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# Inspector's Matters Issues and Questions

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Examination of the Darlington Local Plan

Part 1 Hearings

(Matter 2 – Amount of Development Needed in the  
Borough)



## Contents

Introduction	1
Matter 2 - Amount of development needed in the Borough	3



## Introduction

We have been instructed on behalf of our clients, Hellens Land Limited and Homes England, to submit a response to the Examination of the Darlington Local Plan: Inspector's Matters, Issues and Questions. Hellens Group have over 40 years' experience of delivering a range of housing, leisure and infrastructure developments across the North of England. Homes England is a non-departmental public body which works to accelerate housing delivery, working with developers across the country to improve neighbourhoods and grow communities.

Our client's joint interest is in respect of the Burtree Village which is located north west of Darlington and is located within the jurisdiction of Darlington Borough Council. These representations have been submitted to support the proposed strategic allocation for 2,000 residential dwellings, 200,000 sqm of employment space, community facilities, link road and associated infrastructure at Greater Faverdale (Burtree Garden Village).

This Statement should be read in conjunction with all previous representations made on behalf of our clients in relation to Burtree Garden Village.

Our clients are committed to ensuring the strategic allocation (and the Publication Draft Local Plan) is sound and robust. Our comments will therefore focus on the following Matters:

- Matter 1: - Legal and Procedural Requirements and other General 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
- Matter 7: Economic Development
- Matter 8 – Town Centres and Retail Development
- Matter 9- – Transport and other infrastructure
- Matter 10 - Other strategic and development management policies
- Matter 11 - Other Issues

# Inspector's Matters Issues and Questions

Hellens Land Limited and Homes England

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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

### Economic growth and Employment Land Requirements

#### **Q.2.1 Is the aim to facilitate economic growth of 7,000 net additional jobs in the Borough between 2016 and 2036 justified and positively prepared?**

Policy H1 of the emerging Darlington Local Plan (eDLP) states that over the 20 year plan period (2016 to 2036) the eDLP will seek to meet a minimum requirement of 422 dwellings per annum ('dpa') equating to a total net minimum requirement of 8,440 dwellings. Policy H1 goes on to set out "a Local Plan housing target" which "makes an allowance for economic growth and 7,000 full time equivalent additional jobs over the plan period" and "reflects the additional homes required to meet the need for additional workers". The 7,000 net additional job target in the plan is therefore a critical part of the growth strategy for the Borough.

The evidential basis for this number is set out in paragraph 7.1.8 of the eDLP which states:

*Developed by public and private sector partners, the updated Tees Valley Strategic Economic Plan (SEP) 2016 sets out the ambition and priorities for generating economic growth through transformational change in the Tees Valley. With a target of achieving a net increase of 25,000 new jobs by 2026 over the next ten years, approximately 7,000 of these are based in Darlington up to 2036.<sup>1</sup>*

Furthermore, the Darlington Employment Needs Report (2017) which uses Government data (Business Register and Employment Survey) to project recent jobs growth forwards over the plan period concludes that Darlington could be expected to deliver jobs growth of 7,034 FTE over the plan. The Darlington Employment Needs Report assesses economic forecasts, past employment data and the objectives of the Tees Valley SEP. It concludes that the SEP alone is targeting 25,000 jobs across Tees Valley over the next ten years and this equates to around 6,000 jobs in Darlington. This is on top of base line employment growth. Overall the report concludes that a total growth target of 7,000 jobs over twenty years is appropriate given the ambitions on the SEP and past indicators of economic growth.

In our view the aim to facilitate economic growth of 7,000 net additional jobs in the Borough is justified and positively prepared. If one considers that the reopening of Tees Valley Airport alone is due to create over 7,000 jobs (a large proportion of which would be in Darlington) with a further 1,000 in the Morton Park Amazon site and at least 750 - 1,000 jobs associated with Treasury North (notwithstanding spin off jobs), it shows that the economic projections and ambitions of the Council are eminently plausible and justified. We understand that the Department for National Trade are also locating a regional hub in Darlington, so there is sufficient diversity in the employment base.

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<sup>1</sup> A figure justified in the Darlington Future Employment Needs Report September 2017 based on an Oxford Economics forecast.

## 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?**

In terms of delivering a wide range of housing, the NPPF confirms the expectation of local authorities to plan positively to significantly boost the supply of housing (Paragraph 59). To underpin this paragraph 60 of the NPPF states that *“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.**”*

Hellens Land and Homes England fully support the approach taken to identifying local housing needs in Darlington Borough Council, namely the approach of identifying a figure which meets the minimum demographic needs of the Borough but targeting a strategy which facilitates its economic aspirations. Appendix 1 sets out a detailed assessment of the local housing need position in Darlington.

The 2019 NPPF (Paragraph 60) and corresponding Planning Practice Guidance (PPG - Paragraph: 002 Reference ID: 2a-002-20190220) require the use of the standard methodology figure. However exceptions based on local evidence, can inform a higher figure.<sup>2</sup>

The PPG sets out specific circumstances where the ‘actual housing need is higher than the standard method indicates’:

*Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:*

***growth strategies for the area** that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*

***strategic infrastructure improvements** that are likely to drive an increase in the homes needed locally; or*

*an authority agreeing to take on **unmet need from neighbouring authorities**, as set out in a statement of common ground;*

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<sup>2</sup> Paragraph: 010 Reference ID: 2a-010-20190220

*There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities are encouraged to make as much use as possible of previously-developed or brownfield land, and therefore cities and urban centres, not only those subject to the cities and urban centres uplift may strive to plan for more home. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests. Paragraph: 010 Reference ID: 2a-010-010-20201216*

Here the PPG sets out specific contexts in which the housing need figure may be increased such as where there is a growth strategy for the area, where previously levels of housing delivery show need to be higher and where a previous assessment of need such as a SHMA indicates significantly greater levels of need (all of which apply in Darlington). Policy H1 sets out a housing requirement for the Borough of 422 dwellings per annum (dpa), some 245 dpa above the standard method calculation of 177 dpa.

The increase from the standard method housing requirement of 177 dpa is based upon the following considerations:

- Revised long-term population projections which account for “*significant issues with the ONS data in Darlington*”<sup>3</sup>. These issues demonstrate that it would not be appropriate to rely on the 2014 Household Projections and therefore the standard method. The revised long-term population projection results in a demographic need for **384 dpa**.
- Market signals adjustment to address concealed households. **(+5 dpa)**; and
- An allowance for older persons housing **(+33 dpa)**.

**Total 422 dpa**

Here the Council has concluded that due to flaws in the 2014 Household Projections for Darlington there are exceptional reasons to depart from the standard method (as required by paragraph 60 of the NPPF). It has developed an alternative approach which reflects current and future demographic trends and market signals (as required by paragraph 60 of the NPPF). Furthermore it makes an allowance for older person housing ensuring that institutional housing needs are also quantified and planned for. Again, this is something that the PPG supports.<sup>4</sup> Overall the minimum Local Housing Need for Darlington is robust. The Council meets both the standard method derived need and its own minimum need and therefore as per the PPG “*the approach can be considered sound as it will have exceeded the minimum starting point*”<sup>5</sup>

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<sup>3</sup> Paragraph 2.15 of the 2017 SHMA

<sup>4</sup> Paragraph: 001 Reference ID: 63-001-20190626

<sup>5</sup> Paragraph: 015 Reference ID: 2a-015-20190220

Further to the minimum local housing need, the Council has included a housing target of 492 dpa to underpin its economic growth target of 7,000 new jobs during the plan period. This is based on the Council's 'Employment Needs Report' which takes into account the Tees Valley Strategic Economic Plan, economic forecasts and past employment data. Whilst economic growth is not a feature included within the standard method, it is a noted consideration of the PPG upon which a Council is entitled to adjust its requirement for housing to support economic policy objectives. The Council has made this adjustment of +70 dpa to support the job growth objective of the Tees Valley Strategic Economic plan. The PPG states that "*where a strategic policy-making authority can show that an alternative approach identifies a need higher than using the standard method, and that it adequately reflects current and future demographic trends and market signals, the approach can be considered sound as it will have exceeded the minimum starting point*".

Recent delivery (an average of 567 dwellings per annum over the last five years) shows the number to be manifestly deliverable and achievable and further supports the requirement identified by the Plan. Furthermore, past delivery is a further consideration when deciding whether to increase the housing need figure in a local plan.

For further commentary on the methodology supporting the above figures, please see the appended "*Housing Need and Requirement in Darlington*" report.

We consider this approach, inclusive of a higher base requirement and an additional target is **justified and positively prepared**.

**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?**

Whilst there is some argument about whether the housing target of 492 dpa should be considered as part of the minimum need or the policy requirement, the plan is being positive and ambitious and therefore meets the requirements of the NPPF and PPG in this respect. Recent delivery shows the number to be manifestly deliverable and achievable and further supports the requirement identified by the Plan.