
Inspector's Matters Issues and Questions

Examination of the Darlington Local Plan

Part 2 Hearings (Matter 5)



Contents

Introduction	1
Matter 5: Meeting particular housing needs	2



Introduction

Savills (UK) Limited have been instructed on behalf of our client, Bussey & Armstrong Projects Ltd, who are longstanding developers within the Borough, to submit a response to the Examination of the Darlington Local Plan: Inspector's Matters, Issues and Questions.

Our client's interest is in respect of the West Park Garden Village which is located north west of Darlington and is located within the jurisdiction of Darlington Borough Council.

This Statement should be read in conjunction with all previous representations made on behalf of Bussey & Armstrong Projects Ltd.

These representations have been submitted to support the proposed residential allocation of land adjacent to the north of West Park Garden Village and to provide comments on the general approach and strategy of the plan relating to matters on housing requirement, allocations, Development Limits and others.

Our client is committed to ensuring the emerging Local Plan is prepared on a sound and robust basis. In particular, they wish to ensure that the correct provision of housing and housing allocations are provided throughout the plan period to meet the social and economic needs of the Borough.

Our comments therefore focus on the following 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

This statement addresses a number of questions raised by the Inspector under Matter 5: Meeting particular housing needs.

Matter 5: Meeting particular housing needs

Housing mix (policy H4)

Q5.1. Is the Council's proposed modification to the opening paragraph of policy H4 necessary to make the Plan sound and, if so, would it be effective in so doing?

The Council has proposed modifications to the opening paragraph of policy H4 to encourage, rather than expect, housing developments to provide a mix of housing, and to require consideration of the site's character. We welcome this proposed modification.

It is acknowledged that a mix of house types, sizes and tenures is needed and our Client is supportive of providing a range and choice of homes to meet the needs of the local area.

It is considered that the modification is appropriate and adds flexibility to the policy whilst still providing guidance for development. It is important that policy provides guidance but is not so onerous and inflexible that it stalls or even prevents future development.

Q5.2. Is the Council's proposed modification to the requirement in policy H4 for accessible and adaptable homes necessary to make the Plan sound? Is the modified requirement (47%) justified by up to date and proportionate evidence including about need and viability having regard to relevant national guidance ?

Whilst our Client welcomes the objective of Policy H4 for securing a mix of housing types, sizes and tenures which are appropriate to local needs, concerns were present regarding the optional technical housing standards includes for the delivery of 80% of new homes as category M4(2) and 9% as category M4(3) as part of all new applications for new build homes.

Even though it is acknowledged that the Council has proposed a modification to policy H4 to reduce the requirement for the proportion of new homes that are accessible and adaptable from 80% to 47%, to take account of the latest strategic housing market assessment (SHMA 2020 (SD08)), our Client still considered these requirements to be unjustified and result in the policy being unsound.

A Ministerial Statement dated 25th March 2015 stated that "*optional new national technical standards should only be required through any new Local Plan policies if they address a clearly, evidenced need, and where their impact on viability has been considered, in accordance with the National Planning Policy Framework and Planning Guidance.*"

It is vital that the Councils provides local evidence which justifies the inclusion of optional higher standards for accessible and adaptable homes in its Local Plan policy.

The PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability.

PPG ID: 56-009 also states that policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. Therefore, there will need to be a clear policy for how the Council will work with developers and housing associations to deliver these homes. This will also need to give consideration to the significant additional costs associated with the provision of M4(3(2b)) dwellings.

Whilst we note the reduction, it is considered that the final figure needs to be backed up by further evidence, as advised by the PPG, to ensure that the policy does not become too onerous creating viability implications for future development. No information is provided in relation to the adaptability and accessibility of the existing stock, or the size, location, type and quality of dwellings needed based on future demand.

We question if this element cannot be met solely through building regulations avoid an unnecessary onerous policy within the Local Plan.

Affordable housing (policies H5 and H6 and appendix E)

Q5.3. Are the affordable housing requirements of policy H5 table 6.5, which sets out three different levels of affordable housing for different parts of the Borough (which are defined on the map in Appendix E), justified by up to date and proportionate evidence relating to need and viability?

Our Client supports the area-based approach to determining the appropriate expected provision of affordable housing in response to identified need. We consider this approach is reasonably founded upon the conclusions of the SHMA and is also reasonably underpinned by the Council's wider ambitious housing and economic growth objectives.

We consider this measure will be effective in ensuring the maximum possible provision of affordable housing, whilst avoiding restricting the viability of prospective development, which could have the potential to undermine the Borough's wider plan objectives

Q5.4. Is the Council's proposed modification to the affordable housing tenure split in policy H5 necessary to make the Plan sound and, if so, would it be effective in so doing?

The Council's proposed modifications include proposed changes to the tenure split. These are: where there is a 10% affordable requirement this would be 100% affordable home ownership, for the 20% areas they will be 50% affordable rent and 50% affordable home ownership and 30% will be 65% affordable rent and 35% affordable home ownership.

We do not have much to say on this matter other than it is considered to be sound and in line with the policies set out in the NPPF and reflecting the most recent evidence from the SHMA 2020 (SD08) and Housing Topic Paper 2021.