

**Darlington Local Plan Examination in Public
Response to Inspectors Matters, Issues and Questions
Made on Behalf of The Church Commissioners for England**

Matter 2- Amount of Development Needed in the Borough

Introduction

- 1.1 This Hearing Statement is made on behalf of The Church Commissioners for England (our 'Client') in advance of making verbal representations at the Examination in Public of the Darlington Local Plan. Our Client has made comments throughout the Local Plan consultation process, including at the Pre-Submission Draft stage in December 2018.
- 1.2 This Hearing Statement represents our Client's view on the overarching policies and targets in the Plan. These comments have been made in the context of our Client's land interest at Hall Farm, Branksome (housing allocation reference 100). Measuring 22 hectares, the site is an allocated urban extension to the west of the main urban area with an indicative yield of 450 homes, including 270 which are estimated to be delivered during the plan period. Our client supports this allocation.
- 1.3 Our response to the relevant questions in Matter 2 3 is set out below. We have had specific regard to the tests of soundness outlined in the National Planning Policy Framework (NPPF); namely that the policies in the Local Plan must be justified, effective, positively planned and consistent with national policy in order to be found sound.

Matter 2- Amount of Development needed in the Borough

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?

- 2.1 The Council's proposed minimum requirement of 422 net additional dwellings per year is not justified or positively prepared based on the evidence. It is clear that this minimum requirement does not make an allowance for economic growth and is therefore not justified based on the evidence. It is not positively prepared as it does not provide a strategy which seeks to meet the housing requirement and is not consistent with national policy and the government's objective of significantly boosting housing supply. The 2017 SHMA is clear that using this approach, there would be a shortfall of 1,808 workers.
- 2.2 The Council's target of 492 net additional dwellings per year is however justified, positively prepared and consistent with national policy based on the current evidence. It is a realistic figure which accounts for the economic growth, and increase in jobs, predicted over the plan period. It also reflects the additional new homes required to meet the need for additional workers. This is in accordance with PPG which allows for higher housing need figure that include growth strategies (Paragraph ID: 2a-010-20201216).
- 2.3 Our Client would also like to make clear that due to the date of the SHMA (2017), the plan does not take into account recent positive announcements from central Government, which are likely to boost economic growth and the housing requirement in the Borough (as well as the sub-region). This includes the announcement of a 'Northern Economic Campus', with 750 Treasury Officials and 500 Civil Servants in the Department of International Trade. The nearby Teesside Freeport is also projected to create another 18,000 jobs in due course. This further strengthens the justification for providing 492 dwellings per annum, if not more. Although not of all of these workers will live in Darlington, a fair proportion will.
- 2.4 Taking into account the timing of these announcements and the advanced stage of the plan, our Client fully supports the 492 dwellings per annum figure and considers it sound.
- 2.5 To ensure that the local plan meets the tests of soundness, Policy H1 needs to be amended to remove the housing requirement range (422 to 492 dwellings) and all reference to 422 dwellings per year. The policy should only make reference to 492 net dwellings per annum and 9,840 over the plan period and should set out that this is not a restrictive maximum.
- 2.6 Our Client has provided a track changed policy which incorporates the above changes in their response to the Submission Local Plan (September 2020).

- 2.7 However, the 2019 Planning Practice Guidance (D2a-024, PPG, 20 February 2019) states "*An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.*" In this context it is considered that the Council should allocate as much land as possible to deliver affordable housing need, if the assessment of affordable need requires it.
- 2.8 In Darlington, affordable housing need is acute. The December 2020 SHMA (paragraph 3.50, page 24) concludes on there being a requirement for 409 affordable dwellings per annum (dpa), 2016-2036. Even based on the upper end of the Plan's housing requirement (492 dpa), affordable need would represent 83% of all housing if 492 dpa were to be the requirement and affordable need were to be met in full.
- 2.9 Policy H5 of the submission Local Plan sets out the affordable housing requirement across the Darlington area. The requirement is either 10%, 20%, or 30% depending on the ward in which development takes place. The majority would require 20%, including the land at Hall Farm. On this basis, to provide 409 affordable dpa, would require overall housing provision of 2,045 dpa. Even if all development were delivered at the higher rate of 30%, overall provision would need to be 1,363 dpa. However, these figures only serve to emphasise that Darlington's housing requirement should be a minimum 492 dpa 2016-2036, and if possible be higher to deliver as much of the affordable housing needed as possible.
- 2.10 From reference to MHCLG live tables, affordable housing completions in Darlington have averaged 120 dpa over the past 5 years (2015-2020), and 125 dpa over the past 10 years (2010-2020). As a proportion of overall net completions in Darlington, affordable housing completions have constituted 29% (2015-2020) and 36% (2010-2020) respectively. A continuation of these proportions (29% and 36%) would require overall housing provision of 1,410 dpa and 1,136 dpa respectively. Furthermore, based on the upper end of the Plan's range for a housing requirement (492 dpa), only 143 to 177 affordable dwellings would be delivered, less than half the affordable housing need (409 affordable dpa) determined by the Council's 2020 SHMA.
- 2.11 This evidence only serves to emphasise how the Plan's requirement should be 492 dpa at the very minimum. If land is available to help deliver the affordable housing required, the housing requirement (492 dpa) should be increased further in line with PPG.

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?

- 2.12 Setting out the housing requirement as a range is not clear and there is some ambiguity surrounding it contrary to the NPPF.
- 2.13 This ambiguity is not clarified in the Council's response to PQ20 which states that the two requirement figures are based on the SHMA and economic growth respectively.
- 2.14 Policy H1 sets out a minimum requirement of 422 net dwellings and a Local Plan housing target of 492 dwellings over the plan period which gives a requirement of 8,440 to 9,840 respectively.
- 2.15 Our client considers that the setting of a range for the housing requirement could be misinterpreted as a target which would therefore lead to a limiting of development of new homes contrary to the NPPF's objective of significantly boosting homes.
- 2.16 Our Client considers that the range should be deleted, and the Council should amend the policy to read that the housing requirement is 492 dwellings per annum (9,840 dwellings over the plan period) and therefore removing any ambiguity. Planning Practice Guidance (PPG) recognises that there are instances where it is appropriate to plan for a higher housing requirement including planning for growth and infrastructure improvements.
- 2.17 Providing two different figures is confusing and we would recommend that the Council amend the housing policy to remove the second lower figure.