** Mr Frank Brown (1251018)

**Address** [REDACTED]

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

**Comment by** Mr Frank Brown (1251018)

**Comment ID** DBLPPS631

**Response Date** 17/09/20 12:42

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

**Status** Processed

**Submission Type** Letter

**Version** 0.8

**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. It does not clearly demonstrate, using well evidenced and justifiable methods, the exceptional circumstances exist that would justify an alternative approach. The NPPF 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 amount 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. There is no transparent explanation of why the local administrative data increases the housing need by over 100% of the standard methodology.

The NPPF also suggests that exceptional circumstances may exist where current market signals indicate such a deviation to be exceptional. The Strategic Housing Market Assessment 2017 commissioned by Darlington Borough Council stated that on the whole market signals do not indicate

any need for housing adjustment. There are therefore no justifiable exceptional circumstances which exist to justify the increased housing requirement.

There is no evidence founded on facts which is apparent in the plan to support economic growth, or of the 7,000 full time jobs included in the plan. The SHMA 2017 refers to these jobs as 'aspirational'. As they are 'aspirational' they do not then meet the criteria for exceptional circumstances that exist which would give rise to the need for an increase in the housing requirement. The impact of Brexit on the economy or the housing requirement has not been considered, nor has the devastating effects that Covid-19 has had on the economy or any forecast growth. The plan is therefore not current or up to date with its estimates and is not founded on facts existing at this current time.

#### 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 transparent, justifiable and easily understandable demonstration of why 492 dwellings are required broke down into a calculation identifying what the standard methodology calculates, and how, each element of the local administrative data increases this figure and a description of how they can be categorised as 'exceptional'. Given the impact of Covid-19 and the impacts of Brexit I would expect to see the estimates included in the plan with regards to the housing requirement and economic growth reviewed to make them more 'current' and to take into account these impacts.

#### 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