

April 2021



Darlington Local Plan Examination

Stage 1 Hearings

Matter 4

Housing development

Prepared by

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On behalf of

Hallam Land Management

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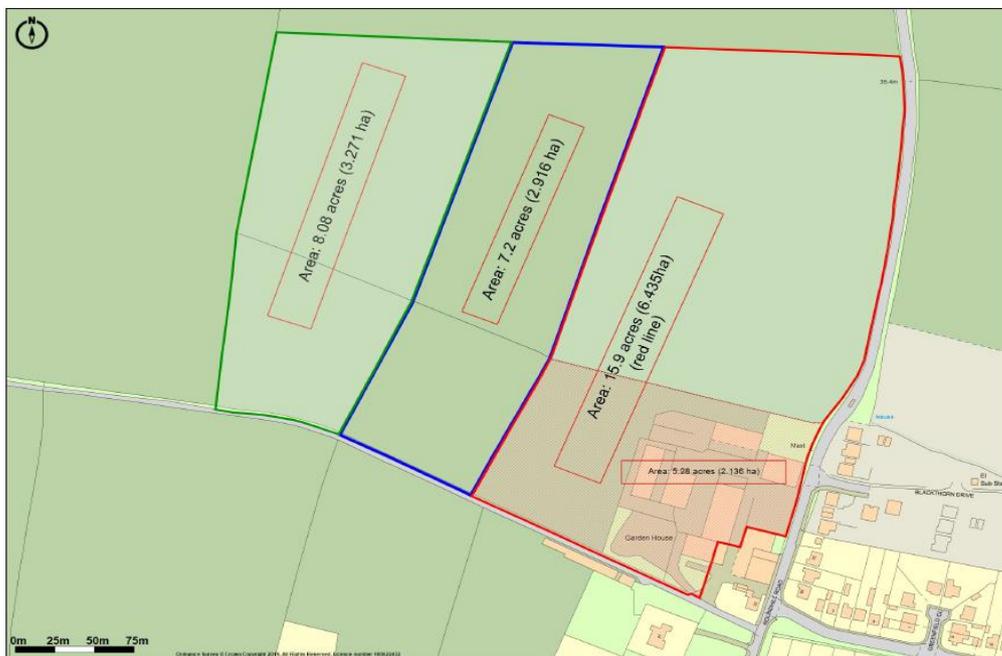
1. Response to Matter 4

Methodology for selecting housing allocations

Question 4.3. Was the approach to selecting the housing allocations in the Plan justified and consistent with national policy and guidance?

- 1.1 These representations are made in the specific context of land west of Roundhill Road, Hurworth which has been 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 as shown at Figure 1 below.

Figure 1: Land west of Roundhill Road, Hurworth



- 1.2 The site is not currently allocated for development in the Draft Plan though has been promoted through the Council's Housing and Employment Land Availability Assessment (HELAA) (2017) under Site Ref: 335. The site was assessed through the HELAA as being suitable, available and achievable to support residential development however, the Council opted to not progress the site as an allocation within the Draft Plan.
- 1.3 The wider site can deliver circa 355 dwellings which would seek to address the deficit of 435 dwellings required to meet housing need in Hurworth as detailed in Table 6.1 of Policy H1 which is detailed at Paragraphs 1.9 – 1.18 later in this Statement. In the context of these Representations, it is maintained that the site should be allocated for housing within the Draft Plan.

- 1.4 The Draft Plan allocates the majority of development in the exiting urban area of Darlington through major urban extensions. Of the 6,709 houses allocated for development under Policy H2, 6,429 houses are proposed to be delivered in the existing urban area of Darlington with only 280 houses allocated for development in the Service Villages. This accounts for 95.8% of housing allocations in Darlington urban area and only 4.2% in the Service Villages.
- 1.5 The Draft Plan is entirely over reliant on the allocation of ten large urban extension sites focussing delivery in and around Darlington with no existing infrastructure in place. The predicted delivery rates for these sites (as set out at Appendix A of the Draft Plan) are ambitious and undeliverable due to the amount of work that would be required and the timescales for undertaking this work at the pre-planning, planning and lead in stages. This is detailed later in this Statement at Paragraph 1.18.
- 1.6 A further concern with how the Council has approached the selection of housing allocations is how sites have been allocated and distributed between the Service Villages. Policy SH1 confirms that Hurworth is a Service Village which will accommodate a proportionate level of development to meet local needs.
- 1.7 Table 6.1 within Policy H1 sets out housing need specifically within the designated neighbourhood areas and confirms that the housing requirement for Hurworth is **625 dwellings over the Plan Period [our emphasis]**. Table 6.1 of Policy H1 is shown below:

Settlement	Housing Requirement
Low Consicliffe and Merrybent	1520
Blackwell	0
Hurworth	625
Middleton St George	260
Sadberge	0

- 1.8 Despite this, the Draft Plan does not allocate any residential development sites in Hurworth instead relying only on two committed development sites which will only deliver a maximum of 190 dwellings (Site Refs: 103 and 333) leaving a deficit of at least 435 dwellings in the Plan Period in Hurworth.
- 1.9 A proposed housing allocation just outside of Darlington (Site Ref: 410 Snipe Lane, Hurworth Moor) is within the Hurworth Neighbourhood Plan Area and is proposed to deliver circa 700 dwellings, however this site is completely removed from Hurworth and

forms an extension to the urban area of Darlington so will not meet the development needs of Hurworth.

- 1.10 Similarly, a further committed housing site is proposed approx. 1.3km to the north east of Hurworth (Site Ref: 394 Lakeside, The Old Brickworks) for 118 dwellings. Again, this site is entirely removed from Hurworth but is shown as a 'village' housing commitment in the Draft Plan with the nearest village being Hurworth.
- 1.11 It is not considered appropriate or justified for either of these two sites to be counted as Hurworth allocations or commitments given they are entirely removed from the main settlement of Hurworth. On that basis, this still leaves a housing requirement deficit of circa 435 dwellings within Hurworth which conflicts entirely with housing need requirements identified within Table 6.1 of Policy H1.
- 1.12 The Draft Plan does not account for this deficit at all. It is unclear why the Council have not allocated any sites that have been promoted for development in Hurworth or if it is assumed that windfall sites will make up the deficit. Windfall opportunities in Hurworth are very limited due to the tightly drawn Development Limit proposed under Policy H3 of the Draft Plan and geographical constraints including the River Tees to the south.
- 1.13 The Council's approach in which allocation sites have been distributed between the three Service Villages under Policy H2 as also unjustified with allocations disproportionately spread with the majority being directed towards Middleton St George. The table below outlines the proposed allocations and commitments in the three Service Villages:

Middleton St George	
1 proposed allocation	260 dwellings
8 commitment sites	930 dwellings
	Total dwellings: 1,190 in the Plan Period
Heighington	
1 proposed allocation	20 dwellings
2 commitment sites	118 dwellings
	Total dwellings: 138 in the Plan Period
Hurworth	
0 proposed allocations	0 dwellings
2 commitment sites	190 dwellings
	Total dwellings: 190 in the Plan Period

- 1.14 The distribution of development is entirely disproportionate with no allocations proposed in Hurworth. Hurworth is equally as sustainable as Middleton St George so there are no identified reasons in the Draft Plan that would prevent a more even distribution of housing between both Villages.
- 1.15 There is no need for Middleton St George to be allocated a further housing site of 260 dwellings in the Draft Plan when there are already 8 commitment sites in the village delivering 930 dwellings.
- 1.16 A comparison of the sustainability credentials of Hurworth / Hurworth Place and Middleton St George were included in Representations made to the Draft Submission Local Plan consultation and are again detailed below:

Hurworth / Hurworth Place	Middleton St George
Spar Convenience Store	Londis Convenience Store
Post Office	Post Office
Hurworth Fisheries	Premier Country Harvest Convenience Store
Hurworth Dental Practice (accepting non-NHS patients)	Golden Chef Chinese takeaway
Hurworth Physiotherapy	Pizza Nareno
Florist	Sixteen Gents Barbers
Nick & Gordon Carver Estate Agent	Twelve Central Hairdresser
Hurworth Primary School	St George's C of E Primary School
Priory Hurworth House Special School	Middleton Pharmacy
Hurworth Methodist Church	MSG Dental Practice
All Saints Church and graveyard	Platform 1 Public House
Hurworth Village Hall	Stanhope Park Veterinary Practice
Bay Horse public house/restaurant	Havelock Arms public house
The Otter and Fish pub/restaurant	Newsagents
Emerson Arms public house	Middleton St George Community Centre

Hurworth School (Academy School for pupils aged 11-16)	Middleton St George Cricket and Social Club
The Station Hotel public house	Table Talk Indian Restaurant
Christian reading room	Pawsitively Pet Food Shop
Rockcliffe Hall Country Club and Spa Hotel	Vickers Betting Shop
Rockcliffe Surgery (currently accepting NHS patients)	Café Italissimmo
Oxford Garage	Image Hairdresser
Theo's hairdresser's	
Rockcliffe Pharmacy	
Hurworth Grange community centre, containing a bar, small businesses and function rooms	
The Comet public house	
Public Transport Links	
<p>Bus stops are situated throughout the village along West End</p> <p>The no.12 bus service (Arriva) serves Hurworth, Hurworth Place, Croft on Tees, Darlington, Middleton St George and Teesside Airport.</p> <p>The service operates with a frequency of approx. every 30 mins (towards Darlington and Teesside Airport) during the day Mon-Sat and approx. every hour (towards Hurworth Place and Croft) during the day Mon-Sat.</p> <p>Services are generally every 2 hours on Sundays.</p>	<p>Dinsdale Train Station is located to the south of the village which provides rail links to Bishop Auckland, Darlington, Middlesbrough and Saltburn every 15 – 30 minutes during the day Mon-Sat and hourly on Sundays</p> <p>Bus stops located on Middleton Lane, Yarm Road and Station Road.</p> <p>The no.12 bus service (Arriva) serves Middleton St George, Teesside Airport, Middleton One Row, Morton Park, Darlington and Hurworth.</p> <p>The service operates every 30 mins (towards Darlington, Hurworth and Teesside Airport) during the day Mon-Sat.</p>

	<p>Services are generally every 2 hours on Sundays.</p> <p>Teesside International Airport is also a short distance from Middleton St George operating flights throughout the UK with links onto Europe via London Heathrow</p>
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- 1.17 The comparative exercise demonstrates that Hurworth is equally as sustainable as Middleton St George in terms of services, facilities and transport links for existing and new residents. Hurworth / Hurworth Place has in fact got a slightly larger range of facilities including three schools compared to one school in Middleton St George which is a key factor when deciding where new residential development should be located.
- 1.18 The Draft Plan is entirely unjustified in its approach for distributing housing fairly and proportionately through the Service Villages and conflicts with Table 6.1 of Policy H1. For the Draft Plan to be justified, there needs to be a more even distribution of housing between the Service Villages.

Total supply from housing allocations (policy 2)

Question 4.14. Is the assumption that a total of 6,709 dwellings will be built on the allocated sites between 2020 and 2036 justified?

- 1.19 Table 6.2 of Policy H2 sets out a list of Allocation sites in the Local Plan totalling delivery of 6,709 dwellings between 2020 and 2036. Of these, 5,820 dwellings are proposed to be delivered across 10 urban extension site allocations surrounding Darlington equating to 86.75% of development overall from Allocations.
- 1.20 Key concerns with this approach are maintained. In Representations made to the Draft Submission Plan, an assessment of the likely lead-in times and delivery rates of the ten urban extension allocation sites against Lichfield’s ‘Start to Finish’ research 2nd Edition (February 2020) was provided. The Research is widely used as a credible benchmark on lead-in times and delivery rates at Local Plan examinations across the country The Council have provided unrealistic delivery rates in the Draft Plan when assessed against the Research. The current planning position of the 10 allocation sites are set out below:

Site Ref	Expected delivery of dwellings in the Plan Period	Planning Status – as of 26 th April 2021	Developer Secured?	Draft Plan Predicted Lead in Time	Predicted Lead in Time based on Start to Finish Research and Planning Status

3	380	Outline permission approved 21 August 2020 Ref 15/01050/OUT. Reserved Matters and Conditions applications submitted in October 2020 (Ref Nos: 20/00939/RM and 20/00938/CON)	Theakston Estates Ltd	2022	2024
8	370	Approved 6 th February 2020 Ref:15/00804/OUT. Reserved Matters and Approval of Conditions Applications submitted in Feb, March and April 2021 (Refs: 21/00346/RM, 21/00205/RM and 21/00304/CON)	Persimmon Homes, Taylor Wimpey And Northumbrian Land Ltd	2022	2024
20	500	No Application Submitted	None	2027	2027
41	420	17/00632/OUT – still pending decision extension of time agreed to the 28 th May 2021. Reserved Matters and Discharge of Conditions Approval still required.	Taylor Wimpey	2023	2024
100	270	No Application submitted	None	2028	2028
185	750	No Application submitted.	None	2024	2026

410	700	<p>20/00196/FUL - Hybrid application for 449 dwellings. Approved 13th October 2020 subject to S106 Agreement.</p> <p>Full Application: a) 150 dwellings to be constructed by Darlington Borough Council and Esh Developments. b) 155 market dwellings to be constructed by Esh Developments.</p> <p>Outline Application: a) 144 affordable dwellings with all matters reserved for future consideration apart from access. Will need further Reserved Matters approval.</p> <p>Approval of Conditions Application submitted 15th October 2020 Ref: 20/00957/CON. Still pending decision.</p>	<p>Darlington Borough Council and Esh Developments.</p> <p>Social Housing Developer still required</p>	2023	2023
249	630	<p>Outline Application submitted July 2017 Ref: 17/00636/OUT. Still undetermined extension of time agreed to the 31st May 2021. Reserved Matters and Discharge of Conditions approval still required</p>	Gladman Developments	2024	2026
251	1650	No Application submitted.	None	2024	2026
392	150	18/00988/FUL – pending decision. Amended plans submitted March 2021	Bellway Homes	2023	2023

- 1.21 When the 10 Urban Extension Allocation sites were examined against the Start to Finish Research, the evidence shows that the predicted delivery rates are overly ambitious and realistically won't be realised until later in the Plan Period and beyond. The evidence suggests that there will be an expected shortfall in delivery just on these 10 sites of circa 550 dwellings between the Plan Period of 2020 and 2036. This equates to an undersupply of circa 470 dwellings from the Council's five year supply.
- 1.22 The key reasons why we believe the delivery rates in the Draft Plan will likely take longer than calculated are detailed below:
1. Four of the ten sites (Refs: 20, 100, 185, and 251) do not have planning applications currently submitted with the Council and no housebuilder associated. There is no evidence if or when these sites will progress or whether a development partner can be secured so their deliverability is questioned. The total yield of these four sites is 3,170 dwellings which are being relied upon to start delivering as part of the Council's five year supply.
 2. A further three of the ten sites (Refs: 41, 249 and 392) have Outline / Full planning applications submitted that are still pending a decision. Two of the three applications will still require further Reserved Matters and Condition Approvals as well as site preparation works prior to any development commencing which will likely take a number of years to progress.
 3. A number of sites have multiple land ownerships and the need for equalisation and/or collaboration agreements which on average take a significant amount of time to agree between parties.
 4. All of the strategic allocation sites need to fund and deliver significant infrastructure ahead of housing completions commencing. Given the current planning status of these sites, evidence of where this funding will come from is not clear. Darlington Borough Council do not have an adopted Community Infrastructure Levy (CIL) Charging Schedule so development infrastructure is mainly funded via S106 agreements. Funding of infrastructure is therefore likely to delay delivery rates further in the Plan Period.
- 1.23 Darlington is a relatively fragile housing market and is in danger of being swamped by the large scale Urban Extension Allocations proposed 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. In this regard, the assumption that 6,709 dwellings will be built on the allocated sites between 2020-2036 is not considered to be reasonable or justified.
- 1.24 For the Draft Plan to be found sound and the five year supply forecasts accurate, it is considered necessary to include some smaller – mid-size residential allocation sites spread evenly through the three Service Villages identified in the Draft Plan under Policy SH1 rather than relying entirely on the larger urban extension allocations that will take a long time to progress and start delivering housing.

Question 4.15. Has the Council provided clear evidence to demonstrate that a total of 735 dwellings will be built on the allocated sites without planning permission between 2020 and 2025?

- 1.25 Based on the nationally derived Lichfield's 'Start to Finish' research, the evidence shows that the rate of delivery relied upon in the Draft Plan is overly optimistic and will likely result in a shortfall in housing delivery which will affect the Council's five year housing supply. The expected shortfall of housing delivery in the five year supply is expected to be circa 470 dwellings.
- 1.26 To ensure five year supply delivery rates are accurate, the Draft Plan needs to make allowances for further small to mid-sized allocation sites directed towards the Service Villages to ensure assessed housing need is met in full whilst the larger Urban Extension sites progress.
- 1.27 The Council have made allowances for this under Policy H1 which allows unallocated sites that are outside of development limits but well related to urban areas to be supported for development. A more robust approach would be to ensure there are sufficient allocation sites in the Draft Plan to meet assessed housing need rather than relying on windfall sites delivering in the event that the Council cannot demonstrate a five year housing supply.

Overall housing supply for the plan period (appendix A)

Q4.18. Would basing the five year requirement on 422 dwellings per year be effective in helping to ensure that identified needs, and the target of 492 dwellings per year, can be met?

- 1.28 We do not consider that basing the five year requirement on 422 dwellings per annum is effective or justified in helping to ensure that identified housing need is met. We maintain that the higher figure of 492 dwellings per annum should be the minimum requirement which includes an uplift to support economic growth aspirations based on 2017 SHMA evidence.
- 1.29 Assessing the housing land supply position against a minimum housing requirement of 492 net dwellings per annum would be a positive approach, ensuring that housing needs are met in full and the Council's economic growth aspirations are supported by sufficient housing. In this regard the approach is justified in accordance with the NPPF.
- 1.30 It is important to highlight that there is a significant amount of current inward investment in Darlington. The Government recently announced in March 2021 that they would be

developing a new Treasury campus in Darlington¹. The site will initially employ 750 officials with plans for future expansion and is expected to open before the end of 2024².

- 1.31 Additionally, Teesside International Airport which is located just outside of Darlington is set to undergo significant expansion. Terminal refurbishment plans were announced in December 2020 and on the 3rd March 2021, the Tees Valley region including the Airport was awarded Freeport status by the Government which is expected to yield long term economic benefits for the Airport³. The Teesside Freeport is expected to create more than 18,000 jobs and provide a £3.2billion boost to the local economy over the next five years.
- 1.32 This significant amount of planned inward investment and relocation of staff in the Treasury to Darlington will inevitably create greater demand for a wide range and balance of housing types and locations throughout Darlington Borough to meet the planned growth.
- 1.33 The Draft Plan must accurately assess the housing needs for Darlington throughout the Plan Period and ensure the Council's economic growth aspirations are supported by providing sufficient housing in the right locations.

Question: 4.21. Is the approach set out in policy H1 to allowing development outside development limits if there is no longer a demonstrable supply of sites to fully meet the five year requirement justified and consistent with national policy?

- 1.34 Policy H1 includes a fallback position that allows for sites that are not allocated in the Draft Plan and located beyond development limits but are well related to the limits of the main urban area or service villages to be supported for development. Proposals will have to demonstrate that they will be deliverable in the short term, therefore contributing to the five year supply.
- 1.35 We generally support the provision allowed for in Policy H1 which provides a mechanism for sites to come forward outside of the development limits, including in the Service Villages, in the event that a 5 year housing land supply cannot be demonstrated. Such an approach accords with the NPPF and doesn't unnecessarily restrict sustainable development coming forward.
- 1.36 However, for the policy to be effective it must be clearly worded and unambiguous to ensure that the starting point for the five year housing supply is a minimum of 492 net dwellings per annum in accordance with Policy H1 and the 2017 SHMA evidence base. The Council's five year housing land supply position must be tested against the higher

¹ <https://www.theguardian.com/politics/2021/mar/03/darlington-named-as-site-of-planned-treasury-northern-campus>

² <https://www.itv.com/news/tyne-tees/2021-03-03/sunak-announces-darlington-as-location-for-treasurys-northern-headquarters-and-confirms-teesside-freeport>

³ <https://teesvalley-ca.gov.uk/teesside-freeport/>

housing requirement set by the Draft Plan (492 dwellings per annum). It is currently not clear from Policy H1 what the starting point for determining the five year requirement is.

- 1.37 Sites that have been promoted for Allocation through the Draft Plan that are outside of the development limits but well connected to the Service Villages, such as Land available to the west of Roundhill Road, Hurworth that has been promoted by Hallam Land Management through Representations made to the Draft Plan, should be included as Allocations in the first instance to maintain a healthy and deliverable five year housing supply rather than being relied upon as windfall sites.