
Inspector's Matters Issues and Questions

Examination of the Darlington Local Plan

Part 1 Hearings (Matter 2)



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Introduction

We have been instructed on behalf of our clients, Story Homes, to submit a response to the Examination of the Darlington Local Plan: Inspector's Matters, Issues and Questions.

Story Homes are a medium-sized housebuilder with 30 years' experience of delivering high quality aspirational housing in the North East, Cumbria, Lancashire and Scotland. Story Homes have successfully delivered several schemes in the Borough of Darlington including Paddocks View in Middleton St George and The Willows in Blackwell.

Story Homes continues to invest in the Borough and the representations made to the emerging Darlington Local Plan ('eDLP') provide constructive comments necessary to ensure the Borough continues to grow.

Story Homes is promoting three sites through this local plan process; Great Burdon (Allocation 020); Middleton St George (Allocation 099) and Hurworth on Tees (Unallocated).

This Statement should be read in conjunction with all previous representations made on behalf of our clients.

Our clients are committed to ensuring the promoted allocations and the eDLP are 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 9- – Transport and other infrastructure
- Matter 10 - Other strategic and development management policies

Inspector's Matters Issues and Questions

Story Homes



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?

Our client fully supports the Council's job target of 7,000 jobs (taken from the Tees Valley Strategic Economic Plan and supported by trend-based economic data). This aim is justified by 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. Whilst of course there is some uncertainty when making long-term projections, the level of evidence put forward by the Local Plan is proportionate to the level of justification required. The Darlington Employment Needs Report concludes that Darlington could be expected to deliver jobs growth of 7,034 FTE over the plan, the majority of which are expected to come forward in a few key sectors including construction, health and social care and professional and business services. These are sectors which recent initiatives, funding and policies indicate will grow in the Borough.

Darlington and the wider Tees Valley hinterland has been very successful in securing inward investment. In March 2021 the Chancellor of the Exchequer announced that Treasury North would be coming to Darlington directly creating hundreds of highly skilled jobs but also generating spin-off jobs in construction, clerical work, hospitality, and other sectors across the region.

Amazon's recent investment at Morton Park is likely to deliver in excess of 1,000 jobs, in line with the economic objectives of the plan and Darlington Economic Strategy to deliver employment in logistics. Other initiatives such as the National Horizons Centre (benefiting from £17.5m of funding) the office development at Feethams (£3.2m investment in Grade A office space) and the redevelopment of the Railway Station (£25m of funding secured) all support the ambition of the NPPF. These growing areas of the Darlington economy chime with the priority sectors of the Tees Valley Strategic Economic Plan (2016).

Furthermore, in 2018 Tees Valley Airport was brought back into public ownership to secure its long-term future. A 10 Year Plan is now being implemented which includes the creation of 7,600 jobs and an additional £420 million to the local economy each year. Several routes have been confirmed including Ryanair flights to Alicante and Loganair flights to London Heathrow.

The Freeport status of Tees Valley Airport will facilitate the delivery of the Southside logistics and manufacturing park, a central part of the Airport's plan to attract businesses and investment to the airport. Freeport status provides tax relief which will incentivise businesses to base their operations at Teesside International or close by.

Whilst Covid has created a temporary set-back, there is no evidence to suggest it has caused a significant structural change in the economic fortunes of Darlington.

In conclusion, the aim to facilitate the growth of 7,000 additional jobs in the Borough is justified and positively prepared. It is based on proportionate evidence and is supported by real life committed projects.

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?

Our client supports Policy H1 which sets out a minimum requirement of 422 dpa and an increased housing target of 492 dpa to meet the Council's growth targets. The Council is required by the NPPF (paragraph 60) to base its local housing need calculation on the standard methodology as set out in the planning practice guidance "*unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.*"

Furthermore whilst the local housing need figure (whether based on the standard method or some alternative approach as per paragraph 60) should be the starting point for strategic policy-making, the PPG¹ states that a higher figure than that derived by the standard methodology should also be considered:

- Where additional growth above historic trends is likely to or is planned to occur over the plan period;
- Where growth strategies are in place, particularly where those growth strategies identify that additional housing above historic trends is needed to support growth or funding is in place to promote and facilitate growth;
- Where strategic infrastructure improvements are planned that would support new homes;
- Where an authority has agreed to take on unmet need, calculated using the standard method, from neighbouring authorities, as set out in a statement of common ground; and
- Where previous delivery has exceeded the minimum need identified and this is indicative of greater housing need.

The PPG also states that where a recent SHMA suggests higher levels of need than those proposed by a strategic policy-making authority, an assessment of lower need should be justified.²

The Strategic Housing Market Assessment (2017) that supports the housing requirement and target demonstrates that the 2014 Household Projections are flawed in Darlington and cannot therefore be relied upon.³ These are the same projections that support the standard methodology and demonstrate that it would not be appropriate to use the standard method in Darlington. This represents exceptional circumstances as per paragraph 60 of the NPPF.

¹ Paragraph: 010 Reference ID: 2a-010-20201216

² Paragraph: 010 Reference ID: 2a-010-20201216

³ Paragraph 2.15 of the 2017 SHMA

The SHMA therefore produces its own projection based on a long-term migration scenario using data from the ten year period leading up to the start of the eDLP Plan Period (2006 to 2016).⁴ This approach is justified and in line with the requirements of paragraph 60 of the NPPF which requires an alternative approach to reflect current and future demographic trends. In terms of market signals, the 2017 SHMA concludes that house prices, affordability and rental prices do not justify increasing the housing number, but the SHMA does make an adjustment for concealed families to reflect the growth in this indicator of overcrowding⁵. Again, this is consistent with the requirement of paragraph 60 of the NPPF which requires an alternative approach to 'reflect market signals'. Furthermore the SHMA includes an adjustment for older persons housing (typically in institutional homes) due to a local plan ambition (Paragraph 5.3.1 of the eDLP) to keep older people in their own homes. Again this accords with the PPG which states that planning for the housing needs of older people is a requirement of planning policy.⁶ Taking these adjustments together it results in a need for 422 dpa – the minimum requirement for Policy H1.

Furthermore we support the Council's job target of 7,000 jobs (see Q2.1 above) and the Council's housing 'target' to reflect this – 492 dpa. The PPG states that a higher housing figure can be considered where **there is a growth strategy in place** and this part of planning guidance supports Policy H1's housing target.

Finally, the PPG states that if a number goes above the minimum need the assumption is that it is sound.⁷ In conclusion, the housing requirement and target in Policy H1 is justified, positively prepared and consistent with national policy. It has demonstrated that exceptional circumstances as per paragraph 60 of the NPPF exist and has delivered an alternative requirement as per the requirements of national planning policy and guidance.

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 above Council has demonstrated the circumstances require to depart from the standard method as set out in planning guidance. Paragraph 60 states that any alternative method must address current and future demographic trends and market signals. The approach adopted by the 2017 SHMA meets the requirements of Paragraph 60. The Council has also demonstrated that to meet the Tees Valley growth strategy (the Strategic Economic Plan) and recent economic trends requires additional housing and the Council proposes that this higher number should be identified as a 'target' above the minimum need. Whilst there is some argument about whether the additional housing required here should be considered as part of the need or the requirement, the plan is being positive and ambitious and therefore meets the requirements of the NPPF and PPG in this respect. 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.

⁴ Paragraph 2.22 and 2.31 of the 2017 SHMA

⁵ Paragraph 3.37 of the 2017 SHMA

⁶ Paragraph: 001 Reference ID: 63-001-20190626

⁷ Paragraph: 015 Reference ID: 2a-015-20190220