

April 2021



## **Darlington Local Plan Examination**

### **Stage 1 Hearings**

#### **Matter 3**

#### **Vision, aims, objectives and spatial strategy**

Prepared by

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On behalf of

Hallam Land Management

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## 1. Response to Matter 3

### **Settlement hierarchy (policy SH1) and the distribution of housing and employment development allocations**

***Question: 3.2. 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?***

**Question: 3.3. 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?**

- 1.1 We generally support the Settlement Hierarchy and the general distribution of housing development proposed through commitments and allocations as set out in Policy SH1 which seeks to direct development to the main urban area of Darlington and the Service Villages. We particularly support the inclusion of Hurworth as a Service Village alongside Middleton St George and Heighington.
- 1.2 The three Service Villages have strong housing markets and infrastructure already in place so are highly sustainable and readily available to accommodate new housing due to their range of services and facilities. It is important that the three Service Villages play a key role in supporting housing growth in the Borough due to their sustainability.
- 1.3 However, representations made to the Submission Draft Plan consultation raised concerns that the Draft Plan is overly dependent on major urban extensions being delivered on the outskirts of Darlington without fully acknowledging the likely lead in times and delivery rates of these major developments and the impact this will have on the Council's rolling five year housing supply.
- 1.4 Of the 6,709 houses allocated for development in the Borough up to 2036 under Draft Policy H2, 6,429 are proposed to be delivered in the existing urban area of Darlington with only 280 dwellings allocated for development in the Service Villages across just 2 allocation sites. This accounts for 95.8% of housing allocations in Darlington town and only 4.2% in the Service Villages.
- 1.5 Darlington is a relatively fragile housing market due to its location and economy and significant concerns remain that the housing market will be swamped by large scale residential allocations through the proposed Urban Extensions during the Plan Period. This will prejudice the delivery rate from these units within the lifetime of the Plan and will certainly reduce the Council's five year housing supply.
- 1.6 There are significant infrastructure requirements for all of the proposed Urban Extension Allocation sites and various issues that will need to be overcome during the planning

process and lead in times before development can commence on site. It is clear that the proposed delivery rates of the allocation sites (in Appendix A of the Draft Plan) are overly ambitious and likely undeliverable.

- 1.7 In this regard, we maintain that the Draft Plan and Policy H2 are unjustified in their approach for fairly distributing housing and employment allocations throughout the Borough and are not consistent with the settlement hierarchy under Policy SH1 resulting in the Plan being unsound.
- 1.8 A more sustainable option and for the Draft Plan to be found sound would be to direct additional small and medium sized residential allocation sites towards the three Service Villages, particularly Hurworth, that hasn't got any proposed allocation sites in the Draft Local Plan despite there being evidenced need in Table 6.1 of Draft Policy H1.
- 1.9 Hurworth is a highly sustainable village and already has infrastructure in place to deliver housing quickly, ensuring housing delivery rates are retained in the short and medium term whilst the larger strategic allocation sites progress. Taking this approach will protect housing delivery rates in the Draft Plan and will assist the Council in maintaining a healthy five year housing supply.
- 1.10 Paragraph 4.0.9 of the Draft Plan confirms this stating that "*The larger villages Heighington, Hurworth/Hurworth Place and Middleton St George have a range of services which means they are well placed to accommodate some development which would also assist in providing for a range of sites within the Borough.*"
- 1.11 There are significant imbalances with how allocations are spread throughout the Borough and Service Villages identified under Policy SH1 which is further detailed in our response to Matter 4 of the Draft Plan examination.

### **Development limits**

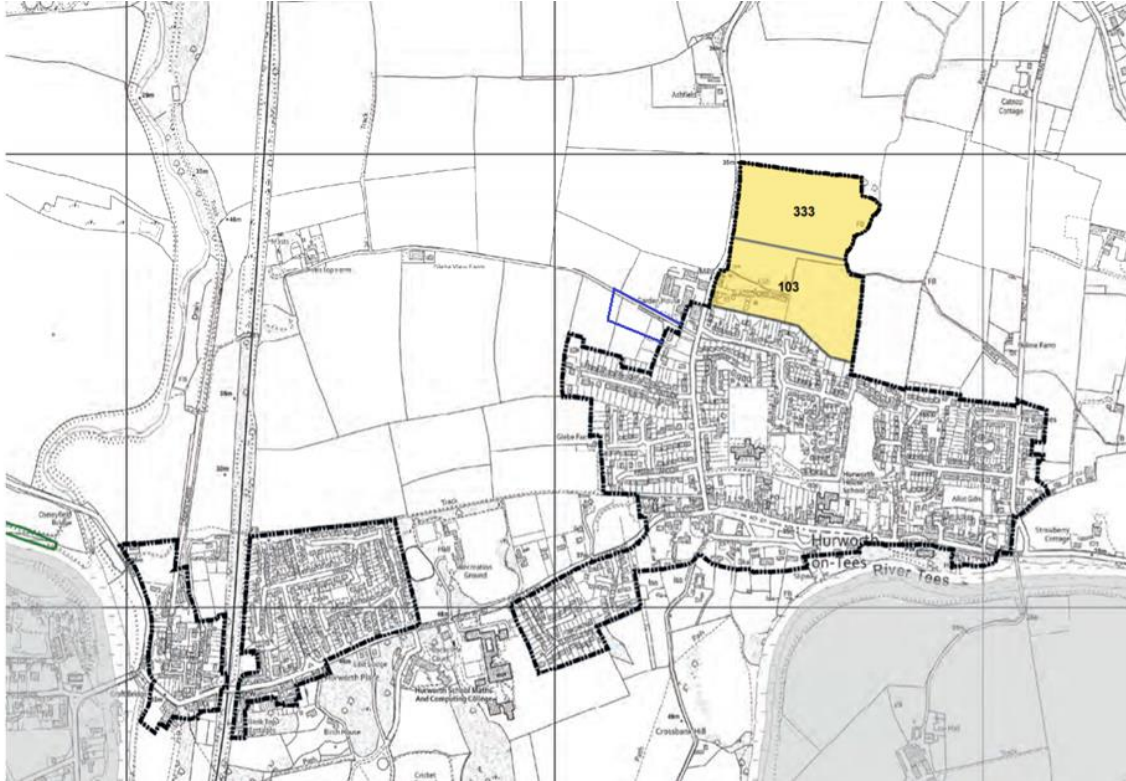
***Question: 3.4. Are the development limits to the Darlington urban area, three service villages, and eight rural villages defined on the policies map based on evidence that is relevant, up to date, adequate and proportionate?***

- 1.12 We object to the use of settlement boundaries if these preclude otherwise sustainable development from coming forward to maintain a healthy supply of housing as required by the NPPF. The NPPF makes clear that sustainable development should proceed without delay in accordance with the presumption in favour of sustainable development.
- 1.13 The Council's use of tightly drawn settlement limits in the Draft Plan is likely to unnecessarily restrict such development from being delivered.
- 1.14 Policy H1 of the Draft Plan recognises the need for sites beyond the development limits to be supported for development should the Council be unable to demonstrate a five year supply of housing land (which will likely be the case given the expected time it will

take for the larger urban extension sites to progress). The wording of Policy H1 therefore conflicts with the purposes of the development limits drawn under Policy H3.

- 1.15 The development limit proposed for the Service Village of Hurworth is inaccurate and not proportionate. Hurworth and Hurworth Place are already joined together by existing development and combine to act as one larger settlement yet the Development Limit as drawn splits Hurworth / Hurworth Place into three parts.
- 1.16 As currently drawn in the Draft Plan, the development limit boundary excludes a number of existing built development centrally within Hurworth / Hurworth Place including Rockcliffe Court, Hurworth School and Hurworth Grange Community Centre. Additionally, the settlement boundary excludes permitted development to the north of Hurworth including land to the south of Garden House Farm where Planning permission was approved in 2016 and 2018 for the development of three houses (16/00989/OUT and 18/00576/RM). Further permission was approved in October 2020 for the change of use of part of the adjacent field from agricultural land to residential curtilage (/Ref: 20/00083/FUL).
- 1.17 It is not clear why the Council have taken this approach and sought to exclude existing and permitted development within the settlement boundary outside of the development limits.
- 1.18 For the development limit for Hurworth to be relevant, accurate and justified – it should be expanded to include all existing development centrally within the Settlement of Hurworth and Hurworth Place and the permitted development for three dwellings and associated garden land to the south of Garden House Farm to the north of Hurworth. Given the extent of the farm buildings associated with Garden House Farm as existing development, it would also be logical to include these within the settlement boundary alongside the main farmhouse which is drawn within the development limits.
- 1.19 Figure 1 below shows the following:
  - a) The development limit for Hurworth shown in Black as currently drawn in the Draft Plan Policies Map. This includes the Garden House Farm farmhouse but excludes the associated farm buildings that extend to the west; and
  - b) Permitted development of three houses and associated garden land immediately to the south of Garden House Farm shown in Blue which has been omitted from within the settlement boundary.

**Figure 1: Proposed Settlement Boundary for Hurworth under Policy H3 including permitted development of three dwellings and associated garden land to the south of Garden House Farm shown in blue**



- 1.20 Representations were made to the Draft Submission Plan consultation in the specific context of land west of Roundhill Road, Hurworth which contains farm buildings associated with Garden House Farm and associated land which was promoted by Hallam Land Management for allocation in the Draft Plan for residential development. The site includes various extents of land available to accommodate residential development which is further detailed under the Hearing Statement for Matter 4.
- 1.21 Inclusion of this site as an allocation within the Draft Plan alongside the permitted development of three houses and associated garden land immediately to the south would complement the two adjacent committed development sites to the east of Roundhill Road which are under construction.
- 1.22 This would provide a clear and defensible boundary to Hurworth and a 'rounding off' of development to the north of the settlement. The inclusion of this site as an allocation would also accord fully with the identified housing need for Hurworth detailed at Table 6.1 of Policy H1 of the Draft Plan.