

Richard Cowen for
Gillan Gibson

Representor number
1164350

**STATEMENT OF RICHARD COWEN TO THE EXAMINATION IN PUBLIC
INTO THE
DARLINGTON LOCAL PLAN**

RELATING TO MATTER 2

Background

- 1.1 I make this statement on behalf of CPRE Durham in respect of questions asked by the Inspector relating to Matter 2 at the Examination in Public
- 1.2 Representations were made to Darlington Borough Council by Mrs. Gillan Gibson on behalf of CPRE Darlington. However, in December 2020, Mrs Gibson suffered a severe stroke and is currently unable to represent CPRE.
- 1.3 CPRE Darlington is a part of CPRE Durham. The area covered by CPRE Durham covers all the area between the Tyne and the Tees and so includes Darlington. It welcomes District Groups such as that at Darlington although at present Darlington is the only such Group. All correspondence by CPRE Darlington is written in conjunction with members of CPRE Durham, including myself.
- 1.4 CPRE Durham has made representations in respect of all Local Plans made in its area since 2010, namely Gateshead (as part of the Newcastle and Gateshead Joint Core Strategy), Sunderland, Hartlepool, Stockton and County Durham. prior to the introduction of the Standard Method for calculating the Objectively Assessed Need (OAN) for housing, CPRE Durham (along with other organisations) has always argued that local councils have overestimated the OAN by about 30%.
- 1.5 The Standard Method has been heavily criticised in many part of the country as it has significantly increased the OAN for many local authorities from the which they proposed. However, in the North east, the Standard Method has had the opposite effect and reduced the OAN proposed by local authorities. CPRE Durham was pleased when Durham County Council reflected the OAN when it produced its Local Plan following the withdrawal of the original Plan in 2014.

South Tyneside Council also appears to be working to the OAN using the Standard Method.

1.6 Darlington Borough Council has been different. It has had extremely high OAN for some years now and CPRE Durham (including Darlington) together with other organisations has been alarmed by the figures used. They have not been the 30% increase mentioned above but twice or even up to 3 times the Standard Method calculations for the Borough.

1.7 The question therefore is whether this approach by the Council is justified and so makes the Local Plan sound. I will attempt to deal with this while answering the questions asked.

CPRE Durham's response to the Inspector's questions on Matter 2.

Q2.1. Is the aim to facilitate economic growth of 7,000 net additional jobs in the Borough between 2016 and 2036 justified and positively prepared?

While CPRE Durham accepts the need for growth, we represent that this has to be reasonable. There is a considerable amount of land in Darlington which is allocated for employment, and has been since the Local Plan was adopted in 1997 (and amended in 2011).

We are concerned that this strongly suggests that the Plan's objective of providing 7,000 jobs within the Plan's lifetime is optimistic. This may be especially so following the Covid pandemic. 7,000 jobs is a significant number for a medium sized town in the north east of England and, subject to below, we are not aware of any major employment initiative that would attract a large number of jobs to Darlington.

We accept that the government has recently announced Freeport status for certain areas in Teesside. That of course is something that has arisen since the submission of the Plan for examination. While the area of the Freeport does include Teesside International Airport, part of which does fall within Darlington, the vast majority of the Freeport is within other local authority areas. CPRE Durham questions whether this will attract further development to areas outside of the Freeport in Darlington and, indeed, whether the Freeport may attract employment sites within it from other areas of Darlington. As far as the Airport is concerned, I also refer to the comments made by Mrs Gibson in her representations to the Council and represent that these need to be borne in mind.

The government has also announced that there will be a northern branch of the Treasury in Darlington. This is of course welcome but the extent to which it will contribute to 7,000 jobs as stated in the Plan has to be questioned.

In her representations on Greater Faverdale, Mrs Gibson accepted the need for a reserve employment site, but not to the extent stated in the Plan. In addition, the

need for so much employment land elsewhere is questioned especially when sites such as at Faverdale are now being suggested for other uses, including housing.

While of course the creation of 7,000 jobs is a positive approach, given the above we question whether it is realistic and, therefore, whether it is justified. We represent that a much more reasonable number should be proposed for the Plan period.

Q2.2. Are the proposals in policies E1 and E2 to provide for a total of 158 hectares (net) of additional land for employment uses justified and positively prepared? In particular, would this overall quantity of land allow for the creation of 7,000 net additional jobs between 2016 and 2036 and provide sufficient flexibility to accommodate needs not anticipated and enable a rapid response to changes in economic circumstances?

We represent that, if the land allocated as shown on the draft Policies Map is in fact adopted, it will, bearing in mind our answers above, provide more than enough flexibility for unforeseen circumstances, especially if there is a reserve employment site at Faverdale (even without the Greater Faverdale extension).

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?

CPRE Durham argues strongly that both numbers mentioned here are not justified. Whether or not such a number is “positively prepared”, we argue that it is not consistent with national policy, particularly as mentioned in Paragraph 60 of the NPPF, in that the OAN far exceeds the number calculated under the Standard Method. Although Paragraph 35a of the NPPF states that this figure is a minimum, we represent that the total should be in that region unless, as stated in Paragraph 60 exceptional circumstances, exist to use other means. We represent that the Council has not demonstrated such circumstances to justify such a high figure for the OAN in Darlington.

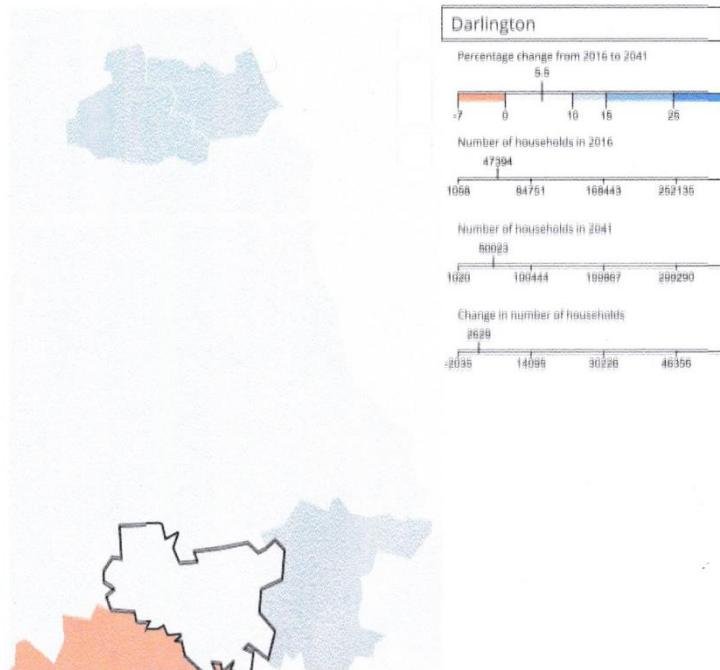
The Standard Method calculates the OAN for Darlington to be 177 houses per year. We acknowledge of course that this is a minimum figure and that there may be exceptional local circumstances that require a different approach (Planning Practice Guidance Paragraph: 015 Reference ID: 2a-015-20190220). We also accept that the government has stated that the 2014 Household Projections should be used to assess the OAN, even though subsequent projections in 2016 and 2018 have produced lower projections (see PPG Paragraph: 005 Reference ID: 2a-005-20190220). Nevertheless, Paragraph: 003 Reference ID: 2a-003-20190220 does make it clear that if the Standard Method is not used, authorities can expect it to be scrutinised at Examination.

In the Housing Topic Paper, Darlington argues that these figures are incorrect and that this justifies them using a different method. We represent that this is a flawed approach and one cannot just, in effect, say we disagree with the figures. The ONS projections since 2016 continue to show figures that do not equate to those used by Darlington. In 2018, the ONS projections for Darlington from 2016 to 2041 were as shown in the diagram below.

19/04/2021

Household projections in England - Office for National Statistics

Figure 3: Projected percentage change in number of households for local authorities in England, 2016 to 2041



<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/2016basedhouseholdprojectionsinengland/2016basedhouseholdprojectionsinengland>

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In other words, the most recent projections for Darlington until 2041 are 2629 households, nothing like the figure proposed by the Council to 2035 of over 8,000 households. While noting and acknowledging the reasons for using the 2014 projections rather than subsequent ones, a difference on this scale appears hard to justify.

The PPG within Paragraph: 004 Reference ID: 2a-004-20201216 does now provide for a 35% uplift in certain cities in England but Darlington is not included among them.

We also note Paragraph: 010 Reference ID: 2a-010-20201216 of the PPG which states there may be circumstances where the OAN may be greater than indicated by the Standard Method. A list of examples is given although this is said not to be exhaustive. One example is where a recent Strategic Housing Market Assessment indicates a greater OAN – but there is also a proviso that in such circumstances brownfield land should be used.

However, we represent that this does not justify using a figure that is over double the OAN under the Standard Method, especially when that figure is itself a “moving target”, ranging from 422 to 492 houses per year, or even higher potentially. And further no attempt has been made to use brownfield or other previously developed land. As Mrs Gibson has mentioned, while the government may encourage an increase in the OAN, it must be realistic and justified.

While we acknowledge the Freeport on Teesside and the creation of a Northern Treasury Office in Darlington, for reasons given above we do not accept that this justifies the sort of figures given by Darlington. Also it should be noted that Darlington’s figures were given well before such announcements were made.

We therefore represent that the Plan as drafted is not sound as it is not consistent with government policy. To be made sound, as Mrs Gibson has outlined in her representations, we believe many of the proposed allocations for housing should be deleted.

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?

CPRE Durham is very concerned about this issue and represents that the range given, even if found to be sound (notwithstanding our arguments above), is ambiguous. Planning must be clear and there is no scope for implied issues such as implied conditions. If this range is given and accepted, we represent it will lead to increased pressure to build to the maximum that will be difficult to resist, whatever the actual circumstances at the time.

Q2.5. Is the Plan based on adequate and proportionate evidence about the quantitative and qualitative need for office, retail and leisure development in the Borough?

We have commented on employment provision above.

Mrs Gibson has commented on issues relating to District and Local Centres. We remain concerned that only 2 areas are mentioned in Policy TC4 and represent that, in a town the size of Darlington together with the surrounding villages, this is unrealistic.

We therefore represent that consideration needs to be given to the areas identified by Mrs Gibson to assess whether the sort of services mentioned in this question are appropriate there.