
Inspector's Matters Issues and Questions

Examination of the Darlington Local Plan

Part 1 Hearings (Matter 9)



Contents

Introduction	1
Matter 9 – Transport and Other Infrastructure	2



Introduction

We have been instructed on behalf of our clients, Story Homes, to submit a response to the Examination of the Darlington Local Plan: Inspector's Matters, Issues and Questions.

Story Homes are a medium-sized housebuilder with 30 years' experience of delivering high quality aspirational housing in the North East, Cumbria, Lancashire and Scotland. Story Homes have successfully delivered several schemes in the Borough of Darlington including Paddocks View in Middleton St George and The Willows in Blackwell.

Story Homes continues to invest in the Borough and the representations made to the emerging Darlington Local Plan ('eDLP') provide constructive comments necessary to ensure the Borough continues to grow.

Story Homes is promoting three sites through this local plan process; Great Burdon (Allocation 020); Middleton St George (Allocation 099) and Hurworth on Tees (Unallocated).

This Statement should be read in conjunction with all previous representations made on behalf of our clients.

Our clients are committed to ensuring the promoted allocations and the eDLP are sound and robust. Our comments will therefore focus on the following Matters:

- Matter 1: - Legal and Procedural Requirements and other General 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
- Matter 9- – Transport and other infrastructure
- Matter 10 - Other strategic and development management policies

This statement addresses a number of questions raised by the Inspector under Matter 9: Transport and Other Infrastructure

Matter 9 – Transport and Other Infrastructure

Improving access and accessibility (policies IN2 and IN3)

Q9.5. Subject to the Council's proposed modifications, is policy IN2 sound?

Our client has concerns about the implications for IN 2 part (d) as modified. The modification that the Council is proposing will require sites where more than 20% of the dwellings are not within 400m of a frequent bus service to provide financial contributions for a *“supported or extended bus service for up to 5 years, and bus infrastructure.”*

The first concern is that the requirement set out in the modification is too inflexible to take in account the real life circumstances of individual sites. There could be sites which are remote from day to day services such as shops and schools but which are 100% within the bus stop criteria; these would be “accessible” accordingly to IN2 with no contribution required. There could, however, be sites which are within walking distance of a supermarket, primary school or train station but beyond the required distance from a bus stop which would be inaccessible and would be required to contribute towards a bus service. There must be the ability for planning judgement to prevail in such circumstances and to prevent this is unjustified.

The second concern is that a contribution to support or extend a bus service may not be possible due to a reluctance or possibly an objection from bus operators. Furthermore, it could perversely lead to more emissions due to unplanned / ill-coordinated bus services driving around the town on under-utilised routes or serving under-utilised stops.

The third concern to raise is that this requirement does not appear to be tested or accounted for in the Viability Appraisal (August 2020). The August 2020 Viability Appraisal applies a cost of *“£250 per bedroom applied to urban extension typologies based on past provision and proposed requirements”* (page 57). In Darlington, this contribution is typically for securing safe routes to school and often includes upgrades to footpaths and improvements in lighting, but can include bus stop upgrades. It could also include the monitoring and survey associated with a Travel Plan which could cost around £25,000 for a 100 dwelling site. Notwithstanding, the modification to Policy IN2(d) clearly goes beyond this. An example would be that for a 100 dwellings site (assuming all 3 bedrooms), the Viability Appraisal would assume a Sustainable Transport policy cost of £75,000. Across 5 years this amounts to just £41 per day which is completely insufficient to support or extend a bus service as well as pay for additional stops, associated S278 works and travel plan monitoring.

In conclusion, we do not feel that this modification has been properly considered. It is unlikely to be effective. It is not justified and is likely to be in conflict with national planning policy on the requirement to test the viability of such policy requirements.

Q9.6. Are the requirements for transport assessments and travel plans set out in policy IN3 consistent with national policy?

IN 3 states that “major developments will be required to engage in the Travel Planning process and produce a Transport Assessment.” To require all major development to provide such documents is too imprecise a requirement and takes no account of site specific issues (which is a requirement of the Planning Practice Guidance).

The PPG states “Transport Assessments are thorough assessments of the transport implications of development, and Transport Statements are a ‘lighter-touch’ evaluation to be used where this would be more proportionate to the potential impact of the development (ie in the case of developments with anticipated limited transport impacts). Where the transport impacts of development are not significant, it may be that no Transport Assessment or Statement or Travel Plan is required. Local planning authorities, developers, relevant transport authorities, and neighbourhood planning organisations should agree what evaluation is needed in each instance.”

The Council’s policy should refer to the graded approach set out in the PPG which requires different levels of assessment depending on various factors including actual impact on road trips.

Car and cycle parking requirements (policies IN1, IN2 and IN4)

Q9.7 Subject to the Council’s proposed modification, are the requirements of policy IN4 relating to car and cycle parking, including reference to having regard to local circumstances and the standards set out in the Tees Valley Highway Design Guide, sound?

We have concerns about whether this document is up to date and whether it is suitable to reference in this long term strategic plan.

Utilities, telecommunications and broadband infrastructure (policies IN6-IN8)

Q9.8 Do policies IN6 and IN8 set out a sound approach to the provision of utilities and broadband infrastructure in development?

The provision of such utilities is a private enterprise and Story Homes as a developer can only ever make homes suitable for the installation of such utilities rather than provide them directly. This should be clarified in the plan

Renewable energy (policy IN9)

Q9.9. Subject to the Council’s proposed modification, is policy IN9 consistent with national policy relating to renewable energy infrastructure? In particular:

- the criteria for wind energy development in part (a).**
- the criteria for solar power development in part (b).**
- the requirement for developments of over 300 houses to be enabled for district energy connection unless demonstrated not to be feasible or viable.**

Inspector's Matters Issues and Questions

Story Homes



Whilst we recognise that the requirement for site of over 300 homes to provide district heating is predicated on viability and feasibility, it should be the role of this plan to test such provision. We do not feel that this provision has been subject to this necessary testing and that this simply defers this testing to the application stage.

Furthermore, and as set out in Matter 1 statement (Q1.14 and Q1.15), creeping standards which increase costs, often significantly above inflation, will cause viability concerns for allocated sites over time.