

Gladman Developments Ltd.

Darlington Local Plan Examination

Matter 3

Hearing Statement



April 2021

Matter 3 - Vision, aims, objectives and spatial strategy.

Q3.1. Subject to the Council's proposed modification, is policy SD1 consistent with national policy and would it be effective in helping decision makers know how to react to development proposals?

- 1.1 Gladman consider that the proposed modifications to Policy SD1 provides greater consistency with Paragraph 11 of the Framework and the emerging Local Plan Policy H1 and provides greater flexibility for the determination of planning applications to deliver sustainable development.
- 1.2 While Gladman consider that the proposed amendments deliver a sound approach which aligns with national guidance, the PPG highlights that there is no need to replicate wording from Paragraph 11 of the Framework within Local Plan policies. In this regard, it may be advisable to reword or delete criterion i) and ii) which directly replicate aspects of Paragraph 11 d).

Q3.2. Is the settlement hierarchy set out in policy SH1 based on evidence that is relevant, up to date, adequate and proportionate? Is the hierarchy and associated broad distribution of development reasonable, having regard to alternatives that were considered during the preparation of the Plan and the findings of the sustainability appraisal?

- 1.3 Gladman consider that the settlement hierarchy and associated distribution of development is justified through the evidence base which considered the proposed approach, the most sustainable patterns of growth reflecting the relative levels of sustainability across all settlements.
- 1.4 While the hierarchy is effectively a continuation of the strategy employed within the 2011 and 1997 Local Plans, the emerging Plan explicitly sets out a settlement hierarchy and appropriately apportions growth to each settlement. The Council have also tested three spatial options against the Local Plan's sustainability objectives¹. Indeed, the Sustainability Appraisal (SA) and associated background topic papers apply a robust and comprehensive methodology which ensures that all reasonable alternatives have been considered and rejected with clear and justified reasoning.

Q3.3. Is the broad distribution of housing and employment development proposed through commitments and allocations in the Plan consistent with the settlement hierarchy set out in policy SH1?

- 1.5 Gladman contend that the broad distribution of housing and employment development aligns and is consistent with, the settlement hierarchy which has been

¹ Darlington Borough Sustainability Appraisal (August 2020): APPENDIX D: ASSESSMENT OF LOCAL PLAN POLICY OPTIONS

evidenced and justified through the evidence base, with reasonable alternatives fully considered against a clear set of sustainability objectives.

- 1.6 The Council's Spatial Distribution of Development Topic Paper (February 2021) details the approach taken to selecting strategic development locations across the borough in line with the settlement hierarchy.

Q3.4. Are the development limits to the Darlington urban area, three service villages, and eight rural villages defined on the policies map based on evidence that is relevant, up to date, adequate and proportionate?

- 1.7 Gladman do not consider that the settlement boundary policies are the most appropriate tool to guide development, particularly if they preclude otherwise sustainable development from coming forward. Additionally, it is contended that the evidence to justify the application and identification of such a policy tool, does not exist within the Local Plan evidence base.
- 1.8 Appendix 3 of the Spatial Distribution of Development Topic Paper (February 2021) sets out the methodology for identifying development limits, which the Council believe are the most appropriate way of indicating where development is likely or unlikely to be supported in principle.
- 1.9 The starting point to the identification of new development limits was the policies set out in the Local Plan (1997), before numerous key principles were applied including accounting for newly constructed and future development. Beyond noting the above information and listing the principles employed to identify development limits, the evidence base does not justify the identification of such boundaries or set out the analysis of settlements in relation to the principles within Appendix 3 of the Spatial Distribution of Development Topic Paper.
- 1.10 It appears that the development limits identified within the policies maps in relation to Policy H3 are merely a continuation of the 1997 Local Plan application of development boundaries, with revisions to account for newly constructed schemes and future planned development.
- 1.11 Policy H1 recognises the need for sites beyond the identified development limits to be considered acceptable in the absence of a five-year supply of housing land in Darlington. Yet, Policy H3 does not provide such provision within the policy wording and does not set out any flexibility in the approach, thus arbitrarily restricting otherwise sustainable development from coming forward. This directly contradicts the positive approach to growth required in the Framework.
- 1.12 Gladman consider that a consistent approach in relation to development limits must be employed across the Local Plan and assert that further flexibility should be built

into the wording of Policy H3 to allow for consideration of sites located adjacent to the development boundary and/or settlement form. Indeed, this would also align with commentary within the methodology to identifying development limits which states, “They offer sufficient flexibility to still permit development outside of identified areas where it can be justified under other policies (either local or national)”².

Q3.5. Are the Council’s proposed changes to the development limits to Low Coniscliffe and Merrybent villages necessary to make the Plan sound?

- 1.13 Gladman consider that the proposed amendments to the development limits at Low Coniscliffe and Merrybent villages provide consistency with the adopted Neighbourhood Plan.
- 1.14 Notwithstanding this, Gladman reiterate the comments made in response to Q3.4 that Policy H3 (Development Limits), does not provide for sufficient flexibility required by and to be consistent with, the presumption in favour of sustainable development.
- 1.15 Therefore, in order to be ‘sound’ and consistent with the requirements of the Framework, further flexibility should be included within the wording of Policy H3.

² Page 55 - Darlington Proposed Submission Local Plan (2016 – 36) Spatial Distribution of Development Topic Paper (February 2021).