
Inspector's Matters Issues and Questions

Examination of the Darlington Local Plan

Part 1 Hearings (Matter 2)



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Introduction

Savills (UK) Limited has been instructed on behalf of our client, Bussey & Armstrong Limited, who are longstanding developers within the Borough, to submit a response to the Examination of the Darlington Local Plan: Inspector's Matters, Issues and Questions.

Our client's interest is in respect of the West Park Garden Village which is located north west of Darlington and is located within the jurisdiction of Darlington Borough Council.

This Statement should be read in conjunction with all previous representations made on behalf of Bussey & Armstrong Limited.

These representations have been submitted to support the proposed residential allocation of land adjacent to the north of West Park Garden Village and to provide comments on the general approach and strategy of the plan relating to matters on housing requirement, allocations, Development Limits and others.

Our client is committed to ensuring the emerging Local Plan is prepared on a sound and robust basis. In particular, they wish to ensure that the correct provision of housing and housing allocations are provided throughout the plan period to meet the social and economic needs of the Borough.

Our comments therefore focus on the following Matters:

- Matter 2: Amount of development needed in the Borough
- Matter 3: Vision, aims, objectives and spatial strategy
- Matter 4: Housing development
- Matter 5: Meeting particular housing needs

This statement addresses a number of questions raised by the Inspector under Matter 2: Amount of development needed in the Borough.

Matter 2 - Amount of development needed in the Borough

Household growth and housing requirements (policy H1)

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

As per paragraph 60 of the NPPF 2019, *“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.”* It is considered that it is appropriate to plan for a higher figure than the standard method indicates as exceptional circumstances have been demonstrated in that the figure identified within the Standard Methodology does not take into account projected economic growth.

As required by the NPPF, the emerging Local Plan must define the overall level of growth over the Plan period (up to 2036), based on the requirement to meet the Borough's objectively assessed needs (OAN).

The standard method alone could have implications for housing targets in some areas of the country (principally in the north of England), where economic growth strategies may not be supported by local authorities that plan for the minimum number of additional dwellings as indicated by the standard methodology. By only using the proposed methodology it could lead to the Borough not planning enough homes to support any economic growth strategy.

If the Council does not seek to meet the most appropriate level of development needed it is considered that the Borough would suffer significantly from out-migration, reduced / limited employment opportunities and have a detrimental impact on the existing supply of local services and facilities. This goes against the strategic Vision, Strategy and Objectives of the Plan and would therefore be unsound as the plan would not have been planned positively.

Our Client therefore supports the approach taken to identifying and meeting the objectively assessed housing need in Darlington. They also support the Council's approach of identifying a figure based on the economic needs of the authority not the demographic projection which would lead to a fall in working age persons.

It is considered appropriate to plan for more housing than the initial figure set out in the Standard Method Calculations and we support Darlington's decision to utilise a figure over and above the 162 dwelling per annum level to help support sustainable development, to boost housing supply and to support the economic prosperity of the area.

Furthermore, evidence suggests that the Council should identify a housing requirement, above the standard method, and in the case of the SHMA, it is considered that this provides part of the evidence for a higher housing need figure for the Borough.

Following consideration of the 2014-based household projections, adjusting for longer-term migration trends, taking account of the market signals uplift for concealed families and homeless households and allowing for vacant and second homes the SHMA Update 2017 identifies a housing need of 389dpa.

However, this figure does not consider the local economy, and would according to the SHMA create a shortfall of 1,808 workers. The SHMA therefore recommends an uplift of a further 70dpa taking the housing requirement to 459dpa. When adding the care home bed spaces this goes up further to the identified 492dpa.

We support the evidence based on the demographic baseline, market signals, economic growth and consideration of C2 accommodation and therefore support the housing requirement of 492dpa, ensuring sustainable development is built throughout the plan period to meet the need and demand of the Borough based on the economic growth of Darlington Town and its hinterland which is considered to be backed by evidence and supports the local economic growth aspirations for the Borough.

Furthermore, based on past delivery rates, recent delivery (an average of 567 dwellings per annum over the last five years) shows the proposed housing target to be manifestly deliverable and achievable and further supports the requirement identified by the Plan.

Q2.4. Is expressing the housing requirement as a range clear and unambiguous, and does the plan clearly establish a housing requirement figure for the Borough for the Plan period as required by national policy?

As set out to Q2.3 above, the Council has demonstrated the circumstances required to depart from the standard method as set out in planning guidance.

Policy H1 sets out a minimum requirement of 422dpa and an increased housing target of 492dpa to meet the Council's growth targets.

It is key that there is flexibility built into the Local Plan with regard to housing numbers and future development opportunities. This is to ensure that housing need and demand is met throughout the entire Plan period. It is therefore vital that the proposed housing figure is a minimum figure, rather than viewed as a cap and a restriction to new development.

In the interest of effective, positive and justified plan making, where there is a need for new homes, there should be no cap on sustainable development. It is not considered consistent with National Policy to place a restrictive cap on the housing requirement as national policy seeks to support the Government's objective of significantly boosting the supply of homes. We therefore support the policy text states the states the proposed figures are not a cap.

With the wording of the policy text, it is clear that whilst 422dpa is the minimum requirement, the Council, landowners, developers and other stakeholders should seek to meet the higher annual housing figure of 492dpa to meet the evidential need to support the local economic growth of the Borough.