

**EXAMINATION OF DARLINGTON LOCAL PLAN**  
**BANKS PROPERTY RESPONSES TO INSPECTOR'S NOTE 4:**  
**MATTER 5. MEETING PARTICULAR HOUSING NEEDS**

**FILE NOTE**

LP/NE/3915/PL-2

**1 Matter 5. Meeting particular housing needs**

*Affordable housing (policies H5 and H6 and appendix E)*

*Q.5.3. 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?*

Banks Property do not believe that the affordable housing requirements are justified by up to date and proportionate evidence. The affordable housing requirements appear to have been derived taking into account the findings of the Strategic Housing Market Assessment (SHMA) and Local Plan Viability Assessment (CD08) testing scenarios.

Whilst the supporting text in the Proposed Submission Local Plan Proposed Submission Local Plan (CD01) refers to the 2015 SHMA, a 2020 SHMA update appears to be referred to in the Council's submissions and core documents (SD08). There is no evidence in the 2015 SHMA to justify the percentages of affordable housing applied to different wards. This appears to be solely down to the viability testing models set out in CD08.

As set out in our hearing statement for matter 1 (Q1.14), CD08 provides a high-level assessment based on a number of assumptions regarding land values, build costs and developer contributions. The assumptions that feed into the viability assessments are broad brush and likely to vary site by site. It will only be at the planning application stage that such costs will be able to be accurately defined. Therefore, Banks Property suggest that Policy 5 is amended to provide a range of affordable housing requirement within each category. This would allow flexibility to ensure affordable housing requirements are more likely to be met in addition to other developer contributions sought. We would suggest a range of 15%-20% affordable housing requirement is set for the middle category.

J Seabury  
4 May 2021