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Written statements in response to the Inspectors questions:

Q2.3 Are (a) the minimum requirement of 422 nett additional dwellings per year and (b) the target of 492 nett additional dwellings per year between 2016 and 2036 justified, positively prepared and consistent with national policy

The calculation of housing need does not follow the standard method as required by the NPPF, nor does it clearly 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 give 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 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. 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.

The plan includes a number of assumptions which have been made but does not give evidence what these assumptions are and how exactly they have increased the number of dwellings by approx 300% 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, plus the proposed move of 'Treasury North', but this should not be taken as evidence that 7,000 full time additional jobs will be created over the plan term. .

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 actually 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 it will have on these estimates. This is yet another demonstration that the 'exceptional' circumstances leading to the deviation from 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 Covid-19 is not, in my 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 have based their deviation from the standard methodology are assumptions, estimates and guesswork, none of which is current, justifiable or evidenced on facts.

Based on the average no of 2.5 adults and children per dwelling, Darlington BC is anticipating an increase in population of Darlington of 25,00 people, over the period of the Plan, with a current population of 108,000, that is an increase in size of 23%, I find this very difficult to believe.

To make this plan sound

I would advocate that a transparent and justifiable method of demonstrating that the 492 dwellings are actually required is used and that this is 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 exactly how they are exceptional.

I would ask, as the 'Plan' development is now more than 5 yrs old it is reassessed in light of the UK's exit from the EU, the issues as a result of the effects of the current pandemic and the Governments policy on climate change.

Plus the revised Plan take account of DBC's own initiative to develop the Town centre/Town centre fringe and its associated 'Brown field' sites as part of the available land for housing/dwelling development

I would ask DBC for a clear explanation of how they have taken account market signals in their housing requirement calculation. Bearing in mind that the population of Darlington, according to statistics, has reduced in the last 5 yrs not increased. Plus why are Darlington housing numbers disproportionate to the adjacent Local authorities.